



October 16, 2020

Mr. Mike Bollinger  
Beazer East, Inc.  
c/o Three Rivers Management, Inc.  
600 River Avenue, Suite 200  
Pittsburgh, PA 15212

Subject: Review of Beazer's September 3, 2020 Response to DNR's August 3, 2020 Letter

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  
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  
VPLE BRRTS #: 06-41-561426

Dear Mr. Bollinger:

On August 3, 2020, the Wisconsin Department of Natural Resources (DNR) prepared a letter to Beazer and addressed to you, with the results of a preliminary review of updated site investigation (SI) figures. The DNR requested the following issues be addressed before continuing with the SI review:

1. Accurate and/or consistent identification of tar
2. Delineation of the degree and extent of contamination, with possible justification with other lines of evidence
3. Justification for the separation of high concentration areas

The DNR requested updated figures or additional information to address the inconsistencies in data interpretation.

On September 3, 2020, Beazer submitted a response that did not address the issues identified by the DNR. The referenced "protocol" to delineate hardened tar from mobile tar was not approved, nor was information provided to evaluate the potential groundwater and vapor risks associated with hardened vs. mobile tar.

In the DNR's letter, *Supplemental Information for Review of Remedial Action Options Report*, dated July 14, 2017, the DNR presented a conceptual site model (CSM) to explain the upward tar migration and identification of a "Wabash Fill" layer above the tar source areas. The CSM proposed by Beazer is not supported by the site history or conditions. Beazer is considering the hazardous substance discharge of

tar to have occurred at the current ground surface. However, the tar discharge occurred at a lower elevation before fill material was used to raise the site elevation.

The tar processing performed by Koppers, for which Beazer is responsible, occurred at a lower elevation before the Wabash facility was constructed at the current site elevation. In the September 3, 2020 letter, Beazer is interpreting the tar discharge as a surface release and using this incorrect CSM as justification for complete delineation of the contamination.

Beazer's September 3, 2020 response did not properly address the issues identified in the DNR's August 3, 2020 letter. Therefore, the DNR is requiring Beazer to amend its response to address the identified issues and will not provide further technical comment on Beazer's response until it is amended and adequately addresses the issues identified by the DNR.

The DNR is requesting submittal of this information within 30 days, by November 16, 2020.

If you have any questions regarding this letter, please contact me, Eric Amadi, by calling (414) 405.0752 or by email at [eric.amadi@wisconsin.gov](mailto:eric.amadi@wisconsin.gov).

Sincerely,



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

cc: Mike Slenska - Beazer (electronic)  
Mike Noel - Tetra Tech (electronic)  
SER Case File #: FID #: 241379050; BRRTS #: 02-41-553761 / 06-41-561509  
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