



Mr. John Sager
Wisconsin Department of Natural Resources
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Superior, WI 54880

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Date: January 15, 2025
Our Ref: 30211015
Subject: Bimonthly Progress Report – November and December 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 November and December 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
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

**Bimonthly Progress Report
November and December 2024**

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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 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. On November 25, 2024, Beazer provided comments on WDNR's October 10 Preliminary Determination and associated October 9 memorandum.

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 2024 Data Gap Investigation (DGI) data review/validation and preparation of a draft data summary report, continued preparation of a draft Sub-Area A FFS, and participating in a project team conference call with WDNR on December 6, 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.

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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 November 7, 2024, FTS submitted the Second Semi-Annual 2024 RCRA Groundwater Monitoring Results to WDNR.

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.