

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
2300 N. Dr. Martin Luther King, Jr. Drive  
Milwaukee WI 53212-3128

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 808-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



September 22, 2014

Mr. Michael Kellogg  
Connell Aluminum Properties  
One International Place  
Boston, MA 02110

Mr. Mike Slenska  
Beazer East, Inc.  
c/o Three Rivers Management, Inc.  
1910 Cochran Road  
Manor Oak One, Suite 200  
Pittsburg, PA 15220

Subject: Review of Site Investigation Activities  
Former Koppers Tar Plant and Wabash Alloys Site  
9100 South 5<sup>th</sup> Avenue, Oak Creek, WI 53154  
FID #: 241379050; BRRTS #: 02-41-553761  
Connell VPLE BRRTS #: 06-41-560068  
Beazer VPLE BRRTS #: 06-41-561509  
  
City of Oak Creek Utility Corridor Lot 1  
9170 South 5<sup>th</sup> Avenue, Oak Creek, WI 53154  
FID #: 341074470; BRRTS #: 02-41-561425  
Beazer VPLE BRRTS #: 06-41-561426

Dear Messrs. Kellogg and Slenska:

On January 14, 2014, the Department received the submittal, *Site Investigation Report, Former Koppers Tar Plant And Wabash Alloys Site, Oak Creek, WI*, prepared by your consultants, NRT, Inc. and Tetra Tech, Inc. The submittal outlined a number of recommendations for the Department's concurrence. Additional information (revised figures and a CD) was submitted on January 28, 2014. On March 24, 2014, the VPLE Committee met and evaluated the site investigation submittal to provide input to the recommendations made by your consultants.

Based on the review of the information provided, the Department sent a letter to you dated March 28, 2014, requesting additional information to make a determination regarding the completeness of the Site Investigation. This is generally based on the completion of the Phase I and Phase II.

The Department understands that significant investigation took place before the former Wabash Alloys site was accepted into the VPLE program, as indicated in the referenced submittal and that historically, a number of remedial activities and movement of materials onto and across the site has occurred and concurs that this makes the delineation of past potential contamination sources difficult.

Therefore, based on information in the file; meeting presentations and discussions; email correspondence; physical observation during site investigation activities (tar investigation & identification; exploratory test pits); and laboratory data, the Department believes that the on-site investigation appears to be complete and that no further site investigation work is needed on-site.

Messrs. Kellog and Slenska .  
RE: Review of Site Investigation Activities  
Former Koppers Tar Plant and Wabash Alloys Site And  
City of Oak Creek Utility Corridor Lot 1  
Oak Creek, WI  
Page 2 of 2

Noting that the off-site contamination may be co-mingled with the contamination present on the Utility property, the Department also concurs with your recommendation that the extent of soil and groundwater contamination on the City of Oak Creek Utility Corridor Lot 1 parcel, and continuing to the south of the parcel should be defined. This additional investigation is needed off-site before the site investigation is deemed complete. Please clarify when the off-site investigation will be conducted.

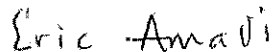
Additionally, your consultant made some general recommendations in the referenced submittal as follows:

- A joint remedial actions options report, (by NRT, Inc. and Tetra Tech, Inc.), should be prepared for the former tar plant and aluminum smelter remedial activities;
- An additional round of sampling for metals analyses should be collected for documenting stable concentrations in shallow and deep wells. No further sampling for PCBs in groundwater is necessary as concentrations are non-detectable for three prior rounds of sampling;
- Quarterly groundwater sampling for VOCs and PAHs should be collected to further characterize groundwater quality and document that groundwater plume(s) are stable or receding in size and concentration;
- Potential preferential migration pathways along buried utilities in the City utility corridor should be further investigated.

The Department agrees to these recommendations and looks forward to receiving a joint remedial actions options report; a plan to conduct additional groundwater sampling, a utility assessment and the additional off-site investigation.

We appreciate the efforts you are taking to investigate and restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.263.8639.

Sincerely,



Eric Amadi - Hydrogeologist  
Remediation & Redevelopment Program  
SER - Milwaukee Service Center

cc: Julie Zimdars - NRT (electronic)  
Mike Noel - Tetra Tech (electronic)  
SER Case File #: 02-41-553761 / 06-41-560068 & 06-41-561509  
SER Case File #: 02-41-561425 / 06-41-561426.