

Ms. Carolyn Bury
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Mr. Rob Watson
Illinois Environmental Protection Agency
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Springfield, IL 62794

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Subject:
Former Koppers Wood-Treating Site – Carbondale, Illinois
March 2020 Status Report

ENVIRONMENT

Dear Ms. Bury and Mr. Watson:

Date:
April 16, 2020

Enclosed please find a status report for the above-referenced Site. This status report covers corrective-action-related activities performed during the month of March 2020 and identifies anticipated future activities for the next several months.

Contact:
David Bessingpas

Please feel free to contact me (218.208.3427), or Mr. Mike Slenska of Beazer (412.208.8867), with any questions.

Phone:
218.208.3427

Sincerely,

Email:
david.bessingpas@arcadis.com

Arcadis U.S., Inc.

Our ref:
30049153



David Bessingpas
Project Manager

Copies:
Mike Slenska, P.E. – Beazer East, Inc.
Chip McChesney – Beazer East, Inc.
Devin Fisher – Beazer East, Inc.

Status Report – March 2020

Former Koppers Wood-Treating Site
Carbondale, Illinois

Items Performed/Completed Since Previous Report:

- On February 5, 2020, USEPA submitted a letter to Beazer requesting a schedule for construction activities associated with the ecological risk-based soil remediation, and suggesting that Beazer complete the associated tree clearing activities before April 1, 2020 (due to a clearing restriction window of April 1 through September 30 related to potential summer roosting habitat for certain endangered bat species). Beazer replied to USEPA's February 5 letter via email on February 11, in a letter dated February 19, and in a follow-up letter dated March 10. In summary, consistent with Beazer's communications to USEPA over the last three years, Beazer's replies to USEPA's February 5 letter indicated that Beazer was not planning to initiate the ecological risk-based soil remediation activities until USEPA provided approvals of various outstanding Site-related documents, and because such approvals have not been received, Beazer would not be completing the tree clearing activities prior to April 1, 2020. A conference call was held on March 19 between Beazer and USEPA to discuss USEPA's February 5 letter and Beazer's February 11, February 19, and March 10 responses. USEPA submitted a follow-up letter to Beazer on March 27, 2019 stating USEPA's commitment to resolving the outstanding documents in an expeditious manner, and requesting that Beazer make preparations to begin tree clearing for the ecological risk-based soil remediation on October 1, 2020.
- On March 4, 2020, Beazer completed the purchase of 1.9 wetland mitigation bank credits, in accordance with the United States Army Corps of Engineers (USACE) permit issued on February 21, 2020 for the ecological risk-based remediation.
- On March 25, 2020, USEPA provided additional comments on the revised draft Materials Management Plan dated September 13, 2018.
- On March 25, 2020, USEPA provided the latest model Environmental Covenant (EC; dated August 16, 2019) from the Illinois Environmental Protection Agency (IEPA).
- Beazer and USEPA coordinated with the IEPA regarding Section 401 Water Quality Certification for the ecological risk-based soil remediation.
- Beazer continued post-construction OMM activities (e.g., barrier trench DNAPL thickness measurements/removal, RW-23 groundwater/DNAPL removal, CAMU leachate monitoring/removal, Site inspections, etc.). Groundwater and DNAPL removal volumes are summarized as follows:

	RW-23 – Groundwater	RW-23 – DNAPL	South Trench Sump – DNAPL	North Trench Sump – DNAPL
March 2020 Total (gallons):	1600	17	52	0
Cumulative Total (gallons):	196,799	9,781	22,959	1,186

Items Anticipated to be Performed/Completed over the Next One to Two Months:

- Beazer will review the revised model EC and comments on the MMP provided by USEPA on March 25, 2020, and submit revised drafts of these documents for USEPA's review/approval.

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- Beazer will continue coordinate with the IEPA regarding Section 401 Water Quality Certification for the ecological risk-based soil remediation.
- USEPA will review and approve or provide comments on the draft Long-Term Operation, Maintenance, and Monitoring (OMM) Plan submitted by Beazer on July 19, 2018.
- USEPA will review and approve or provide additional comments on the revised Sediment Monitored Natural Recovery (MNR) Work Plan submitted by Beazer on October 9, 2018.
- USEPA will review and approve or provide additional comments on the revised Human Health Risk Assessment (HHRA) Addendum submitted by Beazer on June 18, 2019.
- Beazer will select a contractor for the ecological risk-based soil remedial construction.

Items Anticipated to be Performed/Completed over the Next Two to Six Months:

- Pending receipt of USEPA approvals of the four documents outlined above, and issuance of the Section 401 Water Quality Certification from IEPA, Beazer will prepare a schedule for implementing the ecological risk-based soil remediation following the April 1 to September 30 tree clearing restriction specified in the February 21, 2020 USACE Permit.

Items that May Cause Delay in Implementing Future Activities and Efforts (if any) to Limit Such Delays:

- None.