

Mr. John Sager
Wisconsin Department of Natural Resources
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Date: May 28, 2021
Our Ref: 30083267
Subject: Bimonthly Progress Report – March and April 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 March and April 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

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

Bimonthly Progress Report

March and April 2021

Former Koppers Inc. – Superior, WI Facility
WID 006-179-493
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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 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. On March 10, 2021, WDNR issued a letter to Beazer stating that "Based on the information supplied to DNR by Beazer, DNR does not contest Beazer's waste determination for off-property soil/sediment managed as part of a future corrective action. Beazer determined this soil/sediment is not a listed hazardous waste."

On March 1, 2021, Beazer submitted a letter to WDNR responding to WDNR's December 8, 2020 Notice of Non-Compliance letter.

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:

- On March 25, 2021, USEPA submitted letters to property owners with tables and figures presenting the results of the 2020 supplemental data gap investigations. Beazer/USEPA conducted follow-up meetings/calls with the property owners in April 2021.
- Beazer/USEPA continued development/evaluation of alternate, Site-specific cleanup levels.
- Beazer (and their consultants, Arcadis and Anchor QEA), USEPA (and their contractor, Jacobs), and WDNR participated in a project team conference call on March 24, 2021. A copy of the slides presented during that call were provided to the project team on March 25, 2021.
- Beazer prepared a draft Supplemental Data Gap Investigation Summary Report, which was submitted to WDNR for review on April 23, 2021.

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

Refer to Section A above for a list of submittals related to the GLLA FFS project. No other reports were submitted to WDNR during this reporting period.

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 finalizing the Supplemental Data Gap Investigation Summary Report.