

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](http://www.arcadis.com)

Date: July 23, 2021  
Our Ref: 30083267  
Subject: Bimonthly Progress Report – May and June 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 May and June 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](mailto: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

## **Bimonthly Progress Report**

**May and June 2021**

Former Koppers Inc. – Superior, WI Facility  
WID 006-179-493  
BRRTS 02-16-000484

### **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 May 5, 2021, WDNR issued a letter to Beazer regarding close-out of the hazardous waste compliance assessment. Beazer is currently preparing a response to the May 5 letter, along with a Long-Term Care License Renewal Application.

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/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 May 26, 2021. A copy of the slides presented during that call were provided to the project team on May 26, 2021.
- On May 28, 2021, Beazer submitted a memo to the GLLA Project Team summarizing property use information obtained during interviews with the owners of property located within the GLLA project area.

### **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 June 11, 2021, FTS submitted the First Semi-Annual 2021 RCRA Groundwater Monitoring Results 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 finalizing the Supplemental Data Gap Investigation Summary Report.

Beazer will continue preparing a response to WDNR's May 5 hazardous waste compliance assessment letter, along with a Long-Term Care License Renewal Application.