

Mr. John Sager
Wisconsin Department of Natural Resources
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Superior, WI 54880

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Subject:
Bimonthly Progress Report – July and August 2020
Former Koppers Inc. Superior, WI Facility
WID 006-179-493
BRRTS 02-16-000484

ENVIRONMENT

Date:
September 30, 2020

Dear Mr. Sager:

Contact:
David Bessingpas

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of July and August 2020 for the Former Koppers Inc. Facility in Superior, Wisconsin. This report is prepared in compliance with Wisconsin's Hazardous Waste Facility Investigations Guidelines and the facility Part B Permit. If you have any comments or questions concerning this progress report, please contact Ms. Jane Patarcity of Beazer at 412.208.8813 or me at 218.208.3427.

Phone:
218.208.3427

Email:
david.bessingpas
@arcadis.com

Sincerely,

Our ref:
30043905

Arcadis U.S., Inc.



David Bessingpas
Project Manager

Copies:
Christopher Saari, WDNR
Judy Fassbender, WDNR
Linda Paul, Koppers
Steve Willis, Koppers
Jane Patarcity, Beazer

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A. Current Activities

On September 12, 2011, Beazer submitted a Construction Documentation Report for the completed on-property corrective measures. WDNR issued a conditional approval of the report on October 21, 2011, but withheld final approval pending Beazer's submittal of an acceptable continuing obligations/GIS Registry package. A Notification of Continuing Obligations and Residual Contamination was submitted to the current property owner on June 16, 2014. A GIS Registry package was submitted to WDNR on August 5, 2015. Final WDNR approval of the on-property corrective measures is pending.

On July 7, 2016, Beazer submitted to WDNR a letter regarding non-hazardous waste determination for sediments and soils that may be managed in the off-property portion of the Site as part of future corrective actions. On July 12, 2016, WDNR requested additional information regarding other sites where similar waste determinations were accepted. Beazer submitted the requested information to WDNR in a letter dated November 1, 2016. In a letter dated November 28, 2016, WDNR provided copies of Hazardous Waste Annual Reports and Hazardous Waste Manifest Records for Beazer's consideration. On February 7, 2017, Beazer submitted a response to WDNR's November 28 letter. During a February 24, 2020 conference call, WDNR stated that they don't disagree with Beazer's non-hazardous waste determination, but that they will not formally concur with it either. WDNR is looking into options for responding to disposal facility requests for regulatory agency written confirmation of waste characterization.

On August 18, 2020, WDNR submitted a letter to Beazer stating its plans to re-issue the Long-Term Care License for the facility, and identifying Beazer as the Licensee.

On August 17, 2020, WDNR submitted a letter to Beazer with a reminder that site investigation scoping and work plans should include an evaluation of potential PFAS compounds and other applicable emerging contaminants that were historically or are presently produced, used, handles, or stored at the Site.

Beazer and USEPA continued to work on the Great Lakes Legacy Act (GLLA) Focused Feasibility Study (FFS) project for the off-property portion of the Site during this reporting period. GLLA project-related activities conducted during this reporting period included the following:

- Beazer (and their consultants, Arcadis and Anchor QEA), USEPA (and their contractor, Jacobs), and WDNR participated in project team conference calls on July 6, 10, 13, 20, and 27, 2020. Draft summaries for each conference call were submitted to the project team for review/comment. Team comments, if any, were addressed, and finalized call summaries were prepared and distributed to the project team.
- Beazer continued Supplemental Data Gap Investigation field activities.
- The project team continued discussions regarding comments on the draft FFS.

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- On July 3, 2020, Beazer received a letter from WDNR (dated June 20, 2020) approving the April 14, 2020 Wetland and Water Body Delineation Report.
- On July 22, 2020, Beazer submitted an Addendum to the September 2019 Supplemental Data Gap Investigation Work Plan.
- On July 30, 2020, WDNR submitted a letter and attached memo to Beazer outlining proposed numeric cleanup levels for soil and sediment for use as part of the GLLA FFS.

B. Summary of Findings

See Section I below.

C. Schedule

No schedule updates were submitted during this reporting period.

D. Progress

Refer to Sections A and C of this report.

E. Problems Encountered

No problems were encountered this reporting period.

F. Corrective Action

No corrective actions were required this reporting period.

G. Project Personnel

No project personnel changes occurred during this reporting period.

H. Response to Agency Comments on RFI Reports

No responses to agency comments were submitted during this reporting period.

I. Reports Submitted to the Agency

On July 20, 2020, Beazer submitted the NR 700 Semi-Annual Progress Report for the period of January through June 2020.

Refer to Section A above for a list of document submittals related to the GLLA FFS project.

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J. Projected Work for the next Reporting Period

Beazer and USEPA will continue to work on the GLLA FFS project, including participating in project team calls, continuing FFS report preparation tasks, discussing clean-up goals, and preparing a draft Supplemental Data Gap Investigation Summary Report.