

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: March 18, 2021
Our Ref: 30083267
Subject: Bimonthly Progress Report – January and February 2021
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 January and February 2021 for the Former Koppers Inc. Facility in Superior, Wisconsin. 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.



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:

- USEPA issued a project Fact Sheet titled "Crawford Creek Cleanup Assessment Continues under GLRI."
- Beazer (and their consultants, Arcadis and Anchor QEA), USEPA (and their contractor, Jacobs), and WDNR participated in a project team conference call on January 27 and February 4, 2021.
- Beazer continued development of potential sediment and floodplain material remediation areas/volumes and preliminary cost estimates. Potential remediation areas/volumes were presented during the January 27, 2021 conference call. On January 28, 2021, various tables and figures summarizing the data evaluations and associated potential remediation areas/volumes that were presented during the January 27 call were submitted to WDNR. Preliminary cost estimates associated with the potential remediation areas/volumes were presented during the February 4, 2021 conference call. On February 18, the preliminary cost estimates that were presented during the February 4 call were submitted to WDNR.

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 January 27, 2021, Arcadis submitted the July-December 2020 NR 700 Semi-Annual Site Progress Report to WDNR.

On February 22, 2021, FTS submitted the 2020 Annual RCRA Groundwater Monitoring Report to WDNR.

Refer to Section A above for a list of 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.