



Mr. John Sager
Wisconsin Department of Natural Resources
1701 N 4th Street
Superior, WI 54880

Arcadis U.S., Inc.
123 North Third Street
Suite 705
Minneapolis
Minnesota 55401
Phone: 612 339 9434
Fax: 612 336 4538
www.arcadis.com

Date: January 29, 2021
Our Ref: 30043905
Subject: Bimonthly Progress Report – November and December 2020
Former Koppers Inc. Superior, WI Facility
WID 006-179-493
BRRTS 02-16-000484

Dear Mr. Sager:

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of November and December 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.

Sincerely,
Arcadis U.S., Inc.

A handwritten signature in blue ink that reads 'David Bessingpas'.

David Bessingpas
Project Manager

Email: david.bessingpas@arcadis.com
Direct Line: 218.208.3427
Mobile: 320.260.8621

CC: Christopher Saari, WDNR
Judy Fassbender, WDNR
Robert Tatsch, Koppers
Steve Willis, Koppers
Jane Patarcity, Beazer

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 floodplain materials 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.

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 a project team conference call on November 2, November 9, November 30, December 7, and December 14.
- Beazer continued Supplemental Data Gap Investigation report preparation activities. An updated floodplain material data table (with all data for samples collected from depths deeper than 4 feet) submitted on November 18, 2020. Draft figures were presented during the various calls referenced above.
- Beazer initiated development of potential remediation areas/volumes associated with floodplain material and sediment samples exceeding WDNR's proposed cleanup levels.

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 December 1, 2020, FTS submitted the Second Semi-Annual RCRA Groundwater Monitoring Results to WDNR.

On December 1, 2020, FTS submitted the 2020 On-Property Corrective Measures Monitoring and Maintenance Report to WDNR.

On December 2, 2020, FTS submitted the Summary of 2020 Sign Inspection Activities to WDNR.

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

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 Supplemental Data Gap Investigation Summary Report.