

Robinson, John H - DNR

From: Saari, Christopher A - DNR
Sent: Thursday, May 23, 2013 3:12 PM
To: Ashenbrucker, Steven J - DNR
Cc: Lynch, Edward K - DNR; Robinson, John H - DNR
Subject: RE: Koppers Inc. Superior, WI Facility - Request for Final Closure Approval of Drip Pad

Hi Steve:

Per our discussion this morning, I spent some time reviewing this letter and can offer the following comments:

- The first paragraph of the letter suggests that previous drip pad decommissioning and closure activities resulted in a “clean closure” under s. NR 665.0445, Wis. Adm. Code. Based on my understanding of the activities completed by Koppers, residual contamination remained beneath the drip pad and therefore this was only granted partial closure, with long-term care requirements. Maybe this is another instance of me misunderstanding terms used specifically in the Waste program, but I don’t view this as a “clean closure”.
- After reading Jim Ross’ June 28, 2007 partial closure letter again, I think we might need to revisit the issue of groundwater monitoring specific to the long-term care requirements of the drip pad. To my knowledge, the only groundwater monitoring going on at the site now is related to the closed surface impoundments and Beazer’s attempts to demonstrate the feasibility of natural attenuation on a site-wide basis. However, neither of these efforts seems geared towards demonstrating that contamination is not originating from beneath and/or migrating away from the drip track. Maybe this issue has already been addressed, but it would be worth a look since we are exploring the issue of final closure.
- In response to the letter’s first item for which Koppers seeks concurrence, I would agree that a final closure approval for the drip pad could be issued once the off-site remediation has been completed. However, I do not agree with the rest of their statement, “that no further action at the drip pad is required at this time, including no need for regular inspections and/or re-application of low permeability coating as may be required under Subpart W.” I believe that inspection and maintenance of the drip pad would be a required item under long-term care requirements. Furthermore, as I pointed out in my August 9, 2012 email to Koppers, we view the drip pad as both a barrier cap (which means it needs to be inspected and maintained) and a structural impediment (because the drip pad limited previous investigation and remedial actions).
- As for the second item, I do not agree that the concrete drip pad can be maintained in the same manner as the soil and gravel caps installed elsewhere on the site. The soil and gravel caps placed by Beazer were allowed because the degree and extent of contamination was known and the caps were intended only to address the direct contact pathway. Due to the structural impediment nature of the drip pad, we do not know contaminant concentrations or extent under the drip pad, and we therefore could not explicitly rule out impacts via the groundwater pathway. It would be inappropriate to address large cracks in the concrete by filling them in/covering them with gravel or soil, as this change might result in additional contaminant migration from soil to groundwater.
- I have not comments on the third item.

Let me know if you have questions, or if you want additional help with the response to Koppers.

From: Kushik, Amy D [<mailto:KushikAD@koppers.com>]
Sent: Wednesday, May 22, 2013 3:15 PM
To: Ashenbrucker, Steven J - DNR; Saari, Christopher A - DNR; Lynch, Edward K - DNR; Jane.Patarcity@TRMI.Biz
Cc: Paul, Linda S; Hyde, Leslie
Subject: Koppers Inc. Superior, WI Facility - Request for Final Closure Approval of Drip Pad

Please see attached signed letter from Leslie Hyde, Koppers V.P.-Safety and Environmental Affairs.

Thank you.

AK

Amy Kushik
Executive Assistant



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