



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

Arcadis U.S., Inc.  
331 2<sup>nd</sup> Avenue South,  
Suite 600C  
Minneapolis  
Minnesota 55401  
[www.arcadis.com](http://www.arcadis.com)

Date: November 18, 2024  
Our Ref: 30211015  
Subject: Bimonthly Progress Report – September and October 2024  
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 September and October 2024 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.

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

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  
Hillary Evanko, 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 May 5, 2021, WDNR issued a letter to Beazer regarding close-out of the hazardous waste compliance assessment. On November 1, 2021, Beazer submitted responses to WDNR's May 5, 2021 hazardous waste compliance assessment letter, along with a Long-Term Care License Renewal Application. On May 10, 2022, WDNR provided comments on Beazer's November 1, 2021 Long-Term Care License Renewal Application. On October 10, 2022 Beazer submitted responses to WDNR's May 10, 2022 comments, along with a revised Long-Term Care License Renewal Application. On May 1, 2023, WDNR submitted a letter to Beazer providing comments on and requesting additional information pertaining to Beazer's October 10, 2022 submittal. On July 31, 2023, Beazer submitted a response to WDNR's May 1, 2023 letter. On December 15, 2023, WDNR submitted a letter to Beazer providing a draft conditional approval of Beazer's Long-Term Care License Renewal Application. On February 15, 2024, Beazer provided comments on WDNR's December 15 draft conditional approval of Beazer's Long-Term Care License Renewal Application. WDNR provided responses to Beazer's comments on April 12, 2024. On June 28, 2024, Beazer provided comments on WDNR's April 12 responses to Beazer's February 15 comments. On October 10, 2024, WDNR submitted to Beazer a preliminary determination to conditionally approve Beazer's Long-Term Care License Renewal Application, and a memorandum dated October 9, 2024 providing responses to Beazer's June 28, 2024 comment letter. On October 11, 2024, WDNR issued a Public Notice regarding the Long-Term Care License Renewal Preliminary Determination.

FTS completed the second semiannual groundwater monitoring event in October 2024.

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 revising the hydrologic and hydraulic (H&H) modeling for Sub-Area A to address WDNR comments/requests received via email on July 15, 2024, 2024 Data Gap Investigation (DGI) data review/validation and preparation of a draft data summary report, preparation of a railroad drainage ditch investigation work plan, continued preparation of a draft Sub-Area A FFS, and participating in project team conference calls with WDNR on September 13 and October 18, 2024.

**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**

No 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 DGI lab data review/validation and report preparation, draft Sub-Area A FFS preparation, and participating in project status/update calls with WDNR.