From: Amadi, Eric A - DNR
Sent: Thursday, May 14, 2020 4:30 PM
To: 'Noel, Mike'
Cc: Bollinger, Mike W (Pittsburgh) USA; Slenska, Mike (Pittsburgh) USA; Fassbender, Judy L - DNR; Norman, Michele R - DNR; Buss, Pamela E - DNR; Eric Amadi (Eric.Amadi@wisconsin.gov)
Subject: RE: Response to Beazer's March 6, 2020 Letter - Former Koppers Tar Plant and Wabash Alloys Site (BRRTS #: 02-41-553761 & 06-41-561509) and City of Oak Creek Utility Corridor Lot 1 (BRRTS #02-41-561425 and 06-41-561426)

Hi Mike:

Thanks for your email. Sorry, we couldn't make the proposed time for the conference call. Thus, we propose alternate dates/times as follows:

Tuesday (May 19, 2020): 12:00 p.m. - 1:00 p.m.,

Wednesday (May 20, 2020): 3:30 p.m. - 4:30 p.m.,

Thursday (May 21, 2020): 2:30 p.m. - 3:30 p.m.

All times are CDT.

Please let us know what works for you.

Thanks again.

Eric

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Eric Amadi
Phone: (414) 263-8639 - for voice mail
Cell Phone: (262) 993-1074 - please contact cell phone during COVID-19 health crisis
eric.amadi@wisconsin.gov

From: Noel, Mike <Mike.Noel@tetratech.com>
Sent: Monday, May 11, 2020 2:28 PM
To: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>; Fassbender, Judy L - DNR <Judy.Fassbender@wisconsin.gov>
Cc: Bollinger, Mike W (Pittsburgh) USA <Mike.Bollinger@TRMI.Biz>; Slenska, Mike (Pittsburgh) USA <mike.slenska@trmi.biz>; Noel, Mike <Mike.Noel@tetratech.com>
Subject: RE: Response to Beazer's March 6, 2020 Letter - Former Koppers Tar Plant and Wabash Alloys Site (BRRTS #: 02-41-553761 & 06-41-561509) and City of Oak Creek Utility Corridor Lot 1 (BRRTS #02-41-561425 and 06-41-561426)

Eric,
The purpose of this email is to request a technical conference call with the Department as soon as possible regarding the below-described issue.

In your May 5, 2020 letter, you reiterated your request made in your January 8, 2020 letter to further delineate the vertical extent of tar at the following areas:

- B-01-18 located between previous borings B-74 and B-05 near the former naphthalene ASTs
- B-02-18 located in the area of previous borings B-81, MW-122 and SB713 near the former Tar Barrel Platform
- B-03-18 located near previous boring B-38
- B-04-18 located in the area of previous B-92 and MW-123 near the former Pitch Bay

You stated that "These four areas were identified because naphthalene odor was noted at the deepest depths in the boring logs for B-01-18, B-03-18, and B-04-18 and tar was observed at/near the bottom of the borehole for B-02-18. The vertical extent of tar remains unknown in these locations, therefore additional information to delineate the contamination is required… The DNR considers the naphthalene odor noted and tar observed at depth in these four areas to be visual and olfactory evidence of contamination that requires further delineation."

Our March 6, 2020 response letter responded to this precise issue and provided a table summarizing our observations of tar and PID measurements demonstrating that the visual depth of tar had been defined. Your May 5, 2020 letter did not acknowledge the evidence we provided but instead said the delineation was not complete because there was still naphthalene odor at the deepest depths and tar was observed at/near the bottom of the borehole for B-02-18. While this is the first time the Department has ever suggested that naphthalene odor should be part of the analysis, we have nonetheless updated our table below by adding borehole observations of naphthalene odor (from greatest to least: strong, noted, weak, none). While there is nearly always a naphthalene odor noted when visual tar is observed, a naphthalene odor is also observed even when tar is not present. At B-02-18 there is neither odor nor tar observed in the bottom four feet of the borehole which, according to your letter, does not define the vertical extent of tar at that borehole. To base the depth of tar delineation on the extent of visual or olfactory evidence is not scientifically valid. The extent of tar should be based on visual and olfactory evidence. The Agency for Toxic Substances & Disease Registry (ATSDR) public health statement for naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene (August 2005) states "You can smell naphthalene in the air at a concentration of 84 parts naphthalene per one billion parts (ppb) of air. You can smell it in water when 21 ppb are present." That odor threshold is one-fifth the Enforcement Standard for naphthalene (100 ppb). Furthermore, we are not aware of any remediation project where the remedial action objective was to remove or remediate any soils with a naphthalene odor.

Before we perform any additional investigative work, we want to make sure that the work Beazer does will be complete and accepted, because the Department previously has approved sampling objectives and investigation methods and then later re-set such objectives and methods on this project more than once. To that end we would like to arrange a technical conference call to discuss and come to agreement on what we need to do to complete the site investigation. We are available

on Wednesday after 1pm CDT or Thursday anytime except between 1-2pm CDT. Let me know what works for you and I'll send a conference call invite.

	B-01-18			B-02-18			B-03-18			B-04-18		
Borehole Depth	PID	Naph. Odor	Tar Observations	PID	Naph. Odor	Tar Observations	PID	Naph. Odor	Tar Observations	PID	Naph. Odor	
1	0	None	None	0	None	None	0	None	None	0.2	None	
2												
3	0			0			1.2			1		
4											Noted	
5	1.2	Noted	Tar in Matrix	0.2	Weak	Tar in Matrix	0.3			133	None	
6												
7	124			51.2			0.2			398	Strong	
8												
9	260			45.9	Noted		46.3	Strong	Tar in Matrix and Fractures	1566		
10												
11	161			5.3			42.3			736		
12												
13	48			28.3		Tar in Fractures	256		Tar in Fractures	1299		
14												
15	55.5	Noted	None	32.4			1159	Strong		408		
16												
17	25.4			24.3			133		Oily outside sampler	130	Noted	
18												
19	20.5			172		None	11.8	Weak	None	40.1		
20												
21	29.1			8.6		Trace Hard	61.5			3		
22												
23	17.1			0.3	None	None	5.2			0.2		
24												
25												

Michael R. Noel, PG | Vice President, Principal Hydrogeologist
Direct: **(262) 207-3456** | Main: **(262) 792-1282** | Mobile **(262) 853-4983** | Fax **(262) 792-1310** | **mike.noel@tetratech.com**

From: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Sent: Tuesday, May 5, 2020 11:54 AM
To: Slenska, Mike (Pittsburgh) USA <mike.slenska@trmi.biz>
Cc: mkelogg-5524@connell-lp.com; Larry Haskin (lhaskin@haskinkarls.com) <lhaskin@haskinkarls.com>;

Kamp, Tressie K - DOJ <KampTK@doj.state.wi.us>; Motl, Bradley J - DOJ <motlbj@doj.state.wi.us>; Buss, Pamela E - DNR <Pamela.Buss@wisconsin.gov>; Fassbender, Judy L - DNR <Judy.Fassbender@wisconsin.gov>; Norman, Michele R - DNR <Michele.Norman@wisconsin.gov>; Alessi, Timothy G - DNR <timothy.alessi@wisconsin.gov>; Noel, Mike <Mike.Noel@tetratech.com>; Julie Zimdars (Julie.Zimdars@obg.com) <Julie.Zimdars@obg.com>; Bollinger, Mike W (Pittsburgh) USA <Mike.Bollinger@TRMI.Biz>
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Hi Mike:

Attached is our response to Beazer's March 6, 2020 letter. Please let me know if you have questions. Stay safe.

Thanks.

Eric

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Eric Amadi
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