BEAZER EAST, INC.
c/o Three Rivers Management, Inc. (Agent for Beazer East, Inc.)
600 River Avenue, Suite 200, Pittsburgh, PA 15212-5994

July 31, 2023

Douglas W. Coenen, P.E.
Hazardous Waste Engineer
Wisconsin Department of Natural Resources
101 South Webster Street
Madison, WI 53703
Telephone 608-266-2621

Subject: Request for Additional Information; Long-Term Care License Application, Rev 1, October 10, 2022
Beazer East, Inc.
Former Koppers Inc./Beazer East, Inc. Facility – Superior, WI
EPA ID No. WID006179463

Dear Mr. Coenen:

On May 1, 2023, Beazer East, Inc. ("Beazer") received via email from the Wisconsin Department of Natural Resources ("Department") the above-referenced Request for Additional Information for the revised Long-Term Care License Renewal Application (the Application") for the Former Koppers Inc./Beazer East, Inc. facility located in Superior, Wisconsin (the "Site") submitted by Beazer to the Department on October 10, 2022. Please find attached Beazer's written response to the items discussed in the Request for Additional Information.

As an initial matter, Beazer incorporates by reference all of the objections noted in its February 14, 2020, June 17, 2020, March 1, 2021, November 1, 2021 and October 10, 2022 submittals (collectively, the "Prior Submittals") to the Department's December 19, 2019 Request for Information, December 9, 2020 Notice of Noncompliance, May 5, 2021 Conditional Close-Out letter (CCO) and May 10, 2022 Notice of Incompleteness (NOI). Without waiving, limiting, or otherwise prejudicing these objections, and while preserving all rights and defenses that it may have with respect to this matter, Beazer provides its response herein.

Should you have any additional questions, please feel free to contact me.

Sincerely,

Jane Patarcity
Environmental Manager

Enclosure

cc: Jayne Wade, Wisconsin Department of Natural Resources
John Sager, Wisconsin Department of Natural Resources
Dustin Sholly, Wisconsin Department of Natural Resources
Michael Slenska, P.E., Beazer East, Inc.
Angie Gatchie, Field and Technical Services, LLC (agatchie.2006@f-ts.com)
David Bessingpas, Arcadis U.S., Inc. (david.bessingpas@arcadis.com)
TRP Properties (terry@omahatrack.com)
Robert Tatsch (TatschRS@koppers.com)

July 2023 Beazer East, Inc. Response to Request for Additional Information Former Koppers Inc./Beazer East, Inc. Facility Superior, Wisconsin

For convenience, the Department's specific comments in the May 1, 2023 Request for Additional Information ("Request") have been set forth below in italics followed by Beazer's responses.

1. Confirmation of Changes

The Department stated in the May 1, 2023 Request:

> *To assist the department in completing its review, please provide a summary of all changes from the November 1, 2021 application to the 2002 revised application. Minor editorial changes (such as correction of typos) do not need to be identified. Feel free to use a "Record of Revision" format.*

Beazer Response to Comment 1: We believe the Department meant to reference Beazer's October 2022 submittal and not a "2002" revised application; if that is not correct please advise us and we will amend this response. A red-line strike-out version of the November 1, 2021 application that shows all changes included in the October 10, 2022 submittal is included as Attachment 1 to this response.

2. Easement

The Department stated in the May 1, 2023 Request:

> *Beazer's letter, in several places, refers to an irrevocable easement dated December 19, 2012. Please provide a copy of this document. The department also requests a copy of the June 16, 2014, letter regarding notification of continuing obligations that is referred to in footnote #1.*

Beazer Response to Comment 2: We believe the Department may have erred in citing the date of the irrevocable easement as December 19, 2012. A copy of the September 19, 2012 irrevocable easement is provided as Attachment 2. A copy of the June 16, 2014 letter regarding notification of continuing obligations was provided to the Department in Appendix D-1 of the October 2022 submittal. For your convenience, that document is provided as Attachment 3 to this response.

3. Contingency Plan

The Department stated in the May 1, 2023 Request:

> *In its response to 2022 NOI comment 4, Beazer's letter states, "…should the Department expressly determine that a contingency plan is required, Beazer proposes that the PPC Plan will serve as the Site's contingency plan." The department has determined that a contingency plan is needed. The department requests that the PPC plan be amended to state that it represents the Contingency Plan required by s. NR 664.0051, Wis. Adm. Code. Please provide a copy of the amended plan.*

Beazer Response to Comment 3: The PPC plan represents the Contingency Plan required by s. NR 664.0051, Wis. Adm. Code. The title of the PPC plan has been revised to include "*Represents the Contingency Plan as required by s. NR 664.0051, Wis. Adm. Code".* A revised PPC plan cover sheet is included in the documents contained in Attachment 1 as referenced in Response to Comment 1 above.

4. Table 2-1

The Department stated in the May 1, 2023 Request:

> *In its response to 2022 NOI comment 5, Beazer's letter states, "Because the off-property portion of the Site is not a SWMU and corrective measures have not yet been completed, off-property areas have not been added to Table 2-1". The department requests that Table 2-1 be amended to identify the off-site corrective action areas, perhaps as "Area(s) of Concern" (rather than "SWMUs").*

Beazer Response to Comment 4: As further discussed in response to Request No. 7 below, the off-property areas are being addressed in concert with the Great Lakes National Program Office (GLNPO) of the U.S. Environmental Protection Agency through the Great Lakes Legacy Act (GLLA) at the request of, and in consultation with, the Department.

Beazer does not agree that the off-property areas should be incorporated into the Long-Term Care License as an "area of concern." Firstly, this term is not a defined term either in the applicable state regulations or the analogous federal regulations. Secondly, the ultimate remedy(ies) for the off-property areas has not yet been determined. Both of these factors would create uncertainty in the obligations and enforceability of the related provisions in the Long-Term Care License. Furthermore, Beazer is neither an owner nor an operator of the off-property areas and will not have sufficient control over these areas until agreements can be reached with the property owners regarding the ultimate remedy(ies). Finally, if the

off-property areas were added to the Long Term Care License application, then under applicable regulations each of the property owners of each of those areas would have to be added as a signatory to the Long-Term Care License application, and Beazer is not aware of any legal basis, by which Beazer could compel those property owners to sign the Long-Term Care License application.

To date, Beazer has supplied cost and other information regarding the off-property areas at the Department's request. But to reiterate, inclusion of the off-property areas in the Long-Term Care License would be inappropriate and it would be nearly impossible to secure the signatures of each of the off-property area property owners on the Long-Term Care License application. The off-property areas are appropriately addressed through the GLLA, as originally requested by the Department many years ago.

5. Corrective Action Timing

The Department stated in the May 1, 2023 Request:

> *In 2022 NOI comment 5, the department expressed increasing concern that progress on off-property corrective action has been slow. In 2022 NOI comment 6, the department requested a clear description of the basis for and the estimated schedule and completion date(s) and resultant duration(s) of the long-term care and corrective action period(s) for use, among other things, in supporting the associated cost estimates and establishing financial assurance. In its response to 2022 NOI comment 6, Beazer's letter states, "...because an actual remedy for the off-property area has not yet been selected/approved, it is not feasible to determine when such corrective actions will occur or how long they will take." Further, Beazer's letter did not address the completion schedule for long-term care.*
>
> *The department again requests a clear description of the basis for and the estimated schedule and completion date(s) and resultant duration(s) for corrective action. The key assumptions used for this estimate should be included. For example, regarding off-property corrective action, this would include estimates of:*
>
> - *when the proposed remedy will be proposed and approved,*
> - *a description of the remedy (as is further discussed later in this letter)*
> - *the length of time expected to implement the remedy, and*
> - *a description of and estimated duration of subsequent continuing monitoring and maintenance*

Beazer Response to Comment 5: Beazer reiterates its position stated in the October 2022 submittal: because an actual remedy for the off-property area has not yet been

selected/approved, it is not feasible to determine when such corrective actions will occur or how long they will take. As the Department is aware, Beazer is working with GLNPO/EPA via the GLLA process, and in consultation with the Department, to develop a Focused Feasibility Study (FFS) for the off-property area. The FFS is anticipated to provide the information necessary to select an approvable remedy. Once a remedy is selected and approved, the requested information (i.e., description of the remedy, the length of time expected to implement the remedy, and a description of and estimated duration of subsequent continuing monitoring and maintenance) can be provided.

6. <u>Updated Off-Property Corrective Action Cost Estimate</u>

The Department stated in the May 1, 2023 Request:

> *In its response to 2022 NOI comment 6, Beazer's letter states that the Appendix H cost estimates are based on Alternatives A2, B.1 and C.2 of the 2014 Focused Corrective Measures Study.*
>
> *a. The department requests that the cost estimate be revised to utilize the more current information in the September 30, 2022, Draft Focused Feasibility Study (DFFS),*
>
> *b. Additionally, the DFFS contains a range of options and costs associated with the remediation of the off-property contamination. The applicant(s) should only consider those options that are approvable based on feedback provided by the department's Remediation and Redevelopment Program.*

Beazer Response to Comment 6: Beazer does not believe it is appropriate to base the Off-Property Corrective Action Cost Estimate on information contained in the September 30, 2022 Draft Focused Feasibility Study (DFFS). The DFFS is both a draft and – to date – not yet approved. Further, based on discussions with GLNPO/EPA and the Department on a February 17, 2023 conference call, it was agreed that additional data collection is necessary for portions of the off-property area prior to revising/finalizing the DFFS. It was also agreed in those discussions that a stand-alone FFS would be prepared for the upstream portion of the off-property area, referred to as "Sub-Area A". Beazer will update the Off-Property Corrective Action Cost Estimate once the off-property FFSs have been completed and approved, and remedies subsequently selected and approved. Until then, it is most appropriate to continue to base the Off-Property Corrective Action Cost Estimate on the 2014 Focus Corrective Measures Study, as previously suggested by the Department in its May 5, 2021 letter and included as part of Beazer's October 2022 submittal.

7. Corrective Action Cost Estimate - Assumptions

The Department stated in the May 1, 2023 Request:

> *In its response to 2022 NOI comment 6, Beazer's letter identifies additional assumptions used in the cost estimate.*
>
> *a. Pre-disposal costs. Please ensure that the revised estimate includes reasonable estimates of costs for dewatering/stabilization that may be required before materials can be hauled offsite and disposed, and for collecting and analyzing samples of waste materials. See footnote 36 in the 2022 DFSS.*
>
> *b. 50% funding of by GLLA (except for long-term inspection, maintenance, and monitoring). Please provide documentation to support the reasonableness of this assumption.*

Beazer Response to Comment 7:

a. Refer to Beazer's Response to Comment 6.

b. As the Department is aware, Beazer is working with GLNPO/EPA via the GLLA process. The GLLA provides federal funding to accelerate the remediation of contaminated sediments in the Great Lakes Areas of Concern. At 71 Fed. Reg. 25504, May 1, 2006, the EPA discussed cost sharing under the GLLA:

> *The underlying principle that guides our decision-making is that GLNPO will require at least a 35% non-Federal cost share in those cases where no responsible parties are clearly identified (the action could not be required of any responsible party). In other cases, where Agency regulatory and/or enforcement programs determine that the non-Federal sponsor may have some clear responsibility, GLNPO will require a substantially higher contribution (minimum of 40-50%).*

Based on the above, Beazer conservatively assumes that future corrective actions conducted under the GLLA could require as much as a 50% cost share contribution from Beazer as the non-federal sponsor, which would leave a 50% cost share contributed by the federal government under the GLLA.

8. Corrective Action Cost Estimate - Basis for Costs

The Department stated in the May 1, 2023 Request:

> a. *Item 8.a of Beazer's letter states, "Regarding the request to better define the term "costs" as used in Table 1 of Appendix H, Beazer is unclear as to what this question is referring to and requests further clarification". Item B.2.c of the department's May 5, 2021 letter (CCO letter) established that cost estimates should include a clear description of the source of and/or basis for the cost estimates' quantities and unit costs. Put another way, this description should explain where each quantity and each unit cost come from or how it was derived. The department reminds the applicant(s) to include this information with its cost estimates.*
>
> b. *Item 8.c of Beazer's letter states, "The costs for procurement and management of the vendor(s) is (sic) absorbed by Beazer." Please include these costs in the revised cost estimate, as this work would be performed by the State if the licensee was unwilling or unable to perform.*

Beazer Response to Comment 8:

a. Table 1 of Appendix H includes a description of each Activity associated with the Cost Estimate. As noted in Footnote 1 of Table 1 of Appendix H, costs for Tasks 1 and 2 are based on actual costing from the Operation and Maintenance Contractor, in 2022 dollars. Table 1 has been updated to reflect a per sample cost for laboratory analysis to provide a clearer basis for the laboratory analytical costs, and some additional detail has been added to select activities.

b. As stated in Prior Submittals, the costs for procurement and management of the vendor(s) are absorbed by Beazer. Beazer does not track these costs and there is no reasonable manner for Beazer to track and/or report these costs as substantiation for any revised cost estimate.

9. Groundwater Monitoring Program - General

The Department stated in the May 1, 2023 Request:

> *One of the purposes of hazardous waste license renewals is to review the terms of the current license and previous approvals, and to ensure they meet regulatory standards.*

Item 11.b of the 2022 NOI requested that the application demonstrate compliance with the monitoring requirements in ch. NR 664, Wis. Adm. Code. The response in Beazer's letter does not provide this information; rather, it simply states that the April 2002 sampling and analysis plan (SAP) has already been approved by the Department. Therefore, it is not clear how the SAP meets each of the applicable regulatory requirements.

a. *The department requests that the applicant(s) detail how this program meets each of the monitoring requirements in ss. NR 664.0091 through NR 664.0099, Wis. Adm. Code, and the monitoring related requirements in s. NR 664.0100, Wis. Adm. Code. If applicant(s) believe any of these requirements are not applicable, applicant(s) should provide their reasoning.*

   If the program does not meet each of these requirements, the applicant(s) should:

   - *Present a modified monitoring program to assure that it meets each of these requirements, or*
   - *Present details of an alternative monitoring program provisions per s. NR 664.0090(6), Wis. Adm. Code, which allows for the replacement of all or part of these requirements with alternative requirements. For each of these requirements for which an alternative is proposed, the proposal should describe in detail how it will protect human health and the environment, as further required by s. NR 664.0090(6)(b), Wis. Adm. Code.*

b. *In providing this information, the applicant(s) should pay special attention to the following specific code sections which require the owner or operator to determine or specify particular information:*

   - *NR 664.0097(7) (sampling procedure and interval)*
   - *NR 664.0097(8) (statistical method and pql's)*
   - *NR 664.0097(9) (statistical method details)*

c. *In providing this information, the applicant(s) should pay special attention to the following specific code sections which require that the license specify particular information and should provide support or rationale for the proposed approach:*

   All monitoring programs

   - *NR 664.0091(2) (specific elements of the monitoring and response program, which may include one or more of the programs identified in sub. (1))*

- *NR 664.0093(1) (hazardous constituents to which the groundwater protection standard of s. NR 664.0092 applies)*
- *NR 664.0093(2) (excluded constituents and rationale)*
- *NR 664.0094(1) and (2) (concentration limits and alternate concentration limits)*
- *NR 664.0095 (point of standards application)*
- *NR 664.0096 (compliance period)*
- *NR 664.0097(7) (sampling procedure and interval)*
- *NR 664.0097(8) and (9) (statistical methods)*
- *NR 664.0097(10) (data submittal schedule)*

Detection monitoring programs

- *NR 664.0098(1) (parameters or constituents to be monitored)*
- *NR 664.0098(4) (frequencies for collecting samples and conducting statistical tests)*
- *NR 664.0098(6)(b) (period of time to complete statistics)*

Compliance monitoring programs

- *NR 664.0099(1)(a) through (d) (groundwater protection standard)*
- *NR 664.0099(3) (sampling procedures and statistical methods)*
- *NR 664.0099(4)(b) (period of time to complete statistics)*
- *NR 664.0099(6) (frequencies for collecting samples and conducting statistical tests)*

d. Groundwater Monitoring Program – Drip Pad

In addressing the department's request and recommendations provided above regarding the groundwater monitoring program, please bear in mind that the drip pad has never been "clean-closed" as required by s. NR 662.017(1)(h), Wis. Adm. Code, and therefore the facility must meet all long-term care requirements in NR 665.0117, Wis. Adm. Code, including the monitoring requirements of subch. F of NR 665, Wis. Adm. Code. Please describe how the monitoring plan meets each of the monitoring requirements in ss. NR 665.0090 through NR 665.0094, Wis. Adm. Code,

If the program does not meet each of these requirements, the applicant(s) should:

- *Present a modified monitoring program to assure that it meets these requirements, or*
- *Present details of an alternative monitoring program provisions per s. NR 665.0090(6)(a), Wis. Adm. Code, which allows for the*

> *replacement of all or part of these requirements with alternative requirements. For each of these requirements for which an alternative is proposed, the proposal should describe in detail how it will protect human health and the environment, as further required by s. NR 665.0090(6)(b), Wis. Adm. Code.*

Beazer Response to Comment 9:

a-c. Beazer refers the Department to its November 18, 2014 letter, in which it approved the natural attenuation remedy for on-Site groundwater, based on Beazer's October 9, 2014 submittal of a Technical Assistance and Environmental Liability Request (Form 4400-237) and a copy of the June 12, 2014 Groundwater Natural Attenuation Demonstration Summary Report (Arcadis 2014). While the approved natural attenuation remedy did not include any ongoing groundwater monitoring requirements, the Department in its November 18, 2014 letter (see excerpt below) directed Beazer to continue semi-annual groundwater monitoring for the closed RCRA-regulated unit as described in the Long-Term Care Plan Approval Modification, dated October 29, 2002, which effectively approved the Groundwater Monitoring Sampling and Analysis Plan (SAP; RETEC 2002):

> *"When viewed in conjunction with the historic groundwater trend data, the information contained in the report provides supplementary lines of evidence that the residual groundwater contamination located on the source property has reached stable if not decreasing concentrations. This data, along with the geologic conditions present at the site, suggest that natural attenuation will be an effective means to eventually bring the residual groundwater contamination on the source property into compliance with Wisconsin's groundwater quality standards. We therefore approve this remedy. As we have explained to your company in the past, however, the DNR does not have a mechanism to allow a party responsible for a Resource Conservation and Recovery Act (RCRA) land disposal facility to discontinue a groundwater monitoring program prior to the end of the long term care period. Facilities such as this are subject to both the long term care and groundwater monitoring requirements of ss. NR 664.0110(2)(a) and 664.0228(2), Wis. Adm. Code. Consequently, our approval of a natural attenuation remedy for residual groundwater contamination on the source property does not equate to an approval to discontinue your required groundwater monitoring. Beazer will need to continue the semi-annual monitoring as described in the Long-Term Care Plan Approval Modification, dated October 29, 2002."*

When the Department issued this 2014 letter, it approved the SAP as an alternative groundwater monitoring requirement that protects human health and the environment. By

doing so, the Department exercised its authority under NR 664.0090(6) to approve the SAP as a replacement for the groundwater monitoring requirements of NR 664.0091 to NR 664.0100.

That being said, as part of this Long-Term Care License renewal, Beazer is formally requesting that the NR 664 groundwater monitoring requirements for the closed RCRA-regulated unit be replaced by the Department with an alternative of no longer conducting groundwater monitoring at the Site. Beazer's request is consistent with NR 664.0090(6), which allows the Department to replace all or part of the groundwater monitoring requirements in NR 664.0091 to 664.0100. with alternative requirements. NR 664.0090(6) provides:

> *(6) The department may replace all or part of the requirements of ss. NR 664.0091 to 664.0100 applying to a regulated unit with alternative requirements for groundwater monitoring and corrective action for releases to groundwater set out in the license (or in an enforceable document) (as defined in s. NR 670.001 (3) (g)) where the department determines that all of the following apply:*
>
> > *(a) The regulated unit is situated among solid waste management units (or areas of concern), a release has occurred and both the regulated unit and one or more solid waste management units (or areas of concern) are likely to have contributed to the release.*
> >
> > *(b) It is not necessary to apply the groundwater monitoring and corrective action requirements of ss. NR 664.0091 to 664.0100 because alternative requirements will protect human health and the environment.*

With respect to the applicability of the NR 664.0090(6) conditions, Beazer notes that subsection (a) is satisfied because Beazer has previously documented that the closed RCRA-regulated unit is situated among other SWMUs where releases have occurred, such that detection of COCs in groundwater monitoring wells is not necessarily indicative of releases from the RCRA regulated unit (refer to Arcadis letter to the Department dated July 14, 2011, which is provided as Attachment 4 to this response). Subsection (b) is satisfied because the natural attenuation remedy for on-Site groundwater (with no ongoing monitoring requirements) is protective of human health and the environment, and was approved by the Department (WDNR 2014).

Accordingly, both of the NR 664.0090 requirements have been met, which gives the Department authority to replace the NR 664 groundwater monitoring requirements with an acceptable alternative. Because the Department has already approved a groundwater remedy of natural attenuation – i.e., that groundwater conditions are improving naturally

and pose no further threat of degradation or expansion – it is appropriate to substitute the existing SAP monitoring program for the closed RCRA-regulated unit with the alternative requirement that ceases continued groundwater monitoring

d. As stated in multiple of the Prior Submittals, Beazer's Long-Term License Application does not address units and/or activities that were not owned, operated and managed by Beazer. That drip pad was installed after Beazer sold the property to Koppers and the Department opened its own BRRTs case for the Subpart W drip pad in which Koppers was identified as the responsible party. As such, Beazer never owned or operated the Subpart W drip pad and therefore there is no legal basis to require Beazer to perform any closure or post-closure care, or to apply for a license related thereto, in connection with the Subpart W drip pad unit.

10. <u>Groundwater Monitoring Plan Details</u>

The Department stated in the May 1, 2023 Request:

> *In its response to 2022 NOI comment 11.a, Beazer's letter indicates that updates to the 2002 SAP "are summarized in the SAP Addendum (Appendix M) and are not being retransmitted to the Department as they have already been provided in the March 1, 2021 response to the Department's December 9, 2020 Notice of Noncompliance." (For information, please note that Item 8 of Beazer's March 1, 2021 letter referred to a table in its Attachment C, but this table appears to actually have been in its Appendix F). The "Notes" below the table (in Attachment F of March 1, 2021 letter appears to have included only a listing of documents involving SAP changes that Beazer prepared after 2002, not the documents themselves, even though Item 11.a of the 2022 NOI had requested copies of these documents, along with any approvals. Therefore, the department assumes that these changes were never approved.*
>
> a. *For any past changes to the SAP that were desired, department approval should have been requested and approved prior to implementation. Without approvals, the validity of such changes cannot be recognized when the department assesses compliance. It is recommended that the applicant(s) document or acquire approval of the desired changes to the 2022 SAP.*
>
> b. *Please modify the table in Appendix M of the 2022 revised application to incorporate these changes and approvals. This will assist the department is its continuing review.*

Beazer Response to Comment 10: As discussed in our March 1, 2021 letter, Beazer today conducts more groundwater monitoring than what was described in the 2002 SAP. The 2002 SAP groundwater monitoring scope included water level monitoring at 28 wells and sampling at nine wells. The current groundwater monitoring scope includes water level monitoring at all existing monitoring wells (37) and sampling at nine wells (the same nine wells as required by the 2002 SAP). References to monitoring well network modifications, including associated work plans, reports, and WDNR approvals, were provided in Attachment C of Beazer's March 1, 2021 letter. Besides the changes to the monitoring well network for water level measurement, there have been no material changes to the Department-approved SAP.

Appendix M of Beazer's October 2022 Revised Application documents the current monitoring well network for sampling and water level measurements.

Beazer also refers to Response to Comment 9 to the extent that elimination of the groundwater monitoring program renders this response moot.

11. On-Property Corrective Action Plan

The Department stated in the May 1, 2023 Request:

> a. *To assist the department, please provide a summary of the facility's on-property corrective action program. This summary should address how the plan meets each of the requirements in s. NR 664.0100 and NR 664,0101, Wis. Adm. Code, Corrective Action Program.*
>
> *This summary should be sufficiently detailed to describe how the corrective actions that will achieve compliance with the groundwater protection standards, as required by s. NR 664.0099(8)(b)1., Wis. Adm. Code. It can include references as appropriate to historical documents that provide background details.*
>
> *In providing this information, the applicant(s) should pay special attention to the following specific code sections which require that the license specify particular information and should provide support or rationale for the proposed approach:*
>
> - *NR 664.0100(1)(a) through (d) (groundwater protection standard)*
> - *NR 664.0100(2) (specific corrective action measures that will be taken)*
> - *NR 664.0100(3) (when the corrective action will begin)*
> - *NR 664.0101(2) (corrective action description, schedule and financial assurance)*

b. The applicant(s) should provide a report, as required in s. NR 664.0100(7), Wis. Adm. Code, describing the effectiveness of the corrective action program. (For information, note that this report is an annual requirement).

Beazer Response to Comment 11: Beazer refers the Department to its November 18, 2014 letter (see Appendix N.22 of Beazer's October 2022 Revised Application), in which it approved the natural attenuation remedy of on-Site groundwater, based on Beazer's October 9, 2014 submittal of a Technical Assistance and Environmental Liability Request (Form 4400-237) and a copy of the June 12, 2014 Groundwater Natural Attenuation Demonstration Summary Report. Because natural attenuation is the approved remedy for groundwater, there is no additional required ongoing corrective action for groundwater.

12. Financial Assurance

The Department stated in the May 1, 2023 Request:

Currently, financial assurance in the amount of $600,100 is on file. In its response to 2022 NOI comment 10, Beazer's letter indicates, "Upon the Department's approval of the proposed long-term care cost estimate included in Beazer's Revised Application, Beazer will, in accordance with NR 664.0145(4)(g), update the financial assurance instrument to match the Department-approved cost estimate." To demonstrate compliance with long-term cate and corrective action financial assurance requirements, the department recommends that the applicant(s) promptly update its letter of credit to the revised cost estimate (in Appendix H of the 2022 revised application) of $6,354,000 (as of March 30, 2022), plus applicable inflation adjustment, and not wait for any additional department approval. For this purpose and for the time being, the department approves this revised cost estimate amount; it may need to be increased (or reduced) in the future if appropriate, based on the terms of future approvals or license requirements.

Please contact Dustin Sholly, our program's Financial Assurance Specialist, for any questions or assistance in establishing financial assurance documentation and inflation adjustments. Dustin can be reached at (608) 866-0154, and Dustin.Sholly@wisconsin.gov.

Beazer Response to Comment 12: Per the Department's request, Beazer is obtaining a bond in the amount of $5,890,700[1], per the attached revised Cost Estimate for Financial

[1] The October 2022 Cost Estimate for Financial Assurance ($6,354,000) has been adjusted to reflect a 30-year rolling window (previously a 40-year rolling window was assumed), per Additional Item #2 of the Department's May 1, 2023 Request.

Assurance, Table 1 of Appendix H (Attachment 1), and will provide the bond to the Department as soon as it has been obtained. Beazer requests the Department coordinate with Beazer on release of the existing financial assurance in the amount of $600,100 (Letter of Credit #3089324).

13. Deed Notation

The Department stated in the May 1, 2023 Request:

> *Regarding the response to in Beazer's letter to 2022 NOI comment 12, please include a schedule for completing the discussed deed notation work, and for providing a copy of such work to the department.*

Beazer Response to Comment 13: Beazer will prepare and submit for recordation the deed notation within 120 days after approval of the deed notation by both the then-current landowner and the Department.

14. Maps

The Department stated in the May 1, 2023 Request:

> *Regarding map information in the 2022 revised application:*
>
> a. *Item 13.c of the 2022 NOI (referred to as 13.d on Beazer's letter) indicated that injection and withdrawal wells within 1,000 feet do not appear to be shown. Revised Figure 2-2 shows some wells, but does not extend to all areas within 1,000 feet of the site, so it may not show all wells. Please provide a revised figure, ensuring that all required injection and withdrawal wells within 1,000 feet of the facility's boundary are shown.*
>
> b. *As indicated in Item 13.f of the 2022 NOI, s. NR 670.013(12), Wis. Adm. Code (Contents of Part A), requires a topographic map depicting "wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the site property boundary." This was repeated in Item 13.f of the 2022 NOI (referred to as 13.d on Beazer's letter). The locations of all drinking water wells within this radius could not be found. Please provide a map of figure showing all injection and withdrawal wells within ¼ mile of the property boundary.*

Beazer Response to Comment 14: Beazer has confirmed with WDNR (Mr. Brian Austin - Source Water Protection / UIC Coordinator) that there are no injection wells located within

¼ mile of the Site. Additionally, Mr. Austin indicated that precise location information for High-Capacity wells and Community public wells is only available with special permission and waivers are required to obtain this data, however; Mr. Austin was able to access WDNR's internal viewers for staff only and confirmed that there are no High-Capacity or Community wells near the Site. An updated Figure 2-2 depicting both "*injection and withdrawal wells within 1,000 feet of the facility's boundary"* and *"wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the site property boundary."* is included in Attachment 1 of this submittal.

15. Inspections – Run-off Controls

The Department stated in the May 1, 2023 Request:

> *The second and third bullets of Item 14.d of the 2022 NOI requested information to better describe/identify the run-off control systems to be inspected, and for these inspection items, to identify the types of problems to be looked for during inspections and more clearly identify these problems. The response in Beazer's letter does not address these items. Please provide this information.*

Beazer Response to Comment 15: On the Post-Closure Inspection Log Sheet, the "Run-off/Run-on" item refers to the general inspection of the cover system for signs of damage (e.g., erosion) that may be caused by water running off the cover, or signs of ponding/standing water that would indicate the cover is not shedding water as designed.

Additional Items

The Department stated in the May 1, 2023 Request:

> *To assist the applicant(s), the department offers the following comments:*
>
> - *Item 1 discussed certification requirements. As of this writing, TRP has certified only that it owns the facility. The 2022 revised application continues to be missing certified information related to requirements for which Beazer has indicated it is not responsible.*
> - *Length of "Rolling Window" for Financial Assurance: In its response to comment 7, Beazer's letter describes its assumption to use a "rolling 40-year window" for long-term care and corrective action costs. For your information, a rolling 30-year window would be acceptable to the department, as previously discussed in our May 10, 2022 letter.*

Beazer Response to Additional Items: Regarding TRP's certification, the Department's counsel, Ms. Alix Burke, approved the language of TRP's certification prior to TRP providing the certification. Beazer cannot certify to items that it is not responsible. If there is additional information that the Department requires certification for and which is Beazer's responsibility, then Beazer requests that the Department clearly specify those items. If there is additional information that the Department requires certification for and which are not Beazer's responsibility, then Beazer requests that the Department require the appropriate responsible party to certify those items.

Regarding the length of rolling window for financial assurance, Beazer has updated its assumptions to use a 30-year rolling window for the Cost Estimate for Financial Assurance, Table 1 of Appendix H (Attachment 1).

Attachment 1

WISCONSIN LONG-TERM CARE LICENSE RENEWAL APPLICATION

CLOSED RCRA-REGULATED SURFACE IMPOUNDMENTS
FORMER KOPPERS INC. WOOD TREATING FACILITY
SUPERIOR, WISCONSIN

EPA FACILITY ID NO. WID006179493

Prepared for:

Beazer East, Inc.

Prepared by:

Field & Technical Services, LLC
200 Third Avenue
Carnegie, Pennsylvania 15106

~~July~~ October 10, 2022
(Revision 01)~~November 1, 2021~~

CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Document: Wisconsin Long-Term Care License Renewal Application
Former Koppers Inc. Wood Treating Facility
Superior, Wisconsin
EPA ID No. WID006176493

Michael Slenska
(Name)

(Signature)

President
(Title)

Beazer East, Inc.
(Company Name)

(Date)

CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Document: Wisconsin Long-Term Care License Renewal Application
Former Koppers Inc. Wood Treating Facility
Superior, Wisconsin
EPA ID No. WID006176493

_____
(Name)

_____
(Signature)

_____
(Title)

_____
(Company Name)

_____
(Date)

Beazer has provided a copy of the Revised Application to the current landowner, TRP Properties, LLC ("TRP") and has requested that TRP sign the application where appropriate. However, at the time of this submittal, TRP has declined to sign the Revised Application and has communicated to Beazer that they object to the Certification language. It is Beazer's understanding that counsel for TRP has been in communication with the Department regarding this issue.

CERTIFICATION

"I, Brian Dummer, P.E., hereby certify that to the best of my knowledge, all information contained in this document is correct, and I have personally examined this report, and I am familiar with the information and all attachments herein. Furthermore, based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate, and complete."

Document: Wisconsin Long-Term Care License Renewal Application
Former Koppers Inc. Wood Treating Facility
Superior, Wisconsin
EPA ID No. WID006176493

_____
Brian Dummer, P.E.
Professional Engineer Registration, No. _____

_____
(Date)

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ABBREVIATIONS/ACRONYMS

Application	Long-Term Care License Renewal Application
BBL	Blasland, Bouck, & Lee, Inc.
Beazer	Beazer East, Inc.
CFR	Code of Federal Regulations
COPCs	Contaminants of Potential Concern
DNAPL	Dense Non-Aqueous Phase Liquid
ES	Enforcement Standard
FEMA	Federal Emergency Management Agency
Focused CMS	Focused Corrective Measures Study
ft-bgs	Feet Below Ground Surface
ft/year	Feet per Year
FTS	Field & Technical Services, LLC
HDPE	High Density Polyethylene
IDW	Investigative Derived Waste
Keystone	Keystone Environmental Resources
Koppers	Koppers Inc.
MCL	Maximum Contaminant Level
NR	Natural Resources
PAH	Polycyclic Aromatic Hydrocarbon
PAL	Preventative Action Limit
Part A	Part A Permit Application
Part B	Part B Permit Application
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
SAP	Sampling and Analysis Plan
Site	Former Superior, WI Koppers Inc. Wood Treating Site
SVOCs	Semi-Volatile Organic Compounds
SWMU	Solid Waste Management Unit
TRP	TRP Properties, LLC
µg/L	Micrograms per liter
USEPA	United States Environmental Protection Agency
VOCs	Volatile Organic Compounds
WDNR	Wisconsin Department of Natural Resources

1.0 INTRODUCTION

This long-term care license renewal application (Application) for the Resource Conservation and Recovery Act (RCRA)-regulated unit at the Former Koppers Inc. (Koppers) Wood Treating Facility (Site) located in Superior, Wisconsin has been prepared by Field & Technical Services, LLC (FTS) on behalf of Beazer East, Inc. (Beazer). The information provided in this Application has been prepared to address all applicable portions of relevant State of Wisconsin Department of Natural Resources (WDNR) and Federal regulations, specifically the following:

- Wisconsin Administrative Code, Department of Natural Resources (NR) Chapters NR 664 (Hazardous Waste Treatment, Storage and Disposal Facility Standards) and NR 670 Subchapter B (License Application); and
- Title 40 Code of Federal Regulations (CFR) Sections 270.14 (Contents of Part B: General Requirements) and 270.28 (Part B Information Requirements for Post-Closure Permits).

This Application relates only to those former solid waste management units (SWMUs) and the RCRA -regulated unit (former surface impoundments) managed by Beazer and does not relate in any way to the any SWMUs managed by and/or activities conducted by TRP Properties, LLC (the current property owner) and their lessees and Koppers Inc., including, but not limited to, those activities related to the drip pad at the Site regulated under 40 CFR Subpart W.

This Application consists of two primary components, Part A and Part B. The Part A Application (Part A) includes the information required by NR 670.013 and is provided as Appendix A of this Application. The Part A reflects the conditions of the Site as of the submittal date of this Application.

The Part B Application (Part B) is a narrative description addressing the Site environmental setting and physical conditions, regulated units, waste characteristics, groundwater quality, corrective action, and long-term care. This document and supporting information, provided as figures, tables, and appendices, constitutes the Part B Application. The Part B Application constitutes the Site's feasibility and plan of operation report in accordance with NR 670.014(1). To facilitate WDNR's review of this Application, a Part B "crosswalk" is provided as Table 1-1. The "crosswalk" summarizes the specific requirements of NR 670.028 and required components of NR 670.014 and lists the specific section, figure, table, or attachment to this document where the required information is located.

The WDNR Hazardous Waste Facility Operation License (License No. 03157) governs long-term care for the closed RCRA-regulated surface impoundments (closed RCRA-regulated unit) and Site-related corrective actions. WDNR License No. 03157 took effect on December 21, 1990 and expired on September 30, 2020.

Long-term Care activities (i.e., routine inspection/maintenance and groundwater monitoring) for the closed RCRA-regulated unit are conducted in accordance with the following documents:

- Closure and Post-Closure Care Plan (Keystone Environmental Resources [Keystone], August 27, 1987);
- The Conditional Closure and Long-Term Care Plan Approval (WDNR, October 1, 1987);
- Hazardous Waste Closure and Long-Term Care Plan Condition Clarification (WDNR; October 21, 1987);
- The Site Sampling Analysis Plan (SAP - The RETEC Group, Inc., April 2002), with subsequent well network modifications; and
- Closure and Long-Term Care Plan Approval, Groundwater Monitoring Sampling and Analysis Plan (WDNR, October 29, 2002).

The current RCRA-regulated unit long-term care activities conducted at the Site consist of the following:

- Monthly closed RCRA-regulated unit inspections;
- Semi-annual inspection and maintenance of all monitoring wells;
- Semi-annual gauging of thirty-seven (37) wells;
- Semi-annual sampling of two (2) upgradient (background) monitoring wells and seven (7) side-gradient or downgradient monitoring wells for field parameters, volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs); and
- Annual sampling of two (2) upgradient (background) monitoring wells and seven (7) side-gradient or downgradient monitoring wells for dioxins and furans.

To date, all long-term care activities have been conducted in accordance with the requirements of WDNR License No. 03157 and associated documents (i.e., the Closure and Post-Closure Care Plan, The Conditional Closure and Long-Term Care Plan Approvals, the SAP (with subsequent well network modifications), and the Conditional Closure and Long-Term Care Plan Approval of the SAP). Minor modifications to the approved maintenance and monitoring schedules provided in Section 4.1.1 of this Application are intended to supplement the long-term care component of the conditionally approved October 1987 Closure and Post-Closure Care Plan.

The RCRA regulated unit is located among numerous other former Solid Waste Management Units (SWMUs). Brief descriptions of the completed corrective measures associated with the SWMUs are provided in Sections 2.1.4 and 2.3.2 of this Application. All corrective measures have been implemented in accordance with the WDNR-approved *Focused Corrective Measures Study* (Focused CMS; Arcadis, Revised July 2007) and the WDNR conditionally approved *On-Property Corrective Measures Implementation Design Report* (Arcadis, December 2009). A summary of the ongoing long-term care activities (i.e., inspections/maintenance) associated with the completed corrective measures is provided in Sections 4.1.2 and 4.5.3.

This Application consists of the text, figures, tables, and various appendices. The remainder of this Application is organized as follows:

- **Section 2** provides a summary of general site background information including a discussion of former SWMUs and potential source areas;
- **Section 3** provides a discussion of waste characteristics and waste analysis (not applicable given the long-term care status of the Site);
- **Section 4** discusses long-term requirements such as certifications, points of contact, inspections, maintenance, security, monitoring, training, and financial assurance;
- **Section 5** provides a summary of groundwater information including recent groundwater quality data; and
- **Section 6** is a list of various guidance documents or historical site-specific documents referenced in this Application.

2.0 SITE DESCRIPTION

This section contains general descriptive information regarding the Site as it relates to the closed RCRA-regulated unit (two closed former RCRA-regulated surface impoundments). Information regarding the Site location, operational history, investigation history, remediation history, and physical conditions is provided.

2.1 GENERAL DESCRIPTION, LOCATION, AND HISTORY

2.1.1 General Description and Location

The 112-acre Site is located in northwestern Wisconsin (at the junction of County Roads A and Z), approximately five miles southeast of the town of Superior, in Douglas County. The area immediately surrounding the Site is sparsely populated and consists primarily of brush, woodland, and marshy areas. The physical address for the Site is 3185 County Road A, Superior, Wisconsin. The Site is located at 92º04'10.70"W longitude, 46º38'47.91"N latitude. Site boundaries are shown on the Site location map provided as Figure 2-1.

The entire Site is zoned industrial and land use around the Site is primarily agricultural or resource conservation areas. Some sparse residential areas are located along County Roads A and Z to the north and southeast of the Site.

Figure 2-2 is a detailed map which includes the location of the RCRA-regulated unit and former SWMUs at the Site, a tabular description of the RCRA-regulated unit and former SWMUs, Site security features, surrounding land use information, the locations of surface water bodies, topographic information, and a wind rose. Figure 2-3 is a Site map which displays the locations of all existing monitoring wells.

2.1.2 Owner / Operational History

The National Lumber and Creosote Company began wood treating operations at the Site in 1928. Railroad cross ties, bridge timbers, switch ties, and crossing panels were pressure-treated primarily with creosote. In 1938, the Wood Preserving Corporation purchased the Site and maintained similar wood treating operations. On November 1, 1944 the deed for the Site property was transferred to Koppers Company, Inc. In addition to creosote, pentachlorophenol was reportedly used at the Site from 1955 through 1979. In June 1988, BNS Acquisitions, Inc. (a wholly-owned subsidiary of Beazer PLC) acquired 90 percent of the stock of Koppers Company Inc. On December 28, 1988, the Site was sold to Koppers Industries, Inc., and on January 26, 1989 the name Koppers Company Inc. was changed to Beazer Materials and Services, Inc. On April 16, 1990, the name Beazer Materials and Services, Inc. was changed to Beazer East, Inc. The name Koppers Industries, Inc. was changed to Koppers Inc. in February 2003. Koppers discontinued all

wood treating operations at the Site in 2006. The former process facilities were subsequently dismantled and removed from the Site by Koppers.
Koppers sold the property to TRP Properties, LLC (TRP) in September 2012. The Site is currently used as a railroad tie grinding facility with Koppers leasing portions of the property for storage and transfer of untreated railroad ties. Beazer retains certain environmental responsibilities at the Site, including monitoring and maintenance associated with the closed RCRA-regulated unit.

2.1.3 Investigation and Regulatory History

Multiple potential source areas have been subjected to numerous investigations since the 1980s. The first reported investigations completed focused on an interim status groundwater monitoring program and hydrogeologic investigations for two RCRA-regulated surface impoundments (the surface impoundments were closed in 1989 as a single RCRA-regulated unit).

In 1987/1988, a RCRA Facility Assessment (RFA) was completed under the direction of United States Environmental Protection Agency (USEPA) Region V. Several of the former SWMUs were grouped by the USEPA into six (6) potential source areas (Areas A through F). Two additional areas, Areas G and H, were not included in the RFA, but were later added to the USEPA's list by Koppers Company, Inc. and Beazer, respectively. The former spray irrigation field was investigated as part of the 1987/1988 RFA, however; the USEPA recommended no further action at that time. The former sprayfield area was later added and referred to as Area S.

Between 1990 and 1996, Beazer conducted two phases of investigation and groundwater quality assessment activities for the Site. Phase II RCRA Facility Investigation (RFI) activities were conducted between July 1990 and October 1990, and included soil, sediment, surface-water and groundwater sampling, while Phase III RFI activities (conducted between October 1996 and December 1996) were focused on soil and groundwater. The results of the Phase II and Phase III RFIs were reported in the *Phase II RCRA Facility Investigation Report of Findings* (Keystone, June 1991) and the *RCRA Facility Investigation Report* (Fluor Daniel GTI, June 1997), respectively. Additional bedrock investigative activities (including installation of bedrock monitoring wells and supplemental sampling) were completed in response to WDNR comments on the June 1997 *RCRA Facility Investigation Report.* Results of the bedrock investigative activities were submitted to WNDR in *the RFI Bedrock Monitoring Wells Report* (Blasland, Bouck & Lee, Inc. [BBL], July 2000).

A *Post-Remediation Human Health Risk Assessment* (AMEC, July 2007) for onsite soils was submitted to WDNR as an attachment to the *Focused Corrective Measures Study* (Arcadis, July 2007). Addenda to this report were submitted in January 2008 and December 2009.

Investigation of offsite surface water and streambed sediments along Crawford Creek and an unnamed tributary to Crawford Creek has also been completed. Summaries of the investigation of

the offsite surface water and sediments are provided in the following documents previously submitted to WDNR:

- *Preliminary Characterization Report, Surface Water and Streambed Sediment* (Fluor Daniel GTI, March 1997).
- *Supplemental Surface Water and Streambed Sediment Investigation Report* (BBL, July 2000);
- *Crawford Creek Floodplain Investigation Results* (BBL, June 2003);
- *Summary of May 2003 Outfall 001 Drainage Ditch Investigation Letter Report* (BBL, October 2003);
- *Off-Property Investigation Data Summary Report* (BBL, February 2006); and
- *Supplemental Off-Property Investigation Summary Report* (Arcadis, April 2014).
- *Off-Property Focused Corrective Measures Study* (Arcadis, August 2014).

Since 2018, Beazer and the USEPA have been working in conjunction with WDNR to develop a Focused Feasibility Study for the off-property portion of the Site, as part of a Great Lakes Legacy Act project. These ongoing efforts are not governed by WDNR License No. 03157 and are not addressed in this Application.

WDNR Hazardous Waste Facility Operation License No. 03157 governs long-term care for the closed RCRA-regulated unit and corrective measures at the Site (routine inspection/maintenance and groundwater monitoring as described in Sections 4 and 5). WDNR License No. 03157 was effective on December 21, 1990 and expired on September 30, 2020. The USEPA I.D. Number for the Site is WID006179493. Beazer has conducted groundwater monitoring in accordance with WDNR License No. 03157 and associated documents (i.e., the Closure and Post-Closure Care Plan, The Conditional Closure and Long-Term Care Plan Approval, Hazardous Waste Closure and Long-Term Care Plan Condition Clarification, the SAP (with subsequent well network modifications), and the Conditional Closure and Long-Term Care Plan Approval of the SAP) requirements for more than 30 years.

2.1.4 Remediation History

Closure activities for the RCRA-regulated surface impoundments were initiated in 1988. Sludge and bottom sediment were removed and taken off-site for disposal prior to closure. The RCRA impoundments were closed in 1989. The closure activities were conducted in accordance with the *Closure and Post-Closure Care Plan* [Keystone, 1987 (provided as Appendix B.1)] and associated *Conditional Closure and Long-Term Care Plan Approval* [WDNR, 1987 (provided as

Appendix B.2)] with subsequent *Hazardous Waste Closure and Long-Term Care Plan Condition Clarification* [WDNR, 1987 (provided as Appendix B.3)]. Closure and certification information for the closed RCRA-regulated unit is provided in the *Construction Documentation Report Surface Impoundment Closure* [Closure Report; Keystone, 1989 (provided as Appendix B.4)].

In addition to the closure of the surface impoundments, four non-RCRA surface impoundments have been closed (Area C) and Beazer has conducted corrective measures to address the impacted media for various former on-Site SWMUs, including the placement of clean soil covers (minimum 1-foot thick) over impacted soils in Area A (Former Unlined Landfill/Landfarm Area), Area B (Treatment Area), Area F (Drip Track Area), Area G (Pentachlorophenol Straw Bales Area), Area H (Lead Track Landfill Area), and Area S (Former Sprayfield Area). In addition, the on-property portion of the "Outfall 001 Drainage Ditch" (Area D) was remediated by removing soil materials from the channel bottom and banks (materials were placed in Area A, prior to installation of the soil cover), and installing an engineered liner system within the ditch. The corrective measures were conducted in accordance with the *On-Property Corrective Measures Implementation Design Report* (Arcadis, December 2009)[1]. Details regarding the completed corrective measures are provided in the WDNR-conditionally approved *On-Property Corrective Measures Implementation Construction Documentation Report* (Construction Documentation Report; Arcadis, September 2011). A copy of the Construction Documentation Report is provided as Appendix C. As a required component of the on-property corrective actions, Beazer submitted a *Notification of Continuing Obligations and Residual Contamination* (Beazer, June 2014) to the property owner (TRP) and a *GIS Registry Submittal* to WDNR (Beazer, August 2015) to mitigate potential disturbance of the features of the final remedy (surface covers and engineered liner system) at the Site. This notification and submittal (which are posted on the WDNR Remediation and Redevelopment Program's GIS Registry of Closed Remediation Sites) provide a mechanism for notifying the current property owner and any potential purchaser of the property of the following:

- The presence of impacted soil and groundwater at the Site;
- Future use restrictions (the future use of the property is restricted to industrial use);
- Well construction restrictions (the construction of a water well without prior WDNR approval is prohibited); and
- Soil excavation procedures (the notification and submittal specify the procedures to manage soils that may be excavated or disturbed as a result of site activities such as minor repair activities).

[1] WDNR conditionally approved the *On-Property Corrective Measures Implementation Design Report* on May 25, 2010. Arcadis provided responses to WDNR's comments on July 2, 2010, and WDNR approved the responses to comments on July 8, 2010.

The *Notification of Continuing Obligations and Residual Contamination* and *GIS Registry Submittal* are provided herein as Appendices D.1 and D.2, respectively.

In addition to these completed corrective actions, as presented in the Focused CMS, natural attenuation is the corrective action for groundwater impacts at the Site. Beazer conducted multiple supplemental groundwater investigations between 2004 and 2007 and again between April 2013 and January 2014 to support the natural attenuation remedy. Data generated from these investigations have confirmed that concentrations of constituents of potential concern (COPCs) in groundwater are stable or decreasing, and that natural attenuation of COPCs is occurring. Summaries of the supplemental groundwater investigations are provided in various documents previously submitted to WDNR, primarily in the *Groundwater Natural Attenuation Evaluation Report* (BBL, January 2006), the *Summary of Supplemental Groundwater Investigations* (Arcadis, September 2007), and the *Groundwater Natural Attenuation Demonstration Summary Report* (Arcadis, June 2014).

A *Technical Assistance and Environmental Liability Clarification Request* was subsequently submitted to WNDR on behalf of Beazer (Arcadis, October 2014) requesting approval of the natural attenuation remedy for groundwater. WDNR's Remediation and Redevelopment Program approved the groundwater natural attenuation remedy in a letter to Beazer dated November 18, 2014 with the stipulation that long term care groundwater monitoring was to continue.

2.2 PHYSICAL FEATURES

This section contains a physical description of the Site and surroundings. Site topography, geology (including regional seismic zones), hydrogeology, groundwater flow, and surface water features (including floodplains) are discussed in subsections 2.2.1 through 2.2.4, respectively.

2.2.1 Topography

Site topography is depicted on two figures. Figure 2-1 is a Site location map based on a United States Geological Survey quadrangle. Figure 2-1 depicts topography in the vicinity of the Site and extends to a distance of at least 1,000 feet from the Site boundary. Figure 2-1 depicts topography on 10-foot contour intervals given the relief in the area. Figure 2-2 is a general site arrangement plan which depicts topography at a contour interval of 2 feet. Figure 2-2 is based on a scale of 1-inch equals 300 feet. Relevant information required by NR 670.014(2)(s) is satisfied by Figures 2-1 and 2-2.

2.2.2 Geology and Hydrogeology

A comprehensive review of regional and Site geology and hydrogeology is presented in the *Phase II RCRA Facility Investigation Report of Findings* and the *RCRA Facility Investigation Report* (Phase II and Phase III Reports).

A Site map depicting the locations of all monitoring wells is provided as Figure 2-3. The most recent (April 2021) potentiometric surface elevation contour maps for the shallow (A-Zone) and deep (C-Zone) water bearing zones are presented on Figures 2-4 and 2-5, respectively. For historical reference, additional groundwater elevation tables and contour maps dating back to 2002 (the first groundwater monitoring event under the WDNR-approved SAP) are copied and included in Appendix E.

A summary of the geology and hydrogeology at the Site is provided in the following subsections.

2.2.2.1 Geology

In some areas of the Site, primarily in the vicinity of the former treatment area, a thin layer of fill material is present at the ground surface. However, most of the Site is underlain by a sequence of Quaternary sediments deposited by continental glaciers. Three of the four stratigraphic zones of interest at the Site are within in these deposits.

The uppermost stratigraphic unit is a red-brown clay deposit, which likely represents a till composed of reworked lake bottom sediments. The upper approximately 15-feet of the red-brown clay contains hairline fractures filled with greenish gray silt and clay. The shallow (A-zone) and intermediate (B-zone) zones consist primarily of this clay with little to no sand or gravel.

The lower regions of the red-brown clay unit, which represent the deep zone (C-zone) at the Site, contain discontinuous deposits of fine- to coarse-grained sand and silt. These discontinuous fine to coarse grained deposits occur at depths that vary from approximately 35 to 50 feet below ground surface (ft-bgs) in certain areas of the Site.

The clay unit continues beneath the discontinuous sand and silt deposits to the top of the Precambrian Lake Superior Sandstone, the uppermost bedrock (D-zone) at the Site. The Precambrian Lake Superior Sandstone occurs regionally at a depth of approximately 170 ft-bgs.

2.2.2.2 Hydrogeology

Perched groundwater may be temporarily retained in the thin fill layer (where present). However, across most of the Site, the uppermost groundwater occurs in an unconfined state within the thick red-brown clay (an aquitard). A-zone monitoring wells monitor the water table in this shallow clay with the bottom of the screened interval typically located approximately 13.0 to 15.5 ft-bgs. Previous geologic studies in the Superior area and aquifer testing at the Site show these clay deposits to have very low intergranular hydraulic conductivities. B-zone monitoring wells at the Site monitor the slightly deeper zones within the shallow clay (bottom of the screened interval located approximately 32 to 35 ft-bgs).

Historically, groundwater flow patterns in the shallow and intermediate clay indicate localized distortions to the overall northerly flow due to combined effects of variability in recharge; low hydraulic conductivity of the clay; and interactions with surface water (drainage ditches). However, groundwater elevation data consistently support a generally northerly flow direction for groundwater at the Site, which is to be expected based upon the location of regional receiving surface water bodies.

The most recent (April 2021) A-zone groundwater elevation contours are presented on Figure 2-4. It should be noted that the development of meaningful A-zone groundwater elevation contours is complicated by the low hydraulic conductivity of the soil and the presence of drainage ditches. Due to these factors, variable groundwater flow patterns have been observed historically for the A-zone clay unit. Despite the varying patterns associated with contouring shallow groundwater in this setting, the predominant groundwater flow direction in the A-zone is generally toward the north/northwest. Two effective porosity values (0.01 and 0.3) are used when calculating groundwater flow velocities within the A-zone. The 0.3 value is used to evaluate flow through the pore space in the clay (primary porosity). The 0.01 value is used to evaluate the flow through the microfractures in the clay (secondary porosity). In April 2021, the A-zone had an estimated groundwater flow velocity of 0.02 feet per year (ft/year) when using the primary effective porosity value (0.3) and 0.47 ft/year when using the secondary effective porosity value (0.01).

C-zone monitoring wells at the Site monitor groundwater in the discontinuous silt and sand within the clay unit and are generally screened at depths from approximately 39 to 49 ft-bgs. Groundwater occurs in a confined state within the C-zone. The groundwater flow direction in the C-zone is generally toward the north, although it should be noted that the sand lenses in the C-zone are discontinuous and are separated by the red-brown clay aquitard.

The most recent C-zone groundwater elevation contours are presented on Figure 2-5 (April 2021). An effective porosity of 0.2 is used when calculating groundwater flow velocities within the C-zone. The C-zone had an estimated groundwater flow velocity of 3.4×10^{-1} ft/day during the April 2021 monitoring event.

Based upon observed potentiometric elevation differentials at cluster well locations, there is minimal hydraulic connection between the A and C zones. Within the Site, there is a general tendency for downward vertical gradients.

Three D-zone wells (W-18D, W-33D, and W-34D) were installed at the Site in February 2000 to evaluate groundwater flow and quality in the bedrock zone. These wells are screened at depths of approximately 176 to 196 ft-bgs. The D-zone wells monitor the Precambrian Lake Superior Sandstone, which is the uppermost bedrock at the Site. It appears that groundwater flow in the D-zone is to the north/northwest based on the potentiometric surface elevations measured for the three D-zone monitoring wells.

2.2.3 Surface Water

Crawford Creek, a tributary to the Nemadji River, is located approximately 0.5 miles to the northwest of the Site. The primary drainage feature for the Site is the on-Site Outfall 001 drainage ditch, which feeds an unnamed tributary to Crawford Creek. The tributary flows approximately 0.5 miles from the northwest corner of Site to Crawford Creek.

The Site is not located within a 100-year floodplain as identified on the Federal Emergency Management Agency (FEMA) Panel Numbers 55031C0089D and 55031C0095D (last revised February 2, 2012). A copy of the FEMA map is provided as Figure 2-6.

2.2.4 Seismic Standard

The Site is located in Douglas County, Wisconsin. Douglas County is not included among those political jurisdictions listed in Appendix VI of 40 CFR 264 for which seismic standards must be considered. Therefore, the closed RCRA-regulated unit complies with the requirements regarding seismic areas.

2.3 REGULATED UNITS / FORMER SWMUs

2.3.1 Closed Regulated Units

There is one closed regulated unit at the Site addressed in this Application: the RCRA-Regulated Closed Surface Impoundments.

The two clay-lined RCRA-regulated former surface impoundments (also known as the closed RCRA-regulated unit) were constructed in 1982 to store process wastewater following oil-water separation. Each of the rectangular RCRA-regulated surface impoundments measured approximately 127-feet by 170-feet from the top of the dike with sloping sides to the bottom. The total bottom area was estimated to be approximately 40,672 square feet with an estimated maximum hydraulic volume of 2,203,234 gallons.

Closure activities for the RCRA-regulated surface impoundments were initiated in 1988. Sludge and bottom sediment were removed and taken off-site for disposal prior to construction of the RCRA cap. The RCRA cap consists of a multi-component cover system constructed of a 24-inch clay barrier soil layer, a high-density polyethylene (HDPE) geomembrane barrier layer, a geocomposite drainage layer, a 30-inch-thick soil layer, and a top soil/vegetative cover layer. The surface impoundments were closed in 1989 as a single RCRA-regulated unit. The closure activities were conducted in accordance with the Closure and Post-Closure Care Plan (Keystone, August 1987) and associated Conditional Closure and Long-Term Care Plan Approval (WDNR, October 1987) with subsequent Hazardous Waste Closure and Long-Term Care Plan Condition Clarification (WDNR, October 1987). The completed closure activities were documented in the Closure Report.

As stated in Section 2.1.4, copies of the aforementioned closure documents are provided herein as Appendices B.1 – B.4.

The closed RCRA-regulated unit is associated with USEPA listed hazardous waste K001 (bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol). However, it should be noted that the use of pentachlorophenol as a wood preservative at the Site was discontinued in 1979, three years prior to the construction of the RCRA-regulated surface impoundments. Thus, it is highly unlikely that the RCRA-regulated surface impoundments received wastewater containing pentachlorophenol. Waste characteristics associated with the closed regulated unit are discussed in further detail in Section 3.0.

2.3.2 Former SWMUs

During the RFA conducted in 1987/1988, the USEPA identified fourteen SWMUs at the Site. Several of the former SWMUs were grouped by the USEPA into six (6) potential source areas (Areas A through F). Two additional areas, Areas G and H, were not included in the RFA, but were later added to the USEPA's list by Koppers Company, Inc. and Beazer, respectively. The former spray irrigation field was investigated as part of the 1987/1988 RFA, however; the USEPA recommended no further action at that time. Additional investigation of soil quality within the former sprayfield was completed during the Phase III RFI and the area was later added as an area of potential concern and referred to as Area S.

Table 2-1 provides a summary of the former SWMUs/potential source areas at the Site managed by Beazer, and does not relate in any way to any solid waste units managed by and/or activities conducted by TRP (the current property owner) and Koppers, including, but not limited to, those activities related to the drip pad at the Site regulated under 40 CFR Subpart W. The locations of these former SWMUs/potential source areas managed by Beazer are depicted on Figure 2-2.

As previously stated in Section 2.1.4, Beazer has conducted corrective measures to address the impacted media for various former SWMUs. The completed soil cover (covering Areas A, B, F, G, H, and S) and the engineered liner system in the on-property portion of the Outfall 001 Drainage Ditch (Area D) are components of the final remedy for the Site. Details on these corrective measures for the former SWMUs are provided in the Construction Documentation Report (Appendix C).

2.4 SITE SECURITY AND STRUCTURES

Access to the Site is off of County Road A and is controlled by entrance gates. Only authorized personnel are allowed access into the Site during operational hours and the entrance gates are locked when not in use. All visitors and contractors are required to check in at the Site Office prior to accessing the Site. In addition to the Site security features, the closed RCRA-regulated unit is secured by a fence and an entrance gate that is closed and locked at all times (except during

maintenance). Signs that read "Danger – Unauthorized Personnel Keep Out" are at the entrance gate and other strategic locations around the fence in sufficient numbers to be seen from any approach and are legible from a distance of at least 25 feet.

An aerial photograph depicting the current Site structures is included in the Part A of this Application (Appendix A).

3.0 WASTE CHARACTERISTICS / WASTE ANALYSIS PLAN

3.1 WASTE CHARACTERISTICS

The hazardous wastes associated with the former RCRA-regulated surface impoundments (closed RCRA-regulated unit) at the Site (K001) originated from wood treating operations utilizing creosote. All K001 material ~~was~~ and visibly contaminated soils were removed from the RCRA-regulated surface impoundments during closure in 1988/1989, and no wastes have since been treated, stored, or disposed of in the closed RCRA-regulated unit.

As documented in the Closure Report (Appendix B.4), residual K001 COPCs were detected in several subgrade soil samples collected from the uppermost stratigraphic unit (A/B-zones) following excavation of the K001 material / visibly contaminated soils from the RCRA-regulated surface impoundments. Due to the low permeability of the clay where the COPCs were detected, residual COPCs have remained localized in the A-zone as evidenced by the consistency of groundwater data collected over the past 30 years.

Beazer is currently registered as a Very Small Quantity Generator (VSQG) of hazardous waste. A minimal amount of investigative derived waste (IDW) is generated from sampling events. Routine waste streams at the Site include purged groundwater and personal protective equipment (PPE). Purged groundwater and PPE are managed protectively with the following USEPA waste codes:

- F032 (Wastewaters [except those that have not come into contact with process contaminants], process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations [except potentially cross-contaminated wastes that have had the F032 waste code deleted in accordance with §261.35 of this chapter or potentially cross-contaminated wastes that are otherwise currently regulated as hazardous wastes (i.e., F034 or F035), and where the generator does not resume or initiate use of chlorophenolic formulations]. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol); and
- F034 (Wastewaters [except those that have not come into contact with process contaminants], process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use creosote formulations. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol).

Purged groundwater is transferred directly from monitoring wells into portable collection containers (5-gallon buckets) prior to being transferred into 55-gallon Department of Transportation (DOT) approved storage/transportation drums for offsite disposal. Disposable PPE and sampling supplies and/ or any other environmental investigation media are also transferred

into DOT-approved drums awaiting proper disposal. All drums are labeled in accordance with the applicable USEPA and DOT regulations.

3.2 - WASTE ANALYSIS PLAN

The closed RCRA-regulated unit at the Site is in long-term care, therefore; no waste is or will be treated, stored, or disposed at the regulated unit during the Post-Closure Period. In accordance with NR 670.014, the Chemical and Physical Analysis requirement of NR 670.014(2)(b) and the Waste Analysis Plan requirement defined in NR 670.014(2)(c) and NR 664.0013 do not apply.

The hazardous waste previously contained in the RCRA-regulated surface impoundments (also known as the closed RCRA-regulated unit) was classified as K001, defined in 40 CFR 261 as "bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol." As previously stated, the use of pentachlorophenol as a wood preservative at the Site was discontinued three years prior to the construction of the RCRA-regulated surface impoundments, therefore; it is highly unlikely that the RCRA-regulated surface impoundments received wastewater containing pentachlorophenol.

~~All~~ The K001 material ~~was~~ and visibly contaminated soils were removed from the surface impoundments prior to construction of the RCRA cap. The RCRA cap consists of a multi-component cover system constructed of a 24-inch clay barrier soil layer, a HDPE geomembrane barrier layer, a geocomposite drainage layer, a 30-inch-thick soil layer, and a top soil / vegetative cover layer. Details on this installation are included in the Closure Report (Appendix B.4). No wastes have since been treated, stored, or disposed of in this unit, therefore; a Waste Analysis Plan is not applicable for this Application.

4.0 LONG-TERM CARE REQUIREMENTS

This section discusses the activities performed in closing the RCRA-regulated surface impoundments (later identified as a single RCRA-regulated unit) and the long-term care activities to be performed at the former SWMUs and RCRA-regulated unit. The information presented in this section satisfies the applicable requirements governing closure of waste management units.

4.1 CLOSURE PLANS AND CERTIFICATIONS

Closure activities for the former RCRA-regulated surface impoundments were completed in 1989 in accordance with the conditionally approved October 1987 Closure and Post-Closure Care Plan (Appendix B.1). Closure certification was completed on November 3, 1989 by a licensed State of Wisconsin Professional Engineer. ~~All~~ The K001 material and visibly contaminated soils were~~was~~ removed from the surface impoundments prior to construction of the RCRA cap. The RCRA cap consists of a multi-component cover system constructed of a 24-inch clay barrier soil layer, a HDPE geomembrane barrier layer, a geocomposite drainage layer, a 30-inch-thick soil layer, and a top soil / vegetative cover layer. Closure and certification information for this unit is provided in Appendix B.4.

In addition to the preceding closure, corrective measures for the former SWMUs have been completed for the Site. These corrective measures were conducted in accordance with the *On-Property Corrective Measures Implementation Design Report* (Arcadis, December 2009)[2]. Details on the completed corrective measures for former SWMUs are provided in the Construction Documentation Report (Appendix C).

4.1.1 Post-Closure Plan and Contacts

Long-term care requirements for the closed surface impoundments (RCRA-regulated unit) are provided in the conditionally approved October 1987 Closure and Post-Closure Plan (Appendix B.1). The Post-Closure Care Plan for the closed surface impoundments includes inspection, monitoring, and maintenance activities that are performed to prevent the unlikely post closure release of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to groundwater or surface waters or to the atmosphere. Approved long-term care activities for the closed regulated unit, include the following:

- Monthly inspections and maintenance of the closed RCRA-regulated unit cap and security fencing; and

[2] WDNR conditionally approved the *On-Property Corrective Measures Implementation Design Report* on May 25, 2010. Arcadis provided responses to WDNR's comments on July 2, 2010, and WDNR approved the responses to comments on July 8, 2010.

- Groundwater monitoring (water level measurement and groundwater sampling/analysis), well network inspections and well maintenance.

Additional detail regarding these activities is provided in Section IX of the Closure and Post Closure Care Plan (Appendix B.1). Site inspections and maintenance are summarized in Sections 4.5.1 and 4.5.2 of this Application. Groundwater monitoring is summarized in Section 5.0 of this Application.

The long-term care contact for the Site is:

Ms. Jane Patarcity, Senior Environmental Manager
Beazer East, Inc.
c/o Three Rivers Management, Inc.
600 River Avenue, Suite 200
Pittsburgh, Pennsylvania 15212
(412) 208-8813

The property owner for the Site is:

TRP Properties LLC
12930 I Street
Omaha, Nebraska 68137

4.1.2 On-Property Corrective Measures Inspections and Maintenance

Inspection and maintenance of the completed corrective measure components for the former SWMUs (i.e., surface covers and Outfall 001 drainage ditch liner system) are provided in the *On-Property Corrective Measures Operations and Maintenance Plan* (O&M Plan; Appendix J of the Construction Documentation Report provided herein as Appendix C). Approved inspection and maintenance activities include the annual inspection and as-needed maintenance of the former SWMU surface covers and drainage ditch liner system and annual monitoring of Outfall 001 drainage ditch sumps.

4.1.3 Off-Property Corrective Actions

In August 2014, Arcadis, on behalf of Beazer, submitted a Focused Corrective Measures Study (FCMS; Arcadis 2014) to WDNR, which identified and evaluated potential corrective action alternatives for the sediment and floodplain materials in the off-property portion of the Site (i.e., the Tributary to Crawford Creek and portions of Crawford Creek). WDNR provided draft comments on the FCMS in a letter to Beazer dated November 13, 2014 (WDNR 2014). Following subsequent meetings and discussions with WDNR, Beazer elected to proceed with a Great Lakes Legacy Act (GLLA) Focused Feasibility Study (FFS) project. Therefore, the 2014 FCMS was

never revised, nor approved by WDNR. Preparation of the GLLA FFS is currently underway. Selection of a remedy for the off-property portion of the Site is anticipated to occur following completion of the GLLA FFS.

4.2 PREPAREDNESS AND PREVENTION

There is no possibility of fire, explosion, or ~~immediate release~~any unplanned sudden or non-sudden release of hazardous waste or ~~of~~ hazardous waste constituents from the closed RCRA-regulated unit that would constitute a threat to human health or the environment. In general, this performance standard was achieved by removing ~~all~~ the K001 hazardous waste and visibly contaminated soils from the former RCRA-regulated surface impoundments as described in Section 2.3.1. As documented in the Closure Report (Appendix B.4), residual COPCs were detected in several subgrade samples collected from the uppermost stratigraphic unit (A/B-zones) following excavation of the K001 material / visibly contaminated soils from the RCRA-regulated surface impoundments. Due to the low permeability of the clay where the COPCs were detected, residual COPCs have remained localized in the A-zone as evidenced by the consistency of groundwater data collected over the past 30 years.

The performance standard is being ensured through inspection and maintenance of the closed RCRA-regulated unit as described in Section 4.5.1 and continued groundwater monitoring. Pursuant to NR 670.014(2)(f) and the preceding justification, it is therefore requested that the ~~Post-Closure~~ Preparedness and Prevention Plan requirements be waived for this Site.

Even though a waiver has been requested, the most recent *Preparedness, Prevention and Contingency (PPC) Plan* (FTS, February 2021) is provided herein as Appendix G.1 to demonstrate compliance with ~~historical~~ the requirements set forth in NR 664 Subchapter C pending approval of the waiver request.

4.3 CONTINGENCY PLAN

NR 670.028 does not specify that a copy of the contingency plan [NR 670.014(g)(2)] is required for submittal unless the department determines that this additional information is necessary. As previously stated, there is no possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents from the closed RCRA-regulated unit that would constitute a threat to human health or the environment. Should WDNR determine that a contingency plan is required for submittal, Beazer proposes that the PPC Plan will serve as the Site's Contingency Plan. Beazer will provide a copy of the PPC Plan to TRP so that TRP may ensure that any workers at the Site are aware of the elements of the PPC Plan.

~~According to NR 670.028, a Contingency Plan prepared in accordance with the requirements of NR 670.014(2)(g) is not required for the closed unit (i.e., the closed RCRA-regulated surface~~

~~impoundments). As previously stated, there is no possibility of fire, explosion, or immediate release of hazardous waste constituents from the closed RCRA-regulated unit that would constitute a threat to human health or the environment. All hazardous waste was removed from the former RCRA-regulated surface impoundments during closure and the RCRA-regulated unit is in long-term care. However, a PPC Plan has previously been prepared for the Site as identified in the preceding section.~~

4.4 SECURITY

Access to the Site is off of County Road A and is controlled by entrance gates. Only authorized personnel are permitted access into the Site during operational hours and the entrance gates are locked when not in use. All visitors and contractors are required to check in at the Site Office prior to accessing the Site. In addition to the Site security features, the closed RCRA-regulated unit is secured by a fence and the entrance gate is closed and locked at all times (except during inspection and maintenance). Signs that read "Danger – Unauthorized Personnel Keep Out" are at the entrance gate and other strategic locations in sufficient numbers to be seen from any approach and are legible from a distance of at least 25 feet.

4.5 INSPECTION AND MAINTENANCE PLANS

The following post-closure care and corrective action process features of the Site are subject to inspection/maintenance during the long-term care period:

- Closed RCRA-regulated unit and associated monitoring well network; and
- On-property corrective measure surface covers and Outfall 001 drainage ditch liner system.

The long-term care inspections/maintenance of these features will be conducted in accordance with the conditionally approved October 1987 Closure and Post-Closure Plan (Appendix B.1) and the O&M Plan (Appendix J of the Construction Documentation Report provided herein as Appendix C). If any problems or deficiencies are noted during inspections, the long-term care contact person will be notified and repairs will be initiated. Copies of the inspection records will be kept for at least three years from the date of inspection in the onsite records storage facility. A summary of the closed RCRA-regulated unit and corrective measure inspection/maintenance activities are provided in the following subsections.

4.5.1 Closed RCRA-Regulated Unit Inspection/Maintenance

Long-term care inspections of the closed RCRA-regulated unit are performed on a monthly basis in accordance with Section IX 1.0 of the Closure and Post-Closure Care Plan (Appendix B.1). Inspections of the closed RCRA-regulated unit include access and security systems (i.e., fences, gates and signage), cover integrity (i.e., vegetative cover condition, potential erosion damage, run on and run off control systems, and presence of standing water), and the condition of associated benchmarks and groundwater monitoring wells. Maintenance activities are conducted as needed based on the inspection findings. The completed inspection forms, as well as documentation of any corrective maintenance, are maintained for at least three years from the date of inspection in the onsite records storage facility. The Long-term Care Inspection Form is provided in Appendix F.1.

4.5.2 Groundwater Monitoring Well Inspections/Maintenance

All groundwater monitoring wells included in the current groundwater monitoring program (as described in Section 5.4) are inspected semi-annually during sampling activities for physical integrity and security in accordance with Section IX 2.0 of the Closure and Post-Closure Care Plan (Appendix B.1). A well inspection form is provided in Appendix F.2.

Subject to weather conditions, ~~,~~monitoring well repairs will be initiated within 60 days of identifying the deficiency and will be documented as part of the Annual RCRA Groundwater Monitoring Reports submitted to WDNR.

4.5.3 On-Property Corrective Measures Inspections/Maintenance

As previously stated in Section 4.1.2, inspection and maintenance of the completed corrective measure components for the former SWMUs (i.e., surface covers and Outfall 001 drainage ditch liner system) are provided in the O&M Plan (Appendix J of the Construction Documentation Report provided herein as Appendix C).

4.6 PERSONNEL TRAINING

Individuals responsible for the inspection and maintenance of the closed RCRA-regulated unit (and associated groundwater monitoring well network), semi-annual groundwater monitoring, and the annual on-property corrective measures surface cover inspections and maintenance will be appropriately trained to conduct those activities. Written records will be maintained at the Site concerning the formal training received associated with the long-term care activities and will be available upon request. The *RCRA Hazardous Waste Training Outline* (FTS, June 2021) is provided as Appendix G.2.

It is anticipated that there will be three positions required to maintain and monitor the closed RCRA-regulated unit and the on-property corrective measure components at the Site (i.e., surface covers and Outfall 001 drainage ditch liner system) during the long-term care period. Descriptions of these positions are provided below:

- **Site Inspector -** The responsibilities of this position are to perform the long-term care inspections, on-property corrective measure surface cover inspections, and Outfall 001 drainage ditch liner system inspections. In addition, the Site Inspector is the designated Primary Emergency Coordinator for the long-term care operations regulated under WDNR License No. 03157. Beazer will ensure that any individual performing inspections and acting as an emergency coordinator has been appropriately trained in inspection and inspection log completion procedures.

- **Groundwater Monitoring Technicians -** The responsibilities of this position include obtaining groundwater samples and water level measurements for the monitoring wells, as described in the SAP and conduct monitoring well inspections. The use of monitoring technicians trained in proper RCRA procedures will ensure that the well network will be properly inspected, monitored and maintained. Groundwater Monitoring Technicians may also perform the long-term care inspections, on-property corrective measure surface cover inspections, and Outfall 001 drainage ditch liner system inspections.

- **Maintenance Personnel -** Responsibilities for this position include activities required to maintain the RCRA regulated unit such as mowing the grass, removing any undesirable vegetation or trees, and performing other maintenance or repair activities as recommended by the Beazer Environmental Manager and/or directed by Beazer's contractor/consultant. These activities will be performed by qualified personnel. When maintenance activities are required during the long-term care period, training records and qualifications of maintenance personnel used will be maintained at the Site and in Beazer's files and will be available upon request.

Personnel training is limited to the individuals responsible for the operations regulated under WDNR License No. 03157. The closed RCRA-regulated unit is not part of the active operations at the Site and is not accessed by the property owner or lessees. The current property owner (TRP) and lessee (Koppers) have been notified by Beazer to not enter into the confines of the closed RCRA-regulated unit which is capped and enclosed by security fencing. Both TRP and Koppers have been instructed to notify the Beazer-designated Primary Emergency Coordinator (Site Inspector) should they observe a release or the potential for a release from the closed RCRA-regulated unit (which is extremely unlikely given that all K001 waste ~~was~~ and visibly contaminated soils were removed during closure and no wastes have since been treated, stored, or disposed of in the RCRA-regulated unit since closure).

4.7 POST-CLOSURE NOTICES

This section contains information on post-closure notifications and associated land use restrictions and institutional controls.

As a required component of the on-property corrective actions, Beazer submitted a *Notification of Continuing Obligations and Residual Contamination* (Beazer, June 2014) to the property owner (TRP) and a *GIS Registry Submittal* (Beazer, August 2015) to WDNR to preclude any disturbance of the features of the final remedy (surface covers and engineered liner system) at the Site. This notification and submittal (through the Wisconsin Remediation and Redevelopment Database [WRRD]) provide a mechanism for notifying the current property owner and any potential purchaser of the property of the following:

- The presence of impacted soil and groundwater at the Site;
- Future use restrictions (the future use of the property is restricted to industrial use);
- Well construction restrictions (the construction of a water well without prior WDNR approval is prohibited); and
- Soil excavation procedures (the notification and submittal specify the procedures to manage soils that may be excavated or disturbed as a result of site activities such as minor repair activities).

4.8 LONG-TERM CARE COST ESTIMATE AND FINANCIAL ASSURANCE

The most recent long-term care cost estimate for the Site is provided in Appendix H. Financial assurance will be maintained for 40 years for long-term care of the closed RCRA-regulated unit and onsite corrective action components. Beazer reserves the right to provide a justification for a shorter time period should conditions allow. The most recent financial assurance documentation provided by Beazer is included in Appendix I.

5.0 GROUNDWATER ASSESSMENT INFORMATION

This section provides a summary of groundwater quality as determined via implementation of groundwater monitoring regulated under WDNR License No. 03157. The information presented in this section satisfies the additional information requirements regarding groundwater protection pursuant to NR 670.014(3).

5.1 GEOLOGY AND HYDROGEOLOGY

A discussion of Site geology and hydrogeology, including identification of upper and lower zones of the monitored groundwater, and groundwater flow characteristics, was provided in Section 2.2.2 of this Application.

5.2 CONSTITUENTS OF INTEREST IN GROUNDWATER

The current groundwater monitoring program at the Site requires the analysis of VOCs and SVOCs at a semi-annual frequency and dioxins and furans at an annual frequency for select upgradient (background), side-gradient, and downgradient monitoring wells.

5.3 GROUNDWATER QUALITY DATA

A copy of all groundwater monitoring data collected since October 2002 (the first groundwater monitoring event under the WDNR-approved SAP) is provided as Appendix J. The results of the most recent semi-annual/annual sampling event (conducted in April 2021) are summarized in the following subsections.

5.3.1 Current Groundwater Monitoring Program

The current groundwater monitoring program is conducted in accordance with the SAP (The RETEC Group, Inc., April 2002; Appendix N~~M~~) requirements (and subsequent well network modifications; Appendix M) and consists of the following activities:

- Inspection and maintenance of all monitoring wells used in any routine monitoring activity;
- Semi-annual gauging and inspection of thirty-seven (37) wells (W-02C, W-04AR2, W-05CR, W-06A, W-06C, W-08A, W-09C, W-10AR2, W-11A, W-12A, W-12CR, W-14A, W-14B, W-16AR, W-18D, W-19A, W-19C, W-20AR, W-21A, W-21B, W-25A, W-26A, W-26B, W-28C, W-29A, W-30A, W-30C, W-31C, W-32C, W-33D, W-34D, W-35A, W-36A, W-37A, W-38A, W-39A, and W-40A);
- Semi-annual sampling of two (2) upgradient (background) monitoring wells (W-04AR2 and W-28C) and seven (7) side-gradient or downgradient

monitoring wells (W-06A, W-06C, W-10AR2, W-12A, W-12CR, W-30A, and W-30C) for VOCs and SVOCs;

- Annual sampling of two (2) upgradient (background) monitoring wells (W-04AR2 and W-28C) and seven (7) side-gradient or downgradient monitoring wells (W-06A, W-06C, W-10AR2, W-12A, W-12CR, W-30A, and W-30C) for dioxins and furans; and

Installation records for wells in the groundwater monitoring network are provided as Appendix K. The most recent semi-annual / annual groundwater monitoring event was conducted in April 2021. A brief discussion of the results of the most recent groundwater monitoring event follows.

5.3.2 April 2021 Groundwater Sampling/Analysis Results

In accordance with the current requirements, groundwater samples collected during the April 2021 monitoring event were analyzed for VOCs, SVOCs, and dioxins/furans. Analytical data summaries from the April 2021 groundwater monitoring event are presented in Table 5-1. The April 20201 analytical data were compared to the WDNR Preventative Action Limits (PALs), WDNR Enforcement Standards (ESs), and/or USEPA Maximum Contaminant Levels (MCLs). A summary of detected constituents and PAL, ES, and MCL exceedances are summarized in Table 5-2. A brief summary of the April 2021 analytical data is provided in the remainder of this subsection.

5.3.2.1 Volatile Organic Compounds

VOC constituents were detected in samples from two (2) of the nine (9) monitoring wells sampled for VOCs (W-10AR2 and W-30A) during the April 2021 sampling event. At both of these wells benzene was the only VOC constituent detected in excess of a WDNR PAL, WDNR ES and/or the MCL values during the April 2021 sampling event, as summarized on Table 5-2. The results observed during the April 2021 sampling event are consistent with historical results.

5.3.2.2 Semi-Volatile Organic Compounds

The primary SVOC COPCs include polycyclic aromatic hydrocarbons (PAHs) and phenolic compounds. As summarized on Table 5-2, SVOCs were detected in eight (8) of the ten (10) of the groundwater samples collected during the April 2021 sampling event. Three monitoring wells (W-04AR2, W-10AR2, and W-30A) contained low-level, estimated detections of a limited number of PAHs in excess of the WDNR PAL, WDNR ES, and/or MCL values as discussed below. Monitoring well W-04AR2 contained benzo(a)pyrene (0.094 J µg/L), benzo(b)fluoranthene (0.18 J µg/L), and chrysene (0.38 ug/L) above their WDNR PALs of 0.02 µg/L and WDNR ESs of 0.2 µg/L. The sample from monitoring well W-10AR2 contained benzo(b)fluoranthene (0.09 J µg/L), and chrysene (0.16 J µg/L) above their WDNR PALs (0.02 µg/L), but below the WDNR ESs (0.2 µg/L). The sample from monitoring well W-30A contained benzo(a)pyrene (0.11 J µg/L),

benzo(b)fluoranthene (0.16 J µg/L) and chrysene (0.29 J ug/l) above their WDNR PALs and WDNR ESs. The results observed during the April 2021 sampling event are consistent with historical results.

5.3.2.3 Dioxins/Furans

Nine monitoring wells (W-04AR2, W-28C, W-06A, W-06C, W-10AR2, W-12A, W-12CR, W-30A, and W-30C) were sampled and analyzed for dioxin and furan congeners to determine the 2,3,7,8-TCDD toxicity equivalent quotient (TEQ) in April 2021 as part of the annual sampling event. Although dioxin/furan congeners were detected in all nine (9) monitoring wells, the 2,3,7,8-TCDD congener was not detected in any of the nine wells sampled during the April 2021 sampling event. As shown in Table 5-2, the only well with TCDD TEQ values that exceeded the 2,3,7,8-TCDD WDNR PAL (0.000003 ug/l) was W-30A. These results are consistent with historical results.

5.3.3 Data Trends

Figure 5-1 presents graphs of recent and historical groundwater monitoring results at monitoring wells W-10AR2 and W-30A. These wells typically exhibit the highest concentrations and frequency of detection of COPCs among the monitored wells. The constituents selected for trend analysis in Figure 5-1 (benzene, chrysene, naphthalene, and pentachlorophenol) are considered representative of COPCs that have been historically detected above WDNR PALs or ESs and are consistent with the constituents selected for trend evaluation in previous groundwater evaluations.

Using these recent data, along with historical data (dating back to 1999) collected from wells W-10AR2 and W-30A for benzene, chrysene, pentachlorophenol, and naphthalene, a linear regression analysis was completed using a 95% confidence level to evaluate whether a data trend exists at wells W-10AR2 and W-30A. The statistical analyses indicate that the long-term trends in the benzene, chrysene, pentachlorophenol, and naphthalene concentrations in wells W-10AR2 and W-30A are stable or decreasing. Details related to the linear regression analysis are provided in Appendix L.

These findings are consistent with the natural attenuation evaluations reported to the WDNR in the *Groundwater Natural Attenuation Evaluation Report* (BBL, January 2006), the *Summary of Supplemental Groundwater Investigations* (Arcadis, September 2007), and the *Groundwater Natural Attenuation Demonstration Summary Report* (Arcadis, June 2014). Those evaluations documented several lines of evidence indicating the occurrence of natural attenuation of Site COPCs in groundwater at the Site.

5.4 GROUNDWATER MONITORING PROGRAM

There are no proposed revisions to the current groundwater monitoring program (as described in Section 5.3.1) at this time, however; an addendum to the approved SAP (The RETEC Group, Inc., April 2002) has been provided as Appendix M to incorporate groundwater monitoring network modifications that have been made since WNDR-approval of the existing SAP in 2002.

6.0 REFERENCES

Copies of the documents referenced below are provided in Appendix N except as otherwise noted.

AMEC Earth & Environmental, Inc., 2007, *Post-Remediation Human Health Risk Assessment, Koppers Inc. Facility, Superior,* Wisconsin, July 2007. (Appendix N.1).

ARCADIS, Inc. (Arcadis), 2007, *Focused Corrective Measures Study, Koppers Inc. Facility, Superior, Wisconsin,* Revised July 2007. (Appendix N.2).

Arcadis, 2007, *Koppers Inc. Superior, WI Facility – Summary of Supplemental Groundwater Investigations*, September 18, 2007. (Appendix N.3).

Arcadis, 2009, *On-Property Corrective Measures Implementation Design Report, Koppers Inc. Superior, Wisconsin Facility,* December 31, 2009. (Appendix N.4).

Arcadis, 2011, *On-Property Corrective Measures Implementation Construction Documentation Report, Koppers Inc. Facility, Superior, Wisconsin*, September 2011. (Appendix C)

Arcadis, 2011, *Operation and Maintenance Plan On-Property Corrective Measures Implementation, Koppers Inc. Facility, Superior, Wisconsin,* Revised September 2011. (Appendix C).

Arcadis, 2014, *Supplemental Off-Property Investigation Summary Report, Former Koppers Inc. Facility – Superior, WI*, April 2014. (Appendix N.5).

Arcadis, 2014, *Groundwater Natural Attenuation Demonstration Summary Report, Former Koppers Inc. Facility, Superior, Wisconsin,* June 2014. (Appendix N.6).

Arcadis, 2014, *Off-Property Focused Corrective Measures Study, Former Koppers Inc. Facility – Superior,* August 22, 2014. (Appendix N.7).

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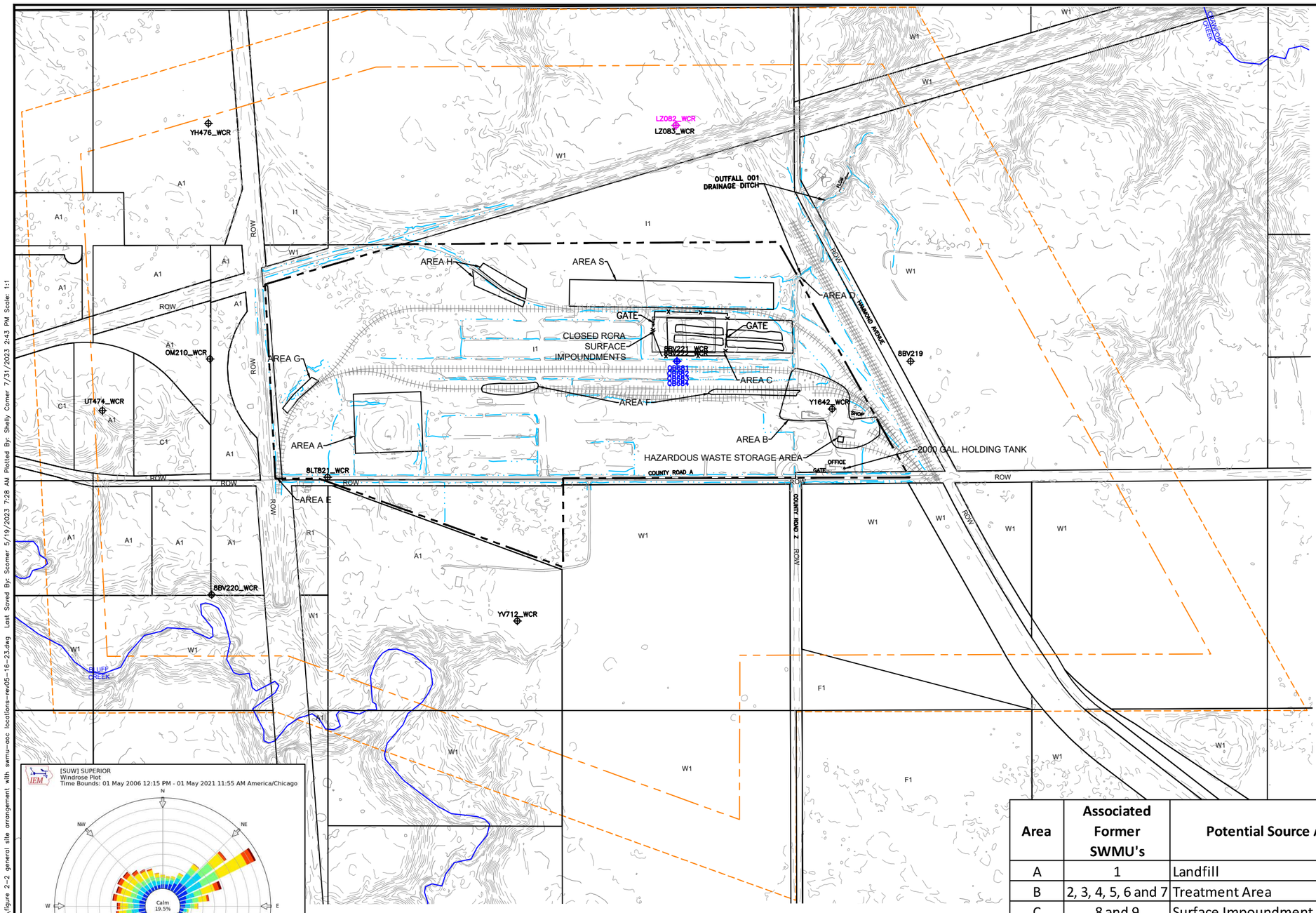
TABLES

FIGURES



N

LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- 1000'BUFFER
- 1/4 MILE BUFFER
- ROAD
- INTERMITTENT STREAM
- DITCH FOR RUN-OFF
- RAILROAD TRACKS
- FENCE
- CONTOURS
- Y1642_WCR — PRIVATE POTABLE WELL (APPROX.)
- Y1642_WCR — NONCOMMUNITY WELL (APPROX.)
- Y1642_WCR — MONITORING WELL (APPROX.)

LAND USE CLASSIFICATION

A1 – AGRICULTURE
C1 – COMMERCIAL
F1 – FORESTRY
I1 – INDUSTRIAL
ROW – RIGHT-OF-WAY
R1 – RESIDENTIAL 1
W1 – RESOURCE CONSERVATION

NOTES:

1. ACCORDING TO THE WISCONSIN DNR, NO INJECTION OR WITHDRAWAL WELLS EXIST ON SITE OR WITHIN 1/4 MILE OF THE SITE BOUNDARY.
2. ACCORDING TO THE DOUGLAS COUNTY PLANNING AND ZONING DEPARTMENT THE SANITARY AND STORM SEWER LINES ARE UNAVAILABLE AS THEY WERE NOT SURVEYED PRIOR TO PERMITTING AND INSTALLING.
3. ACCORDING TO AVAILABLE INFORMATION ALL WELLS, SPRINGS, OTHER SURFACE WATER BODIES, AND DRINKING WATER WELLS LISTED IN PUBLIC RECORDS OR OTHERWISE KNOWN TO THE APPLICANT WITHIN ¼ MILE OF THE SITE PROPERTY BOUNDARY ARE INCLUDED ON THIS FIGURE.

Area	Associated Former SWMU's	Potential Source Area
A	1	Landfill
B	2, 3, 4, 5, 6 and 7	Treatment Area
C	8 and 9	Surface Impoundment
D	10	Outfall No. 001
E	11	Outfall No. 004
F	12, 13, and 14	Drip Track
G	-	Pentachlorophenol Straw Bales
H	-	Lead Track Landfill
S	-	Spray Field

0 600 1200 FEET

REV #	DATE	DESCRIPTION	APPD
1			
2			
3			

REFERENCE:
1. WISCONSIN STATE PLANE NORTH (NAD 83) COORDINATE SYSTEM.
2. WELL INFORMATION OBTAINED FROM WISCONSIN DNR WEBSITE https://dnr.wisconsin.gov/topic/Groundwater/Data.html#wellreports

BEAZER EAST, INC.
PITTSBURGH, PENNSYLVANIA

DRWN: SCC	DATE: 05/18/21	FIELD & TECHNICAL SERVICES, LLC 200 THIRD AVENUE CARNEGIE, PA 15106	
CHKD: RMW	DATE: 05/18/21		
APPD: DRF	DATE: 05/18/21		
SCALE: AS SHOWN			
ISSUE DATE:			

FORMER KOPPERS INC. FACILITY
SUPERIOR, WISCONSIN

GENERAL SITE ARRANGEMENT WITH SWMU/AOC LOCATIONS

PROJECT NO:T0055621-02
DRAWING NUMBER
FIGURE 2-2

APPENDIX A

Part A Permit Application

APPENDIX B

Closure Documentation

APPENDIX C

On-Property Corrective Measures Implementation Construction Completion Report

APPENDIX D

Notice Documentation

APPENDIX E

Historical Groundwater Elevation Tables/Contour Maps

APPENDIX F

Inspection Forms

APPENDIX G

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

REPRESENTS THE CONTINGENCY PLAN REQUIRED BY S. NR 664.0051, WIS. ADM. CODE

Beazer East, Inc. Operations
at the
Former Koppers Inc. Superior Facility
Superior, Wisconsin

Koppers EPA Facility ID No. WID006179493

Prepared for:

Beazer East, Inc.

Prepared by:

Field & Technical Services, LLC
200 Third Avenue
Carnegie, Pennsylvania 15106

December 2009

Revised: ~~**October 2021**~~**June 2023**

APPENDIX H

Post-Closure Care Cost Estimate

Table 1
Cost Estimate for Financial Assurance
Former Koppers Inc. Facility
Superior, Wisconsin

Revision date: 7/30/2023

Activity	Quantity	Unit	Unit Cost	Total Cost
1. RCRA Surface Impoundment Post-Closure Care				
Quarterly Inspection				
Inspector (on-site quarterly inspection of Surface Impoundment completed by local subcontractor, reporting; includes 4 quarterly inspections)	50	hours	$60	$3,000
Expenses ($250-Rental vehicle, $100-fuel, and $25-PPE)	4	lump sum	$375	$1,500
Maintenance				
Mowing (annual mowing of approximately 1.62 acres)	1	lump sum	$1,600	$1,600
Erosion Repairs (minor erosion repairs - fill with purchased topsoil , vegetation control - restore vegetation where necessary)	1	lump sum	$500	$500
Well Repairs (repainting, labeling, well pad reconstruction)	1	lump sum	$550	$550
Semiannual Groundwater Monitoring				
Sample Collection (technician labor and expenses to gauge and inspect 37 wells, sample 9 monitoring wells, and sample 1 voluntary deep well; includes 2 semi-annual events)	110	hours	$60	$6,600
Expenses ($1800-Equipment, $2400-Travel, $300-Supplies per each semi-annual event)	2	lump sum	$4,500	$9,000
Report Preparation (labor and expenses to submit semiannual reports, an annual report, and WDNR data files)	120	hours	$80	$9,600
Laboratory Analysis, first semiannual analysis (includes VOCs plus naphthalene, 14 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD, Trip and Field Blanks] x $55/sample; SVOCs less naphthalene, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $210/sample; Dioxins and furans, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $575/sample)	1	lump sum	$10,190	$10,190
Laboratory Analysis, second semiannual analysis (includes VOCs plus naphthalene, 14 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD, Trip and Field Blanks] x $55/sample; SVOCs less naphthalene, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $210/sample)	1	lump sum	$3,290	$3,290
Waste Management/Disposal/Reporting (annual reporting in accordance with NR 665.0075 (3 hours x $120), procurement, semi-annual coordination and scheduling of waste haulers (5 hours/event x $120), recertifying of waste profiles (2 hours x $120) and 2 drums x $100	1	lump sum	$2,000	$2,000
Project Management/Administration	4	hours	$125	$500
			Subtotal:	$48,330
			Contingency (10%):	$4,833
			Yearly Total:	**$53,200**
			30 Year Total:	**$1,596,000**
2. On-Property Corrective Measures Inspection/Monitoring/Maintenance				
Annual Inspection/Monitoring/Reporting				
Environmental Professional (annual report preparation)	8	hours	$95	$760
Field Technician (on-site inspection of 8 surface covers and the engineered liner system in the Outfall 001 ditch, monitoring of 2 drainage ditch sumps)	8	hours	$60	$480
Expenses ($250-Rental vehicle, $100-fuel, $125-per diem, and $25-PPE)	1	lump sum	$500	$500
Erosion Repairs minor erosion repairs - fill with purchased topsoil , vegetation control -	1	lump sum	$200	$200
Project Management/Administration	4	hours	$125	$500
			Subtotal:	$2,440
			Contingency (10%):	$244
			Yearly Total:	**$2,700**
			30 Year Total:	**$81,000**
3. Off-Property Corrective Actions				
Indirect	0.5	lump sum	$1,110,200	$555,100
Construction	0.5	lump sum	$5,977,517	$2,988,758
Material Disposal	0.5	lump sum	$622,145	$311,073
Operation and Maintenance	1	lump sum	$358,754	$358,754
			Total:	**$4,213,700**
Total Estimated Costs for Financial Assurance: Task 1 (30 years) + Task 2 (30 years) + Task 3				**$5,890,700**

Notes:
1. Costs for Tasks 1 and 2 are based on actual costing from the Operation and Maintenance Contractor, in 2022 dollars, and applied to an assumed 30 year period. Inflation will be accounted for in annual cost estimate updates.
2. Costs for Task 3 are based on cost estimates for Alternatives A-2, B-1, and C-2 from the 2014 Focused Corrective Measures Study (FCMS). The 2014 FCMS costs estimates have been increased by 22% to adjust for inflation from 2014 to 2022 (based on the U.S. Bureau of Labor Statistics Consumer Price Index Inflation Calculator). In addition, the 2014 unit pricing for Material Disposal ($575/ton; assumed listed hazardous waste) was updated to $78/ton (assumed non-hazardous waste disposed of in a Subtitle D landfill; average pricing from 2020-2021 quotes). It is assumed that Beazer will be responsible for 50% of the off-property corrective action costs (except Operation and Maintenance, which Beazer will be 100% responsible for) as part of a Great Lakes Legacy Act project.

APPENDIX I

Financial Assurance Documentation

APPENDIX J

Analytical Data

APPENDIX K

Groundwater Monitoring Well Logs

APPENDIX L

Linear Regression Analysis

APPENDIX M

Groundwater Sampling and Analysis Plan

APPENDIX N

Reference Documents

Attachment 2

853678

Document Number

POST-CLOSING ACCESS EASEMENT

Document Title

DOCUMENT# 853678
Recorded or Filed on
September 20, 2012 1:35 PM
GAYLE I. WAHNER
DOUGLAS COUNTY RECORDER
SUPERIOR, WI 54880-2769
Fee Amount: $30.00
Total Pages 12

This POST-CLOSING ACCESS EASEMENT ("this **Easement**") is entered into as of September 19, 2012 (the "**Effective Date**"), by and between KOPPERS INC., a Pennsylvania corporation ("**Seller**") and TRP PROPERTIES, LLC, a Nebraska limited liability company ("**Purchaser**"), each of which (with all of their permitted successors and assigns, if any) shall be known for purposes of this Easement as a "**Party**," and both of which together (with all of their permitted successors and assigns) shall be known for purposes of this Easement as the "**Parties**."

Recording Area

Name and Return Address

TRP Properties, LLC
Terry R. Peterson
8202 F Street
Omaha, NE 68127

DCA30ck

See Attachment 1

Parcel Identification Number (PIN)

Recitals

A. Pursuant to that certain Purchase Agreement dated as of September 7th, 2012, (the "**Purchase Agreement**"), Seller sold to Purchaser (the "**Conveyance**") all of its right, title and interest in and to that certain real property located in the Township of Superior, Douglas County, State of Wisconsin, which real property is more particularly described on Attachment 1 attached hereto (the "**Real Property**").

B. Prior to the Conveyance, wood products were treated and stored on portions of the Real Property over its history, using various preservative solutions that contained petroleum, coal-tar derivatives and/or inorganic preservatives. Prior owners/operators of the Real Property include, but are not limited to, Beazer East, Inc., a Delaware corporation ("**Beazer**") and Seller. Seller began its operations on the Real Property on December 29, 1988. Beazer conducted operations on the Real Property prior to December 29, 1988. Seller ceased wood treating operations on the Real Property in 2006.

C. Certain environmental conditions exist at the Real Property (including the presence of contaminated soils and groundwater) as a result of the wood-treating operations that were conducted on the Real Property prior to the Conveyance (the "**Environmental Conditions**").

D. Under the oversight of the Wisconsin Department of Natural Resources ("**WDNR**"), both Seller and Beazer have conducted certain environmental investigation and remediation activities on the Real Property in response to certain of the Environmental Conditions. Purchaser acknowledges (i) that the Real Property is subject to Wisconsin Hazardous Waste Facility Operation License 03157 (the "**License**"); (ii) that the environmental investigation and remediation activities previously implemented included, among other things, the onsite consolidation of contaminated soils and the construction of covers and engineered liner on certain portions of the Real Property; (iii) that WDNR has issued a conditional approval

of certain of the environmental remediation measures previously implemented on the Real Property (the "**Conditional Approval**"); (iv) that WDNR's Conditional Approval requires certain operation and maintenance activities on the Real Property; and (v) that, in relation to the License and to certain other environmental laws and regulations, certain remaining environmental investigations and remediation activities be implemented at the Real Property, and that other long term care obligations be undertaken at the Real Property, among which are the continuing monitoring of groundwater and the issuance of a Continuing Obligations Letter that will impose use restrictions and care obligations on portions of the Real Property.

E. Collectively, the remaining activities necessary to address Environmental Conditions at the Real Property (including, without limitation, those arising out of the License, the Conditional Approval, the Continuing Obligations Letter, and the long term care obligations) are referred to as the "**Environmental Obligations**."

F. As set forth in the Purchase Agreement, Purchaser has agreed to grant Seller and Beazer (together with their respective employees, agents, consultants, contractors, designated representatives, successors, and assigns) access to the Real Property to complete and satisfy any Environmental Obligations that are the responsibility of Seller or Beazer, respectively.

NOW, THEREFORE, in consideration of the foregoing premises, and consummation of the sale of the Real Property, the Parties agree as follows:

1. Purchaser hereby grants, for the benefit of Seller and Beazer (including their respective employees, consultants, agents, contractors and/or designated representatives) (altogether, the "**Grantees**"), and without additional compensation or consideration of any kind, the following easement of record: a non-exclusive right of access to (and from) the Real Property (including without limitation the right to conduct visual inspections, collect samples of soils or groundwater, install additional monitoring wells and to bring equipment and personnel onto the Real Property in connection with such activities), at any reasonable time, with prior notice to Purchaser, for the purpose of performing the Environmental Obligations and such other activities as WDNR (or other regulatory authority) may require with respect to the Environmental Conditions. Purchaser shall be provided with notice that would be sufficient to allow Purchaser, or its designated representative, to be present on the Real Property at any time that either Seller or Beazer is on the Real Property pursuant to the grant under this Section 1.

2. Purchaser hereby further grants, for the benefit of the Grantees, and without additional compensation or consideration of any kind, the following easements of record:

a. The exclusive right to locate at, under, upon, or across the Property, within the two (2) locations indicated by the outlined and crosshatched areas denominated "Possible CAMU location" on Attachment 2 (each, a "**CAMU Restricted Area**"), such structures, improvements, or means as may be desired by the Grantees to enable the pertinent areas to be used as permitted under Paragraph 2.b, below; and

b. The exclusive right to use each CAMU Restricted Area (together with reasonable paths of access to (and from) the same from (and to) public rights-of-way abutting the Real Property) for such activities as may be necessary or desirable to

complete any consolidation of soils and sediments approved by WDNR (or other applicable regulatory authority).

In exercising the exclusive rights granted by this Paragraph 2, neither Grantee may use any CAMU Restricted Area in any way (including in manner, frequency, or intensity) that exceeds what shall be reasonably necessary to accomplish the pertinent consolidation of soils and sediments excavated or removed in connection with WDNR- or USEPA-required remediation of contamination resulting from, or alleged to have resulted from, past industrial or manufacturing activities conducted at the Real Property, whether or not such soils or sediments are physically located on the Real Property at the time of excavation or removal. In addition, the exclusive rights granted by this Paragraph 2 to so locate improvements within and to use the CAMU Restricted Areas shall require, as an expressed condition precedent to such rights, that Seller deliver to Buyer, within five (5) years after the Effective Date of this Easement (the period between the Effective Date of this Easement and the expiration of such five (5) year period being referred to as the "**Notice Period**"), one or more written notices (i) stating that one, or both, of the indicated CAMU Restricted Areas shall be used as provided hereunder, and (ii) if only one, indicating which of the CAMU Restricted Areas shall be so used. If Seller shall not timely deliver any required notice within the Notice Period, then the grant of exclusive rights under this Paragraph 2 shall immediately lapse and be of no further force or effect; if Seller shall indicate, by its notice(s) delivered within the Notice Period, that only one of the CAMU Restricted Areas shall be so used, then the grant of exclusive rights under this Paragraph 2 as to the CAMU Restricted Area not so indicated shall immediately lapse upon expiration of the Notice Period, and shall thereafter be of no further force or effect;

3. So long as Purchaser shall not interfere with or act (or fail to act) in any manner inconsistent with full enjoyment by the Grantees of the easement rights granted under Paragraphs 1 and 2, Purchaser shall retain all rights in the Real Property. Purchaser shall, however, indemnify, defend, and hold harmless Seller from and against all liabilities, claims, demands, and expenses that may arise (whether suffered by Seller, Beazer, or another) in connection with Purchaser's interfering with or acting (or failing to act) in any manner inconsistent with full enjoyment by the Grantees of the easement rights granted under Paragraphs 1 and 2, except only to the extent that such interference or inconsistency shall be caused by Seller's own negligent or intentionally wrongful act.

4. Except to the extent caused by Purchaser's breach of a covenant or obligation under this Easement, Seller shall indemnify, defend, and hold harmless Purchaser from and against all liabilities and expenses in connection with a governmental or third party claim arising out of the presence of Hazardous Materials in soils or sediments which may be placed in the CAMU Restricted Areas.

5. The term of this Easement shall commence on the Effective Date and expire upon the completion of the Environmental Obligations, which may not occur for forty (40) or more years.

6. The Parties shall cooperate with one another in connection with their respective obligations under this Easement in order to minimize interruption of the Purchaser's business operations on the Real Property; provided, however, Purchaser shall not unreasonably disturb or

interfere with Seller or Beazer, or their respective employees, consultants, agents, contractors and/or designated representatives, in connection with the performance of the Environmental Obligations. Purchaser shall exercise reasonable care to avoid damage to any monitoring wells or other equipment brought on the Real Property in connection with the Environmental Obligations.

7. The covenants contained in and the easement established under this Easement shall bind and inure to the benefit of: all fee simple absolute titleholders of the Real Property (including any portion thereof); Beazer (including its employees, consultants, agents, contractors and/or designated representatives); Seller (including its employees, consultants, agents, contractors and/or designated representatives); and all of the respective successors and assigns of Beazer, Seller, and all fee simple absolute titleholders of the Real Property (including any portion thereof). Such covenants contained in and the easement established under this Easement thus shall constitute covenants that run with the Real Property; and may be amended, modified, or terminated only by the written agreement of all of the following: (i) all parties holding (at the time of such amendment, modification, or termination) fee simple absolute title to any part of the Real Property; and (ii) Seller (its successors and assigns).

8. Together with the Purchase Agreement, the terms and conditions hereof constitute the entire agreement between the Parties with respect to the subject matter hereof and shall supersede all previous communications, whether oral or written, between the Parties.

9. Any notices to be provided under this Easement shall be given in accordance with the applicable provisions of the Purchase Agreement.

10. This Easement shall be governed by and construed under the laws of the State of Wisconsin.

11. No waiver by any Party with respect to performance or satisfaction of any covenant, condition, or obligation arising under this Easement shall be valid unless in writing, and the same shall not be considered a waiver by such Party of the same or any other covenant, condition, or obligation hereunder or of any other untimely performance of the covenant, condition, or obligation so waived.

12. This Easement may be executed in multiple counterparts, each of which shall be deemed an original, and all of which together shall constitute one and the same instrument.

13. The execution and delivery of this Easement by each of the Parties to it has been duly authorized by all necessary action, respectively, of such Parties. Accordingly, this Easement constitutes a valid and binding obligation of each of the Parties, in accordance with its terms. None of the execution, delivery, or performance of any Party's respective obligations under this Easement will violate or conflict with any other agreement by which such Party, respectively, is bound.

14. As used in this Easement, the following terms shall have the indicated meanings:

a. "Environmental Laws" means any present and future federal, state and local laws, statutes, ordinances, rules, regulations and the like, as well as common law, relating to protection of human health or the environment, relating to Hazardous Materials, relating to

liability for or costs of Remediation or prevention of releases of Hazardous Materials or relating to liability for or costs of other actual or threatened danger to human health or the environment. "Environmental Law" includes, but is not limited to, the following statutes, as amended, any successor thereto, and any regulations promulgated pursuant thereto, and any state or local statutes, ordinances, rules, regulations and the like addressing similar issues: the Comprehensive Environmental Response, Compensation and Liability Act; the Emergency Planning and Community Right-to-Know Act; the Hazardous Materials Transportation Act; the Resource Conservation and Recovery Act; the Solid Waste Disposal Act; the Clean Water Act; the Clean Air Act; the Toxic Substances Control Act; the Safe Drinking Water Act; the Occupational Safety and Health Act; the Federal Water Pollution Control Act; the Federal Insecticide, Fungicide and Rodenticide Act; the Endangered Species Act, and the National Environmental Policy Act.

b. "Hazardous Materials" includes any and all substances (whether solid, liquid or gas) defined, listed, or otherwise classified as pollutants, hazardous wastes, hazardous substances, hazardous materials, extremely hazardous wastes, or words of similar meaning or regulatory effect under any present or future Environmental Laws or that may have a negative impact on human health or the environment, including, but not limited to, petroleum and petroleum products, asbestos and asbestos-containing materials, polychlorinated biphenyls, lead, radon, radioactive materials, flammables and explosives.

c. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, dumping, or disposing of Hazardous Materials.

d. "Remediation" includes any response, remedial, removal, or corrective action; any activity to clean up, detoxify, decontaminate, contain or otherwise remediate any Hazardous Materials; any actions to prevent, cure or mitigate any Release of any Hazardous Materials; any action to comply with any Environmental Laws or with any permits issued pursuant thereto; any inspection, investigation, study, monitoring, assessment, audit, sampling and testing, laboratory or other analysis, or evaluation relating to any Hazardous Materials.

[Signatures begin on the following page]

IN WITNESS WHEREOF, each of the Parties has executed this Easement as of the date first above written.

SELLER:
KOPPERS INC.

By: _____
Name: Steven R. Lacy
Its: Senior VP, General Counsel & Secretary

STATE OF PENNSYLVANIA)
) ss
ALLEGHENY COUNTY)

Personally came before me on the 14th day of September, 2012, the above-named Steven R. Lacy, the Senior VP, General Counsel & Secretary of KOPPERS INC., to me known to be the person who executed the foregoing instrument in such capacity, and acknowledged the same.

_____
Print Name: JANET L. SHAFFER
Notary Public, State of Pennsylvania
My Commission (is permanent) (expires _____)

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Janet L. Shaffer, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Nov. 5, 2013
Member, Pennsylvania Association of Notaries

[Signatures continue on following page]

853678

PURCHASER:
TRP PROPERTIES, LLC

By: _____
Name: Terry R. Peterson
Its: Manager Member

STATE OF NEBRASKA)
)
DOUGLAS COUNTY)

Personally came before me on the 14th day of September, 2012, the above-named Terry R. Peterson, the Manager Member of TRP PROPERTIES, LLC, to me known to be the person who executed the foregoing instrument in such capacity, and acknowledged the same.

_____
Print Name: Lisa A. Mutlu
Notary Public, State of Nebraska
My Commission (is permanent) (expires 7/22/16)

GENERAL NOTARY-State of Nebraska
LISA A. MUTLU
My Comm. Exp. July 22, 2016

This instrument drafted by:

Michael J. Ostermeyer
Quarles & Brady LLP

ATTACHMENT 1

LEGAL DESCRIPTION OF REAL PROPERTY

All those certain tracts of or parcels of land situate, lying and being in the County of Douglas, State of Wisconsin, to wit:

PARCEL NO. 1.

Part of the SE-SW of Section 12, Township 48 North, Range 14 West, Town of Superior, lying southeasterly of the right of way of the Burlington Northern Railroad, described as follows:

Commencing at the south one-quarter (S. 1/4) corner of said section 12 which is marked with a railroad spike driven into the bituminous surface; thence N. 00 degrees 43 minutes 16 seconds E. along the east line of said SE-SW for a distance of 644.57' to the southerly right of way line of the Burlington Northern Railway Company; thence S. 61 degrees 44 minutes 00 seconds W. along said right of way line for a distance of 1317.58' to the south line of said Section 12; thence S. 88 degrees 58 minutes 44 seconds E. along the south line of said section 12 for a distance of 1152.54' to the place of beginning.

Above described parcel contains 8.53 acres more or less.

PARCEL NO. 2.

All of the east one half (E. 1/2) of the northwest (NW) one quarter of Section 13, Township 48 North, Range 14 West, Town of Superior, described as follows:

Commencing at the north one quarter (N. 1/4) corner of said Section 13 which is marked with a railroad spike driven into the bituminous surface; thence N. 88 degrees 58 minutes 44 seconds W. along the north line of said Section 13 for a distance of 1331.50' to the northwest (NW) corner of the NE-NW; thence S. 00 degrees 24 minutes 58 seconds W. along the west line of said NE-NW for a distance of 1312.98' to the southwest (SW) corner of the NE-NW; thence continuing S. 00 degrees 24 minutes 58 seconds W. along the west line of the SE-NW for a distance of 914.85' to the easterly right of way of the the Soo Line Railroad; thence S. 15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 436.07'to the South line of the SE-NW; thence S. 89 degrees 07 minutes 30 seconds E. along the south line of said SE-NW for a distance of 1320.00 to the southeast (SE) corner of said SE-NW; thence N. 00 degrees 40 minutes 00 seconds E. along the east line of said SE-NW for a distance of 1311.26' to the northeast corner of said SE-NW; thence continuing N. 00 degrees 40 minutes 00 seconds E. along the east line of the NE-NW for a distance of 1311.26' to the place of beginning.

Above described parcel contains 79.23 acres more or less.

PARCEL NO. 3

All that part of the SW-NE of Section 13, Township 48 North, Range 14 West, Town of Superior, lying westerly of what was formerly the easterly line of the right of way of the Northwestern Coal Company, described as follows:

Commencing at the center 1/4 (C.1/4) corner of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence S. 89 degrees 07 minutes 30 seconds E. 33.00' to the east right of way line of C.T.H. "A"; thence N. 00 degrees 40 minutes 00 seconds E. along the east right of way line of C.T.H. "A" for a distance of 24.33' to the easterly right of way line of the Northwestern Coal Railway Company and the place of beginning; thence N. 00 degrees 40 minutes 00 seconds E. along the right of way of C.T.H. "A" for a distance of 1286.89' to the north line of said SW-NE; thence S. 89 degrees 03 minutes 06 seconds E. along the north line of said SW-NE 468.12' to the easterly right of way line of the Northwestern Coal Company; thence S. 20 degrees 41 minutes 20 seconds W. along said right of way for a distance of 1367.22' to the place of beginning.

Above described parcel contains 7.91 acres more or less.

PARCEL NO. 4

All those parts or parcels of the N. 1/2 of the NE-SW of Section 13, Township 48 North, Range 14 West, Town of Superior, described as follows:

Commencing at the center one quarter corner (C. 1/4) of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence N. 89 degrees 07 minutes 30 seconds W. along the north line of said NE-SW for a distance of 1196.83' to the easterly right of way line of the Soo Line Railway; thence S. 15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 383.26' to the northerly right of way line of the Duluth, Missabe & Iron Range Railway, thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 1092.53' to the east line of said NE-SW; thence N. 00 degrees 40 minutes 00 seconds E. along said east line for a distance of 283.77' to the place of beginning.

Above described parcel contains 8.56 acres more or less.

AND

Commencing at the center one quarter corner of said Section 13; thence N. 89 degrees 07 minutes 30 seconds W along the north line of said NE-SW for a distance of 1196.83' to the easterly right of way line of the Soo Line Rail Road; thence continuing N. 89 degrees 07 minutes 30 seconds W. for a distance of 104.29' to the westerly line of the Soo Line Railroad and the place of beginning; thence continuing N. 89 degrees 07 minutes 30 seconds W. for a distance of 18.88' to the northwest corner (NW) of said NE-SW; thence S. 00 degrees 47 minutes 59 seconds W. along the west line of said NE-SW for a distance of 385.86' to the northerly right of way line of the Duluth, Missabe & Iron Range Railway; thence N. 86 degrees 20 minutes 30" E. along said right of way for a distance of 129.92' to the westerly right of way line of the Soo Line Railroad; thence N. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 391.68' to the place of beginning.

Above described parcel contains 0.65 acres more or less.

AND

Commencing at the center one quarter corner of said section 13; thence S. 00 degrees 40 minutes 00 seconds W. along the west line of said NE-SW for a distance of 662.25' to the south line of said N. 1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along said south line of said N.1/2- NE-SW for a distance of 1003.27' to the easterly right of way line of the Soo Line Railroad; thence N. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 205.21' to the southerly right of way line of the Duluth, Missabe & Iron Range Railroad

;thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 1063.80' to the east line of said NE-SW; thence S.00 degrees 40 minutes 00 seconds W. along said east line for a distance of 280.81' to the place of beginning. Above described parcel contains 9.90 acres more or less.

AND

Commencing at the center one quarter corner of said section 13 thence S. 00 degrees 40 minutes 00 seconds W. along the north-south quarter line for a distance of 662.25' to the south line of said N.1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along the south line of the N. 1/2 of the NE-SW for a distance of 1003.27' to the easterly right of way line of the Soo Line Railroad ; thence continuing N. 89 degrees 07 minutes 42 seconds, W. along the south line of said N.1/2-NE-SW for a distance of 104.29' to the westerly right of way line of the Soo Line Railroad and the place of beginning; thence continuing N. 89 degrees 07 minutes 42 seconds W. along the south line of said N.1/2-NE-SW for a distance of 213.98' to the west line of said NE-SW; thence N. 00 degrees 47 minutes 59 seconds E. along said west line for a distance of 176.16' to the south right of way line of the Duluth Missabe & Iron Range Railroad; thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 158.88' to the westerly right of way line of the Soo Line Railroad; thence S. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 196.79' to the place of beginning. Above described parcel contains 0.78 acres more or less.

PARCEL NO. 5

Part of the S. 1/2 of the NE-SW of Section 13, Township 48 North, Range 14 West described as follows, to wit:

Commencing at the center one quarter corner (C. 1/4) of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence S. 00 degrees 40 minutes 00 seconds W. along the north-south one quarter line for distance of 662.25' to the north east corner (NE) of said S. 1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along said north line for a distance of 411.53' to the place of beginning; thence continuing N. 89 degrees 07 minutes 42 seconds W. for a distance of 591.74' to the easterly right of way line of the Soo Line Railroad; thence S.15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 895.88' to the south line of said NE-SW; thence S. 89 degrees 07 minutes 54 seconds E. along said south line for a distance of 35.77' to a point on a 8 degree 36 minute 04 second degree curve concave northwesterly; (long chord is 513.94' and bears N. 27 degrees 12 minutes 28 seconds E.); thence along the arc of said curve for a distance of 527.11'; thence N. 49 degrees 52 minutes 33 seconds E. for a distance of 307.45' to the north line of the S.1/2-NE-SW and the place of beginning.

Above described parcel is also identified as parcels D and E respectively, on plat annexed to deed to National Lumber & Cresoting Company dated March 12,1928, recorded in the office of the Register of Deeds for said Douglas County, in Book 171 of Deeds on page 208.

Above described parcel contains 3.27 acres more or less.

Being the same property as that described in the survey dated July 19-23, 1988, prepared by Hugh C. McDonald.

EXCEPTING THEREFROM, that part of the above-described Parcel No. 4 described as follows:

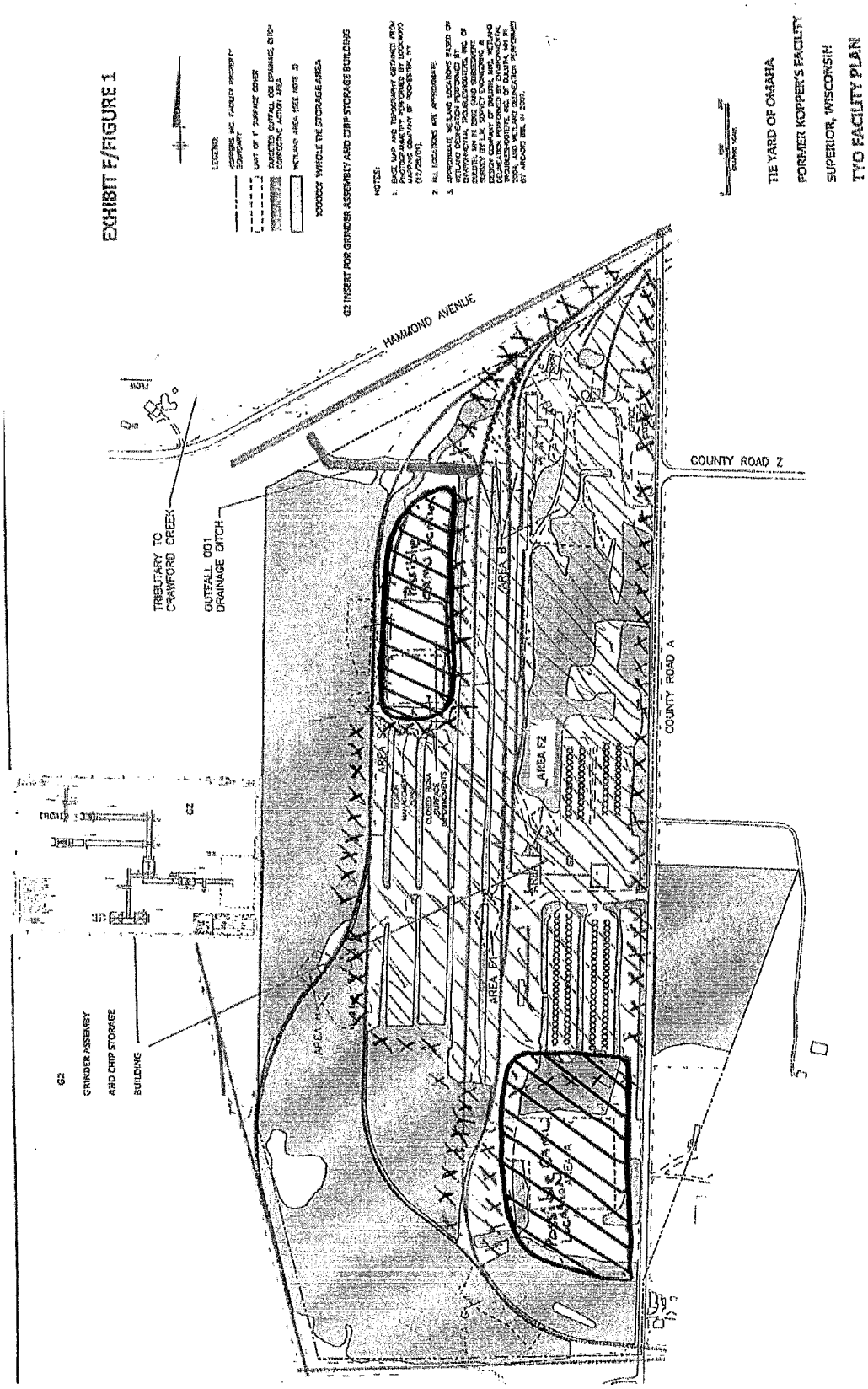
That certain parcel of land situated in the North One-half of the Northeast Quarter of the Southwest Quarter (N 1/2 of NE 1/4 of SW 1/4) of Section Thirteen (13), Township Forty-eight (48) North, Range Fourteen (14) West, in the Town of Superior, in Douglas County, Wisconsin, which is situated between the Southerly boundary line of the 100 foot right of way of the Interstate Branch of the Duluth, Missabe and Iron Range Railway Company and the Northerly boundary line of the right of way, heretofore conveyed by Herman Gasser and J. Lillie Gasser, his wife, to the Northwestern Coal Railway Company, by that certain Deed dated August 22, 1907 and recorded on September 16, 1907 at 9:00 a.m., in Volume 99 of Deeds, page 538, as Document #166118A.

Parcel Identification Numbers:

T5-030-01340-00;
T5-030-01353-00;
T5-030-01356-00;
T5-030-01360-00; and
T5-030-01361-00

853678

ATTACHMENT 2
DEPICTION OF CAMU RESTRICTED AREAS



Attachment 3

Beazer

BEAZER EAST, INC. C/O THREE RIVERS MANAGEMENT, INC.
MANOR OAK ONE, SUITE 200, 1910 COCHRAN ROAD, PITTSBURGH, PA 15220

June 16, 2014

Mr. Terry Peterson
TRP Properties LLC
8202 F. Street
Omaha, NE 68127

Re: Superior, WI Facility
Notification of Continuing Obligations and Residual Contamination

Dear Mr. Peterson:

As you are aware, in July 2011, Beazer East, Inc. (Beazer) completed implementation of corrective actions at the former Koppers Inc. (KI) Facility property in Superior, Wisconsin (i.e., the on-property portion of the Site[1]) that was purchased by TRP Properties, LLC (TRP) in September 2012. Corrective actions included the construction of surface covers in various areas and installation of an engineered liner in a portion of the Outfall 001 drainage ditch.

As indicated in the Wisconsin Department of Natural Resources' (WDNR's) October 21, 2011 conditional approval of the *On-Property Corrective Measures Implementation Construction Documentation Report* (ARCADIS, 2011), "the remedial actions for this site will result in continuing obligations on the property," including "requirements that the property remain in industrial use, that the surface covers and engineered liner system are not disturbed into the future, and that construction of a water well would need prior Department approval." WDNR's letter also requires "notification of the current property owner of continuing obligations, and submittal of an acceptable package for recording the continuing obligations on the Department's geographic information systems (GIS) Registry." Beazer is submitting this notification to TRP as required by WDNR's October 21, 2011 conditional approval letter, and in accordance with the requirements set forth in s. 292.12, Wis. Stats.

Enclosed is a completed WDNR Form 4400-296 (Notification of Continuing Obligations and Residual Contamination), and applicable attachments.

Please contact Jane Patarcity (412-208-8813) should you have any questions regarding this notification.

Sincerely,

Robert S. Markwell
President and General Manager
Three Rivers Management, Inc. (Agent for Beazer East, Inc. and others)

[1] The "Site" includes the former KI Facility property and affected downgradient areas. This letter and attachments specifically addresses the on-property portion of the Site (i.e., the portion of the Site located within the former KI property boundaries).

Writer's Direct Dial: 412/208-8812

cc:
Jane Patarcity, Beazer
Chris Saari, WDNR
Linda Paul, KI
David Bessingpas, ARCADIS

Enclosures:

WDNR Form 4400-296 (Notification of Continuing Obligations and Residual Contamination) and applicable attachments

Include this completed page as an attachment with all notifications provided under sections A and B.

Contact Information

Responsible Party: **The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:**

Responsible Party Name Beazer East, Inc. (Beazer)

Contact Person Last Name	First	MI	Phone Number (include area code)
Patarcity	Jane		(412) 208-8813

Address	City	State	ZIP Code
Manor Oak One, Suite 200, 1910 Cochran Road	Pittsburgh	PA	15220

E-mail jane.patarcity@trmi.biz

Name of Party Receiving Notification:

Title	Last Name	First	MI	Phone Number (include area code)
Mr.	Peterson	Terry		(402) 339-0332

Address	City	State	ZIP Code
TRP Properties LLC, 8202 F Street	Omaha	NE	68127

Site Name and Source Property Information:

Site (Activity) Name Former Koppers Inc. Facility

Address	City	State	ZIP Code
3185 South County Road A	Superior	WI	54880

DNR ID # (BRRTS#)	(DATCP) ID #
02-16-000484	

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: ARCADIS U.S., Inc.

Contact Person Last Name	First	MI	Phone Number (include area code)
Bessingpas	David		(218) 829-4607

Address	City	State	ZIP Code
6602 Excelsior Road	Baxter	MN	56425

E-mail david.bessingpas@arcadis-us.com

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address	City	State	ZIP Code
2501 Golf Course Rd	Ashland	WI	54806

Contact Person Last Name	First	MI	Phone Number (include area code)
Saari	Christopher		(715) 685-2920

E-mail (Firstname.Lastname@wisconsin.gov) christopher.saari@wisconsin.gov

The affected property is:

- (●) the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
- ( ) a deeded property affected by contamination from the source property
- ( ) a right-of-way (ROW)
- ( ) a Department of Transportation (DOT) ROW

Section A: Deeded Property Notification: Residual Contamination and/or Continuing Obligations

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

TRP Properties LLC
8202 F Street
Omaha, NE 68127

Dear Mr. Peterson:

I am providing this letter to inform you of the location and extent of contamination remaining on your property, and of certain long-term responsibilities (continuing obligations) for which you may become responsible. I have investigated a release of constituents from historic wood-treating operations at the Former Koppers Inc. Facility located at 3185 S County Road A, Superior, WI, 54880 that has shown that contamination remains on this source property. I have conducted a cleanup; however, the Department of Natural Resources (DNR)'s final approval of that cleanup is conditioned upon notification of the property owner regarding continuing obligations and recording the continuing obligations on the DNR's GIS Registry.

You have 30 days to comment on the attached legal description of your property and on the continuing obligations proposed herein.

Please review the enclosed legal description of your property, and notify David Bessingpas at 6602 Excelsior Road, Baxter, MN, 56425 within the next 30 days if the legal description is incorrect.

The DNR will not review my GIS Registry submittal for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR to provide any technical information that you may have regarding this Notification of Continuing Obligations and Residual Contamination. If you would like to submit any information that is relevant to this notification, you should mail that information to the DNR contact: Christopher Saari at 2501 Golf Course Road, Ashland, WI, 54806.

Your Long-Term Responsibilities as a Property Owner and Occupant:

The cleanup included: (A) surface covers over eight non-contiguous areas (see Figure 2) – the surface coves consist of a minimum of 12 inches of clean soil fill, underlain by geotextile (some areas are vegetated and some are gravel; (B) engineered liner system over approximately 540 linear feet of the existing Outfall 001 drainage ditch (see Figure 2) – the liner system generally consists of Reactive Core Mat, 6 inches of general fill, and 12 inches of rip-rap; and (C) closure of the former RCRA surface impoundments (see Figures 2 and 3) – the impoundments were excavated, backfilled, and capped. Note that the surface covers and drainage ditch liner components of the cleanup were completed in 2011, and are awaiting final DNR approval pending finalization of the continuing obligations. The surface impoundment closure was completed in 1988, and is included herein so that all obligations are documented in a single submittal. The continuing obligations I am proposing that affect your property are listed below, under the heading **Continuing Obligations**. Under s. 292.12 (5), Wis. Stats., current and future owners and occupants of this property are responsible for complying with continuing obligations.

The fact sheet "Continuing Obligations for Environmental Protection" (DNR publication RR 819) has been included with this letter, to help explain the responsibilities you may have for maintenance of a certain continuing obligation, the limits of any liability for investigation and cleanup of contamination, and how these differ. If the fact sheet is lost, you may obtain copies at http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf.

Contract for Responsibility for Continuing Obligations:

Before DNR provides final approval of the completed cleanup, I will need to inform the DNR as to whom will be responsible for the continuing obligations on your property. Beazer is responsible for monitoring/maintaining/documenting the corrective actions identified in items (A), (B), and (C) above, and groundwater monitoring in accordance with DNR's Conditional Closure and Long-Term Care Approval Modification, so long as property access to do so remains available. As the property owner, you will be responsible for various other continuing obligations, as outlined below.

Under s. 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on you or any subsequent property owner, unless another person has a legally enforceable responsibility to comply with the continuing obligation requirements. If you need more time to finalize an agreement on the responsibility for obtaining DNR approval prior to constructing a new well or reconstructing an existing well, characterizing and managing excavated soils in accordance with applicable statutes and rules, notifying DNR of changes in property use (i.e., from industrial to residential), and various other site-specific conditions, as outlined below, you may request additional time from the DNR contact identified in **Contact Information**. *(Note: Future property owners would need to negotiate a new agreement.)*

Remaining Contamination:

Soil Contamination:

Soil contamination remains at the Former Koppers Inc. Facility. The remaining contaminants include certain volatile organic compounds (VOCs), certain semivolatile organic compounds (SVOCs), and certain dioxins/furans at levels which exceed the soil standards found in ch. NR 700, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining contamination: installation of surface covers over eight non-contiguous areas, installation of an engineered liner system over approximately 540 linear feet of the existing Outfall 001 drainage ditch, and filling in and covering the RCRA surface impoundments (see Figures 2 and 3). A Site-specific risk assessment was used to determine the surface cover limits (refer to "Focused Corrective Measures Study [ARCADIS, 2007], Post-Remediation Human Health Risk Assessment [AMEC, 2007], and Revised Addendum to the Post-Remediation Human Health Risk Assessment [AMEC, 2009]. Soils above default NR 720 standards exist beyond the surface cover limits (see Table 1 and Figure 2).

Groundwater Contamination:

Groundwater contamination originated at the property located at 3185 South County Road A, Superior, WI, 54880. The levels of certain VOCs and certain SVOCs on your property are above state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code. However, the environmental consultants who have investigated this contamination have informed me that this groundwater contaminant plume is stable or receding and will naturally degrade over time. I believe that allowing natural attenuation, or the breakdown of

contaminants in groundwater due to naturally occurring processes, to complete the cleanup at this site will meet the case closure requirements of ch. NR 726, Wis. Adm. Code. I have requested that the DNR accept natural attenuation as the final groundwater remedy for this site.

The following DNR fact sheet (RR 671, "What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater") has been included with this notification, to help explain the use of natural attenuation as a remedy. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/files/PDF/ pubs/rr/RR671.pdf.

Continuing Obligations on Your Property:

As part of the cleanup, I am proposing that the following continuing obligations be used at your property, to address future exposure to residual contamination. Pending DNR approval, you will be responsible for the following continuing obligations.

To construct a new well or to reconstruct an existing well, the property owner at the time of construction or reconstruction will need to obtain prior approval from the DNR. See the paragraph GIS Registry and Well Construction Requirements. Typically, this results in casing off a portion of the aquifer during drilling, when needed, to protect the water supply.

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the property owner at the time of excavation will be responsible for the following:

- determine if contamination is present
- determine whether the material would be considered solid or hazardous waste
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Contaminated soil may be managed in-place, in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future property owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Continued Sampling of Monitoring Wells:

Continued monitoring of the following wells has been required by the Department of Natural Resources: W-02C, W-04AR, W-05CR, W-06A, W-06C, W-08A, W-09C, W-10AR2, W-11A, W-12A, W-12CR, W-14A, W-14B, W-16AR, W-18D, W-19A, W-19C, W-20AR, W-21A, W-21B, W-25A, W-26A, W-26B, W-28C, W-29A, W-30A, W-30C, W-31C, W-32C, W-33D, W-34D, W-35A, W-36A, W-37A, W-38A,

W-39A, and W-40A. A sampling plan was approved on October 29, 2002. Yearly inspections for well integrity will be required. Documentation may be required to be submitted. Once monitoring is no longer needed or required, the well/s need to filled and sealed in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well filling and sealing needs to be provided to the DNR on form 3300-005, at http://dnr.wi.gov/topic/DrinkingWater/documents/forms/3300005.pdf.

A map, Figure 1, is attached, which shows the location of the wells identified above.

Maintenance of a Cover:

A soil cover/engineered cover/other has been placed over remaining contamination to limit contact with the soil, and this cover will need to be maintained. Inspections will be required, and submittal of inspection reports may be required. Certain activities which would disturb the cover or barrier will be prohibited. If the cover was intended for industrial or commercial use, notification of the DNR may be required before changing the land use to a residential type use, to determine if the cover will be protective for that use. A maintenance plan is attached, which describes the maintenance activities likely to be required. A map, Figure 2, is attached, which shows the location of the extent of contamination and the extent of the cover.

Site Specific Conditions:

The following activities are prohibited, unless prior written approval is obtained from the DNR: (1) removing or damaging the existing surface covers, drainage ditch liner system, or surface impoundment cap; (2) disturbing the existing surface covers, drainage ditch liner system, or surface impoundment cap by excavating or grading the land surface, filling or covering, planting trees or shrubs, plowing for agricultural cultivation, constructing or placing a building or other structure, or otherwise jeopardizing cover/liner integrity; or (3) replacing any of the existing surface covers, drainage ditch liner system, or surface impoundment cap with another barrier. See Figures 2-3 for locations of existing features.

The DNR-approved Site-specific risk assessment assumed industrial use of the property. Notification of the DNR will be required if the property changes from industrial use, and additional investigation and remediation may be required at that time.

Maintenance and Audits of Continuing Obligations:

If compliance with a maintenance plan is required as part of a continuing obligation, an inspection log will need to be filled out periodically, and kept available for inspection by the DNR. Submittal of the inspection log may also be required. You will also need to notify any future owners or occupants of this property of the need to maintain the continuing obligation and to document that maintenance in the inspection log.

Periodic audits of these continuing obligations may be conducted by the DNR, to ensure that potential exposure to residual contamination is being addressed. The DNR provides notification before conducting site visits as part of the audit.

GIS Registry and Well Construction Requirements:

All properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at

http://dnr.wi.gov/topic/Brownfields/clean.html. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure/approval letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300−254, is on the internet at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

If you have any questions regarding this notification, I can be reached at (412) 208-8813, jane.patarcity@trmi.biz

Signature of responsible party/environmental consultant for the responsible party	Date Signed
	06-16-14

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination)
List of Figures/Tables/Attachments

Figures

1 – Monitoring Well Locations

2 – Surface Cover Locations

3 – Survey Exhibit for Closed Surface Impoundment

Tables

1 – Summary of Soil Sample Analytical Results

Attachments

A – Legal Description of Property

B – Operation and Maintenance Plan

C – WDNR Fact Sheet RR-617 (Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know)

D – WDNR Fact Sheet RR-819 (Continuing Obligations for Environmental Protection

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination) Figures

FORMER LEAD TRACK LANDFILL (AREA H)

FORMER SPRAYFIELD (AREA S)

CLOSED SURFACE IMPOUNDMENTS (AREA C)

OUTFALL 001 (AREA D)

OUTFALL 001 DRAINAGE DITCH

HAMMOND AVENUE

STRAW BALES AREA (AREA G)

DESIGN MANAGEMENT ZONE

CLOSED RCRA SURFACE IMPOUNDMENTS*

DRIP TRACK AREA (AREA F)

TREATMENT AREA (AREA B)

FORMER UNLINED LANDFILL/LANDFARM (AREA A)

OUTFALL 004 (AREA E)

BOILER HOUSE

SHOP

OFFICE

GATE

COUNTY ROAD A

COUNTY ROAD Z

FLOW

W-02C W-05CR W-09C W-12A W-12CR W-29A W-10AR2 W-30A W-30C W-08A W-21A W-21B W-06A W-06C W-04AR W-11A W-26B W-26A W-32C W-33D W-34D W-20AR W-16AR W-18D W-19C W-19A W-35A W-31C W-38A W-39A W-25A W-40A W-37A W-36A W-28C W-14B W-14A

LEGEND:

- FORMER KOPPERS INC. FACILITY PROPERTY BOUNDARY
- LIMIT OF 1' SURFACE COVER
- LIMIT OF ENGINEERED LINER SYSTEM
- SOLID WASTE MANAGEMENT UNITS (SWMUs) (SEE NOTE 3)
- WATER COURSE
- OH — OVERHEAD POWER LINE (APPROXIMATE)
- RAILROAD LINES
- GRAVEL ACCESS ROAD
- A ZONE (SHALLOW CLAY) MONITORING WELL
- B ZONE (INTERMEDIATE CLAY) MONITORING WELL
- C ZONE (DISCONTINUOUS SAND LENS) MONITORING WELL
- D ZONE (BEDROCK) MONITORING WELL
- KOPPERS SUPPLY WELL (BEDROCK)

NOTES:

1. BASE MAP OBTAINED FROM PHOTOGRAMMETRY PERFORMED BY LOCKWOOD MAPPING COMPANY OF ROCHESTER, NY (12/28/01). GENERAL TOPOGRAPHY OBTAINED FROM AERIAL PHOTOGRAPHY BASED SURVEY BY AXIS GEOSPATIAL COMPANIES OF EASTON, MARYLAND (8/17/08). AS-BUILT TOPOGRAPHY OF CORRECTIVE ACTION AREAS OBTAINED FROM GROUND SURVEY BY LHB, INC. OF DULUTH, MINNESOTA.
2. ALL LOCATIONS ARE APPROXIMATE.
3. SWMU LIMITS DEFINED DURING THE RCRA FACILITY ASSESSMENT/INVESTIGATION.

* Refer to Figure 3 for surveyed limits of closed surface impoundments.

0 150' 300'
GRAPHIC SCALE

BEAZER EAST, INC.
PITTSBURGH, PENNSYLVANIA
FORMER KOPPERS INC. FACILITY SUPERIOR, WISCONSIN
NOTIFICATION OF CONTINUING OBLIGATIONS AND RESIDUAL CONTAMINATION

MONITORING WELL LOCATIONS

ARCADIS

FIGURE
1

FORMER LEAD TRACK LANDFILL (AREA H)

FORMER SPRAYFIELD (AREA S)

CLOSED SURFACE IMPOUNDMENTS (AREA C)

OUTFALL 001 (AREA D)

OUTFALL 001 DRAINAGE DITCH

HAMMOND AVENUE

STRAW BALES AREA (AREA G)

DESIGN MANAGEMENT ZONE

CLOSED RCRA SURFACE IMPOUNDMENTS*

FORMER UNLINED LANDFILL/LANDFARM (AREA A)

DRIP TRACK AREA (AREA F)

TREATMENT AREA (AREA B)

NORTH END OF FORMER PENTA STORAGE TANK AREA

SHOP

OFFICE

GATE

COUNTY ROAD A

COUNTY ROAD Z

OUTFALL 004 (AREA E)

FLOW

OH

LEGEND:

- FORMER KOPPERS INC. FACILITY PROPERTY BOUNDARY (SEE NOTE 5)
- LIMIT OF 1' SURFACE COVER (SEE NOTE 4)
- LIMIT OF ENGINEERED LINER SYSTEM
- SOLID WASTE MANAGEMENT UNITS (SWMUs) (SEE NOTE 3)
- WATER COURSE
- OH — OVERHEAD POWER LINE (APPROXIMATE)
- RAILROAD LINES
- GRAVEL ACCESS ROAD
- 1988 – 2008 SOIL SAMPLE LOCATION
- SOIL SAMPLE LOCATION REQUIRING CORRECTIVE ACTION BASED ON POST-REMEDIATION HHRA (SEE NOTE 4)

NOTES:

1. BASE MAP OBTAINED FROM PHOTOGRAMMETRY PERFORMED BY LOCKWOOD MAPPING COMPANY OF ROCHESTER, NY (12/28/01). GENERAL TOPOGRAPHY OBTAINED FROM AERIAL PHOTOGRAPHY BASED SURVEY BY AXIS GEOSPATIAL COMPANIES OF EASTON, MARYLAND (8/17/08). AS-BUILT TOPOGRAPHY OF CORRECTIVE ACTION AREAS OBTAINED FROM GROUND SURVEY BY LHB, INC. OF DULUTH, MINNESOTA.
2. ALL LOCATIONS ARE APPROXIMATE.
3. SWMU LIMITS DEFINED DURING THE RCRA FACILITY ASSESSMENT/INVESTIGATION.
4. THE EXTENT OF 1' SURFACE COVERS ENCOMPASS SOIL SAMPLES DETERMINED TO REQUIRE CORRECTIVE ACTION BASED ON THE RESULTS OF THE WDNR-APPROVED POST-REMEDIATION HUMAN HEALTH RISK ASSESSMENT (HHRA) AND ASSOCIATED ADDENDUM. IN GENERAL, THE CORRECTIVE ACTION BOUNDARIES WERE FORMED BY CONNECTING "CLEAN" SAMPLE POINTS THAT SURROUND SAMPLES REQUIRING CORRECTIVE ACTION BASED ON THE HHRA. WHERE APPROPRIATE, SITE FEATURES WERE ALSO USED TO ESTABLISH BOUNDARIES. SOILS ABOVE DEFAULT NR720 STANDARDS EXIST BEYOND THE SURFACE COVER LIMITS.

* Refer to Figure 3 for surveyed limits of closed surface impoundments.

0 150' 300'
GRAPHIC SCALE

BEAZER EAST, INC.
PITTSBURGH, PENNSYLVANIA
FORMER KOPPERS INC. FACILITY SUPERIOR, WISCONSIN
NOTIFICATION OF CONTINUING OBLIGATIONS AND RESIDUAL CONTAMINATION

SURFACE COVER LOCATIONS

ARCADIS

FIGURE
2

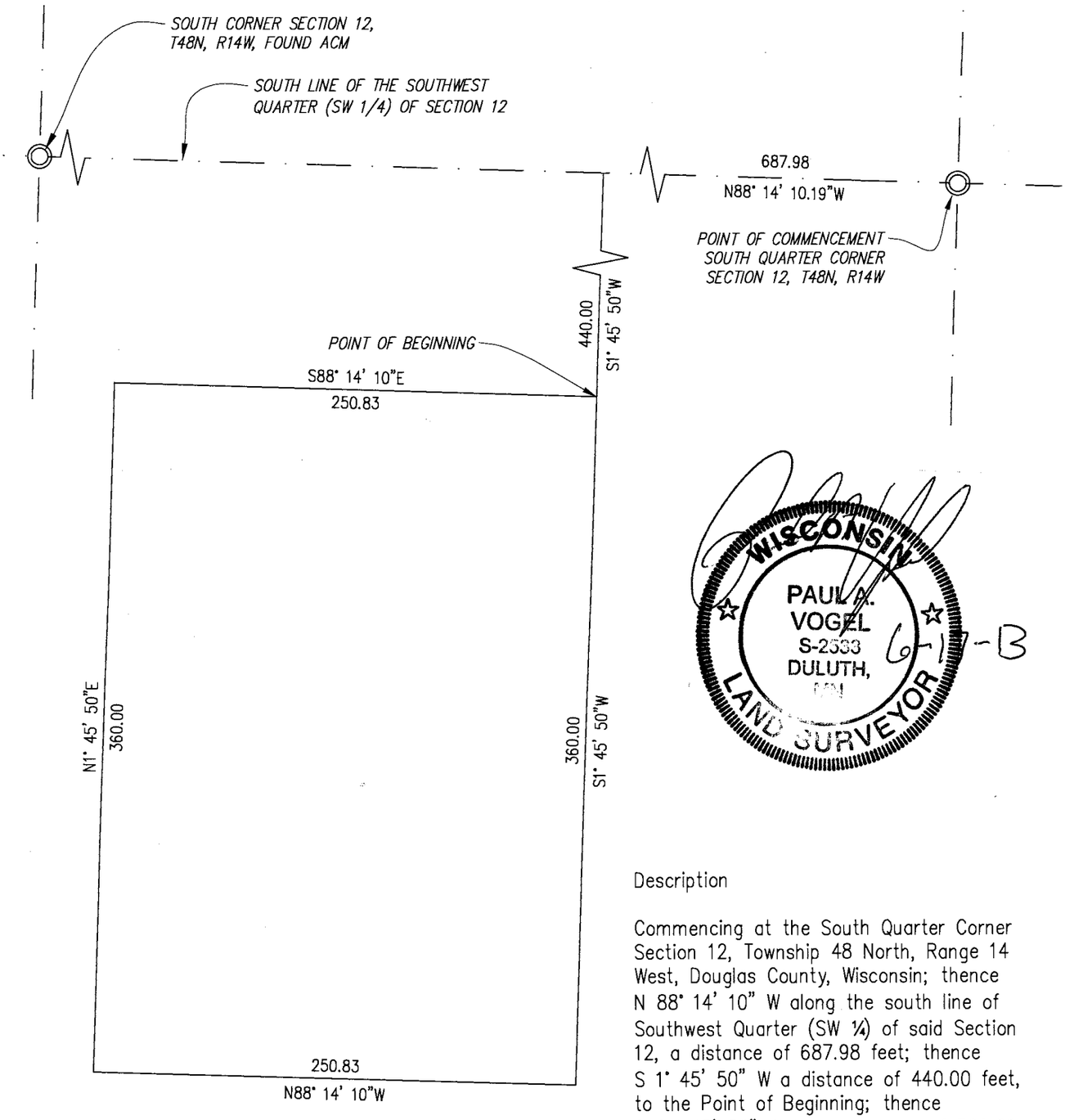
Figure 3 - Survey Exhibit for Closed Surface Impoundments*

EXHIBIT

CLOSED SURFACE IMPOUNDMENT AREA

Being part of the Southwest Quarter of Section 12 and the Northwest Quarter of section 14, T48N, R14W, Douglas County, Wisconsin

PREPARED FOR: ARCADIS



Description

Commencing at the South Quarter Corner Section 12, Township 48 North, Range 14 West, Douglas County, Wisconsin; thence N 88° 14' 10" W along the south line of Southwest Quarter (SW ¼) of said Section 12, a distance of 687.98 feet; thence S 1° 45' 50" W a distance of 440.00 feet, to the Point of Beginning; thence S 01° 45' 50" W for a distance of 360.00 feet; thence N 88° 14' 10" W for a distance of 250.83 feet; thence N 01° 45' 50" E for a distance of 360.00 feet; thence S 88° 14' 10" E, a distance of 250.83 feet to the Point of Beginning.

Containing 90,298 square feet, more or less.

* Refer to Figures 1 and 2 for general location of closed surface impoundments within overall site boundary.

I hereby certify that this survey was prepared under my direction and control and is true and correct to the best of my knowledge and belief.

Registered Land Surveyor S-2533

Date: 06/17/13

REVISION: 06/17/13	
DATE PREPARED: 11/14/12	
PROJ NO: 080327	
FILE: 080327 cEsmt	
SHEET 1 of 1 SHEETS	

LHB

PERFORMANCE DRIVEN DESIGN.

LHBcorp.com

21 W. Superior St., Ste. 500 | Duluth, MN 55802 | 218.727.8446

FILE: ..\080327\DWGS\Base\080327 cEsmts.dwg

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination) Table

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-01	AB-01	AB-01	AB-02	AB-02	AB-03	AB-03	AB-04	AB-04	AB-05	AB-05	AB-06	AB-06	AB-07	AB-07
Sample Depth(Feet):	Industrial		0 - 1.5	1.5 - 3	6 - 7.5	1.5 - 3	9 - 10.5	1.5 - 3	6 - 7.5	0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	6 - 7.5	7.5 - 9	3 - 4.5	6 - 7.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

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Sample Depth(Feet):	Industrial		0 - 1.5	1.5 - 3	6 - 7.5	1.5 - 3	9 - 10.5	1.5 - 3	6 - 7.5	0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	6 - 7.5	7.5 - 9	3 - 4.5	6 - 7.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	2.96	0.556 U	0.1 U	261	0.142 U	726	0.148	2.61	0.143 U	2,430	0.157	0.137 U	0.144 U	11.8	0.146 U
ACENAPHTHYLENE	- -	mg/kg	11.9 U	0.179	0.1 U	402	0.142 U	540 U	0.309	0.873	0.143 U	598	0.139 U	0.1 U	0.1 U	3.97	0.146 U
ANTHRACENE	100000	mg/kg	3.52	0.295	0.05 U	65.9	0.05 U	320	0.211	21.5	0.05 U	1,390	0.213	0.05 U	0.05 U	76.6	0.05 U
BENZO (A) ANTHRACENE	2.11	mg/kg	0.73	0.142	0.00282 U	23.4	0.00435	79.8	0.0274	5.25	0.0117	355	0.057	0.00274 U	0.00288 U	15.2	0.00292 U
BENZO (A) PYRENE	0.211	mg/kg	6.67	1.1	0.00265	25.9	0.002 U	84	0.0288	8.72	0.0245	235	0.029	0.00402	0.00288 U	13.2	0.00433
BENZO (B) FLUORANTHENE	2.11	mg/kg	6.01	1.49	0.00369	19.7	0.00403	82.2	0.0366	7.13	0.0225	261	0.0402	0.00376	0.002 U	18.2	0.0074
BENZO (G,H,I) PERYLENE	- -	mg/kg	9.18	1.5	0.00705 U	60.5	0.0071 U	52.8	0.0184	8.61	0.0216	168	0.0514	0.00685 U	0.0072 U	9.75	0.0073 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	1.52	0.558	0.002 U	6.99	0.002 U	25.2	0.0123	1.94	0.00551	98.3	0.0167	0.002 U	0.002 U	6.59	0.002 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	2.82	0.588	0.0211 U	49	0.0213 U	186	0.0797	4.55	0.0227	660	0.162	0.0205 U	0.0216 U	34.1	0.0219 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	8.62	1.85	0.00423 U	44.9	0.00426 U	83.5	0.0415	16.9	0.0346	269	0.0758	0.00411 U	0.00432 U	15.6	0.00438 U
DIBENZOFURAN	1020	mg/kg	11.9 U	0.556 U	0.1 U	107	0.142 U	912	0.1 U	2.23	0.143 U	1,540	0.1 U	0.137 U	0.1 U	37.4	0.1 U
FLUORANTHENE	22000	mg/kg	6.05	0.89	0.02 U	213	0.0484	849	0.353	6.66	0.0728	3,810	0.0544	0.02 U	0.02 U	216	0.029
FLUORENE	22000	mg/kg	0.439	0.0369	0.02 U	35.2	0.0284 U	503	0.146	2.7	0.0202	2,070	0.158	0.02 U	0.02 U	103	0.0292 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	2.15	0.397	0.00705 U	8.22	0.0071 U	12.8	0.005 U	3.44	0.0051	38.9	0.0106	0.00685 U	0.0072 U	2.2	0.0073 U
NAPHTHALENE	26	mg/kg	2.55	2.98	0.1 U	459	0.142 U	1,140	0.304	0.958	0.1 U	754	0.1 U	0.137 U	0.1 U	3.46	0.1 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	2.78	0.185	0.5 U	210	0.05 U	1,390	0.367	6.36	0.058	6,090	0.609	0.05 U	0.05 U	299	0.05 U
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	2.37	0.593	0.0376	190	0.0317	440	0.183	3.1	0.0286	1,690	0.278	0.0274 U	0.0288 U	165	0.0292 U
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	1.02	0.76	0.0141 U	1.47	0.0141 U	5.85	0.0137 U	0.232	0.0143 U	3.06	0.014 U	0.0137 U	0.0139 U	0.124	0.0147 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

See Notes on Page 94.

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Sample Depth(Feet):	Industrial		0 - 1.5	1.5 - 3	6 - 7.5	1.5 - 3	9 - 10.5	1.5 - 3	6 - 7.5	0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	6 - 7.5	7.5 - 9	3 - 4.5	6 - 7.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-08	AB-08	AB-09	AB-09	AB-09	AB-10	AB-10	AB-11	AB-12	AB-13	AB-13	AB-14	AB-15	AB-15	AB-16
Sample Depth(Feet):	Industrial		1.5 - 3	6 - 7.5	0 - 1.5	3 - 4.5	7.5 - 9	1.5 - 3	3 - 4.5	0 - 1.5	1.5 - 3	1.5 - 3	4.5 - 6	1.5 - 3	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/30/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-08	AB-08	AB-09	AB-09	AB-09	AB-10	AB-10	AB-11	AB-12	AB-13	AB-13	AB-14	AB-15	AB-15	AB-16
Sample Depth(Feet):	Industrial		1.5 - 3	6 - 7.5	0 - 1.5	3 - 4.5	7.5 - 9	1.5 - 3	3 - 4.5	0 - 1.5	1.5 - 3	1.5 - 3	4.5 - 6	1.5 - 3	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/30/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15 U
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	10 U
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15 U
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15 U
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15 U
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.4 J
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15 U
ACENAPHTHENE	33000	mg/kg	0.1 U	0.134 U	0.861	0.264	0.142 U	6.37	0.224	1.23	85.1	1.18	0.126 U	0.127 U	0.1 U	0.139 U	10 U
ACENAPHTHYLENE	- -	mg/kg	0.14 U	0.134 U	0.761	0.136 U	0.142 U	2.94	0.372	1.21 U	1.59	0.346	0.126 U	0.127 U	0.133 U	0.139 U	4 J
ANTHRACENE	100000	mg/kg	0.05 U	0.05 U	0.303	1.12	0.05 U	10.3	8.14	0.209	40.6	0.113	0.05 U	0.05 U	0.463	0.801	0.82
BENZO (A) ANTHRACENE	2.11	mg/kg	0.107	0.00268 U	0.0447	0.341	0.00284 U	0.917	1.51	0.677	31.2	0.196	0.00454	0.00379	0.315	0.0579	0.1 U
BENZO (A) PYRENE	0.211	mg/kg	0.622	0.00268 U	0.28	1.13	0.00284 U	2.09	1.19	1.7	14.7	0.196	0.00332	0.0251	0.766	0.085	2.3
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.401	0.00268 U	0.521	1.88	0.00284 U	1.24	1.1	1.92	15.8	0.26	0.00483	0.0269	0.765	0.0895	5.3
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.893	0.0067 U	0.419	1.44	0.0071 U	1.85	0.681	1.72	13.4	0.221	0.0063 U	0.0379	0.668	0.0772	5.7
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.127	0.00268 U	0.041	0.558	0.00284 U	0.392	0.367	0.658	6.97	0.0971	0.002 U	0.00688	0.261	0.0299	1.2
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	3.4	0.0201 U	1.05	4.2	0.0213 U	6.55	8.82	4.21	54.2	0.462	0.015 U	0.139	2.68	0.421	0.75 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	1.9	0.00402 U	1.66	2.8	0.00426 U	3.75	1.01	4.55	26.3	0.451	0.00378 U	0.0955	1.61	0.182	17
DIBENZOFURAN	1020	mg/kg	0.1 U	0.1 U	0.589	0.119	0.1 U	3.74	0.1 U	0.574	41.9	0.465	0.1 U	0.127 U	0.1 U	0.139 U	10 U
FLUORANTHENE	22000	mg/kg	0.188	0.02 U	0.0594	1.86	0.02 U	3.9	9.09	0.862	155	0.822	0.0221	0.02 U	0.415	0.165	2.5
FLUORENE	22000	mg/kg	0.02 U	0.02 U	0.248 U	0.22	0.02 U	4.19	0.757	0.328	66.8	0.238	0.02 U	0.02 U	0.0713	0.0989	1 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.235	0.0067 U	0.178	0.426	0.0071 U	0.632	0.189	0.108	5.29	0.116	0.0063 U	0.0198	0.322	0.0387	5.6
NAPHTHALENE	26	mg/kg	0.1 U	0.1 U	0.794	0.107	0.1 U	1.52	0.293	1.2	5.88	1.42	0.1 U	0.1 U	0.1 U	0.1 U	5.7 J
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.05 U	0.05 U	0.145	0.525	0.05 U	5.94	13.9	0.229	162	0.259	0.05 U	0.05 U	0.123	0.172	2.6 U
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U
PYRENE	16500	mg/kg	0.298	0.0268 U	0.248 U	0.724	0.0284 U	5.23	7.04	2.8	92.9	1.34	0.0214	0.0254 U	0.499	0.116	1 U
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.0139 U	0.0134 U	0.274	0.0136 U	0.0142 U	0.764	0.0932	0.165	0.391	0.0126 U	0.0126 U	0.279	0.697	NA	0.095
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	NA	0.03 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-08	AB-08	AB-09	AB-09	AB-09	AB-10	AB-10	AB-11	AB-12	AB-13	AB-13	AB-14	AB-15	AB-15	AB-16
Sample Depth(Feet):	Industrial		1.5 - 3	6 - 7.5	0 - 1.5	3 - 4.5	7.5 - 9	1.5 - 3	3 - 4.5	0 - 1.5	1.5 - 3	1.5 - 3	4.5 - 6	1.5 - 3	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/30/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-16	AB-17	AB-17	AB-18	AB-18	AB-18	AB-19	AB-19	AB-20	AB-20	AB-20	AB-21	AB-21	AB-22	AB-22
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	4 - 6
Date Collected:	DC_RCL[1]	Units	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/31/96	10/31/96	10/31/96	10/31/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-16	AB-17	AB-17	AB-18	AB-18	AB-18	AB-19	AB-19	AB-20	AB-20	AB-20	AB-21	AB-21	AB-22	AB-22
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	4 - 6
Date Collected:	DC_RCL[1]	Units	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/31/96	10/31/96	10/31/96	10/31/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	0.13 UJ	NA	0.14 U	NA	NA	0.27	NA	0.31	NA	NA	0.24	NA	0.62	NA
METHYLNAPHTHALENE	53.1	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	6 U	0.1 U
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	0.13 U	NA	0.14 U	NA	NA	0.14 U	NA	0.13 U	NA	NA	0.12 U	NA	0.17 U	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	0.13 U	NA	0.14 U	NA	NA	0.14 U	NA	0.13 U	NA	NA	0.12 U	NA	0.17 U	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	0.13 U	NA	0.14 U	NA	NA	0.35	NA	0.13 U	NA	NA	0.56	NA	0.3	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	6 U	0.1 U
2-METHYLPHENOL	30800	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
2-NITROPHENOL	- -	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	0.13 U	NA	0.14 U	NA	NA	0.14 U	NA	0.13 U	NA	NA	0.12 U	NA	0.21	NA
ACENAPHTHENE	33000	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	6 U	0.1 U
ACENAPHTHYLENE	- -	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	6 U	0.1 U
ANTHRACENE	100000	mg/kg	0.0048 U	0.0047 U	0.097 U	0.46	NA	0.005 U	0.0058 U	11	6.8	NA	0.0049 U	0.076	0.0053 U	0.3 U	0.0066 U
BENZO (A) ANTHRACENE	2.11	mg/kg	0.00096 U	0.00094 U	0.001 U	0.048 U	NA	0.00099 U	0.00098 U	0.95 U	8.9	NA	0.00096 U	0.31	0.0017	0.12	0.003
BENZO (A) PYRENE	0.211	mg/kg	0.0025	0.002 J	0.00097 U	0.092	NA	0.00099 U	0.0018	0.95 U	3.8	NA	0.00096 U	0.35	0.003	0.3	0.0035
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.0044	0.0042 J	0.00097 U	0.14	NA	0.00099 U	0.0026	0.95 U	6	NA	0.00096 U	0.52	0.0058	0.58	0.0096
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0056	0.0049 J	0.0026	0.12 U	NA	0.0024 U	0.0046	2.3 U	1.3 J	NA	0.0025	0.5	0.0049	0.71	0.0066
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.00096 U	0.0016 J	0.00097 U	0.048 U	NA	0.00099 U	0.00098 U	0.95 U	2.5	NA	0.00096 U	0.18	0.0016	0.19	0.0018
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.0069 U	0.0067 U	0.007 U	0.34 U	NA	0.0071 U	0.007 U	6.8 U	15	NA	0.0069 U	0.55	0.0075 U	0.42 U	0.0075 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.011	0.0096 J	0.0014 U	0.068 U	NA	0.0014 U	0.0014 U	1.4 U	8.7	NA	0.0014 U	1.4	0.0014 U	1.5	0.0098
DIBENZOFURAN	1020	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	6 U	0.1 U
FLUORANTHENE	22000	mg/kg	0.0096 U	0.0094 U	0.0097 U	0.48 U	NA	0.0099 U	0.0098 U	9.5 U	25	NA	0.0096 U	0.21	0.01 U	0.6 U	0.01 U
FLUORENE	22000	mg/kg	0.0096 U	0.0094 U	0.01 U	0.48 U	NA	0.0099 U	0.0099 U	4 J	5 J	NA	0.013 U	0.086 U	0.01 U	0.6 U	0.011 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.004	0.0038 J	0.002 U	0.13	NA	0.0024 U	0.0029	2.3 U	4.7	NA	0.0023 U	0.45	0.0038	0.63	0.0058
NAPHTHALENE	26	mg/kg	0.096 U	0.094 U	0.097 U	4.8 U	NA	0.099 U	0.098 U	95 U	89 U	NA	0.096 U	0.86 U	0.1 U	1.9 J	0.1 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.023 U	0.023 U	0.017 U	1.2 U	NA	0.024 U	0.024 U	4.1 J	3.6 J	NA	0.023 U	0.21 U	0.024 U	1.4 U	0.025 U
PHENOL	100000	mg/kg	NA	0.07 U	NA	0.07 U	NA	NA	0.07 U	NA	0.06 U	NA	NA	0.06 U	NA	0.08 U	NA
PYRENE	16500	mg/kg	0.0096 U	0.0094 U	0.0097 U	0.48 U	NA	0.0099 U	0.0098 U	9.5 U	26	NA	0.0096 U	0.34	0.01 U	0.6 U	0.01 U
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	0.013 U	NA	0.014 U	NA	NA	0.014 U	NA	1.4	NA	NA	0.012 U	NA	0.017 U	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	0.027 U	NA	0.027 U	NA	NA	0.028 U	NA	0.25 U	NA	NA	0.025 U	NA	0.034 U	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-16	AB-17	AB-17	AB-18	AB-18	AB-18	AB-19	AB-19	AB-20	AB-20	AB-20	AB-21	AB-21	AB-22	AB-22
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	2 - 4	8 - 10	0 - 2	4 - 6	0 - 2	4 - 6
Date Collected:	DC_RCL[1]	Units	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/30/96	10/31/96	10/31/96	10/31/96	10/31/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	1.7	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.18 P	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.013	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0031	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.013	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.039	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0023 J	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0045	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00055 U	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0014 J	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0019 J	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0032	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00023 U	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00047 J	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	17	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.88	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	4.3	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.96 P	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.32	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.33 P	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.014	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.028 P	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0051	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0039 P	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	75,500	NA	NA	NA	NA	21,300	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	37,700	NA	NA	NA	NA	30,100	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	26,000	NA	NA	NA	NA	18,800	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	663	NA	NA	NA	NA	468	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	4,760	NA	NA	NA	NA	3,680	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-23	AB-23	AB-24	AB-24	AB-25	AB-25	AB-26	AB-26	AB-27	AB-27	AB-28	AB-28	AB-29	AB-30
Sample Depth(Feet):	Industrial		0 - 2	4 - 6	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	10/31/96	10/31/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	10/18/06	10/18/06
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-23	AB-23	AB-24	AB-24	AB-25	AB-25	AB-26	AB-26	AB-27	AB-27	AB-28	AB-28	AB-29	AB-30
Sample Depth(Feet):	Industrial		0 - 2	4 - 6	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	10/31/96	10/31/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	10/18/06	10/18/06
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	0.46	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	8.2 U	0.098 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	0.12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	0.17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	0.12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	0.06 U	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	8.2 U	0.098 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	0.06 U	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	0.15	NA	NA	NA	4.7 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	7.8 J	0.098 U	0.31 J	2.8	0.16 J [0.061 J]	0.18 J	0.45 U	0.44 U	0.028 J	0.24 J	1.5 J	0.72 J	0.096	0.73 J
ACENAPHTHYLENE	- -	mg/kg	0.8 J	0.098 U	1.4	0.81 J	0.73 J [0.22 J]	1.4 J	0.096 J	0.44 U	0.28 J	1.3 J	1.6 J	1.7	1.1	2.5
ANTHRACENE	100000	mg/kg	0.41 U	0.0055 U	74	3.4	0.86 J [0.75 J]	1.6 J	0.21 J	0.44 U	0.59	2 J	2.9	24	3.1	4
BENZO (A) ANTHRACENE	2.11	mg/kg	0.68	0.00098 U	3	2.3	0.53 J [0.32 J]	1.5 J	0.067 J	0.44 U	0.34 J	2.5	3.9	2.7	1.2	3.3
BENZO (A) PYRENE	0.211	mg/kg	1.1	0.0053	3.1	2.8	1.4 [0.5 J]	5.1	0.14 J	0.44 U	0.64	5.1	3.3	5.2	1.6	4.4
BENZO (B) FLUORANTHENE	2.11	mg/kg	2.6	0.011	2.6	3.9	1.3 [0.76 J]	5.9	0.33 J	0.44 U	1.5	8.7	4.8	7.1	4.8	9.2
BENZO (G,H,I) PERYLENE	- -	mg/kg	3.1	0.014	4.2	1.9	2.2 [0.35 J]	5.7	0.41 J	0.44 U	1.1	3.5	2.5	2.3	2.7	6.9
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.72	0.0035	1.1 J	1.1 J	0.44 J [0.22 J]	1.6 J	0.1 J	0.44 U	0.48	2.4	1.4 J	2.1	0.087 U	0.82 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.59 U	0.007 U	75	3.3	1.1 [1.2]	3.3	0.18 J	0.44 U	0.84	9.2	4.9	5.5	4.3	5.2
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	9.4	0.033	0.77 J	0.48 J	0.44 J [0.18 J]	1.2 J	0.081 J	0.44 U	0.24 J	0.96 J	0.62 J	0.67 J	0.71	1.5
DIBENZOFURAN	1020	mg/kg	8.2 U	0.098 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	3.1	0.01 U	3.2	9.8	1.1 [0.69 J]	1.8 J	0.099 J	0.44 U	0.59	6	14	6.8	2	6.8
FLUORENE	22000	mg/kg	0.82 U	0.014 U	5	1.9	0.3 J [0.073 J]	0.41 J	0.019 J	0.44 U	0.058 J	0.36 J	0.93 J	3.5	0.29	0.84
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	2.8	0.01	3.3	1.9	1.8 [0.31 J]	5	0.32 J	0.44 U	0.98	3.5	2.4	2.5	2.4	5.2
NAPHTHALENE	26	mg/kg	6.3 J	0.098 U	2.2	1.9	0.6 J [0.28 J]	1.3 J	0.022 J	0.44 U	0.13 J	0.7 J	1.1 J	1.1 J	0.41	3.2
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	6.2 U	5.9 U	4.7 U [5 U]	11 U	2.2 U	2.1 U	2.2 U	10 U	10 U	6.3 U	NA	6.3 J
PHENANTHRENE	- -	mg/kg	2 U	0.024 U	8.3	6.1	0.47 J [0.35 J]	0.78 J	0.035 J	0.44 U	0.15 J	1 J	3.3	5.9	0.67	3.2
PHENOL	100000	mg/kg	0.06 U	NA	NA	NA	0.97 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	5.6	0.0098 U	2.2	5.8	0.79 J [0.54 J]	1.4 J	0.088 J	0.44 U	0.52	5.9	8.9	4	2.1	6.8
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	0.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.024 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	AB-23 0 - 2 10/31/96	AB-23 4 - 6 10/31/96	AB-24 0 - 0.5 04/26/05	AB-24 0.5 - 1.5 04/26/05	AB-25 0 - 0.5 04/26/05	AB-25 0.5 - 1.5 04/26/05	AB-26 0 - 0.5 04/26/05	AB-26 0.5 - 1.5 04/26/05	AB-27 0 - 0.5 04/26/05	AB-27 0.5 - 1.5 04/26/05	AB-28 0 - 0.5 04/26/05	AB-28 0.5 - 1.5 04/26/05	AB-29 0 - 0.5 10/18/06	AB-30 0 - 0.5 10/18/06
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	10 DB [4.1 DB]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	1.6 [0.62]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	0.13 [0.071]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.041 [0.017]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.13 [0.068]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.28 [0.14]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.021 [0.011]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.031 [0.017]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.0046 J [0.0042 U]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	0.0043 J [0.0019 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	0.011 [0.0076 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.018 [0.0088]	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	0.011 [0.0072 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	0.00072 U [0.00088 U]	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	0.0012 JCON [0.0011 CONU]	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	110 DB [39 DB]	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	6.2 D [2.8 D]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	28 [11]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	8 [3.5]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	2.4 [1.2]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	1.9 [0.99]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	0.057 [0.026]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	0.098 [0.062]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	0.02 [0.005]	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	0.0085 [0.0027]	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-31	AB-32	AB-33	AB-34	AB-35	AB-36	AB-37	BB-01	BB-02	BB-02	BB-03	BB-03	BB-03	BB-04	BB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1.5	1.5 - 3	4.5 - 6	0 - 1.5	6 - 7.5	7.5 - 9	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-31	AB-32	AB-33	AB-34	AB-35	AB-36	AB-37	BB-01	BB-02	BB-02	BB-03	BB-03	BB-03	BB-04	BB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1.5	1.5 - 3	4.5 - 6	0 - 1.5	6 - 7.5	7.5 - 9	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	9.7 U	9.7 U	9.7 U	NA	9.7 U	9.7 U	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.24	0.56 J	0.15	0.028 J	0.33 J	0.013 J	0.041 J	127	0.878	0.1 U	651	0.135	0.15 U	1.42	0.254
ACENAPHTHYLENE	- -	mg/kg	1.6	3.2	1.3	0.17 J	2.1	0.19	0.32	64.6	0.1 U	0.144 U	24.2 U	0.151 U	0.15 U	0.494 U	0.134 U
ANTHRACENE	100000	mg/kg	2.4	4.4	3.1	0.87 J	11	0.28	0.52	8.38	0.05 U	0.05 U	150	0.05 U	0.075 U	2.01	0.668
BENZO (A) ANTHRACENE	2.11	mg/kg	1	3.4	1.3	0.23	1.7	0.11	0.33	16.8	0.0644	0.00288 U	340	0.00364	0.003 U	4.99	1.01
BENZO (A) PYRENE	0.211	mg/kg	1.4	6.2	2.6	0.29	2.9	0.17	0.56	2.95	0.107	0.00288 U	332	0.00302	0.003 U	10.7	2.52
BENZO (B) FLUORANTHENE	2.11	mg/kg	2.5	9.8	6.4	0.53 J	3.2	0.28	1.1	22.4	0.0713	0.00288 U	280	0.00285	0.003 U	8.03	1.82
BENZO (G,H,I) PERYLENE	- -	mg/kg	4.8	10	3.9	0.94	8.6	0.44	1.1	47.7	0.174	0.0072 U	349	0.00755 U	0.0075 U	20.7	5.98
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.089 U	0.82 U	0.093 U	0.036 U	1.3	0.1	0.071 U	7.36	0.0228	0.00288 U	110	0.002 U	0.003 U	2.99	0.682
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	1.9	12	3.5	1.1	14	0.15	0.47	58.1	0.114	0.0216 U	877	0.0208	0.0225 U	4.99	8.54
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.78	2.2	1.1	0.13	1.2	0.045	0.19	98.5	0.415	0.00432 U	520	0.00453 U	0.0045 U	19.6	5.11
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	47.5	0.1 U	0.0648	70.3	0.149	0.15 U	1.04	0.248
FLUORANTHENE	22000	mg/kg	2.1	4.6	1.5	0.17	2	0.13	0.4	22.5	0.0611	0.02 U	2,330	0.02 U	0.02 U	14.7	2.66
FLUORENE	22000	mg/kg	0.48	1	0.26	0.082	0.83	0.032	0.085	13	0.0516	0.02 U	153	0.02 U	0.03 U	1.11	0.229
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	3	7.5	3.8	0.61	6	0.23	0.8	15.8	0.0705	0.0072 U	107	0.00755 U	0.0075 U	6.51	1.68
NAPHTHALENE	26	mg/kg	0.79	1.6	0.13	0.12	1.2	0.024	0.099	39.1	0.289	0.1 U	41.9	0.15	0.15 U	2.16	0.543
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	1.2	2	0.32	0.18	1.8	0.057	0.17	11.7	0.05 U	0.05 U	400	0.0534	0.05 U	7.33	1.39
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	1.7	4.8	1.7	0.28 J	2.5	0.17 J	0.62	52.2	0.249	0.0288 U	1,510	0.113	0.03 U	16.5	3.52
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	3.66	0.0141 U	0.0141 U	50	0.0141 U	0.0141 U	0.415	3.3
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.155	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		AB-31	AB-32	AB-33	AB-34	AB-35	AB-36	AB-37	BB-01	BB-02	BB-02	BB-03	BB-03	BB-03	BB-04	BB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1.5	1.5 - 3	4.5 - 6	0 - 1.5	6 - 7.5	7.5 - 9	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-04	BB-05	BB-05	BB-05	BB-06	BB-06	BB-07	BB-07	BB-08	BB-08	BB-09	BB-09	BB-11	BB-12	BB-12
Sample Depth(Feet):	Industrial		4.5 - 6	1.5 - 3	3 - 4.5	10.5 - 12	1.5 - 3	4.5 - 6	0 - 1.5	4.5 - 6	3 - 4.5	4.5 - 6	0 - 1.5	3 - 4.5	1.5 - 3	0 - 1.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-04	BB-05	BB-05	BB-05	BB-06	BB-06	BB-07	BB-07	BB-08	BB-08	BB-09	BB-09	BB-11	BB-12	BB-12
Sample Depth(Feet):	Industrial		4.5 - 6	1.5 - 3	3 - 4.5	10.5 - 12	1.5 - 3	4.5 - 6	0 - 1.5	4.5 - 6	3 - 4.5	4.5 - 6	0 - 1.5	3 - 4.5	1.5 - 3	0 - 1.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	9.7 U	NA	NA	9.7 U	9.7 U	9.7 U	9.7 U	9.7	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.144 U	0.621	73.7	0.157 U	0.136 U	0.139 U	140	0.14 U	3.17	0.142 U	49.1	110	0.138 U	40.7	11.4
ACENAPHTHYLENE	- -	mg/kg	0.144 U	1.09	10.8 U	0.157 U	0.138 U	0.139 U	50.2 U	0.14 U	0.981	0.1 U	10.3	63.8	0.138	4.99 U	6.07
ANTHRACENE	100000	mg/kg	0.05 U	0.604	36.5	0.05 U	0.05 U	0.0723	104	0.05 U	0.972	0.05 U	22.3	22.3	0.05 U	1.07	2.97
BENZO (A) ANTHRACENE	2.11	mg/kg	0.0023	0.435	16.1	0.00605	0.0233	0.0197	28.7	0.0028 U	1.01	0.00284 U	12.5	12.9	0.0135	4	4.39
BENZO (A) PYRENE	0.211	mg/kg	0.00302	0.43	10.6	0.00465	0.0352	0.02	22.9	0.00331	0.632	0.002 U	8.94	19	0.0338	8.65	1.91
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.00288 U	0.343	8.63	0.00605	0.0246	0.0164	15.4	0.00465	0.529	0.002 U	9.12	11.7	0.0301	5.37	1.89
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0072 U	0.17	10.9	0.0185	0.069	0.0419	26.1	0.007 U	1.36	0.0071 U	13	27.7	0.0278	12.6	2.83
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.00288 U	0.125	3.65	0.00232	0.0116	0.00608	6.34	0.002 U	0.214	0.002 U	3.28	4.09	0.00869	1.75	0.86
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.021 U	1.07	43.4	0.0247	0.0443	0.0424	47.1	0.021 U	2.81	0.0213 U	21.4	40.4	0.0413	12.5	7.38
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.00432 U	0.602	18.5	0.0143	0.156	0.0683	51.2	0.0042 U	1.93	0.00426 U	36.1	36.1	0.0501	18.1	4.05
DIBENZOFURAN	1020	mg/kg	0.144 U	6.43	12.1	1.57 U	0.138 U	0.1 U	50.4	0.14 U	0.445	0.142 U	0.583	5.18	0.138 U	2.37	5.81 J
FLUORANTHENE	22000	mg/kg	0.02 U	2.36	102	0.0293	0.0538	0.0941	189	0.0364	4.01	0.02 U	49.8	69.6	0.071	14.5	21.2
FLUORENE	22000	mg/kg	0.0288 U	0.443	40.2	0.02 U	0.02 U	0.0341	128	0.0349	2.22	0.02 U	19.7	28.1	0.0276 U	5.65	8.05
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.0072 U	0.415	3.38	0.005 U	0.0267	0.0159	7.13	0.007 U	0.3	0.0071 U	4.42	5.65	0.0158	2.68	0.626
NAPHTHALENE	26	mg/kg	0.144 U	20.7	36.4	0.157 U	0.1 U	0.139 U	7,340	0.1 U	1.53	0.1 U	27.5	83.7	0.111	29.3	23
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.05 U	1.67	89.4	0.05 U	0.0515	0.104	334	0.0705	6.33	0.05 U	46	55.1	0.05 U	2.26	27.5
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.0288 U	2.46	47.5	0.02 U	1,480	0.064	112	0.028 U	2.93	0.075	50.4	101	0.141	32	10.8
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.0141 U	6.23	18.2	0.0141 U	0.054	0.384	0.551	0.0141 U	0.0141 U	0.0141 U	4.16	0.425	0.0189	61.4	0.201
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.026	0.032 U	0.032 U	0.032 U	0.621	0.138	0.032 U	2.72	0.0462

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-04	BB-05	BB-05	BB-05	BB-06	BB-06	BB-07	BB-07	BB-08	BB-08	BB-09	BB-09	BB-11	BB-12	BB-12
Sample Depth(Feet):	Industrial		4.5 - 6	1.5 - 3	3 - 4.5	10.5 - 12	1.5 - 3	4.5 - 6	0 - 1.5	4.5 - 6	3 - 4.5	4.5 - 6	0 - 1.5	3 - 4.5	1.5 - 3	0 - 1.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/18/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-13	BB-13	BB-14	BB-14	BB-15	BB-16	BB-16	BB-17	BB-18	BB-19	BB-19	BB-19	BB-20	BB-21	BB-22
Sample Depth(Feet):	Industrial		1.5 - 3	7.5 - 9	1.5 - 3	6 - 7.5	1.5 - 3	0 - 1.5	1.5 - 3	3 - 4.5	0 - 1.5	0 - 1.5	1.5 - 3	7.5 - 9	1.5 - 3	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	07/19/90	07/19/90	07/26/90	07/26/90	07/17/90	07/17/90	07/17/90	07/17/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/26/90
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-13	BB-13	BB-14	BB-14	BB-15	BB-16	BB-16	BB-17	BB-18	BB-19	BB-19	BB-19	BB-20	BB-21	BB-22
Sample Depth(Feet):	Industrial		1.5 - 3	7.5 - 9	1.5 - 3	6 - 7.5	1.5 - 3	0 - 1.5	1.5 - 3	3 - 4.5	0 - 1.5	0 - 1.5	1.5 - 3	7.5 - 9	1.5 - 3	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	07/19/90	07/19/90	07/26/90	07/26/90	07/17/90	07/17/90	07/17/90	07/17/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/26/90
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	9.7 U	9.7 U	NA	NA	NA	NA	NA	NA	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	75.2	1.09	13.4 U	16.2 U	1.36	29.7	26.6	0.133 U	0.332	0.859	0.135 U	0.455	0.3	0.216	0.134 U
ACENAPHTHYLENE	- -	mg/kg	18.7	0.286	42.7	10.6	1.09 U	13.2 U	20.8	0.133 U	0.393	0.579	0.135 U	0.224	0.151	0.149	0.134 U
ANTHRACENE	100000	mg/kg	32.4	0.893	41.8	42.9	3.09	140	3.99	0.05 U	0.274	0.242	5.46	0.995	0.05 U	0.212	0.05 U
BENZO (A) ANTHRACENE	2.11	mg/kg	13.1	0.494	12.2	2.95	6.97	62.1	10.9	0.00266 U	1.14	0.168	0.0392	0.834	0.466	1.9	0.00537
BENZO (A) PYRENE	0.211	mg/kg	5.12	0.357	6.29	1.69	73.4	101	18.5	0.00351	4.36	0.386	0.293	0.43	0.399	1.62	0.0029
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.5	0.254	9.15	2.8	4.28	79	19.1	0.0064	2.31	0.349	0.311	0.538	0.416	1.88	0.01
BENZO (G,H,I) PERYLENE	- -	mg/kg	7.37	0.334	6.57	1.3	16.1	87.9	46.5	0.00665 U	5.65	0.693	0.337	0.673	0.841	5.01	0.0067 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	2.34	0.102	2.53	0.92	1.2	26.7	4.52	0.002 U	0.828	0.092	0.114	0.211	0.134	0.654	0.002 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	27.6	0.677	58.3	89.4	7.27	266	45.5	0.02 U	2.28	0.372	0.0639	1.2	0.692	2.87	0.0234
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	10.9	0.497	18	3.37	19.5	93.6	82.8	0.00399 U	12.4	1.45	0.62	1.22	2.28	12.6	0.00402 U
DIBENZOFURAN	1020	mg/kg	41.6	0.707	406	94.3	0.679	17	10.3	0.133 U	1.34 J	0.605	0.135 U	0.0898	0.173	0.401	0.134 U
FLUORANTHENE	22000	mg/kg	65.8	3.1	80.3	51.5	5.42	182	25.7	0.02 U	2.17	0.536	2.34	4.13	0.373	1.4	0.0836
FLUORENE	22000	mg/kg	55.1	0.973	50.3	24.3	0.512	29.2	2.98	0.02 U	0.0821	0.0868	0.0881	0.9	0.0465	0.0639	0.02 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	1.77	0.0692	2.86	0.449	3.44	30.3	10.2	0.00665 U	1.55	0.211	0.12	0.192	0.282	5.01	0.0067 U
NAPHTHALENE	26	mg/kg	92.5	0.956	160	53.3	2	37.3	26.9	0.1 U	0.704	0.98	0.1 U	0.313	0.264	5.296	0.134 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	11.4	3.59	125	95.6	2.45	81.6	10.8	0.05 U	1.28	0.05 U	0.152	2.47	0.135	1.07	0.0822 J
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	47.8	1.88	57.4	324 U	1.68	87.9	132	0.0266 U	1.91	1.06	0.161	3.04	0.452	1.69	0.0377
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.529	0.0141 U	10.4	0.169	3.6	0.126	0.023	0.0133 U	0.0488	2.56	0.0141 U	0.122	0.0141 U	0.076	0.0134 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.073	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.155	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

See Notes on Page 94.

Table 1
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Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-13	BB-13	BB-14	BB-14	BB-15	BB-16	BB-16	BB-17	BB-18	BB-19	BB-19	BB-19	BB-20	BB-21	BB-22
Sample Depth(Feet):	Industrial		1.5 - 3	7.5 - 9	1.5 - 3	6 - 7.5	1.5 - 3	0 - 1.5	1.5 - 3	3 - 4.5	0 - 1.5	0 - 1.5	1.5 - 3	7.5 - 9	1.5 - 3	0 - 1.5	1.5 - 3
Date Collected:	DC_RCL[1]	Units	07/19/90	07/19/90	07/26/90	07/26/90	07/17/90	07/17/90	07/17/90	07/17/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/19/90	07/26/90
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-22	BB-23	BB-23	BB-23	BB-24	BB-24	BB-24	BB-25	BB-25	BB-25	BB-26	BB-27	BB-27	BB-27	BB-28
Sample Depth(Feet):	Industrial		4.5 - 6	0 - 2	2 - 4	4 - 6	0 - 2	0.5 - 2.5	8 - 10	0 - 2	2 - 4	4 - 6	4 - 6	0 - 2	2 - 4	4 - 6	0 - 2
Date Collected:	DC_RCL[1]	Units	07/26/90	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/05/96	11/05/96	11/05/96	11/15/96	11/05/96	11/05/96	11/05/96	11/11/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 UJ
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	0.014 U	0.014 UJ	NA	NA	NA	NA	NA	0.014 U	NA	NA	0.014 UJ
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	0.007 U	0.004 J	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	0.015 U	0.014 U	NA	NA	NA	NA	NA	0.016	NA	NA	0.022 U
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.002 J
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.002 J
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
BENZENE	7.41	mg/kg	NA	NA	NA	NA	0.005 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	0.07 U	0.071 U	NA	NA	NA	NA	NA	0.069 U	NA	NA	0.072 U
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
TOLUENE	818	mg/kg	NA	NA	NA	NA	0.007 U	0.001 J	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	0.007 U	0.007 UJ	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 UJ
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 U
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	0.007 U	0.034 J	NA	NA	NA	NA	NA	0.007 U	NA	NA	0.007 UJ

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-22	BB-23	BB-23	BB-23	BB-24	BB-24	BB-24	BB-25	BB-25	BB-25	BB-26	BB-27	BB-27	BB-27	BB-28
Sample Depth(Feet):	Industrial		4.5 - 6	0 - 2	2 - 4	4 - 6	0 - 2	0.5 - 2.5	8 - 10	0 - 2	2 - 4	4 - 6	4 - 6	0 - 2	2 - 4	4 - 6	0 - 2
Date Collected:	DC_RCL[1]	Units	07/26/90	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/05/96	11/05/96	11/05/96	11/15/96	11/05/96	11/05/96	11/05/96	11/11/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
3&4-METHYLPHENOL	- -	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	0.14 U	NA	NA	0.38 J	NA	NA	NA	NA	NA	NA	0.29	NA	NA	0.33 J
METHYLNAPHTHALENE	53.1	mg/kg	NA	9.7 U	NA	1 U	1.4 J	NA	0.12 U	NA	NA	0.096 U	0.096 U	9.6 U	NA	0.097 U	0.49 J
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	0.14 U	NA	NA	0.14 U	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	0.14 UJ
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	0.14 U	NA	NA	0.14 U	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	0.14 UJ
2,4-DICHLOROPHENOL	1850	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
2,4-DINITROPHENOL	1230	mg/kg	NA	0.36 J	NA	NA	0.24 J	NA	NA	NA	NA	NA	NA	0.3	NA	NA	0.24 J
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
2-METHYLNAPHTHALENE	2200	mg/kg	NA	9.7 U	NA	1 U	9.7 U	NA	0.12 U	NA	NA	0.096 U	0.096 U	9.6 U	NA	0.097 U	1 U
2-METHYLPHENOL	30800	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
2-NITROPHENOL	- -	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	0.07 U	NA	NA	0.07 U	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	0.14 U	NA	NA	0.17 J	NA	NA	NA	NA	NA	NA	0.18	NA	NA	0.18 J
ACENAPHTHENE	33000	mg/kg	0.134 U	9.7 U	NA	0.25 J	3.4 J	NA	0.12 U	NA	NA	0.096 U	0.096 U	3 J	NA	0.097 U	0.703 J
ACENAPHTHYLENE	- -	mg/kg	0.134 U	9.7 U	NA	1 U	0.84 J	NA	0.12 U	NA	NA	0.096 U	0.096 U	9.6 U	NA	0.097 U	1 U
ANTHRACENE	100000	mg/kg	0.05 U	0.48 U	NA	0.052 U	3.2	NA	0.012 U	NA	NA	0.0048 U	0.0048 U	0.48 U	NA	0.0048 U	0.05 U
BENZO (A) ANTHRACENE	2.11	mg/kg	0.00268 U	0.97 U	NA	0.01 U	0.57 U	NA	0.04	NA	NA	0.00096 U	0.00096 U	0.096 U	NA	0.003	0.01 U
BENZO (A) PYRENE	0.211	mg/kg	0.00268 U	0.52	NA	0.065 U	0.82	NA	0.024	NA	NA	0.002	0.00096 U	1.4	NA	0.0088	0.23
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.00268 U	0.83	NA	0.11 U	1.1 U	NA	0.058	NA	NA	0.004	0.00096 U	2.9	NA	0.02	0.44
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0067 U	0.7	NA	0.098 U	2	NA	0.039	NA	NA	0.0069	0.0023 U	2.8	NA	0.025	0.38
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.00268 U	0.18	NA	0.024	0.35	NA	0.018	NA	NA	0.00099	0.00096 U	0.83	NA	0.0063	0.1
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.0201 U	0.69 U	NA	0.087	2.8	NA	0.091	NA	NA	0.0068 U	0.0068 U	0.69 U	NA	0.014	0.42
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.00402 U	2.4	NA	0.39	5.6	NA	0.071	NA	NA	0.022	0.0014 U	12	NA	0.094	1.4
DIBENZOFURAN	1020	mg/kg	0.134 U	9.7 U	NA	1 U	9.7 U	NA	0.12 U	NA	NA	0.096 U	0.096 U	9.6 U	NA	0.097 U	1 U
FLUORANTHENE	22000	mg/kg	0.02 U	0.97 U	NA	0.1 U	4 U	NA	0.11 U	NA	NA	0.0096 U	0.0096 U	0.96 U	NA	0.0097 U	0.27 U
FLUORENE	22000	mg/kg	0.0268 U	9.7 U	NA	0.1 U	1.6 U	NA	0.016 U	NA	NA	0.0096 U	0.01	0.96 U	NA	0.0097 U	0.1 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.0067 U	0.77	NA	0.13	1.6	NA	0.026	NA	NA	0.0076	0.0023 U	4	NA	0.035	0.37
NAPHTHALENE	26	mg/kg	0.134 U	0.97 U	NA	0.44 J	6.5 J	NA	0.12 U	NA	NA	0.096 U	0.096 U	5.4 J	NA	0.097 U	0.87 J
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.05 U	0.29 J	NA	0.25 U	4 U	NA	0.028 U	NA	NA	0.023 U	0.023 U	2.3 U	NA	0.024 U	0.24 U
PHENOL	100000	mg/kg	NA	0.07 UJ	NA	NA	0.07 UJ	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	0.07 UJ
PYRENE	16500	mg/kg	0.0268 U	0.97 U	NA	0.1 U	3.2 U	NA	0.078	NA	NA	0.0096 U	0.0096 U	0.96 U	NA	0.029	0.44 U
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.0134 U	0.014 U	NA	NA	0.51	NA	NA	NA	NA	NA	NA	0.014 UJ	NA	NA	0.014 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.028 UJ	NA	NA	0.14 U	NA	NA	NA	NA	NA	NA	0.027 UJ	NA	NA	0.029 UJ

See Notes on Page 94.

Table 1
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Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-22	BB-23	BB-23	BB-23	BB-24	BB-24	BB-24	BB-25	BB-25	BB-25	BB-26	BB-27	BB-27	BB-27	BB-28
Sample Depth(Feet):	Industrial		4.5 - 6	0 - 2	2 - 4	4 - 6	0 - 2	0.5 - 2.5	8 - 10	0 - 2	2 - 4	4 - 6	4 - 6	0 - 2	2 - 4	4 - 6	0 - 2
Date Collected:	DC_RCL[1]	Units	07/26/90	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/12/96	11/05/96	11/05/96	11/05/96	11/15/96	11/05/96	11/05/96	11/05/96	11/11/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	22 P	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	4.9 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.35 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0098 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.6 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.52 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.07 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.043 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.078 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0006 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.016 J	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.16 J	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.07 J	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.00057 U	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.002	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	230 J	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	13 J	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	13 J	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	26 P	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	1.4 J	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	7.6 P	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.014 J	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	6.7 P	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.027	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.054 P	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	13.3 U	NA	NA	NA	NA	NA	NA	NA	NA	14 U	13 U	NA	14 U
BARIUM	100000	mg/kg	NA	NA	231	NA	NA	NA	NA	NA	NA	NA	NA	149	130	NA	162
CADMIUM	799	mg/kg	NA	NA	0.67 U	NA	NA	NA	NA	NA	NA	NA	NA	1 U	1 U	NA	1 U
CALCIUM	- -	mg/kg	NA	NA	6,210	NA	NA	NA	NA	NA	NA	NA	NA	NA	8,840	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	48.4	NA	NA	NA	NA	NA	NA	NA	NA	31	50	NA	34
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	29,900	NA	NA	NA	NA	NA	NA	NA	NA	NA	22,100	NA	NA
LEAD	800	mg/kg	NA	NA	13.3 U	NA	NA	NA	NA	NA	NA	NA	NA	14 U	13 U	NA	14 U
MAGNESIUM	- -	mg/kg	NA	NA	9,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	7,480	NA	NA
MANGANESE	22900	mg/kg	NA	NA	270	NA	NA	NA	NA	NA	NA	NA	NA	NA	259	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	2,530	NA	NA	NA	NA	NA	NA	NA	NA	NA	1,810	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
4,4'-DDE	5.07	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
4,4'-DDT	7.03	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.009	0.004 U	NA	NA
ALDRIN	0.101	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
BETA-BHC	0.958	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
DELTA-BHC	117	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
DIELDRIN	0.108	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
ENDOSULFAN II		mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
ENDRIN	185	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	0.005 U	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	0.002 U	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	0.024 U	0.023 U	NA	NA	NA	NA	NA	NA	NA	NA	0.023 U	0.021 U	NA	NA
CHLORDANE	6.47	mg/kg	NA	0.024 U	0.023 U	NA	NA	NA	NA	NA	NA	NA	NA	0.023 U	0.021 U	NA	NA
TOXAPHENE	1.57	mg/kg	NA	0.047 U	0.045 U	NA	NA	NA	NA	NA	NA	NA	NA	0.047 U	0.042 U	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-28	BB-29	BB-29	BB-30	BB-30B	BB-31	BB-31	BB-32	BB-32	BB-33	BB-33	BB-34	BB-34	BB-35	BB-35
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	4 - 6	0 - 2	4 - 6	0 - 2	6 - 8	0 - 2	6 - 8	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	11/11/96	11/12/96	11/12/96	11/11/96	11/11/96	11/06/96	11/06/96	11/06/96	11/06/96	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	0.011 UJ	NA	0.012 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	0.005 UJ	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	0.011 UJ	NA	0.018 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	0.008 J	NA	0.001 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	0.005 U	NA	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	0.002 J	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	0.054 UJ	NA	0.063 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	0.001 J	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	0.005 U	NA	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	0.005 UJ	NA	0.006 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

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Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-28	BB-29	BB-29	BB-30	BB-30B	BB-31	BB-31	BB-32	BB-32	BB-33	BB-33	BB-34	BB-34	BB-35	BB-35
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	4 - 6	0 - 2	4 - 6	0 - 2	6 - 8	0 - 2	6 - 8	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	11/11/96	11/12/96	11/12/96	11/11/96	11/11/96	11/06/96	11/06/96	11/06/96	11/06/96	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	0.34	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	0.1 U	NA	0.49 U	NA	0.098 U	12 U	0.11 U	NA	0.1 U	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	0.17 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	0.17 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	0.17 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.1 U	NA	0.49 U	NA	0.098 U	12 U	0.11 U	NA	0.1 U	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	0.25	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.1 U	NA	0.49 U	NA	0.098 U	12 U	0.11 U	NA	0.1 U	0.39 J	0.33 J	0.029 J	0.11 J	0.047 J	0.45 U [0.45 U]
ACENAPHTHYLENE	- -	mg/kg	0.1 U	NA	0.49 U	NA	0.098 U	12 U	0.36	NA	0.1 U	0.37 J	0.28 J	0.12 J	2.2	0.73 J	0.45 U [0.45 U]
ANTHRACENE	100000	mg/kg	0.0053 U	NA	0.043 UJ	NA	0.031	0.61 U	0.0055 U	NA	0.026	0.96	0.66 J	0.29 J	4.1	1.1 J	0.45 U [0.45 U]
BENZO (A) ANTHRACENE	2.11	mg/kg	0.001 U	NA	0.07 UJ	NA	0.0087 U	0.12 U	0.0011 U	NA	0.041	0.59 J	0.82	0.24 J	1.6 J	0.36 J	0.45 U [0.45 U]
BENZO (A) PYRENE	0.211	mg/kg	0.0033 U	NA	0.07 J	NA	0.0046 U	0.82	0.0011 U	NA	0.025	0.67 J	0.56 J	0.22 J	4.1	0.89 J	0.45 U [0.45 U]
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.0068 U	NA	0.13 J	NA	0.0099 U	1.7	0.0082	NA	0.047	1.2	1.1	0.53 J	6.5	1.3 J	0.45 U [0.45 U]
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0092 U	NA	0.12 J	NA	0.0097 U	1.9	0.0065	NA	0.031	0.82	0.57 J	0.41 J	8.7	2.7	0.45 U [0.45 U]
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.0013	NA	0.042 J	NA	0.0036	0.34	0.0011 U	NA	0.014	0.32 J	0.34 J	0.17 J	1.7 J	0.33 J	0.45 U [0.45 U]
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.0076 U	NA	0.096 J	NA	0.021	0.87 U	0.0078 U	NA	0.067	0.84	0.98	0.38 J	4.3	0.59 J	0.45 U [0.45 U]
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.032	NA	0.25 J	NA	0.017	7.6	0.0016 U	NA	0.078	0.17 J	0.13 J	0.039 J	1.3 J	0.39 J	0.45 U [0.45 U]
DIBENZOFURAN	1020	mg/kg	0.1 U	NA	0.49 U	NA	0.098 U	12 U	0.11 U	NA	0.1 U	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.01 U	NA	0.23 UJ	NA	0.046 U	1.1 J	0.011 U	NA	0.19	2.1	2.4	0.57	4.6	0.67 J	0.45 U [0.45 U]
FLUORENE	22000	mg/kg	0.012 U	NA	0.049 U	NA	0.017 U	0.51 J	0.013	NA	0.031	0.22 J	0.16 J	0.034 J	0.28 J	0.092 J	0.45 U [0.45 U]
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.0096	NA	0.092 J	NA	0.0071	2	0.0027 U	NA	0.024	0.81	0.55 J	0.33 J	6.9	1.9	0.45 U [0.45 U]
NAPHTHALENE	26	mg/kg	0.1 U	NA	0.49 U	NA	0.1	4.4 J	0.11 U	NA	0.13	1.4	0.75	0.23 J	1.9 U	0.17 J	0.45 U [0.45 U]
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.6 U	3.4 U	2.6 U	9.2 U	7.4 U	2.2 U [2.2 U]
PHENANTHRENE	- -	mg/kg	0.026 U	NA	0.12 U	NA	0.024 U	0.42 J	0.048	NA	0.069	1.7	1.1	0.3 J	0.28 J	0.18 J	0.45 U [0.45 U]
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.01 U	NA	0.17 UJ	NA	0.033 U	1.2 U	0.011 U	NA	0.11	1.5	2.2	0.41 J	4.5	0.58 J	0.45 U [0.45 U]
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	0.15 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	0.035 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-28	BB-29	BB-29	BB-30	BB-30B	BB-31	BB-31	BB-32	BB-32	BB-33	BB-33	BB-34	BB-34	BB-35	BB-35
Sample Depth(Feet):	Industrial		4 - 6	0 - 2	4 - 6	0 - 2	4 - 6	0 - 2	6 - 8	0 - 2	6 - 8	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	11/11/96	11/12/96	11/12/96	11/11/96	11/11/96	11/06/96	11/06/96	11/06/96	11/06/96	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	17 U	NA	14 U	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	232	NA	167	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	1 U	NA	1 U	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	43,500	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	44	NA	41	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	35,200	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	17 U	NA	14 U	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	17,500	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	623	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	3,310	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	0.036	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	0.006 U	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	0.019	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	0.006 U	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	0.006 U	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	0.006 U	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	0.036	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	0.006 U	NA	0.006	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	0.003 U	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	0.03 U	NA	0.024 U	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	0.03 U	NA	0.024 U	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	0.059 U	NA	0.048 U	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-36	BB-36	BB-36A	BB-37	BB-37	BB-38	BB-38	BB-39	BB-39	BB-40	BB-40	BB-41	BB-41	BB-41A	BB-42
Sample Depth(Feet):	Industrial		0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	09/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	04/27/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-36	BB-36	BB-36A	BB-37	BB-37	BB-38	BB-38	BB-39	BB-39	BB-40	BB-40	BB-41	BB-41	BB-41A	BB-42
Sample Depth(Feet):	Industrial		0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	09/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	04/27/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.093 J	90 J	NA	0.38 J	62	0.17 J	0.91 J	0.22 J	0.024 J	0.66 J	0.2 J	5 J	940	NA	0.05 J
ACENAPHTHYLENE	- -	mg/kg	0.32 J	26 J	NA	0.5 J	1.8 J	1.2	1.8 J	0.42 J	0.03 J	1.1 J	0.8 J	7.9 J	19 J	NA	0.087 J
ANTHRACENE	100000	mg/kg	5	1,200	NA	1.4 J	55	2.5	7.6	0.59 J	0.045 J	110	37	16	510	NA	0.2 J
BENZO (A) ANTHRACENE	2.11	mg/kg	1.2	140 J	NA	1.2 J	28	0.79 J	5.9	0.76 J	0.011 J	4.1 J	9.5	9.4	180 J	NA	0.14 J
BENZO (A) PYRENE	0.211	mg/kg	1.3	170 J	NA	2.4	11 J	1	6.9	0.78 J	0.031 J	6.3 J	6.8	31	54 J	NA	0.14 J
BENZO (B) FLUORANTHENE	2.11	mg/kg	1.7	310	NA	3.7	22	1.8	12	1.1	0.034 J	9.4 J	11	43	88 J	NA	0.36 J
BENZO (G,H,I) PERYLENE	- -	mg/kg	1.9	98 J	NA	1.8 J	4.9 J	1.2	4.6	0.6 J	0.038 J	5.5 J	3.7 J	14	20 J	NA	0.076 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.71 J	76 J	NA	1 J	7.2 J	0.51 J	3.4	0.39 J	0.35 U	2.6 J	3.7 J	12	31 J	NA	0.11 J
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	6.2	430	NA	2.3	29	1.1	8.4	1	0.018 J	11 J	17	18	180 J	NA	0.27 J
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.38 J	28 J	NA	0.41 J	1.6 J	0.23 J	1.2 J	0.16 J	0.0071 J	18 U	1.1 J	5.1 J	7.4 J	NA	0.025 J
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	1.6	440	NA	3.1	130	2.2	18	1.3	0.022 J	8.1 J	35	21	950	NA	0.28 J
FLUORENE	22000	mg/kg	0.59 J	110 J	NA	0.27 J	43	0.21 J	0.91 J	0.19 J	0.054 J	12 J	3.3 J	3.4 J	900	NA	0.091 J
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	1.6	97 J	NA	2	5.4 J	1.1	5.4	0.66 J	0.038 J	5 J	3.6 J	18	22 J	NA	0.093 J
NAPHTHALENE	26	mg/kg	0.2 J	33 J	NA	0.98 J	36	0.93	1.7 J	1.8	0.08 J	2.3 J	0.43 J	4.4 J	640	NA	0.4 J
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	4.4 U	1,100 U	200 U	9.7 U	98 U	2.8 J	11 U	4.2 U	1.7 U	86 U	31 U	44 U	1,200 U	170 U	4.7 U
PHENANTHRENE	- -	mg/kg	1.4	130 J	NA	1 J	130	1.9	2.9	2.1	0.045 J	22	4.5 J	8.1 J	1,500	NA	0.4 J
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.92	270	NA	3.1	96	1.4	9.4	0.88	0.011 J	6.1 J	20	12	590	NA	0.15 J
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-36	BB-36	BB-36A	BB-37	BB-37	BB-38	BB-38	BB-39	BB-39	BB-40	BB-40	BB-41	BB-41	BB-41A	BB-42
Sample Depth(Feet):	Industrial		0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	09/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	04/27/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	4.6 DB	NA	NA	NA	NA	NA	16 DB	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	0.87	NA	NA	NA	NA	NA	2.7 D	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	0.095	NA	NA	NA	NA	NA	0.26 D	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.023	NA	NA	NA	NA	NA	0.096	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.095	NA	NA	NA	NA	NA	0.32	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.15	NA	NA	NA	NA	NA	0.49	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.016	NA	NA	NA	NA	NA	0.058	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	0.019	NA	NA	NA	NA	NA	0.17	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	0.0045 J	NA	NA	NA	NA	NA	0.062	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	0.0045 J	NA	NA	NA	NA	NA	0.028	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	0.0092	NA	NA	NA	NA	NA	0.023	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.012	NA	NA	NA	NA	NA	0.037	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	0.015	NA	NA	NA	NA	NA	0.03	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	0.0012 U	NA	NA	NA	NA	NA	0.0032 JA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	0.001 CONU	NA	NA	NA	NA	NA	0.0027 CON	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	48 DB	NA	NA	NA	NA	NA	170 DBE	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	3.2 D	NA	NA	NA	NA	NA	8.4 D	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	11	NA	NA	NA	NA	NA	36	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	4.6	NA	NA	NA	NA	NA	12	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	1.1	NA	NA	NA	NA	NA	3.4	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	1.2	NA	NA	NA	NA	NA	3.4	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	0.028	NA	NA	NA	NA	NA	0.17	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	0.086	NA	NA	NA	NA	NA	0.18	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	0.0034	NA	NA	NA	NA	NA	0.046	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	0.0019	NA	NA	NA	NA	NA	0.012	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-42	BB-43	BB-43	BB-44	BB-44	BB-44A	BB-45	BB-45	BB-46	BB-46	BB-47	BB-47	BB-48	BB-49
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	10/18/06	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	10/18/06	10/18/06
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-42	BB-43	BB-43	BB-44	BB-44	BB-44A	BB-45	BB-45	BB-46	BB-46	BB-47	BB-47	BB-48	BB-49
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	10/18/06	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	10/18/06	10/18/06
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.62 U	0.034 J	0.48 U [0.52 U]	0.18 J	0.46 J	NA	0.091 J	0.069 J	0.18 J	0.018 J	0.033 J	0.45 U	0.99 J	0.13
ACENAPHTHYLENE	- -	mg/kg	0.62 U	0.54	0.018 J [0.52 U]	1	0.89 J	NA	0.14 J	0.62 U	1.5	0.1 J	0.15 J	0.45 U	16	0.34
ANTHRACENE	100000	mg/kg	0.62 U	0.23 J	0.48 U [0.52 U]	1.8	1.6	NA	0.26 J	0.15 J	2.4	0.36 J	0.44 J	0.45 U	21	0.74
BENZO (A) ANTHRACENE	2.11	mg/kg	0.62 U	0.26 J	0.48 U [0.52 U]	2	1.4	NA	0.19 J	0.1 J	1.8	0.15 J	0.15 J	0.45 U	14	0.41
BENZO (A) PYRENE	0.211	mg/kg	0.62 U	0.69	0.017 J [0.52 U]	2.6	2.2	NA	0.24 J	0.069 J	2.6	0.2 J	0.22 J	0.45 U	27	0.4
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.014 J	1.2	0.028 J [0.52 U]	3.6	3.1	NA	0.39 J	0.08 J	4.3	0.45 J	0.54	0.45 U	52	0.68
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.62 U	0.6	0.017 J [0.52 U]	1.6	1.2	NA	0.14 J	0.071 J	1.7	0.13 J	0.47	0.45 U	49	0.72
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.62 U	0.37 J	0.48 U [0.52 U]	1.3	1	NA	0.11 J	0.016 J	1.4	0.15 J	0.12 J	0.45 U	1.8 U	0.25
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.015 J	0.5	0.48 U [0.52 U]	2.6	1.8	NA	0.23 J	0.13 J	2.5	0.24 J	0.39 J	0.45 U	21	0.55
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.62 U	0.16 J	0.48 U [0.52 U]	0.45 J	0.39 J	NA	0.04 J	0.011 J	0.61 J	0.045 J	0.09 J	0.45 U	11	0.13
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.014 J	0.13 J	0.48 U [0.52 U]	3.6	2.8	NA	0.45 J	0.11 J	2.8	0.23 J	0.24 J	0.45 U	30	0.96
FLUORENE	22000	mg/kg	0.62 U	0.04 J	0.48 U [0.52 U]	0.27 J	0.43 J	NA	0.099 J	0.083 J	0.23 J	0.054 J	0.051 J	0.45 U	3.1	0.18
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.62 U	0.78	0.023 J [0.52 U]	1.9	1.4	NA	0.16 J	0.031 J	2.1	0.16 J	0.38 J	0.45 U	39	0.52
NAPHTHALENE	26	mg/kg	0.069 J	0.53	0.48 U [0.52 U]	0.45 J	1.4	NA	0.56 J	1.2	0.42 J	0.097 J	0.16 J	0.45 U	3.2	0.44
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	3 U	2 U	2.3 U [2.5 U]	4.7 U	5 U	NA	3.6 U	3 U	5 U	2.8 U	2.2 U	2.2 U	NA	0.39 J
PHENANTHRENE	- -	mg/kg	0.03 J	0.36 J	0.48 U [0.52 U]	1.2	2.3	NA	0.46 J	0.63	1.2	0.13 J	0.18 J	0.45 U	6.4	0.61
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.62 U	0.098 J	0.48 U [0.52 U]	2.2	1.7	NA	0.24 J	0.11 J	1.7	0.14 J	0.23 J	0.45 U	39	0.69
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-42	BB-43	BB-43	BB-44	BB-44	BB-44A	BB-45	BB-45	BB-46	BB-46	BB-47	BB-47	BB-48	BB-49
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	04/27/05	04/27/05	10/18/06	04/27/05	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	10/18/06	10/18/06
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	14.4	NA	NA	NA	NA	NA	NA	NA	5.3
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	3.18	NA	NA	NA	NA	NA	NA	NA	0.922
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	0.252	NA	NA	NA	NA	NA	NA	NA	0.0779
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.0848	NA	NA	NA	NA	NA	NA	NA	0.0251
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.228	NA	NA	NA	NA	NA	NA	NA	0.0743
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.4	NA	NA	NA	NA	NA	NA	NA	0.137
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.057	NA	NA	NA	NA	NA	NA	NA	0.0222
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.144	NA	NA	NA	NA	NA	NA	NA	0.0493
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.053	NA	NA	NA	NA	NA	NA	NA	0.0195
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	0.0269	NA	NA	NA	NA	NA	NA	NA	0.00951
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	0.0177	NA	NA	NA	NA	NA	NA	NA	0.00757
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.108	NA	NA	NA	NA	NA	NA	NA	0.0362
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	0.043	NA	NA	NA	NA	NA	NA	NA	0.0146
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	0.00334 U	NA	NA	NA	NA	NA	NA	NA	0.00288 U
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.00346 U	NA	NA	NA	NA	NA	NA	NA	0.00314
OCDD	61	ug/kg	NA	NA	NA	NA	NA	163	NA	NA	NA	NA	NA	NA	NA	54.1
OCDF	44	ug/kg	NA	NA	NA	NA	NA	14.5	NA	NA	NA	NA	NA	NA	NA	3.66
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	30.1	NA	NA	NA	NA	NA	NA	NA	12.4
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	15.2	NA	NA	NA	NA	NA	NA	NA	3.72
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	2.73	NA	NA	NA	NA	NA	NA	NA	1.18
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	3.49	NA	NA	NA	NA	NA	NA	NA	1.13
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	0.133	NA	NA	NA	NA	NA	NA	NA	0.0498
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	0.521	NA	NA	NA	NA	NA	NA	NA	0.143
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	0.0129	NA	NA	NA	NA	NA	NA	NA	0.0154
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	0.0436	NA	NA	NA	NA	NA	NA	NA	0.00816
Metals																
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-50	BB-51	BB-52	BB-53	BB-54	BB-55	BB-56	CB-01	CB-01	CB-02	CB-03	CB-03	CB-04	CB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5				4.5 - 6	7.5 - 9	9 - 10.5	0 - 1.5	6 - 7.5	6 - 7.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/30/90	07/17/90	07/26/90	07/30/90	07/30/90	07/30/90	07/30/90
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-50	BB-51	BB-52	BB-53	BB-54	BB-55	BB-56	CB-01	CB-01	CB-02	CB-03	CB-03	CB-04	CB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5				4.5 - 6	7.5 - 9	9 - 10.5	0 - 1.5	6 - 7.5	6 - 7.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/30/90	07/17/90	07/26/90	07/30/90	07/30/90	07/30/90	07/30/90
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.35 U [0.13 J]	0.59	NA	0.097 J [0.076 J]	0.043 J	0.7 J	0.082 J	0.564	8.22	14.8 U	0.1 U	19.6	0.209	0.528
ACENAPHTHYLENE	- -	mg/kg	0.75 [1.3]	8.7	NA	1.1 [0.91]	0.75	9.9	0.65	0.559	0.286	14.8 U	0.1 U	4.43	0.112	0.488
ANTHRACENE	100000	mg/kg	1.8 [3.1]	22	NA	1.6 [1.4]	1.4	15	1.5	1.55	2.81	3.02	0.05 U	5.72	0.0645	0.05 U
BENZO (A) ANTHRACENE	2.11	mg/kg	0.73 [2.5]	4.8	NA	1.1 [0.93]	0.44	23	0.8	0.91	1.36	3.21	0.0164	3.92	0.0372	0.00714 U
BENZO (A) PYRENE	0.211	mg/kg	1.4 [3.4]	14	NA	1.1 [1.1]	0.91	14	0.63	0.28	0.442	1.29	0.015	1.28	0.0129	0.00714 U
BENZO (B) FLUORANTHENE	2.11	mg/kg	3.5 [8.1]	21	NA	4 [4]	2	51	1.3	0.479	0.843	2.28	0.0254	1.74	0.0192	0.00714 U
BENZO (G,H,I) PERYLENE	- -	mg/kg	2.7 [5.2]	25	NA	1.8 [1.7]	1.7	20	1.5	0.389	0.602	0.74 U	0.0269	1.23	0.0115	0.0179 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.35 U [0.18 U]	0.59 U	NA	0.19 U [0.18 U]	0.53	1.7 U	0.36	0.192	0.299	0.618	0.00765	0.657	0.00654	0.00714 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	1.7 J [6 J]	7.5	NA	2.4 [2.4]	0.81	36	0.88	1.45	2.66	9.78	0.0338	5.69	0.0647	0.0535 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.63 [1.3]	5.4	NA	0.48 [0.44]	0.38	5	0.24	0.787	0.959	0.444 U	0.0677	2.61	0.0248	0.0107 U
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.835	5.53	57.7	0.16 U	12.9	0.139	0.357 U
FLUORANTHENE	22000	mg/kg	1.1 [1.5]	6.8	NA	1.7 [1.7]	0.51	54	1.3	7.15	10.6	0.173	0.0854	25.7	0.283	0.02 U
FLUORENE	22000	mg/kg	0.28 J [0.45]	5.3	NA	0.3 [0.26]	0.19	3	0.21	3.37	7.24	16	0.02 U	14	0.154	0.0714 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	2.2 [4.1]	23	NA	1.8 [1.7]	1.6	20	1.1	0.092	0.105	0.74 U	0.00815	0.282	0.005 U	0.0179 U
NAPHTHALENE	26	mg/kg	0.27 J [0.46]	0.55 J	NA	1.8 [1.1]	0.12	1.2 J	0.6	0.577	8.12	20	0.1 U	7.81	0.116	0.357 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	1.1 J [3 J]	6.8 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.37 [0.58]	1.5	NA	1.4 [1.1]	0.14	8.3	0.66	10.6	16.6	71.3	0.05 U	42.4	0.395	0.05 U
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	1.2 [2.4]	7.6	NA	2 J [2.1 J]	0.78 J	57 J	1.4 J	5	5.69	3.26	0.0583	14.1	0.135	0.286
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.179	0.251	3.33	1.87	1.5	0.0131 U	0.0143 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		BB-50	BB-51	BB-52	BB-53	BB-54	BB-55	BB-56	CB-01	CB-01	CB-02	CB-03	CB-03	CB-04	CB-04
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5				4.5 - 6	7.5 - 9	9 - 10.5	0 - 1.5	6 - 7.5	6 - 7.5	7.5 - 9
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	11/21/06	07/30/90	07/17/90	07/26/90	07/30/90	07/30/90	07/30/90	07/30/90
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	145	24.7	3.79 [3.74]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	44.3 D	5.25	0.738 [0.719]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	4.56	0.487	0.0614 J [0.0605 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	0.854	0.0955	0.0306 J [0.0284 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	5.47	0.706	0.0637 [0.0585 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	3.75	0.694	0.0922 [0.0859]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	1.03	0.174	0.0204 J [0.0196 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	1.49	0.189	0.0439 J [0.038 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	0.739	0.126	0.0152 J [0.0145 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	0.268	0.0394	0.0133 J [0.0107 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	0.135	0.143	0.00544 J [0.00521 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	1.73	0.211	0.0299 J [0.0285 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	0.507	0.137	0.0111 J [0.0106 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	0.0266	0.00724	0.00344 U [0.00255 U]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	0.0145	0.063	0.00289 U [0.00286 J]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	2,640	336	36 [34.4]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	188	22.8	2.63 [2.53]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	276	50.6	12.2 [12.1]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	181 D	25.4	2.8 [2.74]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	20.4	4.18	1.51 [1.43]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	52.2 D	6.67	0.964 [0.916]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	1.02	0.405	0.0842 JN [0.0819 JN]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	6.08 D	1.23	0.113 [0.11]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	0.111	0.22	0.029 JN [0.0266]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	0.401 D	0.554	0.0192 [0.0195]	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		CB-05	CB-05	CB-06	CB-06	CB-07	CB-07	CB-07	CB-08	CB-09	CB-09	CB-10	CB-10	CB-10	CB-11	CB-11
Sample Depth(Feet):	Industrial		0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	0 - 1.5	4.5 - 6	7.5 - 9	6 - 7.5	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	07/30/90	07/30/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.013 UJ	0.015 UJ	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.003 J	0.004 J	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.003 J	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.002 J	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.066 UJ	0.074 UJ	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.003 J	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	0.007 U	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007 UJ	0.007 UJ	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		CB-05	CB-05	CB-06	CB-06	CB-07	CB-07	CB-07	CB-08	CB-09	CB-09	CB-10	CB-10	CB-10	CB-11	CB-11
Sample Depth(Feet):	Industrial		0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	0 - 1.5	4.5 - 6	7.5 - 9	6 - 7.5	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	07/30/90	07/30/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 UJ	0.07 UJ	NA	NA	0.07 U	0.07 UJ	0.07 UJ
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.31	0.15 U	NA	NA	0.14 U	0.14 U	0.14 U
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.2 U	0.1 U	NA	NA	0.13	0.12 J	0.1 U
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.13 U	0.15 U	NA	NA	0.14 U	0.14 U	0.14 U
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.13 U	0.15 U	NA	NA	0.14 U	0.14 U	0.14 U
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.32	0.15 U	NA	NA	0.14 U	0.14 U	0.14 U
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	0.001 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.2 U	0.1 U	NA	NA	0.1 U	0.099 U	0.1 U
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U	0.07 U	NA	NA	0.07 U	0.07 U	0.07 U
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.13 U	0.15 U	NA	NA	0.14 U	0.14 U	0.14 U
ACENAPHTHENE	33000	mg/kg	0.135 U	21.8	0.138 U	30.5	0.135 U	10.5	2.61	15.4	9.2 U	0.1 U	NA	NA	0.1 U	0.099 UJ	0.1 U
ACENAPHTHYLENE	- -	mg/kg	0.135 U	15.7	0.138 U	11.7	0.135 U	2.89	6.69	5.79	9.2 U	0.1 U	NA	NA	0.1 U	0.099 U	0.1 U
ANTHRACENE	100000	mg/kg	0.05 U	10.1	0.05 U	9.27	0.05 U	3.88	1.66	7.89	0.46 U	0.0051 U	NA	NA	0.0035 U	0.0049 UJ	0.0051 U
BENZO (A) ANTHRACENE	2.11	mg/kg	0.002 U	3	0.0425	3.9	0.00483	1.38	0.78	1.89	0.092 U	0.001 U	NA	NA	0.001 U	0.00099 UJ	0.001 U
BENZO (A) PYRENE	0.211	mg/kg	0.00214	1.08	0.176	2.02	0.00775	0.613	0.563	1.35	0.18	0.001 U	NA	NA	0.001 U	0.00099 UJ	0.001 U
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.00284	1.09	0.302	3.13	0.0137	0.99	0.766	1.61	0.34	0.001 U	NA	NA	0.001 U	0.00099 UJ	0.0042
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.00675 U	1.47	0.233	1.97	0.0289	0.59	0.407	1.16	0.28	0.0025 U	NA	NA	0.0024 U	0.0024 UJ	0.0025 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.002 U	0.488	0.0692	1.07	0.00342	0.336	0.26	0.592	0.1	0.001 U	NA	NA	0.001 U	0.00099 UJ	0.001 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.0203 U	7.24	0.146	8.52	0.015 U	3.26	1.77	4.88	0.65 U	0.0073 U	NA	NA	0.0071 U	0.007 U	0.0073 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.00405 U	2.26	0.503	4.88	0.0581	1.02	1.34	1.78	0.13 U	0.0015 U	NA	NA	0.0014 U	0.001 UJ	0.0015 U
DIBENZOFURAN	1020	mg/kg	0.135 U	18.7	0.138 U	9.7 U	9.7 U	9.7 U	9.7 U	9.7 U	9.2 U	0.1 U	NA	NA	0.1 U	0.099 U	0.1 U
FLUORANTHENE	22000	mg/kg	0.02 U	26.8	0.106	48.2	0.0273	14.8	7.52	21.7	0.92 U	0.01 U	NA	NA	0.01 U	0.0099 U	0.01 U
FLUORENE	22000	mg/kg	0.02 U	20.7	0.02 U	24.1	0.02 U	8.83	4.58	14.8	0.92 U	0.01 U	NA	NA	0.01 U	0.0099 UJ	0.01 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.00675 U	0.286	0.0635	0.448	0.00571	0.093	0.098	0.201	0.3	0.0025 U	NA	NA	0.0014 U	0.002 UJ	0.0025 U
NAPHTHALENE	26	mg/kg	0.1 U	28	0.1 U	25	0.135 U	8.13	4.29	15.3	2.7 J	0.1 U	NA	NA	0.1 U	0.099 U	0.1 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.05 U	50.5	0.05 U	71.4	0.5 U	25.2	10	38.1	2.2 U	0.025 U	NA	NA	0.024 U	0.024 UJ	0.025 U
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.06 UJ	0.07 UJ	NA	NA	0.07 UJ	0.07 UJ	0.07 UJ
PYRENE	16500	mg/kg	0.027 U	12.4	0.11	28.9	0.0276	6.73	8.54	14.5	0.92 U	0.01 U	NA	NA	0.01 U	0.01 U	0.01 U
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.0135 U	2.64	0.744	1.6	0.0316	0.347	2.73	5.39	1.4	0.015 U	NA	NA	0.014 U	0.014 U	0.015 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.52 U	0.029 U	NA	NA	0.029 U	0.028 U	0.029 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		CB-05	CB-05	CB-06	CB-06	CB-07	CB-07	CB-07	CB-08	CB-09	CB-09	CB-10	CB-10	CB-10	CB-11	CB-11
Sample Depth(Feet):	Industrial		0 - 1.5	7.5 - 9	1.5 - 3	6 - 7.5	0 - 1.5	4.5 - 6	7.5 - 9	6 - 7.5	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	07/30/90	07/30/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	07/31/90	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96	10/31/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.27	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.057 P	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0037	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0015 J	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0044	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0094	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00076	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0014 J	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0014 J	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00031 U	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00048 J	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00093 J	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00042 U	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0002 U	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	2.6	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.17	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.53	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.27 P	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.037	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.091 P	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0014 J	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.014 P	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.00042 U	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.0011	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	13 U	NA	NA	15 U	NA	14 U	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	206	NA	NA	271	NA	274	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1 U	NA	NA	1 U	NA	1 U	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	9,430	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	47	NA	NA	60	NA	68	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	31,800	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	13 U	NA	NA	15 U	NA	14 U	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11,700	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	406	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,610	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	0.003 U	NA	0.002 U	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	0.003 U	NA	0.002 U	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	0.003 U	NA	0.002 U	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	0.003 U	NA	0.002 U	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	0.003 U	NA	0.002 U	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.005 U	NA	0.005 U	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.003 U	NA	0.002 U	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.003 U	NA	0.002 U	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.003 U	NA	0.002 U	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 U	NA	NA	0.025 U	NA	0.024 U	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.022 U	NA	NA	0.025 U	NA	0.024 U	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.044 U	NA	NA	0.05 U	NA	0.048 U	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	CB-12 0 - 2 10/31/96	CB-12 2 - 4 10/31/96	CB-12 8 - 10 10/31/96	CB-13 0 - 2 10/31/96	CB-13 8 - 10 10/31/96	CB-14 0 - 0.5 04/27/05	CB-14 0.5 - 1.5 04/27/05	CB-15 0 - 0.5 04/27/05	CB-15 0.5 - 1.5 04/27/05	FB-01 1.5 - 3 08/02/90	FB-01 6 - 7.5 08/02/90	FB-02 7.5 - 9 08/02/90	FB-03 6 - 7.5 08/02/90	FB-03 7.5 - 9 08/02/90
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	0.014 UJ	NA	NA	0.019 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	0.003 J	NA	NA	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	0.07 UJ	NA	NA	0.094 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	0.003 J	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	0.007 U	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	0.002 J	NA	NA	0.009 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	0.007 UJ	NA	NA	0.009 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA

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Superior, Wisconsin
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Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	0.07 UJ	NA	0.08 UJ	0.07 UJ	0.09 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	0.14 U	NA	0.16 U	0.14 U	0.19 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	0.19	NA	0.11 U	0.1 U	0.13 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	0.14 U	NA	0.16 U	0.14 U	0.19 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	0.14 U	NA	0.16 U	0.14 U	0.19 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	0.14 U	NA	0.16 U	0.14 U	0.19 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.095 U	NA	0.11 U	0.1 U	0.13 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	0.07 U	NA	0.08 U	0.07 U	0.09 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	0.14 U	NA	0.16 U	0.14 U	0.19 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.095 U	NA	0.11 U	0.1 U	0.13 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	13.4	2.09	0.132	29.4	5.68
ACENAPHTHYLENE	- -	mg/kg	0.095 U	NA	0.1 U	0.1 U	0.13 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	4.32	1.54 U	0.164 U	12.8	0.583
ANTHRACENE	100000	mg/kg	0.0048 U	NA	0.0054 U	0.005 U	0.0065 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	33.1	0.579	0.05 U	6.15	1.35
BENZO (A) ANTHRACENE	2.11	mg/kg	0.00095 U	NA	0.0011 U	0.001 U	0.0013 U	0.48 U	0.024 J	0.46 U	0.43 U [0.45 U]	12.3	1.24	0.00391	5.98	1.19
BENZO (A) PYRENE	0.211	mg/kg	0.0022	NA	0.0016	0.001 U	0.0013 U	0.48 U	0.014 J	0.46 U	0.43 U [0.45 U]	11.4	1.03	0.00297	3.15	0.695
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.0045	NA	0.015	0.001 U	0.025	0.48 U	0.097 J	0.46 U	0.43 U [0.45 U]	15.9	1.37	0.00473	3.54	0.78
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0059	NA	0.0031 U	0.0024 U	0.0032 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	7.63	0.563	0.0082 U	3.16	0.513
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.0011	NA	0.0011 U	0.001 U	0.0013 U	0.48 U	0.01 J	0.46 U	0.43 U [0.45 U]	5.42	0.484	0.002 U	1.52	0.335
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.005 U	NA	0.0078 U	0.0072 U	0.0094 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	50.3	0.601	0.0162	7.33	1.43
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.022	NA	0.0016 U	0.0014 U	0.0019 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	24.7	1.56	0.00492 U	6.28	1.04
DIBENZOFURAN	1020	mg/kg	0.095 U	NA	0.11 U	0.1 U	0.13 U	NA	NA	NA	NA	3.21	1.19	0.214	19.6	5.31
FLUORANTHENE	22000	mg/kg	0.0095 U	NA	0.011 U	0.01 U	0.013 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	62.8	4.59	0.0278	29.3	7.75
FLUORENE	22000	mg/kg	0.0095 U	NA	0.011 U	0.01 U	0.013 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	8.22	1.43	0.0288	15.4	3.66
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.0053	NA	0.0026 U	0.0024 U	0.0032 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	5.78	0.394	0.0082 U	1.32	0.191
NAPHTHALENE	26	mg/kg	0.095 U	NA	0.11 U	0.1 U	0.13 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	2.08	4.1	0.164 U	32.4	5.93
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	2.3 U	2.2 U	2.3 U	2.1 U [2.2 U]	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.023 U	NA	0.026 U	0.024 U	0.032 U	0.48 U	0.45 U	0.46 U	0.43 U [0.45 U]	19.6	5.2	0.05	36.1	10.3
PHENOL	100000	mg/kg	0.07 UJ	NA	0.08 UJ	0.07 UJ	0.09 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.0095 U	NA	0.011 U	0.01 U	0.013 U	0.48 U	0.011 J	0.46 U	0.43 U [0.45 U]	60.4	1.82	0.0248	22.9	4.54
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	0.053	NA	0.016 U	0.014 U	0.019 U	NA	NA	NA	NA	25.1	0.0402	0.0164 U	0.309	0.0151 U
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.027 U	NA	0.031 U	0.029 U	0.037 U	NA	NA	NA	NA	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

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Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	0.54 B	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	0.28	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	0.019	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.0025 J	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.026	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.02	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.0041 J	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	0.0043 U	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.0059 J	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	0.0015 U	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	0.0018 J	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.0038 U	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	0.0021 J	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	0.0011 U	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	0.0009 U	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	7.3 EB	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	0.79	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	0.95	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	1.1	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	0.051	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	0.29	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	0.0015 U	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	0.015	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	0.0011 U	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	0.0009 U	NA	NA	NA	NA	NA	NA	NA	NA
Metals																
ARSENIC	2.39	mg/kg	NA	14 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	237	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	34,400	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	62	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	42,100	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	14 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	24,200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	534	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	5,860	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	0.005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	0.024 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	0.024 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	0.048 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-04	FB-04	FB-05	FB-05	FB-5A	FB-07	FB-08	FB-09	FB-09	FB-09	FB-10	FB-10	FB-11	FB-11	FB-11
Sample Depth(Feet):	Industrial		3 - 4.5	7.5 - 9	3 - 4.5	4.5 - 6	0 - 0.5	3 - 4.5	1.5 - 3	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10
Date Collected:	DC_RCL[1]	Units	08/01/90	08/02/90	08/03/90	08/03/90	11/21/06	08/02/90	08/03/90	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.014 UJ	NA	0.013 UJ	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.004 J	NA	0.005 J	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.005 J	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.002 J	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.068 UJ	NA	0.067 UJ	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 J	NA	0.003 J	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.007 U	NA	0.007 U	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.002 J	NA	0.018 J	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-04	FB-04	FB-05	FB-05	FB-5A	FB-07	FB-08	FB-09	FB-09	FB-09	FB-10	FB-10	FB-11	FB-11	FB-11
Sample Depth(Feet):	Industrial		3 - 4.5	7.5 - 9	3 - 4.5	4.5 - 6	0 - 0.5	3 - 4.5	1.5 - 3	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10
Date Collected:	DC_RCL[1]	Units	08/01/90	08/02/90	08/03/90	08/03/90	11/21/06	08/02/90	08/03/90	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.35 J	NA	NA	NA	NA	1.5 J	0.12 U	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	200 U	NA	0.24	NA	0.1 U	1.5 J	42 U	0.1 U
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	NA	0.16 J	0.12 U	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	NA	0.13 J	0.13	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.39 J	NA	NA	NA	NA	0.57 J	0.12 U	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	200 U	NA	0.12 U	NA	0.1 U	8.6 U	42 U	0.1 U
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.06 U	0.06 U	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	NA	0.14 J	0.06 U	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	NA	0.18 J	0.12 U	NA
ACENAPHTHENE	33000	mg/kg	34.5	3.78	0.05 U	0.134 U	NA	0.126 U	0.126 U	200 U	NA	0.12 U	NA	0.1 U	3.2 J	42 U	0.1 U
ACENAPHTHYLENE	- -	mg/kg	5.46	0.275	0.123 U	0.134 U	NA	0.1 U	0.126 U	200 U	NA	0.12 U	NA	0.1 U	8.6 U	42 U	0.1 U
ANTHRACENE	100000	mg/kg	15.7	1.26	0.05 U	0.05 U	NA	0.05 U	0.05 U	20	NA	0.009	NA	0.005 U	1.5 J	5.2 U	0.0051 U
BENZO (A) ANTHRACENE	2.11	mg/kg	10.9	1.34	0.01	0.00268 U	NA	0.00252 U	0.00284	3.9	NA	0.001 U	NA	0.001 U	3.6 J	10 J	0.0041
BENZO (A) PYRENE	0.211	mg/kg	4.83	0.625	0.0212	0.00268 U	NA	0.00272	0.00755	4.7 J	NA	0.004	NA	0.001 U	2.3 J	4.6 J	0.007
BENZO (B) FLUORANTHENE	2.11	mg/kg	6.2	0.721	0.0191	0.002 U	NA	0.002 U	0.0113	6.8	NA	0.031	NA	0.001 U	3.4 J	6.7 J	0.021
BENZO (G,H,I) PERYLENE	- -	mg/kg	3.27	0.501	0.0284	0.0067 U	NA	0.0063 U	0.0068	4.8 U	NA	0.007	NA	0.003 U	2.3 J	5.2 J	0.019
BENZO (K) FLUORANTHENE	21.1	mg/kg	2.67	0.312	0.00789	0.002 U	NA	0.002 U	0.00439	2.6	NA	0.002	NA	0.001 U	1.2 J	2.7 J	0.006
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	24.1	1.57	1.12	0.0201 U	NA	0.015 U	0.0265	9.5 J	NA	0.009 U	NA	0.007 U	7 J	23 J	0.0073 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	6.59	0.976	0.0686	0.00402 U	NA	0.00378 U	0.0328	2.8 U	NA	0.002 U	NA	0.002 U	4.5 J	17 J	0.047
DIBENZOFURAN	1020	mg/kg	22.6	3	0.1 U	0.134 U	NA	0.1 U	0.1 U	200 U	NA	0.12 U	NA	0.1 U	8.6 U	42 U	0.1 U
FLUORANTHENE	22000	mg/kg	62.4	7.7	0.0323	0.02 U	NA	0.02 U	0.0206	1.5 J	NA	0.013	NA	0.01 U	14 J	34 J	0.019 U
FLUORENE	22000	mg/kg	27.2	3.2	0.02 U	0.02 U	NA	0.02 U	0.02 U	20 U	NA	0.012 U	NA	0.01 U	2.6 J	4.2 UJ	0.01 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	1.41	0.19	0.0128	0.0067 U	NA	0.0063 U	0.00652	5.7	NA	0.005	NA	0.003 U	2.2 J	4.9 J	0.013
NAPHTHALENE	26	mg/kg	16.2	1.93	0.1 U	0.1 U	NA	0.1 U	0.114	200 U	NA	0.12 U	NA	0.1 U	3.2 J	42 U	0.1 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	75.6	10.1	0.05 U	0.05 U	NA	0.05 U	0.05 U	6 J	NA	0.029 U	NA	0.025 U	9.3 J	10 UJ	0.025 U
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.07 UJ	NA	NA	NA	NA	0.06 UJ	0.06 U	NA
PYRENE	16500	mg/kg	31.1	33.9	0.0246 U	0.0268 U	NA	0.0252 U	0.0252 U	20 U	NA	0.012 U	NA	0.01 U	9.8 J	26 J	0.023
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.159	0.0142 U	0.0182	0.0134 U	NA	0.0125 U	NA	0.065	NA	NA	NA	NA	0.27	0.27	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.032 U	0.032 U	0.032 U	NA	0.032 U	NA	0.028 U	NA	NA	NA	NA	0.25 U	0.048 U	NA

See Notes on Page 94.

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Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-04	FB-04	FB-05	FB-05	FB-5A	FB-07	FB-08	FB-09	FB-09	FB-09	FB-10	FB-10	FB-11	FB-11	FB-11
Sample Depth(Feet):	Industrial		3 - 4.5	7.5 - 9	3 - 4.5	4.5 - 6	0 - 0.5	3 - 4.5	1.5 - 3	0 - 2	2 - 4	8 - 10	0 - 2	8 - 10	0 - 2	2 - 4	8 - 10
Date Collected:	DC_RCL[1]	Units	08/01/90	08/02/90	08/03/90	08/03/90	11/21/06	08/02/90	08/03/90	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	8.84	NA	NA	0.51	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	1.67	NA	NA	0.12 P	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	0.0973	NA	NA	0.0094	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.0917	NA	NA	0.0019 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.0637	NA	NA	0.015	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.381	NA	NA	0.014	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.0361 J	NA	NA	0.0023 J	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.152	NA	NA	0.0025	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.022 J	NA	NA	0.004	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	0.0305 J	NA	NA	0.00092 U	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	0.00802 J	NA	NA	0.0012 J	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.0707	NA	NA	0.0027 U	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	0.0174 J	NA	NA	0.0021 J	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	0.00331 U	NA	NA	0.00056 U	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	0.00268 U	NA	NA	0.00056 U	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	78.4	NA	NA	6.2	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	5.69	NA	NA	0.36	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	17.5	NA	NA	1.1	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	6.31	NA	NA	0.55 P	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	1.99	NA	NA	0.085	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	2.13	NA	NA	0.12 P	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	0.13 JN	NA	NA	0.0012 J	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	0.244	NA	NA	0.014 P	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	0.00331 U	NA	NA	0.004	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	0.0199 JN	NA	NA	0.0046	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	14 U	NA	NA	NA	NA	12 U	12 U	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	218	NA	NA	NA	NA	199	176	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	1 U	NA	NA	NA	NA	1 U	1 U	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	57,200	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	46	NA	NA	NA	NA	45	42	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	32,400	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	14 U	NA	NA	NA	NA	12 U	12 U	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	22,400	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	569	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4,590	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.004 U	0.005 U	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.004 U	0.005 U	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.004 U	0.005 U	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.004 U	0.005 U	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	0.011	NA	NA	NA	NA	0.004 U	0.005 U	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.013	0.005 U	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.004 U	0.005 U	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.01	0.005 U	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.024 U	NA	NA	NA	NA	0.021 U	0.024 U	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.024 U	NA	NA	NA	NA	0.021 U	0.024 U	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	0.048 U	NA	NA	NA	NA	0.042 U	0.047 U	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-12	FB-12	FB-13	FB-13	FB-14	FB-14	FB-15	FB-15	FB-16	FB-16	FB-17	FB-17	FB-18	FB-18	FB-19
Sample Depth(Feet):	Industrial		0 - 2	8 - 10	0 - 2	8 - 10	0 - 2	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	0.012 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	0.001 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	0.062 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	0.006 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	0.011 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-12	FB-12	FB-13	FB-13	FB-14	FB-14	FB-15	FB-15	FB-16	FB-16	FB-17	FB-17	FB-18	FB-18	FB-19
Sample Depth(Feet):	Industrial		0 - 2	8 - 10	0 - 2	8 - 10	0 - 2	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	0.45 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	0.49 U	NA	1.2 U	38 U	0.12	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	0.11 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	0.11 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	0.63 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	0.49 U	NA	1.2 U	38 U	0.1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	0.11 UJ	NA	NA	NA	NA	NA	10 U	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	NA	0.49 U	NA	1.2 U	38 U	0.1 U	0.021 J	0.94 U	0.031 J	0.44 U	0.047 J	2.1 U	0.19 J	0.024 J	0.15 J
ACENAPHTHYLENE	- -	mg/kg	NA	0.49 U	NA	1.2 U	38 U	0.1 U	0.17 J	0.2 J	0.17 J	0.44 U	0.45 J	0.48 J	1.1 J	0.16 J	0.44 J
ANTHRACENE	100000	mg/kg	NA	0.053	NA	0.22	3.3	0.0053 U	0.25 J	0.22 J	0.32 J	0.44 U	0.34 J	0.36 J	2.9	0.13 J	0.35 J
BENZO (A) ANTHRACENE	2.11	mg/kg	NA	0.086	NA	0.018	6.4	0.001 U	0.23 J	0.34 J	0.37 J	0.44 U	0.38 J	0.23 J	0.95 J	0.14 J	0.99 J
BENZO (A) PYRENE	0.211	mg/kg	NA	0.063 J	NA	0.012 UJ	3.2 J	0.001 U	0.41 J	0.53 J	0.35 J	0.44 U	0.43 J	0.28 J	0.81 J	0.13 J	0.71 J
BENZO (B) FLUORANTHENE	2.11	mg/kg	NA	0.11	NA	0.04	5.3	0.0077	0.79 J	0.77 J	0.79 J	0.44 U	1.7 J	1.6 J	2.2	0.62 J	2.8
BENZO (G,H,I) PERYLENE	- -	mg/kg	NA	0.13	NA	0.029 U	3.3	0.0026 U	0.45 J	0.57 J	0.43 J	0.44 U	0.69 J	0.65 J	2	0.21 J	0.46 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	NA	0.04 J	NA	0.012 U	2.3	0.001 U	0.052 J	0.091 J	0.059 J	0.44 U	0.6 J	0.54 J	0.85 J	0.23 J	1 J
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	NA	0.22	NA	0.086 U	16	0.0075 U	0.56 J	0.53 J	0.49 J	0.44 U	0.66 J	0.44 J	2.1	0.21 J	2.8
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	NA	0.38	NA	0.017 U	9.8	0.0015 U	0.1 J	0.13 J	0.087 J	0.44 U	0.91 J	0.91 J	1.1 J	0.35 J	0.8 J
DIBENZOFURAN	1020	mg/kg	NA	0.49 U	NA	1.2 U	38 U	0.1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	NA	0.33	NA	0.12 U	36	0.0011	0.75 J	0.54 J	0.25 J	0.44 U	1 J	0.56 J	2.4	0.23 J	9.2
FLUORENE	22000	mg/kg	NA	0.11	NA	0.12 U	3.8 U	0.01 U	0.027 J	0.026 J	0.045 J	0.44 U	2.1 U	2.1 U	0.62 J	0.16 J	0.35 J
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	NA	0.1	NA	0.029 U	2.7	0.0026 U	0.44 J	0.59 J	0.36 J	0.44 U	0.83 J	0.8 J	1.8 J	0.27 J	0.67 J
NAPHTHALENE	26	mg/kg	NA	0.49 U	NA	0.39 U	38 U	0.1 U	0.23 J	0.057 J	0.42 J	0.44 U	0.18 J	0.25 J	0.8 J	0.085 J	1.7 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	4 U	4.6 U	4.2 U	2.1 U	10 U	10 U	2.9 J	3.9 U	8.4 U
PHENANTHRENE	- -	mg/kg	NA	0.33	NA	2.9 U	1.1 J	0.026 U	0.22 J	0.1 J	0.34 J	0.44 U	0.45 J	0.32 J	1.4 J	0.19 J	0.13 J
PHENOL	100000	mg/kg	NA	NA	NA	NA	0.05 UJ	NA	NA	NA	NA	NA	2.1 U	NA	NA	NA	NA
PYRENE	16500	mg/kg	NA	0.24	NA	0.12 U	37	0.01 U	0.48 J	0.43 J	0.25 J	0.44 U	0.99 J	0.58 J	1.9 J	0.28 J	10
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	0.053	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	0.022 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-12	FB-12	FB-13	FB-13	FB-14	FB-14	FB-15	FB-15	FB-16	FB-16	FB-17	FB-17	FB-18	FB-18	FB-19
Sample Depth(Feet):	Industrial		0 - 2	8 - 10	0 - 2	8 - 10	0 - 2	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	11/01/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	15 DB	NA	NA	NA	NA	NA	NA	NA	1.6 B
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	2.5 D	NA	NA	NA	NA	NA	NA	NA	0.26
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	0.2 D	NA	NA	NA	NA	NA	NA	NA	0.027
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	0.25	NA	NA	NA	NA	NA	NA	NA	0.02
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.18	NA	NA	NA	NA	NA	NA	NA	0.022
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	0.63	NA	NA	NA	NA	NA	NA	NA	0.043
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.074	NA	NA	NA	NA	NA	NA	NA	0.0046 J
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	0.38	NA	NA	NA	NA	NA	NA	NA	0.023
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.044	NA	NA	NA	NA	NA	NA	NA	0.0033 U
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	0.07	NA	NA	NA	NA	NA	NA	NA	0.0029 U
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	0.022	NA	NA	NA	NA	NA	NA	NA	0.0039 U
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.06	NA	NA	NA	NA	NA	NA	NA	0.0035 J
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	0.021	NA	NA	NA	NA	NA	NA	NA	0.0039 U
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	0.0066	NA	NA	NA	NA	NA	NA	NA	0.00069 U
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.0023 CON	NA	NA	NA	NA	NA	NA	NA	0.00058 U
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	100 DB	NA	NA	NA	NA	NA	NA	NA	14 EB
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	7.6 D	NA	NA	NA	NA	NA	NA	NA	0.85
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	30	NA	NA	NA	NA	NA	NA	NA	6.5
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	10	NA	NA	NA	NA	NA	NA	NA	1.1
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	4.3	NA	NA	NA	NA	NA	NA	NA	0.79
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	3.2	NA	NA	NA	NA	NA	NA	NA	0.33
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.26	NA	NA	NA	NA	NA	NA	NA	0.0079
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.33	NA	NA	NA	NA	NA	NA	NA	0.015
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.032	NA	NA	NA	NA	NA	NA	NA	0.00069 U
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.03	NA	NA	NA	NA	NA	NA	NA	0.0022 U
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	11 U	NA	11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	66	NA	23	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	1 U	NA	1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	16,300	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	35	NA	50	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	22,600	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	11 U	NA	11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	9,510	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	379	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	1,180	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	0.006	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	0.008	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	0.004 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	0.003	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	0.004 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	0.014	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	0.014	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	0.004 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	0.033	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	0.018 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	0.018 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	0.037 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-19	FB-20	FB-20	FB-21	FB-21	FB-22	FB-22	FB-23	FB-23	FB-24	FB-24	FB-25	FB-25	FB-26	FB-26	FB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Volatile Organic Compounds (VOCs)																		
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-19	FB-20	FB-20	FB-21	FB-21	FB-22	FB-22	FB-23	FB-23	FB-24	FB-24	FB-25	FB-25	FB-26	FB-26	FB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Semivolatile Organic Compounds (SVOCs)																		
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.2 U	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	1 J	0.054 J	0.14 J	0.23 J	0.7 U	0.036 J	0.052 J	0.039 J	0.11 J	0.053 J	0.46 U	0.42 J	59 J	0.47 U	0.46 U	3.3
ACENAPHTHYLENE	- -	mg/kg	0.47 J	0.2 J	0.66 J	0.3 J	0.22 J	0.18 J	0.42 J	0.49 J	0.61 J	0.53 J	0.088 J	0.41 J	480 U	0.07 J	0.46 U	3 J
ANTHRACENE	100000	mg/kg	0.79 J	0.34 J	1.3 J	0.52 J	0.13 J	0.27 J	0.47 J	0.56 J	0.81	0.76 J	0.098 J	0.17 J	480 U	0.028 J	0.46 U	26
BENZO (A) ANTHRACENE	2.11	mg/kg	1.8 J	0.23 J	1.4 J	0.52 J	0.078 J	0.21 J	0.22 J	0.28 J	0.56 J	0.6 J	0.083 J	0.097 J	480 U	0.47 U	0.46 U	6.6
BENZO (A) PYRENE	0.211	mg/kg	1.3 J	0.17 J	1.3 J	0.35 J	0.071 J	0.11 J	0.15 J	0.21 J	0.49 J	0.78 J	0.12 J	0.14 J	480 U	0.025 J	0.46 U	8.2
BENZO (B) FLUORANTHENE	2.11	mg/kg	4.2	0.59 J	2.9	0.82	0.51 J	0.41 J	0.45 J	0.59 J	1.2	2.5	0.38 J	1.4 J	480 U	0.29 J	0.46 U	12
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.88 J	0.41 J	1.1 J	0.27 J	0.24 J	0.44 J	0.64 J	1	0.86	1.4	0.27 J	0.15 J	480 U	0.031 J	0.46 U	4.8
BENZO (K) FLUORANTHENE	21.1	mg/kg	1.3 J	0.22 J	1.2 J	0.31 J	0.19 J	0.21 J	0.18 J	0.14 J	0.7 U	0.48 J	0.023 J	0.49 J	480 U	0.11 J	0.46 U	3.8
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	3.9	0.27 J	2.3	0.64 J	0.18 J	0.38 J	0.37 J	0.44 J	0.87	1.5	0.18 J	0.21 J	480 U	0.47 U	0.46 U	11
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.58 J	0.73 U	1.1 J	0.34 J	0.7 U	0.82 U	0.74 U	0.15 J	0.17 J	0.3 J	0.055 J	2.3 U	480 U	0.47 U	0.46 U	2.5 J
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	8.3	1	5.7	2	0.22 J	0.3 J	0.32 J	0.7	2	1.8	0.19 J	0.36 J	30 J	0.47 U	0.46 U	14 J
FLUORENE	22000	mg/kg	0.41 J	0.17 J	0.7 J	0.75	0.13 J	0.035 J	0.048 J	0.04 J	0.092 J	0.06 J	0.013 J	0.71 J	120 J	0.47 U	0.46 U	2.4 J
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	1 J	0.35 J	1.4 J	0.34 J	0.23 J	0.26 J	0.34 J	0.34 J	0.43 J	1.3	0.23 J	0.45 J	480 U	0.1 J	0.46 U	5.2
NAPHTHALENE	26	mg/kg	3.5 U	0.064 J	0.37 J	4.2	0.7 U	0.089 J	0.1 J	0.17 J	0.15 J	0.29 J	0.049 J	0.057 J	480 U	0.47 U	0.46 U	2.7 J
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	17 U	3.6 U	11 U	3.4 U	3.4 U	4 U	3.6 U	3.4 U	3.4 U	3.8 U	2.2 U	16	3,300	2.3 U	2.2 U	78 U
PHENANTHRENE	- -	mg/kg	1.1 J	0.57 J	0.86 J	2.7	0.059 J	0.25 J	0.23 J	0.27 J	0.54 J	0.81	0.054 J	0.91 J	120 J	0.47 U	0.46 U	14
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46 U	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	16	0.68 J	3.8	0.96	0.3 J	0.56 J	0.57 J	0.63 J	1.4	1.1	0.14 J	0.31 J	27 J	0.025 J	0.46 U	25
Pentachlorophenol/Tetrachlorophenol																		
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-19	FB-20	FB-20	FB-21	FB-21	FB-22	FB-22	FB-23	FB-23	FB-24	FB-24	FB-25	FB-25	FB-26	FB-26	FB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05
Dioxins/Furans																		
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																		
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																		
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-27	FB-28	FB-28	FB-29	FB-29	FB-30	FB-30	FB-31	FB-31	FB-32	FB-32	FB-33	FB-33	FB-34	FB-34
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-27	FB-28	FB-28	FB-29	FB-29	FB-30	FB-30	FB-31	FB-31	FB-32	FB-32	FB-33	FB-33	FB-34	FB-34
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	5,500 U	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	5.1	0.047 J	0.071 J	1.5 J	260 J	0.68 J	0.19 J [0.093 J]	0.057 J	160 J	170	29	0.052 J	0.07 J	0.89	2 J
ACENAPHTHYLENE	- -	mg/kg	2.8 J	0.4 J	0.35 J	0.45 J	12 J	0.46 J	0.037 J [0.3 J]	0.014 J	1,100 U	3.9 J	0.95 J	0.12 J	0.82	0.1 J	1.9 J
ANTHRACENE	100000	mg/kg	10 J	0.78	0.69	4.9	210 J	1.4	0.14 J [0.55 J]	0.053 J	50 J	55	10 J	0.23 J	1.1	0.92	42 U
BENZO (A) ANTHRACENE	2.11	mg/kg	7.4	0.18 J	0.24 J	2.5	130 J	0.73 J	0.064 J [0.31 J]	0.042 J	1,100 U	46	9.7 J	0.17 J	0.55 J	0.6 J	2.4 J
BENZO (A) PYRENE	0.211	mg/kg	7.3	0.21 J	0.26 J	1.9	43 J	1.1	0.047 J [0.59 J]	0.35 U	1,100 U	12 J	2.9 J	0.17 J	1	0.26 J	42 U
BENZO (B) FLUORANTHENE	2.11	mg/kg	11	0.47 J	0.62 J	3	77 J	1.8	0.085 J [1]	0.057 J	1,100 U	20 J	5.2 J	0.36 J	1.5	0.48 J	42 U
BENZO (G,H,I) PERYLENE	- -	mg/kg	3 J	0.53 J	0.47 J	1.3 J	340 U	1.3	0.078 J [0.94]	0.35 U	1,100 U	36 U	11 U	0.36 J	2.9	0.25 J	42 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	3.9	0.19 J	0.21 J	0.96 J	27 J	0.62 J	0.03 J [0.27 J]	0.024 J	1,100 U	9.3 J	2.2 J	0.13 J	0.49 J	0.17 J	42 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	10	0.77	0.46 J	5	180 J	1.2	0.1 J [0.5 J]	0.059 J	1,100 U	43	10 J	0.35 J	1	0.74	2.4 J
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	2 J	0.69 U	0.69 U	0.14 J	340 U	0.28 J	0.36 U [0.19 J]	0.35 U	1,100 U	36 U	11 U	0.062 J	0.47 J	0.69 U	42 U
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	21	0.27 J	0.4 J	8	730	2.2	0.31 J [0.82 J]	0.17 J	1,100 U	410	63	0.44	0.83	3.3	7.6 J
FLUORENE	22000	mg/kg	2.7 J	0.08 J	0.1 J	0.5 J	25 J	0.4 J	0.17 J [0.1 J]	0.031 J	160 J	36	5.9 J	0.05 J	0.11 J	0.49 J	2.5 J
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	3.6	0.34 J	0.37 J	1.2 J	340 U	1.1	0.031 J [0.77 J]	0.35 U	1,100 U	36 U	1.5 J	0.26 J	2.2	0.11 J	42 U
NAPHTHALENE	26	mg/kg	1.7 J	0.095 J	0.15 J	1.9 U	340 U	3.2	0.081 J [0.12 J]	0.047 J	1,100 U	36 U	11 U	0.15 J	0.14 J	0.29 J	42 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	30 J	3.3 U	3.4 U	9.2 U	1,600 U	2 J	1.8 [4.1 U]	1.7 U	8,400	170 U	53 U	0.94 J	1.7 J	1.6 J	320 J
PHENANTHRENE	- -	mg/kg	22	0.16 J	0.23 J	1.8 J	13 J	3.3	0.49 [0.37 J]	0.089 J	380 J	5.5 J	1.2 J	0.24 J	0.38 J	1.5	6.1 J
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1,100 U	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	18	0.38 J	0.48 J	6.3	470	1.6	0.21 J [0.6 J]	0.12 J	87 J	180	39	0.37 J	0.76 J	1.9	8.3 J
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-27	FB-28	FB-28	FB-29	FB-29	FB-30	FB-30	FB-31	FB-31	FB-32	FB-32	FB-33	FB-33	FB-34	FB-34
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05	09/27/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-35	FB-36	FB-37	FB-38	FB-39	FB-40	FB-41	FB-42	FB-43	FB-44	FB-45	FB-46	FB-47	FB-48	FB-49
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-35	FB-36	FB-37	FB-38	FB-39	FB-40	FB-41	FB-42	FB-43	FB-44	FB-45	FB-46	FB-47	FB-48	FB-49
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.08 J	0.11 [0.11 J]	NA	0.22	0.11	0.37	0.16	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHYLENE	- -	mg/kg	0.63	1.1 [1.1]	NA	3.1	1.2	3.7	0.62	NA	NA	NA	NA	NA	NA	NA	NA
ANTHRACENE	100000	mg/kg	1.4	1.6 [1.5]	NA	3.5	2.4	8.4	55 D	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (A) ANTHRACENE	2.11	mg/kg	0.43	0.77 [0.99]	NA	1.4	1.6	4.2	0.76	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (A) PYRENE	0.211	mg/kg	0.55	1.1 [1.4]	NA	2	1.7	5.6	1	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (B) FLUORANTHENE	2.11	mg/kg	1.1	1.8 [3.1]	NA	3.8	3.5	13	1.7	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (G,H,I) PERYLENE	- -	mg/kg	1.5	2.5 [3]	NA	6.8	2.7	9.4	1.1	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.47	0.65 [0.32 U]	NA	1.5	1.6	6.1	0.62	NA	NA	NA	NA	NA	NA	NA	NA
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.8	1.2 [1.6]	NA	2.3	2.8	9.2	1.5	NA	NA	NA	NA	NA	NA	NA	NA
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.23	0.53 [0.53]	NA	1.1	0.7	2.8	0.28	NA	NA	NA	NA	NA	NA	NA	NA
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.97	1.2 [1.6]	NA	2.5	3.2	11	1.5	NA	NA	NA	NA	NA	NA	NA	NA
FLUORENE	22000	mg/kg	0.2	0.25 [0.24 J]	NA	0.45	0.33	0.93	3	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	1	2 [2.3]	NA	4.6	2.5	9.7	1.1	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	0.23	0.39 [0.42]	NA	0.62	1.4	1.4	0.88	NA	NA	NA	NA	NA	NA	NA	NA
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	2.4 J	2.6 J [3.3 J]	16 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.49	0.66 [0.7]	NA	1.1	1.3	4	4	NA	NA	NA	NA	NA	NA	NA	NA
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.77	1.1 [1.6]	NA	2.2	2.9	8.8	1.1	NA	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-35	FB-36	FB-37	FB-38	FB-39	FB-40	FB-41	FB-42	FB-43	FB-44	FB-45	FB-46	FB-47	FB-48	FB-49
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	45.5	8.26	NA	NA	NA	NA	19.9	11.4
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	10.8	1.76	NA	NA	NA	NA	3.62	1.87
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.718	0.118	NA	NA	NA	NA	0.22	0.124
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.428	0.0866	NA	NA	NA	NA	0.159	0.166
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.604	0.0861	NA	NA	NA	NA	0.156	0.087
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	1.58	0.305	NA	NA	NA	NA	0.741	0.534
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.255	0.0413	NA	NA	NA	NA	0.0712	0.0474 J
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.727	0.138	NA	NA	NA	NA	0.292	0.243
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.189	0.0242	NA	NA	NA	NA	0.0431 J	0.0297 J
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.147	0.0349	NA	NA	NA	NA	0.0532 J	0.0582 J
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0714	0.0109	NA	NA	NA	NA	0.0151 J	0.0109 J
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.444	0.0725	NA	NA	NA	NA	0.143	0.0968
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.14	0.0196	NA	NA	NA	NA	0.033 J	0.021 J
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0133	0.00451	NA	NA	NA	NA	0.00385 U	0.00508 U
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0121	0.00143 U	NA	NA	NA	NA	0.00409 J	0.00387 J
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	357	60.9	NA	NA	NA	NA	172	88.2
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	37.4	6.91	NA	NA	NA	NA	14	6.37
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	94.1	16.8	NA	NA	NA	NA	47.9	24.1
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	38.9	6.32	NA	NA	NA	NA	14.2	6.79
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	10.2	2.05	NA	NA	NA	NA	4.71	3.34
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	12.9 D	1.93	NA	NA	NA	NA	4.21	2.34
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.568	0.118	NA	NA	NA	NA	0.253	0.273 JN
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	2.36 D	0.345	NA	NA	NA	NA	0.461	0.302
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.0517	0.0181	NA	NA	NA	NA	0.00486	0.00508 U
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	0.178	0.016	NA	NA	NA	NA	0.0438	0.0263
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-50	GB-01	GB-01	GB-02	GB-02	GB-03	GB-03	GB-04	GB-04	GB-04	GB-04	GB-05	GB-05	GB-05	GB-06
Sample Depth(Feet):	Industrial			3 - 4.5	6 - 7.5	0 - 1.5	3 - 4.5	1.5 - 3	6 - 7.5	0 - 1.5	1.5 - 3	3 - 4.5	4.5 - 6	0 - 1.5	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	11/21/06	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	11/06/96
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.015 U
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.006 J
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.005 J
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.076 U
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.008 U
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.002 J

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-50	GB-01	GB-01	GB-02	GB-02	GB-03	GB-03	GB-04	GB-04	GB-04	GB-04	GB-05	GB-05	GB-05	GB-06
Sample Depth(Feet):	Industrial			3 - 4.5	6 - 7.5	0 - 1.5	3 - 4.5	1.5 - 3	6 - 7.5	0 - 1.5	1.5 - 3	3 - 4.5	4.5 - 6	0 - 1.5	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	11/21/06	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	11/06/96
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.009 J	0.454	0.148 U	25.5	0.137 U	0.142 U	0.143 U	154	0.134 U	13.9 U	1.35 U	16.6 U	9.99	43.4	NA
ACENAPHTHYLENE	- -	mg/kg	0.07	0.163	0.148 U	14.2	0.137 U	0.712	0.239	56.9	0.449	29.1	1.57	16.6 U	1.32 U	1.31	NA
ANTHRACENE	100000	mg/kg	0.15	0.0531	0.05 U	6.13	0.05 U	0.05 U	0.05 U	133	0.05 U	3.62	0.671	0.05 U	6.4	7.93	NA
BENZO (A) ANTHRACENE	2.11	mg/kg	0.11	0.234	0.0114	17.7	0.0105	0.0351	0.00662	52.4	0.029	1.58	0.183	3.45	3.8	8.1	NA
BENZO (A) PYRENE	0.211	mg/kg	0.18	0.0663	0.00377	7.32	0.00635	0.0142	0.00337	18.6	0.0114	0.495	0.0528	0.599	1.89	2.79	NA
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.38	0.134	0.00944	9.79	0.0174	0.0277	0.00998	29	0.0228	0.528	0.0582	1.94	1.9	3.66	NA
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.29	0.234	0.0074 U	23.7	0.0207	0.0288	0.00715 U	24.8	0.0272	0.702	0.102	4.43	3.41	4.58	NA
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.15	0.0483	0.00273	3.86	0.00497	0.00955	0.002 U	9.21	0.00734	0.247	0.0262	0.753	0.718	1.47	NA
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.2	0.346	0.0222 U	26.5	0.0434	0.158	0.0228	334	0.128	5.08	0.611	12.8	16	28.6	NA
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.066	0.333	0.00444 U	32.8	0.0248	0.0518	0.00429 U	41.2	0.0189	1.26	0.172	7.36	5.17	6.82	NA
DIBENZOFURAN	1020	mg/kg	NA	0.136 U	0.148 U	28.8	0.137 U	1.38	0.731	111	1.08	24.5	5.43	16.6 U	24	15.3	NA
FLUORANTHENE	22000	mg/kg	0.1	1.27	0.0877	91.8	0.0819	0.146	0.031	193	0.205	10.6	1.26	15.5	11.8	28.2	NA
FLUORENE	22000	mg/kg	0.02	0.0908	0.0318	24.6	0.02	0.269	0.67	144	0.14	18.7	2.05	1.05	2.94	11	NA
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.25	0.0415	0.0074 U	4.05	0.005 U	0.00654	0.00715 U	6	0.00515	0.149	0.0186	0.804	0.749	1.03	NA
NAPHTHALENE	26	mg/kg	0.02	0.134	0.1 U	33.8	0.1 U	0.201	0.155	32.3	0.218	14.8	0.626	16.6 U	0.698	1.6	NA
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.046	0.0918	0.0752	65.4	0.0713	0.794	0.57	327	0.134	26.8	1.72	0.455	4.48	5.36	NA
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.15	0.755	0.0593	62.9	0.0856	0.0855	0.0861	124	0.102	5.01	1.06	11.1	8.43	0.37	NA
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	2.6	0.492	163	0.0521	15.8	3.79	892	17.4	39.4	11	452	115	80.5	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		FB-50	GB-01	GB-01	GB-02	GB-02	GB-03	GB-03	GB-04	GB-04	GB-04	GB-04	GB-05	GB-05	GB-05	GB-06
Sample Depth(Feet):	Industrial			3 - 4.5	6 - 7.5	0 - 1.5	3 - 4.5	1.5 - 3	6 - 7.5	0 - 1.5	1.5 - 3	3 - 4.5	4.5 - 6	0 - 1.5	1.5 - 3	3 - 4.5	0 - 2
Date Collected:	DC_RCL[1]	Units	11/21/06	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	07/17/90	11/06/96
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-06	GB-07	GB-07	GB-07A	GB-08	GB-08	GB-08A	GB-09	GB-10	GB-10	GB-11	GB-11	GB-12	GB-12	GB-13
Sample Depth(Feet):	Industrial		8 - 10	0 - 2	8 - 10	0 - 0.5	0 - 2	4 - 6	0 - 0.5	8 - 10	0 - 2	4 - 6	0 - 2	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	11/06/96	11/06/96	11/06/96	10/18/06	11/05/96	11/05/96	09/27/05	11/05/96	11/05/96	11/05/96	11/05/96	11/05/96	04/26/05	04/26/05	04/26/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	0.015 U	NA	NA	NA	NA	NA	NA	0.015 U	0.014 U	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	0.015 U	NA	NA	NA	NA	NA	NA	0.003 J	0.005 J	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	0.002 J	NA	NA	NA	NA	NA	NA	0.008 U	0.002 J	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	0.076 U	NA	NA	NA	NA	NA	NA	0.076 U	0.068 U	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	0.008 U	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	0.004 J	NA	NA	NA	NA	NA	NA	0.008 U	0.007 U	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-06	GB-07	GB-07	GB-07A	GB-08	GB-08	GB-08A	GB-09	GB-10	GB-10	GB-11	GB-11	GB-12	GB-12	GB-13
Sample Depth(Feet):	Industrial		8 - 10	0 - 2	8 - 10	0 - 0.5	0 - 2	4 - 6	0 - 0.5	8 - 10	0 - 2	4 - 6	0 - 2	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	11/06/96	11/06/96	11/06/96	10/18/06	11/05/96	11/05/96	09/27/05	11/05/96	11/05/96	11/05/96	11/05/96	11/05/96	04/26/05	04/26/05	04/26/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	0.14 U	0.36	0.33	NA	0.46	0.26	NA	0.3	NA	0.26	0.29	0.29	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.16 U	0.91 U	0.11 U	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	0.14 U	0.15 U	0.16 U	NA	0.13 U	0.14 U	NA	0.15 U	NA	0.14 U	0.13 U	0.16 U	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	0.14 U	0.15 U	0.16 U	NA	0.13 U	0.14 U	NA	0.15 U	NA	0.14 U	0.35	0.16 U	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	0.14 U	0.15 U	0.3	NA	0.27	0.14 U	NA	0.24	NA	0.14 U	0.13 U	0.16 U	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.096 U	0.91 U	0.11 U	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	0.14 U	0.15 U	0.16 U	NA	0.21	0.14 U	NA	0.15 U	NA	0.14 U	0.13 U	0.16 U	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.096 U	0.91 U	0.11 U	0.01 J	0.011 J	0.66 U
ACENAPHTHYLENE	- -	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.096 U	0.91 U	0.11 U	0.4 U	0.38 U	0.055 J
ANTHRACENE	100000	mg/kg	0.0049 U	0.0064	0.0057 U	NA	0.047 U	0.0048 U	NA	0.0054 U	NA	0.0048 U	0.045 U	0.0055 U	0.029 J	0.021 J	0.12 J
BENZO (A) ANTHRACENE	2.11	mg/kg	0.00099 U	0.0011 U	0.0039	NA	0.0093 U	0.00095 U	NA	0.0037	NA	0.0019	0.0091 U	0.0011 U	0.029 J	0.015 J	0.061 J
BENZO (A) PYRENE	0.211	mg/kg	0.00099 U	0.016	0.0041	NA	0.0093 U	0.00095 U	NA	0.0011 U	NA	0.0027	0.077	0.0023	0.038 J	0.019 J	0.067 J
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.00099 U	0.038	0.019	NA	0.47	0.00095 U	NA	0.007	NA	0.0055	0.14	0.0042	0.086 J	0.042 J	0.13 J
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.0024 U	0.032	0.0088	NA	0.45	0.0023 U	NA	0.0069	NA	0.0071	0.23	0.0053	0.04 J	0.029 J	0.09 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.00099 U	0.0011 U	0.003	NA	0.0093 U	0.00095 U	NA	0.0011 U	NA	0.0018	0.047	0.0012 U	0.4 U	0.38 U	0.66 U
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.007 U	0.0076 U	0.036	NA	0.47	0.0068 U	NA	0.013	NA	0.011	0.065 U	0.0078 U	0.024 J	0.38 U	0.11 J
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.0014 U	0.09	0.0016 U	NA	1.6	0.0014 U	NA	0.012	NA	0.024	0.7	0.0016 U	0.4 U	0.38 U	0.66 U
DIBENZOFURAN	1020	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.096 U	0.013 U	0.11 U	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.0099 U	0.02	0.018	NA	0.26	0.0095 U	NA	0.011 U	NA	0.0096 U	0.091 U	0.011 U	0.077 J	0.038 J	0.12 J
FLUORENE	22000	mg/kg	0.011	0.026	0.014	NA	0.093 U	0.0095 U	NA	0.011 U	NA	0.0096 U	0.091 U	0.011 U	0.4 U	0.38 U	0.66 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.0024 U	0.033	0.007	NA	0.52	0.0023 U	NA	0.0053	NA	0.0066	0.23	0.0044	0.039 J	0.024 J	0.1 J
NAPHTHALENE	26	mg/kg	0.099 U	0.11 U	0.11 U	NA	0.93 U	0.095 U	NA	0.11 U	NA	0.096 U	0.91 U	0.11 U	0.047 J	0.38 U	0.66 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2 U	1.9 U	4.6
PHENANTHRENE	- -	mg/kg	0.024 U	0.026 U	0.028 U	NA	0.23 U	0.023 U	NA	0.026 U	NA	0.035	0.22 U	0.027 U	0.057 J	0.029 J	0.039 J
PHENOL	100000	mg/kg	0.07 U	0.08 U	0.08 U	NA	0.07 U	0.07 U	NA	0.08 U	NA	0.07 U	0.06 U	0.08 U	NA	NA	NA
PYRENE	16500	mg/kg	0.0099 U	0.045	0.015	NA	0.57	0.0095 U	NA	0.019	NA	0.01 U	0.091 U	0.011 U	0.051 J	0.028 J	0.11 J
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.014 UJ	0.4 J	0.21 J	NA	0.15 J	0.014 UJ	NA	0.035 J	NA	0.014 UJ	0.52 J	0.016 UJ	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.028 UJ	0.3 UJ	0.033 UJ	NA	0.027 UJ	0.027 UJ	NA	0.031 UJ	NA	0.027 UJ	0.13 UJ	0.031 UJ	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: Sample Depth(Feet): Date Collected:	WDNR Industrial DC_RCL[1]	Units	GB-06 8 - 10 11/06/96	GB-07 0 - 2 11/06/96	GB-07 8 - 10 11/06/96	GB-07A 0 - 0.5 10/18/06	GB-08 0 - 2 11/05/96	GB-08 4 - 6 11/05/96	GB-08A 0 - 0.5 09/27/05	GB-09 8 - 10 11/05/96	GB-10 0 - 2 11/05/96	GB-10 4 - 6 11/05/96	GB-11 0 - 2 11/05/96	GB-11 8 - 10 11/05/96	GB-12 0 - 0.5 04/26/05	GB-12 0.5 - 1.5 04/26/05	GB-13 0 - 0.5 04/26/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	26.9	NA	NA	51.1	NA	NA	NA	1.6	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	4.41	NA	NA	6.93	NA	NA	NA	0.66 P	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	0.4	NA	NA	0.382	NA	NA	NA	0.1	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.0751	NA	NA	0.113	NA	NA	NA	0.0071	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.363	NA	NA	0.194	NA	NA	NA	0.14	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.724	NA	NA	1.14	NA	NA	NA	0.13	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.0824	NA	NA	0.0584	NA	NA	NA	0.031	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	0.161	NA	NA	0.238	NA	NA	NA	0.0035	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	0.1	NA	NA	0.0448	NA	NA	NA	0.088	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	0.0216	NA	NA	0.0261	NA	NA	NA	0.00049 U	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	0.0232	NA	NA	0.0125 J	NA	NA	NA	0.025	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.146	NA	NA	0.0925	NA	NA	NA	0.062	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	0.0549	NA	NA	0.0293	NA	NA	NA	0.05	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	0.00343	NA	NA	0.00218 J	NA	NA	NA	0.0002 U	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	0.00231 U	NA	NA	0.00277	NA	NA	NA	0.0025	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	260	NA	NA	421	NA	NA	NA	11	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	20.8	NA	NA	40.7	NA	NA	NA	0.87	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	51.3	NA	NA	114	NA	NA	NA	2.5	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	20.1	NA	NA	47.9	NA	NA	NA	2.9 P	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	3.42	NA	NA	8.66	NA	NA	NA	0.24	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	5.26 D	NA	NA	6.81 D	NA	NA	NA	2.2 P	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	0.0539	NA	NA	0.281	NA	NA	NA	0.00047 UJ	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	0.472	NA	NA	0.34 D	NA	NA	NA	0.29 P	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	0.00343	NA	NA	0.0191	NA	NA	NA	0.00051	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	0.0166 U	NA	NA	0.0289	NA	NA	NA	0.015 P	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	15 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	201	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	7,270	NA	NA	4,160	NA	NA	NA	NA	4,420	45,700	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	41	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	35,900	NA	NA	38,400	NA	NA	NA	NA	36,500	30,600	NA	NA	NA	NA
LEAD	800	mg/kg	NA	15 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	7,070	NA	NA	7,080	NA	NA	NA	NA	7,140	19,300	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	218	NA	NA	852	NA	NA	NA	NA	194	557	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	1,920	NA	NA	1,850	NA	NA	NA	NA	1,570	3,750	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.003	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	0.006	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	0.005 U	NA	NA	NA	NA	0.005 U	0.004 U	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	0.002 U	NA	NA	NA	NA	0.002 U	0.002 U	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	0.023 U	NA	NA	NA	NA	0.023 U	0.002 U	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	0.023 U	NA	NA	NA	NA	0.023 U	0.022 U	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	0.045 U	NA	NA	NA	NA	0.046 U	0.044 U	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-13	GB-14	GB-14	GB-15	GB-15	GB-16	GB-16	GB-17	GB-17	GB-17A	GB-18	GB-18	GB-19	GB-19	GB-20
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-13	GB-14	GB-14	GB-15	GB-15	GB-16	GB-16	GB-17	GB-17	GB-17A	GB-18	GB-18	GB-19	GB-19	GB-20
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	590 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.47 U	0.26 J	10 J	0.84 U	1.4 U	0.54 U	0.74 U	0.012 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
ACENAPHTHYLENE	- -	mg/kg	0.47 U	0.085 J	120 U	0.08 J	0.067 J	0.54 U	0.74 U	0.42 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
ANTHRACENE	100000	mg/kg	0.47 U	0.17 J	3.8 J	0.23 J	0.14 J	0.54 U	0.068 J	0.74	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BENZO (A) ANTHRACENE	2.11	mg/kg	0.47 U	0.37 J	16 J	0.067 J	1.4 U	0.54 U	0.024 J	0.12 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BENZO (A) PYRENE	0.211	mg/kg	0.47 U	0.25 J	3.5 J	0.096 J	0.064 J	0.54 U	0.018 J	0.64	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.47 U	0.61 J	13 J	0.29 J	0.11 J	0.54 U	0.08 J	0.63	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.47 U	0.22 J	120 U	0.16 J	0.16 J	0.54 U	0.74 U	0.5 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.47 U	0.18 J	3.9 J	0.1 J	1.4 U	0.54 U	0.74 U	0.1 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.47 U	0.68 J	20 J	0.33 J	1.4 U	0.54 U	0.016 J	0.25 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.47 U	2.3 U	120 U	0.034 J	1.4 U	0.54 U	0.74 U	0.14 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.47 U	1.4 J	110 J	0.18 J	0.04 J	0.54 U	0.057 J	0.16 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
FLUORENE	22000	mg/kg	0.47 U	0.24 J	120 U	0.84 U	1.4 U	0.54 U	0.74 U	0.17 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.47 U	0.19 J	2.5 J	0.15 J	0.15 J	0.54 U	0.74 U	0.54	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
NAPHTHALENE	26	mg/kg	0.47 U	1.6 J	16 J	0.84 U	1.4 U	0.54 U	0.74 U	0.54 U	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	2.3 U	8 J	650	4.1 U	4.6 J	2.6 U	5.8 J	1.3 J	2.4 U	NA	2.3 U	2.3 U	2.5 U	2.4 U	NA
PHENANTHRENE	- -	mg/kg	0.47 U	0.37 J	4.5 J	0.035 J	1.4 U	0.54 U	0.025 J	0.031 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
PHENOL	100000	mg/kg	NA	NA	120 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.47 U	0.98 J	70 J	0.14 J	1.4 U	0.54 U	0.053 J	0.16 J	0.5 U	NA	0.47 U	0.47 U	0.52 U	0.5 U	NA
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-13	GB-14	GB-14	GB-15	GB-15	GB-16	GB-16	GB-17	GB-17	GB-17A	GB-18	GB-18	GB-19	GB-19	GB-20
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	400 DB	NA	NA	NA	NA	NA	NA	NA	141	NA	NA	NA	NA	5
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	170 DE	NA	NA	NA	NA	NA	NA	NA	45.6	NA	NA	NA	NA	1.46
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	26 D	NA	NA	NA	NA	NA	NA	NA	4.79	NA	NA	NA	NA	0.179
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	1.1 D	NA	NA	NA	NA	NA	NA	NA	0.726	NA	NA	NA	NA	0.0364
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	36 D	NA	NA	NA	NA	NA	NA	NA	4.33	NA	NA	NA	NA	0.192
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	37 D	NA	NA	NA	NA	NA	NA	NA	6.6	NA	NA	NA	NA	0.231
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	9.2 D	NA	NA	NA	NA	NA	NA	NA	1.38	NA	NA	NA	NA	0.0845
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	1.6 D	NA	NA	NA	NA	NA	NA	NA	1.22	NA	NA	NA	NA	0.0653
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	3.4 D	NA	NA	NA	NA	NA	NA	NA	1.85	NA	NA	NA	NA	0.0828
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	0.13	NA	NA	NA	NA	NA	NA	NA	0.174	NA	NA	NA	NA	0.0116 J
1,2,3,7,8-PECDF	0.442	ug/kg	NA	4.3 D	NA	NA	NA	NA	NA	NA	NA	0.566	NA	NA	NA	NA	0.027
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	5.3 D	NA	NA	NA	NA	NA	NA	NA	2.08	NA	NA	NA	NA	0.112
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	2.3 D	NA	NA	NA	NA	NA	NA	NA	0.986	NA	NA	NA	NA	0.0402
2,3,7,8-TCDD	0.0184	ug/kg	NA	0.007	NA	NA	NA	NA	NA	NA	NA	0.00594 U	NA	NA	NA	NA	0.00201 U
2,3,7,8-TCDF	0.133	ug/kg	NA	0.43 CON	NA	NA	NA	NA	NA	NA	NA	0.0588	NA	NA	NA	NA	0.00166 U
OCDD	61	ug/kg	NA	880 DBE	NA	NA	NA	NA	NA	NA	NA	869	NA	NA	NA	NA	34.4
OCDF	44	ug/kg	NA	83 D	NA	NA	NA	NA	NA	NA	NA	141	NA	NA	NA	NA	2.74
TOTAL HPCDD	- -	ug/kg	NA	620	NA	NA	NA	NA	NA	NA	NA	208	NA	NA	NA	NA	8.01
TOTAL HPCDF	- -	ug/kg	NA	720	NA	NA	NA	NA	NA	NA	NA	236 D	NA	NA	NA	NA	5.77
TOTAL HXCDD	- -	ug/kg	NA	68	NA	NA	NA	NA	NA	NA	NA	20.6	NA	NA	NA	NA	0.904
TOTAL HXCDF	- -	ug/kg	NA	400	NA	NA	NA	NA	NA	NA	NA	82.2 D	NA	NA	NA	NA	2.77
TOTAL PECDD	- -	ug/kg	NA	0.25	NA	NA	NA	NA	NA	NA	NA	0.581	NA	NA	NA	NA	0.0663
TOTAL PECDF	- -	ug/kg	NA	19	NA	NA	NA	NA	NA	NA	NA	6.25 D	NA	NA	NA	NA	0.322
TOTAL TCDD	- -	ug/kg	NA	0.044	NA	NA	NA	NA	NA	NA	NA	0.0308	NA	NA	NA	NA	0.00359
TOTAL TCDF	- -	ug/kg	NA	0.71	NA	NA	NA	NA	NA	NA	NA	0.394 D	NA	NA	NA	NA	0.0345
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-21	GB-22	GB-23	GB-24	GB-25	GB-26	HB-09	HB-10	HB-11	HB-11	HB-11	HB-12	HB-13	HB-13
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	8 - 10	8 - 10	0 - 2	2 - 4	8 - 10	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	10/30/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-21	GB-22	GB-23	GB-24	GB-25	GB-26	HB-09	HB-10	HB-11	HB-11	HB-11	HB-12	HB-13	HB-13
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	8 - 10	8 - 10	0 - 2	2 - 4	8 - 10	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	10/30/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	0.14 U	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.89	0.1 U	NA	0.75	0.1 U	0.1 U	1.1 UJ
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	0.14 U	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	0.14 U	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.14 U	NA	NA	NA	0.14 U	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.79	0.1 U	NA	0.48	0.1 U	0.1 U	1.1 UJ
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.25	NA	NA	NA	0.07 U	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.23	NA	NA	NA	0.14 U	NA
ACENAPHTHENE	33000	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.098 U	0.1 U	NA	0.1 U	0.1 U	0.1 U	0.25 J
ACENAPHTHYLENE	- -	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.44	0.1 U	NA	0.18	0.1 U	0.1 U	1.1 U
ANTHRACENE	100000	mg/kg	NA	NA	NA	NA	NA	NA	0.005 U	0.017	0.005 U	NA	0.018	0.0051 U	0.005 U	0.054 U
BENZO (A) ANTHRACENE	2.11	mg/kg	NA	NA	NA	NA	NA	NA	0.001 U	0.038	0.001 U	NA	0.023	0.001 U	0.001 U	0.042
BENZO (A) PYRENE	0.211	mg/kg	NA	NA	NA	NA	NA	NA	0.001 U	0.0048	0.001 U	NA	0.0031	0.001 U	0.0088	0.022
BENZO (B) FLUORANTHENE	2.11	mg/kg	NA	NA	NA	NA	NA	NA	0.001 U	0.013	0.001 U	NA	0.0077	0.001 U	0.015	0.038
BENZO (G,H,I) PERYLENE	- -	mg/kg	NA	NA	NA	NA	NA	NA	0.0024 U	0.0098	0.0024 U	NA	0.0064	0.0025 U	0.0024 U	0.026 U
BENZO (K) FLUORANTHENE	21.1	mg/kg	NA	NA	NA	NA	NA	NA	0.001 U	0.0056	0.001 U	NA	0.004	0.001 U	0.0055	0.015
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	NA	NA	NA	NA	NA	NA	0.0071 U	0.15	0.0071 U	NA	0.079	0.0073 U	0.019	0.077 U
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	NA	NA	NA	NA	NA	NA	0.0014 U	0.024	0.0014 U	NA	0.0015 U	0.0014 U	0.066	0.015 U
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.79	0.1 U	NA	0.48	0.1 U	0.1 U	1.1 UJ
FLUORANTHENE	22000	mg/kg	NA	NA	NA	NA	NA	NA	0.01 U	0.14	0.01 U	NA	0.12	0.01 U	0.016	0.29
FLUORENE	22000	mg/kg	NA	NA	NA	NA	NA	NA	0.01 U	0.08	0.01 U	NA	0.089	0.01 U	0.01 U	0.11 U
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	NA	NA	NA	NA	NA	NA	0.0024 U	0.0064	0.0024 U	NA	0.0039	0.0025 U	0.0024 U	0.026 U
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	0.1 U	0.58	0.1 U	NA	0.36	0.1 U	0.1 U	0.47 J
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	NA	NA	NA	NA	NA	NA	0.024 U	0.14	0.024 U	NA	0.13	0.025 U	0.024 U	0.25 J
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	0.07 U	NA	NA	NA	0.07 U	NA
PYRENE	16500	mg/kg	NA	NA	NA	NA	NA	NA	0.01 U	0.24	0.01 U	NA	0.12	0.01 U	0.027	0.24
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	9.5	NA	NA	NA	0.23	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	1.4 UJ	NA	NA	NA	0.032 U	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		GB-21	GB-22	GB-23	GB-24	GB-25	GB-26	HB-09	HB-10	HB-11	HB-11	HB-11	HB-12	HB-13	HB-13
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	8 - 10	8 - 10	0 - 2	2 - 4	8 - 10	8 - 10	0 - 2	8 - 10
Date Collected:	DC_RCL[1]	Units	10/18/06	10/18/06	10/18/06	10/18/06	11/21/06	11/21/06	10/30/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96	10/29/96
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	19.5	12.6	21.4	2.5	0.0245	1.87	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	4.48	4.02	2.45	0.31	0.00688	0.346	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	0.473	0.436	0.157	0.0222	0.000667 J	0.0322	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	0.086	0.062	0.0566	0.0156 U	0.000368 J	0.00573	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	0.425	0.458	0.132	0.0142 U	0.000946 J	0.0279	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	0.669	0.543	0.322	0.0391	0.00102 J	0.0517	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	0.137	0.149	0.0299	0.00359 U	0.000463 J	0.00852	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	0.185	0.113	0.094	0.0118	0.000552 J	0.0113	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	0.172	0.192	0.0356	0.00656 U	0.000251 U	0.0135	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	0.0174 U	0.0207	0.0108	0.00298 U	0.000181 J	0.00144 J	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	0.0425	0.0539	0.00718	0.00229 U	0.00021 J	0.00314	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	0.197	0.225	0.052	0.00736	0.000425 J	0.0129	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	0.0747	0.111	0.0193	0.00257 U	0.000212 J	0.00573	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	0.00299 U	0.00247 U	0.00289 U	0.00259 U	0.00011 U	0.000351 U	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	0.00419	0.00618	0.00336 U	0.00234 U	0.000159 U	0.000467 J	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	137	98	201	28.2	0.299	19.1	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	14	10.5	13.3	1.72	0.0173	1.21	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	30.6	22.6	63.4	7.98	0.0486	3.84	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	19.2	15.2	12.6	1.52	0.0218	1.52	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	2.3	1.92	4.77	0.552	0.00943	0.249	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	5.88 D	6.6 D	2.37	0.284	0.00944	0.489	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	0.0706 U	0.0515	0.0573	0.00359	0.00524 JN	0.00936 JN	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	0.642 D	1.05 D	0.212	0.0299 U	0.00263 JN	0.0413	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	0.00299 U	0.00198 U	0.00289 U	0.00463 U	0.00666 JN	0.0029 JN	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	0.0254	0.0747	0.00685 U	0.00628 U	0.00659 JN	0.00292 JN	NA	NA	NA	NA	NA	NA	NA	NA
Metals																
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	55,500	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	38,500	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	22,900	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	556	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	4,540	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HB-14	HB-14	HB-14	HB-15	HB-15	HB-16	HB-16	HB-17	HB-17	HB-18	HB-18	HB-19	HB-19	HB-20	HB-20
Sample Depth(Feet):	Industrial		0 - 2	2 - 4	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	10/29/96	10/29/96	10/29/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05	09/27/05	09/27/05	09/27/05
Volatile Organic Compounds (VOCs)																	
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HB-14	HB-14	HB-14	HB-15	HB-15	HB-16	HB-16	HB-17	HB-17	HB-18	HB-18	HB-19	HB-19	HB-20	HB-20
Sample Depth(Feet):	Industrial		0 - 2	2 - 4	8 - 10	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5
Date Collected:	DC_RCL[1]	Units	10/29/96	10/29/96	10/29/96	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	04/26/05	09/27/05	09/27/05	09/27/05	09/27/05
Semivolatile Organic Compounds (SVOCs)																	
2,6-DICHLOROPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	0.11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	0.8 U	NA	0.1 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	0.11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	0.11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	0.11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.8 U	NA	0.17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	0.11 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.8 U	NA	0.1 U	1.3 J	0.69	7.2	380	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
ACENAPHTHYLENE	- -	mg/kg	0.8 U	NA	0.1 U	0.21 J	0.035 J	0.15 J	8.7 J	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
ANTHRACENE	100000	mg/kg	0.04 U	NA	0.0072	0.52 J	0.23 J	2 J	89 J	0.034 J	0.042 J	0.45 U	23 U	NA	NA	NA	NA
BENZO (A) ANTHRACENE	2.11	mg/kg	0.13	NA	0.001 U	3.1	0.51	1.4 J	69 J	0.013 J	0.012 J	0.45 U	1.2 J	NA	NA	NA	NA
BENZO (A) PYRENE	0.211	mg/kg	0.21	NA	0.013	1.6 J	0.14 J	0.46 J	21 J	0.026 J	0.025 J	0.45 U	0.6 J	NA	NA	NA	NA
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.25	NA	0.024	3.3	0.28 J	0.74 J	38 J	0.056 J	0.039 J	0.45 U	0.49 J	NA	NA	NA	NA
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.41	NA	0.023	0.4 J	0.031 J	0.1 J	4.8 J	0.022 J	0.02 J	0.45 U	23 U	NA	NA	NA	NA
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.053	NA	0.0044	0.35 J	0.022 J	2.4 U	100 U	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.36	NA	0.012	3.3	0.48	1 J	57 J	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	1.1	NA	0.049	0.17 J	0.016 J	0.042 J	100 U	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
DIBENZOFURAN	1020	mg/kg	0.8 U	NA	0.17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.21	NA	0.019	18	3.3	10	450	0.019 J	0.4 U	0.019 J	8.4 J	NA	NA	NA	NA
FLUORENE	22000	mg/kg	0.08 U	NA	0.01 U	0.15 J	0.12 J	3.8	150	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.34	NA	0.02	0.5 J	0.043 J	0.13 J	6.2 J	0.025 J	0.022 J	0.45 U	23 U	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	0.8 U	NA	0.1 U	3.1 U	0.48 U	0.12 J	6.9 J	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	19	6.9	7.2 J	1,600	2 J	3.6 J	2.2 U	91 J	1.4 J	2.6 [2.2 U]	28 J	37 J
PHENANTHRENE	- -	mg/kg	0.19 U	NA	0.025 U	0.11 J	0.26 J	7.7	190	0.46 U	0.4 U	0.45 U	23 U	NA	NA	NA	NA
PHENOL	100000	mg/kg	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.4	NA	0.028	13	1.7	5.8	280	0.031 J	0.019 J	0.012 J	7.6 J	NA	NA	NA	NA
Pentachlorophenol/Tetrachlorophenol																	
PENTACHLOROPHENOL	2.7	mg/kg	0.37	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.046 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	HB-14 0 - 2 10/29/96	HB-14 2 - 4 10/29/96	HB-14 8 - 10 10/29/96	HB-15 0 - 0.5 04/26/05	HB-15 0.5 - 1.5 04/26/05	HB-16 0 - 0.5 04/26/05	HB-16 0.5 - 1.5 04/26/05	HB-17 0 - 0.5 04/26/05	HB-17 0.5 - 1.5 04/26/05	HB-18 0 - 0.5 04/26/05	HB-18 0.5 - 1.5 04/26/05	HB-19 0 - 0.5 09/27/05	HB-19 0.5 - 1.5 09/27/05	HB-20 0 - 0.5 09/27/05	HB-20 0.5 - 1.5 09/27/05
Dioxins/Furans																	
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	1.3	NA	NA	90 DB	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	0.19	NA	NA	14 D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	0.0086	NA	NA	1.2 D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	0.0037	NA	NA	0.24 JD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	0.0051	NA	NA	1.1 D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	0.031	NA	NA	3.5 D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	0.0035 P	NA	NA	0.19 JD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	0.0049	NA	NA	0.38 JD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	0.0014 J	NA	NA	0.036 JD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	0.0007 J	NA	NA	0.057	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	0.00045 U	NA	NA	0.092	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	0.0024 J	NA	NA	0.14 JD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	0.0008 J	NA	NA	0.12	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	0.00035 U	NA	NA	0.0073	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	0.00048 U	NA	NA	0.011 CON	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	12	NA	NA	500 DEB	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	1	NA	NA	64 D	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	2.2	NA	NA	150	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	0.98	NA	NA	86	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	0.1	NA	NA	12	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	0.17 P	NA	NA	18	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	0.0044	NA	NA	0.98	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	0.011 P	NA	NA	0.75	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	0.015	NA	NA	0.26	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	0.00048 U	NA	NA	0.067	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																	
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	6,620	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	42,600	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	19,800	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	804	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	4,070	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																	
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HB-20A	HB-21	HB-21	HB-22	HB-22	HB-23	HB-24	HB-25	HB-26	HB-27	HTP-01	HTP-02	HTP-03
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	2 - 4	4 - 5	2 - 4
Date Collected:	DC_RCL[1]	Units	10/18/06	09/27/05	09/27/05	09/27/05	09/27/05	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	08/01/90	08/01/90	08/02/90
Volatile Organic Compounds (VOCs)															
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	HB-20A 0 - 0.5 10/18/06	HB-21 0 - 0.5 09/27/05	HB-21 0.5 - 1.5 09/27/05	HB-22 0 - 0.5 09/27/05	HB-22 0.5 - 1.5 09/27/05	HB-23 0 - 0.5 10/18/06	HB-24 0 - 0.5 10/18/06	HB-25 0 - 0.5 11/21/06	HB-26 0 - 0.5 11/21/06	HB-27 0 - 0.5 11/21/06	HTP-01 2 - 4 08/01/90	HTP-02 4 - 5 08/01/90	HTP-03 2 - 4 08/02/90
Semivolatile Organic Compounds (SVOCs)															
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	57 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	NA	NA	16	NA	NA	NA	NA	NA	NA	NA	0.162	15.2 [2]	0.152
ACENAPHTHYLENE	- -	mg/kg	NA	NA	0.85 J	NA	NA	NA	NA	NA	NA	NA	0.1 U	14.8 [1.58]	0.27
ANTHRACENE	100000	mg/kg	NA	NA	15	NA	NA	NA	NA	NA	NA	NA	0.0721	7.21 [0.81]	0.0674
BENZO (A) ANTHRACENE	2.11	mg/kg	NA	NA	7.8 J	NA	NA	NA	NA	NA	NA	NA	0.123	3.14 [0.459]	0.122
BENZO (A) PYRENE	0.211	mg/kg	NA	NA	3.6 J	NA	NA	NA	NA	NA	NA	NA	0.0434	0.907 [0.14]	0.0739
BENZO (B) FLUORANTHENE	2.11	mg/kg	NA	NA	7.5 J	NA	NA	NA	NA	NA	NA	NA	0.0519	1.03 [0.147]	0.114
BENZO (G,H,I) PERYLENE	- -	mg/kg	NA	NA	1.7 J	NA	NA	NA	NA	NA	NA	NA	0.0448	0.63 [0.0864]	0.0755
BENZO (K) FLUORANTHENE	21.1	mg/kg	NA	NA	2.5 J	NA	NA	NA	NA	NA	NA	NA	0.0225	0.476 [0.069]	0.0413
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	NA	NA	11 J	NA	NA	NA	NA	NA	NA	NA	0.302	5.87 [1.12]	0.615
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	NA	NA	0.61 J	NA	NA	NA	NA	NA	NA	NA	0.0854	1.29 [1.47]	0.178
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.107	26.7 [2.98]	0.264
FLUORANTHENE	22000	mg/kg	NA	NA	41	NA	NA	NA	NA	NA	NA	NA	0.409	12.3 [1.62]	0.487
FLUORENE	22000	mg/kg	NA	NA	15	NA	NA	NA	NA	NA	NA	NA	0.106	15.6 [1.89]	0.178
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	NA	NA	1.8 J	NA	NA	NA	NA	NA	NA	NA	0.0148	0.209 [0.0291]	0.0355
NAPHTHALENE	26	mg/kg	NA	NA	13	NA	NA	NA	NA	NA	NA	NA	0.1 U	18.5 [1.71]	0.899
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	43 J	57 U	2.2 U	1,300	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	NA	NA	52	NA	NA	NA	NA	NA	NA	NA	0.231	33.8 [4.08]	0.431
PHENOL	100000	mg/kg	NA	NA	12 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	NA	NA	29	NA	NA	NA	NA	NA	NA	NA	0.226	9.29 [1.28]	0.39
Pentachlorophenol/Tetrachlorophenol															
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.229	171.7 [24.5]	2.51
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.032 U	0.032 U [0.032 U]	0.032 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HB-20A	HB-21	HB-21	HB-22	HB-22	HB-23	HB-24	HB-25	HB-26	HB-27	HTP-01	HTP-02	HTP-03
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	2 - 4	4 - 5	2 - 4
Date Collected:	DC_RCL[1]	Units	10/18/06	09/27/05	09/27/05	09/27/05	09/27/05	10/18/06	10/18/06	11/21/06	11/21/06	11/21/06	08/01/90	08/01/90	08/02/90
Dioxins/Furans															
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	47.2	NA	NA	NA	NA	0.251	13.5 [32.3]	0.175	13.9	1.93	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	9.44	NA	NA	NA	NA	0.0299	2.41 [5.21]	0.0367	3.86	0.427	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	0.876	NA	NA	NA	NA	0.00491 U	0.249 [0.398]	0.00248 J	0.359	0.0366	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	0.0889	NA	NA	NA	NA	0.0126 U	0.028 J [0.145 J]	0.00167 J	0.0524 J	0.00533	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	0.837	NA	NA	NA	NA	0.00258	0.215 [0.298]	0.00271	0.386	0.0446	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	1.22	NA	NA	NA	NA	0.00769	0.444 [0.948]	0.00601	0.525	0.0636	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	0.198 D	NA	NA	NA	NA	0.00212 U	0.0611 D [0.0989]	0.000967 J	0.102	0.0123	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	0.204	NA	NA	NA	NA	0.00364 U	0.0424 J [0.261 J]	0.00233 J	0.0961	0.0114	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	0.326	NA	NA	NA	NA	0.00314 U	0.117 [0.118]	0.000807 U	0.175	0.0206	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	0.0209	NA	NA	NA	NA	0.00267 U	0.00397 UJ [0.0412 J]	0.000739 J	0.0148 J	0.00225 J	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	0.125	NA	NA	NA	NA	0.00197 U	0.0351 [0.0288]	0.00046 J	0.0647	0.00787	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	0.328	NA	NA	NA	NA	0.00231 U	0.108 [0.172]	0.00142 J	0.164	0.0181	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	0.262	NA	NA	NA	NA	0.00187 U	0.0714 [0.0635]	0.000822 J	0.137	0.0168	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	0.00312 U	NA	NA	NA	NA	0.00315 U	0.0032 U [0.0026 U]	0.000448 U	0.003 U	0.000299 J	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	0.0197	NA	NA	NA	NA	0.00275 U	0.00577 [0.00378]	0.00041 U	0.013	0.00168	NA	NA	NA
OCDD	61	ug/kg	583	NA	NA	NA	NA	2.19	125 [291]	1.45	153	21.2	NA	NA	NA
OCDF	44	ug/kg	49.2	NA	NA	NA	NA	0.137	10.5 [24.6]	0.148	18	1.69	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	91.6	NA	NA	NA	NA	0.439	23.4 [55.1]	0.326	25.2	3.47	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	61.7	NA	NA	NA	NA	0.133	12.6 [24.5]	0.136	20.8	2.04	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	4.94	NA	NA	NA	NA	0.0285	1.59 [4.5]	0.0422	1.88	0.225	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	15.3 D	NA	NA	NA	NA	0.0431	4.37 D [6.09 D]	0.042	7.71	0.777	NA	NA	NA
TOTAL PECDD	- -	ug/kg	0.0431	NA	NA	NA	NA	0.00267 U	0.0702 J [0.247 J]	0.00746 JN	0.0546 JN	0.00958 JN	NA	NA	NA
TOTAL PECDF	- -	ug/kg	1.83 D	NA	NA	NA	NA	0.00374	0.493 D [0.689]	0.0108 JN	0.721	0.0996	NA	NA	NA
TOTAL TCDD	- -	ug/kg	0.00312 U	NA	NA	NA	NA	0.00315 U	0.0032 U [0.00508 U]	0.0037	0.003 U	0.00239 JN	NA	NA	NA
TOTAL TCDF	- -	ug/kg	0.0582	NA	NA	NA	NA	0.00275 U	0.00577 J [0.0316 J]	0.0115 JN	0.0547 JN	0.00546 JN	NA	NA	NA
Metals															
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides															
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HTP-03	HTP-04	HTP-05	HTP-06	HTP-07	HTP-08	NEOFPTA[2]	PDI-A1	PDI-A2	PDI-A3	PDI-A4	PDI-A5	PDI-B1	PDI-B2
Sample Depth(Feet):	Industrial		4 - 5	5 - 6	1.5 - 2.5	0.5 - 1.5	0 - 2	1.5 - 3	0 - 2	0 - 0.4	0 - 0.4	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/01/01	08/04/08	08/04/08	08/04/08	08/04/08	08/04/08	08/05/08	08/05/08
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HTP-03	HTP-04	HTP-05	HTP-06	HTP-07	HTP-08	NEOFPTA[2]	PDI-A1	PDI-A2	PDI-A3	PDI-A4	PDI-A5	PDI-B1	PDI-B2
Sample Depth(Feet):	Industrial		4 - 5	5 - 6	1.5 - 2.5	0.5 - 1.5	0 - 2	1.5 - 3	0 - 2	0 - 0.4	0 - 0.4	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/01/01	08/04/08	08/04/08	08/04/08	08/04/08	08/04/08	08/05/08	08/05/08
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.133 U	0.136 U	2.52	0.221	1.5	0.985	NA	0.042	0.034	0.036 J [0.14 J]	0.33	2.8	0.045	1.2
ACENAPHTHYLENE	- -	mg/kg	0.104	0.218	1.25	0.1 U	0.778	1.13	NA	0.11	0.071	0.04 J [0.33 J]	1.1	3.1	0.13	2
ANTHRACENE	100000	mg/kg	0.05 U	0.05 U	0.825	0.107	32.5	1.9	NA	0.17	0.12	0.11 J [0.62 J]	2.3	4.5	0.22	4.9
BENZO (A) ANTHRACENE	2.11	mg/kg	0.00266 U	0.00272 U	4.04	0.366	3.86	3.54	NA	0.15	0.11	0.064 J [0.44 J]	1.3	4.9	0.2	6.3
BENZO (A) PYRENE	0.211	mg/kg	0.00213	0.00272 U	0.437	0.145	3.51	2.78	NA	0.13	0.16	0.091 J [0.56 J]	1.9	7.2	0.23	5.6
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.002 U	0.0058	0.754	0.222	0.478	0.33	NA	0.21	0.25	0.12 J [0.85 J]	3.3	7.8	0.41	6.2
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.00665 U	0.0068 U	0.546	0.132	3.51	2.67	NA	0.33 J	0.29 J	0.15 J [0.76 J]	4.1 J	8 J	0.45 J	7.8 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.002 U	0.002 U	0.323	0.0959	1.85	1.3	NA	0.11	0.096	0.061 J [0.3 J]	1.1	3.9	0.12	3.2
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.02 U	0.0204 U	8.1	0.95	30.7	9.45	NA	0.4	0.16	0.12 J [0.59 J]	2.3	7.5	0.38	6.6
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.00399 U	0.00408 U	1.05	0.268	8.34	5.24	NA	0.059	0.075	0.044 J [0.25 J]	1	2	0.097	1.7
DIBENZOFURAN	1020	mg/kg	0.1 U	0.226	1.82	0.225	1.5	1.9	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.02 U	0.02 U	10.3	0.991	17.2	7.82	NA	0.36	0.16	0.12 J [0.78 J]	3.5	15	0.45	12
FLUORENE	22000	mg/kg	0.02 U	0.0451	6.58	0.127	0.276	1.12	NA	0.066	0.064	0.072 J [0.24 J]	0.39	2.2	0.068	2
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.00665 U	0.0068 U	0.179	0.0552	1.8	0.946	NA	0.2 J	0.22 J	0.13 J [0.7 J]	3.2 J	6.7 J	0.32 J	5.9 J
NAPHTHALENE	26	mg/kg	0.1 U	0.136 U	1.91	0.118	2.16	7.86	NA	0.052	0.083	0.024 J [0.3 J]	0.56	1.8	0.099	1.1
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.05 U	0.111	10.9	0.339	5.75	3.54	NA	0.17	0.11	0.042 J [0.42 J]	1.4	5.4	0.23	7.2
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.0266 U	0.0849	7.52	1.19	8.68	4.69	NA	0.23	0.12	0.078 J [0.57 J]	2.2	13	0.32	9
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	0.639	NA	NA	1.03	0.188	139	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	NA	NA	0.032 U	0.032 U	0.032 U	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		HTP-03	HTP-04	HTP-05	HTP-06	HTP-07	HTP-08	NEOFPTA[2]	PDI-A1	PDI-A2	PDI-A3	PDI-A4	PDI-A5	PDI-B1	PDI-B2
Sample Depth(Feet):	Industrial		4 - 5	5 - 6	1.5 - 2.5	0.5 - 1.5	0 - 2	1.5 - 3	0 - 2	0 - 0.4	0 - 0.4	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	08/02/90	08/01/90	08/01/90	08/01/90	08/01/90	08/01/90	10/01/01	08/04/08	08/04/08	08/04/08	08/04/08	08/04/08	08/05/08	08/05/08
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	75	NA	NA	NA	NA	NA	4.12	60.3
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	6	NA	NA	NA	NA	NA	0.749	12.1
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	NA	NA	0.52	NA	NA	NA	NA	NA	0.0521	1.03
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	0.2	NA	NA	NA	NA	NA	0.0442	0.236
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.44	NA	NA	NA	NA	NA	0.0584	1.12
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	1.4	NA	NA	NA	NA	NA	0.129	1.63
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.091 J	NA	NA	NA	NA	NA	0.0184	0.251
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	NA	NA	0.32	NA	NA	NA	NA	NA	0.0775	0.357
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.022 J	NA	NA	NA	NA	NA	0.0118	0.288
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	0.032 J	NA	NA	NA	NA	NA	0.0191	0.0683
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	NA	NA	0.043 J	NA	NA	NA	NA	NA	0.00373	0.0924
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.066 J	NA	NA	NA	NA	NA	0.0333	0.445
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	NA	NA	0.037 J	NA	NA	NA	NA	NA	0.0101	0.217
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	NA	NA	0.0085 U	NA	NA	NA	NA	NA	0.00175	0.00778
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	NA	NA	0.012 U	NA	NA	NA	NA	NA	0.000634 UX	0.0178
OCDD	61	ug/kg	NA	NA	NA	NA	NA	NA	530 J	NA	NA	NA	NA	NA	41.3	847 DJ
OCDF	44	ug/kg	NA	NA	NA	NA	NA	NA	31	NA	NA	NA	NA	NA	2.3	50.3 D
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	230	NA	NA	NA	NA	NA	11.3	144
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	32	NA	NA	NA	NA	NA	2.86	54.4
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	20	NA	NA	NA	NA	NA	1.46	11.9
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	6.5	NA	NA	NA	NA	NA	0.966	16.9
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	1.1	NA	NA	NA	NA	NA	0.112	0.478
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.3	NA	NA	NA	NA	NA	0.211	1.53
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.013	NA	NA	NA	NA	NA	0.0153	0.0823
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	NA	NA	0.012 U	NA	NA	NA	NA	NA	0.0109	0.112
Metals																
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: Sample Depth(Feet): Date Collected:	WDNR Industrial DC_RCL[1]	Units	PDI-B3 0 - 0.25 08/05/08	PDI-B4 0 - 0.5 08/05/08	PDI-B5 0 - 0.5 08/05/08	PDI-B6 0 - 0.5 08/05/08	PDI-B7 0 - 0.5 08/05/08	PDI-B8 0 - 0.5 08/05/08	PDI-B9 0 - 0.5 08/05/08	PDI-B10 0 - 0.5 08/05/08	PDI-B11 0 - 0.5 08/05/08	PDI-B12 0 - 0.5 08/05/08	PDI-B13 0 - 0.5 08/05/08	PDI-B14 0 - 0.5 08/05/08	PDI-B15 0 - 0.5 08/05/08
Volatile Organic Compounds (VOCs)															
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		PDI-B3	PDI-B4	PDI-B5	PDI-B6	PDI-B7	PDI-B8	PDI-B9	PDI-B10	PDI-B11	PDI-B12	PDI-B13	PDI-B14	PDI-B15
Sample Depth(Feet):	Industrial		0 - 0.25	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08	08/05/08
Semivolatile Organic Compounds (SVOCs)															
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.073	0.55	1.5	0.17	NA	0.054 [0.1]	NA	1.6	0.65	0.46	0.85	0.85	0.74
ACENAPHTHYLENE	- -	mg/kg	0.16	1.4	1.8	0.25	NA	0.15 [0.13]	NA	5.8	4.2	0.67	3.4	2.7	1.2
ANTHRACENE	100000	mg/kg	0.35	2.8	4.5	0.51	NA	0.23 [0.23]	NA	11	6.4	2.6	5.3	5.9	2.5
BENZO (A) ANTHRACENE	2.11	mg/kg	0.26	2.2	6	0.41	NA	0.2 [0.12]	NA	3.5	3.3	1.1	2.2	4.8	1.3
BENZO (A) PYRENE	0.211	mg/kg	0.3	4	6.9	0.36	NA	0.32 [0.23]	NA	7.8	6.3	1.5	3.6	5.4	1.4
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.51	5.4	8.3	0.67	NA	0.5 [0.27]	NA	12	8.5	2.4 JX	9.6	11	2.3
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.58 J	8.9	9.2	0.56 J	NA	0.41 J [0.36]	NA	15 J	15 J	2.6	7.8 J	6.1 J	2.4 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.21	2.3	2.9	0.19	NA	0.17 [0.1]	NA	2.5	3.3	2.3 JX	2.3	2.2	0.85
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.45	4.8	8.1	0.57	NA	0.38 [0.19]	NA	7.6	7.1	4.2	4.8	7.4	1.7
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.15	1.8	1.9	0.13	NA	0.096 [0.11]	NA	4.4	2.6	0.54	2.2	1.8	0.65
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.6	3.5	12	1.3	NA	0.38 [0.22]	NA	7.6	7.2	2.1	5	12	2.4
FLUORENE	22000	mg/kg	0.096	0.85	2.2	0.2	NA	0.091 [0.18]	NA	3.8	1.2	0.78	2.1	1.9	1.7
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.49 J	6.3	6.9	0.42 J	NA	0.36 J [0.31]	NA	15 J	11 J	1.9	8.3 J	5.9 J	2.3 J
NAPHTHALENE	26	mg/kg	0.21	0.51	1	0.74	NA	0.067 [0.1]	NA	0.39 J	1.2	0.5	0.76	1.6	0.52
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.42	1.7	6.9	0.86	NA	0.079 [0.16]	NA	0.98	2	0.78	1.1	2.6	0.68
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.35	3.2	9.6	0.58	NA	0.27 [0.16]	NA	5.7	4.8	1.9	3.6	9.5	1.7
Pentachlorophenol/Tetrachlorophenol															
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	PDI-B3 0 - 0.25 08/05/08	PDI-B4 0 - 0.5 08/05/08	PDI-B5 0 - 0.5 08/05/08	PDI-B6 0 - 0.5 08/05/08	PDI-B7 0 - 0.5 08/05/08	PDI-B8 0 - 0.5 08/05/08	PDI-B9 0 - 0.5 08/05/08	PDI-B10 0 - 0.5 08/05/08	PDI-B11 0 - 0.5 08/05/08	PDI-B12 0 - 0.5 08/05/08	PDI-B13 0 - 0.5 08/05/08	PDI-B14 0 - 0.5 08/05/08	PDI-B15 0 - 0.5 08/05/08
Dioxins/Furans															
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	NA	0.115 [0.132]	NA	7.11	818 D	218 D	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	NA	0.0201 [0.0252]	NA	2.37	348 D	44.1 D	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	NA	0.00174 J [0.00264]	NA	0.279	35.7 D	4.74 D	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.000822 J [0.00084 UX]	NA	0.0366	5.06	0.615	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.0014 J [0.00191 J]	NA	0.352	39.9	3.87	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.00335 [0.00367]	NA	0.24	24.9	5.52	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.000529 UX [0.000581 J]	NA	0.0719	8.07	0.891	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	NA	0.00148 J [0.00142 UX]	NA	0.0652	8.39	0.744	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.000524 J [0.000706 J]	NA	0.0647	5.08	0.976	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	NA	0.000374 UX [0.000375 UX]	NA	0.0141	1.7	0.157	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	NA	0.000205 U [0.000223 UX]	NA	0.0144	1.38	0.209	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	NA	0.000766 UX [0.00109 J]	NA	0.124	11.6	1.56	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	NA	0.000413 J [0.00047 J]	NA	0.0517	4.74	0.592	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	NA	0.000248 U [0.000209 U]	NA	0.0016	0.152	0.0131	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	NA	0.000238 U [0.000209 U]	NA	0.00161	0.179	0.0244	NA	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	NA	0.98 [1.17]	NA	133 D	8,710 DJ	2,940 DJ	NA	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	NA	0.0809 [0.101]	NA	7.2	1,180 D	186 D	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	NA	0.287 [0.325]	NA	13.4	1,360 D	407 D	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	NA	0.085 [0.111]	NA	10.5 J	1,290 D	200 D	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	NA	0.0315 [0.0326]	NA	0.949	101	22.3	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	NA	0.0249 [0.0334]	NA	4.04	458 DJ	59.1	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	NA	0.00227 [0.0021]	NA	0.058	5.08	0.825	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	NA	0.0013 [0.0034]	NA	0.391	42.6 J	4.34 J	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	NA	0.000485 [0.000345 UX]	NA	0.0111	0.526	0.153	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	NA	0.000254 UX [0.000493 UX]	NA	0.0233	1.78 J	0.278 J	NA	NA	NA	NA
Metals															
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides															
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: Sample Depth(Feet): Date Collected:	WDNR Industrial DC_RCL[1]	Units	PDI-B17 0 - 0.5 08/05/08	PDI-B18 0 - 0.5 08/05/08	PDI-H1 0 - 0.5 08/04/08	PDI-H2 0 - 0.5 08/04/08	PDI-H3 0 - 0.5 08/04/08	PDI-H4 0 - 0.5 08/04/08	PDI-H5 0 - 0.5 08/04/08	PDI-H6 0 - 0.5 08/04/08	PDI-S1 0 - 0.5 08/05/08	PDI-S2 0 - 0.5 08/05/08	PDI-S3 0 - 0.5 08/05/08	PDI-S4 0 - 0.5 08/05/08	S-1 0 - 0.5 11/20/06
Volatile Organic Compounds (VOCs)															
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.033 J
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	9.1
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.05 J
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.06 U
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.1
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.027 J
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.6
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.052 J

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	PDI-B17 0 - 0.5 08/05/08	PDI-B18 0 - 0.5 08/05/08	PDI-H1 0 - 0.5 08/04/08	PDI-H2 0 - 0.5 08/04/08	PDI-H3 0 - 0.5 08/04/08	PDI-H4 0 - 0.5 08/04/08	PDI-H5 0 - 0.5 08/04/08	PDI-H6 0 - 0.5 08/04/08	PDI-S1 0 - 0.5 08/05/08	PDI-S2 0 - 0.5 08/05/08	PDI-S3 0 - 0.5 08/05/08	PDI-S4 0 - 0.5 08/05/08	S-1 0 - 0.5 11/20/06
Semivolatile Organic Compounds (SVOCs)															
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.02 J
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.041
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.31	0.88	NA	NA	NA	NA	0.11	NA	NA	NA	NA	NA	0.062
ACENAPHTHYLENE	- -	mg/kg	0.82	1.8	NA	NA	NA	NA	0.48	NA	NA	NA	NA	NA	0.99
ANTHRACENE	100000	mg/kg	1.3	2.6	NA	NA	NA	NA	9.3 D	NA	NA	NA	NA	NA	2.1
BENZO (A) ANTHRACENE	2.11	mg/kg	1.7	1.6	NA	NA	NA	NA	0.43	NA	NA	NA	NA	NA	0.33
BENZO (A) PYRENE	0.211	mg/kg	2.1	4.9	NA	NA	NA	NA	0.53	NA	NA	NA	NA	NA	0.51
BENZO (B) FLUORANTHENE	2.11	mg/kg	4.5	4.5	NA	NA	NA	NA	0.94	NA	NA	NA	NA	NA	1.1
BENZO (G,H,I) PERYLENE	- -	mg/kg	2.4	6.5 J	NA	NA	NA	NA	0.85 J	NA	NA	NA	NA	NA	0.75
BENZO (K) FLUORANTHENE	21.1	mg/kg	1.4	1.7	NA	NA	NA	NA	0.33	NA	NA	NA	NA	NA	0.72
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	2.7	2.8	NA	NA	NA	NA	0.65	NA	NA	NA	NA	NA	0.65
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.98	1.7	NA	NA	NA	NA	0.25	NA	NA	NA	NA	NA	0.12
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	2.4	3.5	NA	NA	NA	NA	0.71	NA	NA	NA	NA	NA	0.83
FLUORENE	22000	mg/kg	0.75	1.7	NA	NA	NA	NA	0.38	NA	NA	NA	NA	NA	0.073
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	2.4	5 J	NA	NA	NA	NA	0.79 J	NA	NA	NA	NA	NA	0.35
NAPHTHALENE	26	mg/kg	0.4	0.81	NA	NA	NA	NA	0.19	NA	NA	NA	NA	NA	0.055
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	4.9 [2.2]	2.1 J	NA	NA	0.29 U
PHENANTHRENE	- -	mg/kg	0.51	1.1	NA	NA	NA	NA	0.54	NA	NA	NA	NA	NA	0.33
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	1.9	3.3	NA	NA	NA	NA	0.46	NA	NA	NA	NA	NA	1.1
Pentachlorophenol/Tetrachlorophenol															
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: Sample Depth(Feet): Date Collected:	WDNR Industrial DC_RCL[1]	Units	PDI-B17 0 - 0.5 08/05/08	PDI-B18 0 - 0.5 08/05/08	PDI-H1 0 - 0.5 08/04/08	PDI-H2 0 - 0.5 08/04/08	PDI-H3 0 - 0.5 08/04/08	PDI-H4 0 - 0.5 08/04/08	PDI-H5 0 - 0.5 08/04/08	PDI-H6 0 - 0.5 08/04/08	PDI-S1 0 - 0.5 08/05/08	PDI-S2 0 - 0.5 08/05/08	PDI-S3 0 - 0.5 08/05/08	PDI-S4 0 - 0.5 08/05/08	S-1 0 - 0.5 11/20/06
Dioxins/Furans															
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	31.2	4.39	166 D	6.9	7.38	NA	587 D	NA	NA	9.14	91.3 D [176 D]	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	8.67	1.31	73.8 D	1.92	2.13	NA	102 D	NA	NA	3.68	35.1 D [71.3 D]	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	1.03	0.12	7.42 D	0.199	0.174	NA	5.79 D	NA	NA	0.332	3.61 D [7.78 D]	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	0.0618	0.0174	0.449	0.0235	0.0384	NA	2.13	NA	NA	0.045	0.24 [0.461]	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	1.1	0.126	7.76	0.232	0.197	NA	4.48	NA	NA	0.422	4.05 [7.95]	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	0.621	0.144	5.59	0.256	0.251	NA	16.2	NA	NA	0.358	2.86 [5.36]	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	0.216	0.0319	1.95	0.0627	0.044	NA	1.25	NA	NA	0.0835	0.768 [1.44]	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	0.123	0.0343	0.783	0.0452	0.0651	NA	2.74	NA	NA	0.08	0.41 [0.804]	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	0.297	0.0451	3.37	0.119	0.0341	NA	1.64	NA	NA	0.0848	1.25 [2.4]	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	0.014	0.00679	0.118	0.00825	0.0128	NA	0.565	NA	NA	0.0127	0.0639 [0.138]	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	0.05	0.0171	1.18	0.0451	0.00921	NA	0.431	NA	NA	0.0228	0.36 [0.719]	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	0.3	0.0506	3.09	0.105	0.0755	NA	2.34	NA	NA	0.163	1.61 [3]	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	0.135	0.0351	2.52	0.107	0.0281	NA	1.1	NA	NA	0.0734	1.09 [2.14]	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	0.00147 UX	0.000509	0.00378	0.000681 UX	0.00191	NA	0.0439	NA	NA	0.00067 UX	0.00404 [0.00793]	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	0.00662	0.00273	0.182	0.00784	0.00119	NA	0.0564	NA	NA	0.00322	0.0686 [0.143]	NA
OCDD	61	ug/kg	NA	724 D	41.8	1,920 DJ	82.8 D	57.5	NA	5,000 D	NA	NA	105 DJ	1,070 D [2,080 D]	NA
OCDF	44	ug/kg	NA	28.8	4.97	197 D	6.21	8.31	NA	464 D	NA	NA	11.6	135 D [251 D]	NA
TOTAL HPCDD	- -	ug/kg	NA	66.9	7.59	248 D	12.7	12.5	NA	950 D	NA	NA	15.6	157 D [295]	NA
TOTAL HPCDF	- -	ug/kg	NA	36.8	5.89	306 D	9.3	9.46 J	NA	506 D	NA	NA	16.4 J	183 D [373 D]	NA
TOTAL HXCDD	- -	ug/kg	NA	4.15	0.522	13.6	0.891	1.05	NA	69.4	NA	NA	1.31	8.18 [15.6]	NA
TOTAL HXCDF	- -	ug/kg	NA	13.1	1.91	135 DJ	3.96	2.62	NA	110 J	NA	NA	5.86 J	72.3 DJ [141 DJ]	NA
TOTAL PECDD	- -	ug/kg	NA	0.0981	0.0257	0.312	0.0321	0.0982	NA	6.23	NA	NA	0.0764	0.201 [0.449]	NA
TOTAL PECDF	- -	ug/kg	NA	0.964	0.196	13.3 J	0.524	0.245	NA	10.1 J	NA	NA	0.558 J	6.04 J [12.3 J]	NA
TOTAL TCDD	- -	ug/kg	NA	0.0161	0.00293	0.0144	0.00193	0.0238	NA	1.04	NA	NA	0.0376	0.0382 [0.081]	NA
TOTAL TCDF	- -	ug/kg	NA	0.04	0.00883	0.505 J	0.0308	0.0265	NA	0.472 J	NA	NA	0.0549 J	0.336 J [0.61 J]	NA
Metals															
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2 J
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	42
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	78
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides															
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		S-2	S-3	S-4	S-5	S-6	SB-01	SB-02	SB-03	SB-04	SB-05	SB-06	SB-07	SB-08	SB-09
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1
Date Collected:	DC_RCL[1]	Units	11/20/06	11/20/06	11/20/06	11/20/06	11/20/06	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	0.06 U [0.06 U]	0.06 U	0.06 U	0.06 U	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	0.14 [0.94]	2.4	4.5	2.5	0.36	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	0.045 J [0.043 J]	0.044 J	0.046 J	0.04 J	0.046 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	0.06 U [0.06 U]	0.044 J	0.06 U	0.06 U	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	0.06 U [0.06 U]	0.06 U	0.06 U	0.06 U	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	0.034 J [0.44]	0.68	1.4	0.79	0.083	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	0.06 U [0.06 U]	0.06 U	0.06 U	0.028 J	0.06 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	0.049 J [0.19]	0.61	1	0.65	0.12	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	0.026 J [0.027 J]	0.29	0.09	0.049 J	0.042 J	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		S-2	S-3	S-4	S-5	S-6	SB-01	SB-02	SB-03	SB-04	SB-05	SB-06	SB-07	SB-08	SB-09
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1
Date Collected:	DC_RCL[1]	Units	11/20/06	11/20/06	11/20/06	11/20/06	11/20/06	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88
Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	0.015 J [0.0081 J]	0.62	0.12 U	0.41 U	0.022 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	0.03 [0.015]	1.5	0.13 U	0.43 U	0.062	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.032 [0.015]	0.68	0.1 J	0.12 J	0.17	0.1 U	0.1 U	0.127	0.1 U	0.836	0.657	0.687	0.507	5.04
ACENAPHTHYLENE	- -	mg/kg	0.82 [0.37]	1.4	1.4	2.1	0.091	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.128	0.199	0.535
ANTHRACENE	100000	mg/kg	1.5 [0.68]	3.5	2.6	3.5	0.61	0.267	1.05	0.189	0.05 U	0.144	0.284	1.7	1.71	26.3
BENZO (A) ANTHRACENE	2.11	mg/kg	0.24 [0.11]	1.6	0.76	1.6	0.57	1.71	0.432	0.414	0.0282	0.346	2	2.62	1.61	6.44
BENZO (A) PYRENE	0.211	mg/kg	0.24 [0.12]	1.6	1.4	3.5	0.33	1.14	0.329	0.299	0.0173	0.194	1.35	1.3	0.756	2.42
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.53 [0.27]	2.6	2	5.5	0.73	2.71	0.794	0.598	0.0371	0.405	3.03	3.61	1.78	5.35
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.98 [0.51]	2.6	1.5	1.7	0.17	2.15	0.64	0.463	0.0413	0.331	2.56	2.64	1.4	4.55
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.35 [0.17]	1.5	1.3	3.9	0.56	0.949	0.265	0.167	0.0127	0.14	0.924	1.27	0.596	1.95
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.41 [0.21]	2.6	1.7	5.4	1.4	3.3	0.761	0.489	0.0426	0.383	3.4	4.74	2.06	8.83
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.09 [0.045]	0.48	0.35	0.54	0.061	3.71	0.954	0.688	0.0734	0.569	4.22	3.78	2.13	6.88
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	1.9	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.38 [0.16]	5.3	2	2.6	2.5	4.3	0.829	0.361	0.069	0.817	2.89	8.37	2.64	32.8
FLUORENE	22000	mg/kg	0.037 [0.015]	1.6	0.16	0.18 J	0.3	7.37	0.0976	0.02 U	0.02 U	0.0807	0.495	0.13	0.0821	4.46
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.32 [0.17]	1.4	0.91	1.4	0.15	1.3	0.389	0.275	0.0266	0.205	1.66	1.66	0.986	3.17
NAPHTHALENE	26	mg/kg	0.057 [0.027]	5.1	0.17 U	0.55 U	0.055 J	0.196	0.102	0.1 U	0.1 U	0.1 U	0.1 U	0.231	0.302	1.24
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	0.28 U [0.29 U]	0.6 U	0.68 U	0.56 U	0.28 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENANTHRENE	- -	mg/kg	0.17 [0.075]	4.9	0.53	0.47	2.2	0.265	0.323	0.0891	0.05 U	0.459	0.203	0.408	0.326	11.8
PHENOL	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.51 [0.25]	4.3	4.5	20	2.1	3.51	0.878	0.585	0.0644	0.703	3.04	7.73	2.15	22.8
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	79.2	4.09	1.72	1.36	1.49	47	195	39.8	41.6
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		S-2	S-3	S-4	S-5	S-6	SB-01	SB-02	SB-03	SB-04	SB-05	SB-06	SB-07	SB-08	SB-09
Sample Depth(Feet):	Industrial		0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1	0 - 1
Date Collected:	DC_RCL[1]	Units	11/20/06	11/20/06	11/20/06	11/20/06	11/20/06	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88	08/04/88
Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	5 [5.1]	4.1	NA	NA	0.052	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	0.57 [0.59]	0.42	NA	NA	0.0071	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	0.056 [0.06]	0.04	NA	NA	0.00043 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	0.059 [0.06]	0.023	NA	NA	0.0009 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	0.041 [0.058]	0.033 U	NA	NA	0.00046 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	0.16 [0.16]	0.086	NA	NA	0.0019 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	0.021 U [0.014]	0.15 U	NA	NA	0.00026 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	0.09 [0.094]	0.027	NA	NA	0.0014 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	0.013 [0.014]	0.011	NA	NA	0.00013 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	0.021 [0.032]	0.0053	NA	NA	0.00038 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	0.0056 [0.0034 U]	0.0014 U	NA	NA	0.00018 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	0.021 [0.02 U]	0.0049 J	NA	NA	0.00034 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	0.0095 [0.0098]	0.0026 U	NA	NA	0.00013 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	0.0025 [0.0031]	0.0013 U	NA	NA	0.00018 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	0.00082 J [0.00067 J]	0.0021 U	NA	NA	0.00012 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDD	61	ug/kg	41 [43]	33	NA	NA	0.42	NA	NA	NA	NA	NA	NA	NA	NA	NA
OCDF	44	ug/kg	1.8 [1.9]	1.4	NA	NA	0.023	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	24 [23]	26	NA	NA	0.2	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	0.79 [2.6]	2.1	NA	NA	0.022	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	2.5 [2.8]	2.5	NA	NA	0.025	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	0.31 [0.79]	0.44	NA	NA	0.0044 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDD	- -	ug/kg	0.18 [0.19]	0.05	NA	NA	0.0013 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL PECDF	- -	ug/kg	0.084 [0.085]	0.043	NA	NA	0.0013 J	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDD	- -	ug/kg	0.03 [0.032]	0.0013 U	NA	NA	0.00018 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOTAL TCDF	- -	ug/kg	0.0037 [0.0038]	0.0008 J	NA	NA	0.00012 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals																
ARSENIC	2.39	mg/kg	2.4 J [1.9 J]	2.1 J	3.5	1.6 J	2.9 U	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	55 [50]	24	46	64	2.9	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	110 [96]	35	65	120	4.8	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID: / Sample Depth(Feet): / Date Collected:	WDNR Industrial DC_RCL[1]	Units	SB-10 0 - 1 08/04/88	SB-11 0 - 2 10/29/96	SB-11 4 - 6 10/29/96	SB-12 0 - 2 10/28/96	SB-12 2 - 4 10/28/96	SB-12 4 - 6 10/28/96	SB-13 0 - 2 10/29/96	SB-13 4 - 6 10/29/96	SB-14 0 - 2 10/29/96	SB-14 2 - 4 10/29/96	SB-14 4 - 6 10/29/96	SB-15 0 - 0.5 04/27/05	SB-15 0.5 - 1.5 04/27/05	SB-16 0 - 0.5 04/27/05
Volatile Organic Compounds (VOCs)																
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	0.014 UJ	NA	NA	0.013 UJ	NA	0.013 UJ	NA	NA	0.014 UJ	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.003 J	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	0.015 U	NA	NA	0.013 U	NA	0.074	NA	NA	0.014 U	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	0.002 J	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 UJ	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	0.002 J	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	0.07 U	NA	NA	0.065 U	NA	0.066 U	NA	NA	0.068 U	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.002 J	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	0.001 J	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	0.002 J	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 UJ	NA	NA	0.007 U	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	0.007 U	NA	NA	0.006 U	NA	0.007 U	NA	NA	0.007 U	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	0.007 UJ	NA	NA	0.006 UJ	NA	0.007 UJ	NA	NA	0.007 U	NA	NA	NA	NA

See Notes on Page 94.

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Superior, Wisconsin
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Semivolatile Organic Compounds (SVOCs)																
2,6-DICHLOROPHENOL	- -	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	0.14 U	0.14 U	0.14 UJ	NA	0.12 U	0.14 U	0.15 U	0.4 J	NA	0.14 U	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	4.7 U	NA	0.1 U	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.52 U
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.52 U
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	0.14 U	0.14 U	0.14 U	NA	0.12 U	0.14 U	0.15 U	0.14 UJ	NA	0.14 U	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	0.14 U	0.14 U	0.14 U	NA	0.12 U	0.14 U	0.15 U	0.17 J	NA	0.14 U	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	0.14 U	0.14 U	0.14 UJ	NA	0.12 U	0.14 U	0.15 U	0.34 J	NA	0.14 U	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.52 U
2-CHLOROPHENOL	5110	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	0.52 U
2-METHYLNAPHTHALENE	2200	mg/kg	NA	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	4.7 U	NA	0.1 U	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.25 J	NA	0.07 U	NA	NA	0.52 U
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	0.14 U	0.14 U	0.14 U	NA	0.12 U	0.14 U	0.15 U	0.14 UJ	NA	0.14 U	NA	NA	2.5 U
ACENAPHTHENE	33000	mg/kg	0.1 U	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	4.7 U	NA	0.1 U	0.51 U	0.46 U [0.47 U]	0.52 U
ACENAPHTHYLENE	- -	mg/kg	0.1 U	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	4.7 U	NA	0.1 U	0.51 U	0.46 U [0.011 J]	0.048 J
ANTHRACENE	100000	mg/kg	0.05 U	0.049 U	0.0048 U	0.049 U	NA	0.0042 U	0.0046 U	0.0051 U	0.41	NA	0.005 U	0.51 U	0.46 U [0.026 J]	0.13 J
BENZO (A) ANTHRACENE	2.11	mg/kg	0.578	0.2	0.00096 U	0.22	NA	0.00084 U	0.00093 U	0.001 U	0.2	NA	0.001 U	0.51 U	0.012 J [0.029 J]	0.062 J
BENZO (A) PYRENE	0.211	mg/kg	0.536	0.081	0.00096 U	0.17	NA	0.00084 U	0.00093 U	0.001 U	0.28	NA	0.001 U	0.014 J	0.46 U [0.024 J]	0.1 J
BENZO (B) FLUORANTHENE	2.11	mg/kg	1.6	0.25	0.00096 U	0.37	NA	0.00084 U	0.00093 U	0.001 U	0.53	NA	0.001 U	0.04 J	0.024 J [0.13 J]	0.28 J
BENZO (G,H,I) PERYLENE	- -	mg/kg	1.4	0.14	0.0023 U	0.18	NA	0.002 U	0.0022 U	0.0025 U	0.39	NA	0.0024 U	0.51 U	0.013 J [0.023 J]	0.12 J
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.42	0.097	0.00096 U	0.1	NA	0.00084 U	0.00093 U	0.001 U	0.19	NA	0.001 U	0.011 J	0.46 U [0.017 J]	0.076 J
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	1.11	0.68	0.0068 U	0.36	NA	0.006 U	0.0066 U	0.0073 U	0.85	NA	0.0072 U	0.022 J	0.0095 J [0.053 J]	0.17 J
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	1.94	0.37	0.0014 U	0.79	NA	0.0012 U	0.0013 U	0.0015 U	0.92	NA	0.0011 U	0.51 U	0.46 U [0.47 U]	0.032 J
DIBENZOFURAN	1020	mg/kg	NA	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	4.7 U	NA	0.1 U	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.338	0.56	0.0096 U	0.15	NA	0.0084 U	0.0093 U	0.01 U	0.64	NA	0.01 U	0.015 J	0.021 J [0.042 J]	0.17 J
FLUORENE	22000	mg/kg	0.02 U	0.098 U	0.0096 U	0.098 U	NA	0.0084 U	0.0093 U	0.012	0.47 U	NA	0.01 U	0.51 U	0.46 U [0.47 U]	0.013 J
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.986	0.13	0.0023 U	0.26	NA	0.002 U	0.0022 U	0.0025 U	0.36	NA	0.0024 U	0.01 J	0.46 U [0.022 J]	0.12 J
NAPHTHALENE	26	mg/kg	0.169	0.98 U	0.096 U	0.98 U	NA	0.084 U	0.093 U	0.1 U	1.5 J	NA	0.1 U	0.51 U	0.46 U [0.47 U]	0.52 U
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.52 U
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.5 U	2.2 U [2.3 U]	2.5
PHENANTHRENE	- -	mg/kg	0.05 U	0.24 U	0.023 U	0.24 U	NA	0.02 U	0.022 U	0.025 U	0.25 J	NA	0.024 U	0.51 U	0.46 U [0.021 J]	0.031 J
PHENOL	100000	mg/kg	NA	0.07 U	0.07 U	0.07 U	NA	0.06 U	0.07 U	0.07 U	0.07 UJ	NA	0.07 U	NA	NA	0.52 U
PYRENE	16500	mg/kg	0.749	1.2	0.0096 U	0.31	NA	0.0084 U	0.0093 U	0.01 U	0.93	NA	0.01 U	0.015 J	0.016 J [0.046 J]	0.16 J
Pentachlorophenol/Tetrachlorophenol																
PENTACHLOROPHENOL	2.7	mg/kg	7.27	0.13	0.014 U	1.4	NA	0.58	0.013 U	0.015 U	3.5	NA	0.014 U	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	0.032 U	0.028 U	0.027 U	0.28 U	NA	0.12 U	0.027 U	0.029 U	0.54 U	NA	0.029 U	NA	NA	NA

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Dioxins/Furans																
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	2.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	350 DEB
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	0.9 P	NA	NA	NA	NA	NA	NA	NA	NA	NA	160 DE
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	0.046	NA	NA	NA	NA	NA	NA	NA	NA	NA	17 D
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.0043	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.2 D
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.043	NA	NA	NA	NA	NA	NA	NA	NA	NA	24 D
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.086	NA	NA	NA	NA	NA	NA	NA	NA	NA	17 D
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.0057	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.1 D
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	0.0058	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.7 D
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	0.011	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.24 JD
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	0.00063 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.23
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	0.002 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.66
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.014	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.9 D
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	0.006	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.9
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	0.0005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.007
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	0.00057 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.065 CON
OCDD	61	ug/kg	NA	NA	NA	20	NA	NA	NA	NA	NA	NA	NA	NA	NA	1,300 DBE
OCDF	44	ug/kg	NA	NA	NA	3.3	NA	NA	NA	NA	NA	NA	NA	NA	NA	580 DE
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	4	NA	NA	NA	NA	NA	NA	NA	NA	NA	540
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	4.8 P	NA	NA	NA	NA	NA	NA	NA	NA	NA	830
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	0.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	45
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	1.5 P	NA	NA	NA	NA	NA	NA	NA	NA	NA	270
TOTAL PECDD	- -	ug/kg	NA	NA	NA	0.0026	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.48
TOTAL PECDF	- -	ug/kg	NA	NA	NA	0.12 P	NA	NA	NA	NA	NA	NA	NA	NA	NA	13
TOTAL TCDD	- -	ug/kg	NA	NA	NA	0.0005 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.071
TOTAL TCDF	- -	ug/kg	NA	NA	NA	0.0089 P	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.16
Metals																
ARSENIC	2.39	mg/kg	NA	14 U	NA	NA	13 U	NA	13 U	NA	NA	14 U	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	299	NA	NA	199	NA	89	NA	NA	259	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	1 U	NA	NA	1 U	NA	1 U	NA	NA	1 U	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	77,500	NA	NA	NA	NA	46,400	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	62	NA	NA	35	NA	22	NA	NA	63	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	30,400	NA	NA	NA	NA	40,300	NA	NA	NA	NA
LEAD	800	mg/kg	NA	14 U	NA	NA	13 U	NA	13 U	NA	NA	14 U	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	16,700	NA	NA	NA	NA	24,200	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	521	NA	NA	NA	NA	729	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	3,590	NA	NA	NA	NA	6,180	NA	NA	NA	NA
Pesticides																
4,4'-DDD	7.18	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	0.005 U	NA	NA	0.004 U	NA	0.004 U	NA	NA	0.005 U	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	0.002 U	NA	NA	0.002 U	NA	0.002 U	NA	NA	0.002 U	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	0.024 U	NA	NA	0.022 U	NA	0.022 U	NA	NA	0.023 U	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	0.024 U	NA	NA	0.022 U	NA	0.022 U	NA	NA	0.023 U	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	0.048 U	NA	NA	0.044 U	NA	0.044 U	NA	NA	0.046 U	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		SB-16	SB-17	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	09/27/05	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06
Volatile Organic Compounds (VOCs)															
1,1,2,2-TETRACHLOROETHANE	3.69	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-TRICHLOROETHANE	7.34	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHANE	23.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-DICHLOROETHENE	1190	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,3-TRICHLOROBENZENE	493	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMO-3-CHLOROPROPANE	0.099	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DIBROMOETHANE	0.23	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROETHANE	3.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROPROPANE	6.62	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROPROPANE	1490	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,2-DICHLOROPROPANE	527	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMOBENZENE	679	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BROMODICHLOROMETHANE	1.96	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CARBON TETRACHLORIDE	4.25	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROBENZENE	761	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROETHANE	2120	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROFORM	2.13	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CIS-1,2-DICHLOROETHENE	2040	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBROMOCHLOROMETHANE	4.4	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DICHLORODIFLUOROMETHANE	571	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ISOPROPYLBENZENE	268	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
M&P-XYLENE	388 / 390	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLENE CHLORIDE	1070	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-CHLOROTOLUENE	253	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
P-ISOPROPYLTOLUENE	162	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SEC-BUTYLBENZENE	145	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TERT-BUTYLBENZENE	183	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TETRACHLOROETHENE	153	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRANS-1,2-DICHLOROETHENE	976	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROETHENE	8.81	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
VINYL CHLORIDE	2.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
XYLENES (TOTAL)	--	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-TRICHLOROETHANE	640	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRIMETHYLBENZENE	219	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-TRIMETHYLBENZENE	182	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZENE	7.41	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLOROMETHANE	720	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ETHYLBENZENE	37	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYL(TERT)BUTYL ETHER	293	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-BUTYLBENZENE	108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-PROPYLBENZENE	264	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOLUENE	818	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
O-XYLENE	434	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-DICHLOROBENZENE	376	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-DICHLOROBENZENE	297	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROBUTADIENE	22.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		SB-16	SB-17	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	09/27/05	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06
Semivolatile Organic Compounds (SVOCs)															
2,6-DICHLOROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3&4-METHYLPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-DINITRO- 2-METHYLPHENOL	49.3	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-TRICHLOROBENZENE	98.7	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-DICHLOROBENZENE	17.5	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-METHYLNAPHTHALENE	53.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-TRICHLOROPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-TRICHLOROPHENOL	157	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DICHLOROPHENOL	1850	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DIMETHYLPHENOL	12300	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROPHENOL	1230	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-DINITROTOLUENE	5.52	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-CHLOROPHENOL	5110	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLNAPHTHALENE	2200	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-METHYLPHENOL	30800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-NITROPHENOL	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-BROMOPHENYL PHENYLETHER	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-CHLORO-3-METHYLPHENOL	61600	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-METHYLPHENOL	61600	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-NITROPHENOL	- -	mg/kg	NA	NA	2.3 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHENE	33000	mg/kg	0.46 U	0.47 U	0.011 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ACENAPHTHYLENE	- -	mg/kg	0.46 U	0.025 J	0.19 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ANTHRACENE	100000	mg/kg	0.02 J	0.041 J	0.27 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (A) ANTHRACENE	2.11	mg/kg	0.015 J	0.47 U	1.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (A) PYRENE	0.211	mg/kg	0.021 J	0.058 J	1.9	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (B) FLUORANTHENE	2.11	mg/kg	0.058 J	0.17 J	3.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (G,H,I) PERYLENE	- -	mg/kg	0.009 J	0.086 J	0.53	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BENZO (K) FLUORANTHENE	21.1	mg/kg	0.017 J	0.024 J	1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BUTYL BENZYL PHTHALATE	907	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHRYSENE	211	mg/kg	0.042 J	0.47 U	2.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBENZO (A,H) ANTHRACENE	0.211	mg/kg	0.46 U	0.066 J	0.31 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIBENZOFURAN	1020	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORANTHENE	22000	mg/kg	0.049 J	0.02 J	2.1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
FLUORENE	22000	mg/kg	0.46 U	0.47 U	0.016 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEXACHLOROETHANE	43.1	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
INDENO (1,2,3-CD) PYRENE	2.11	mg/kg	0.013 J	0.08 J	0.62	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NAPHTHALENE	26	mg/kg	0.46 U	0.47 U	0.029 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-NITROSODI-N-PROPYLAMINE	0.246	mg/kg	NA	NA	0.47 U	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PENTACHLOROPHENOL	2.7	mg/kg	1.2 J	2.3 U	3.5	NA	NA	NA	NA	NA	NA	NA	0.014 J	0.71 J	7.7 J
PHENANTHRENE	- -	mg/kg	0.46 U	0.47 U	0.046 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PHENOL	100000	mg/kg	NA	NA	0.012 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PYRENE	16500	mg/kg	0.077 J	0.03 J	2.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol/Tetrachlorophenol															
PENTACHLOROPHENOL	2.7	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,3,4,6 & 2,3,5,6-TETRACHLOROPHENOL	18500	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
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Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Location ID:	WDNR		SB-16	SB-17	SB-17	SB-18	SB-19	SB-20	SB-21	SB-22	SB-23	SB-24	SB-25	SB-26	SB-27
Sample Depth(Feet):	Industrial		0.5 - 1.5	0 - 0.5	0.5 - 1.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
Date Collected:	DC_RCL[1]	Units	04/27/05	04/27/05	04/27/05	09/27/05	09/27/05	09/27/05	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06	10/18/06
Dioxins/Furans															
1,2,3,4,6,7,8-HPCDD	- -	ug/kg	NA	NA	NA	11.8 [7.53]	23.6	131	0.311 J [1.08 J]	5.73	15.9	38.6	NA	NA	NA
1,2,3,4,6,7,8-HPCDF	1	ug/kg	NA	NA	NA	4.36 [2.54]	8.65	55.2	0.1 J [0.367 J]	2.06	5.69	14.8	NA	NA	NA
1,2,3,4,7,8,9-HPCDF	1	ug/kg	NA	NA	NA	0.458 [0.266]	0.887	5.14	0.00854 J [0.0368 J]	0.182	0.575	1.28	NA	NA	NA
1,2,3,4,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.0498 [0.037]	0.101	0.444	0.00234 [0.00545]	0.0203	0.0472	0.156	NA	NA	NA
1,2,3,4,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.677 [0.348]	1.11	5.09	0.00706 U [0.0414]	0.241	0.712	1.53	NA	NA	NA
1,2,3,6,7,8-HXCDD	0.184	ug/kg	NA	NA	NA	0.506 [0.288]	0.913	4.78	0.0119 J [0.0384 J]	0.201	0.619	1.31	NA	NA	NA
1,2,3,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.156 [0.0788]	0.235	0.94	0.00197 J [0.00856 J]	0.0454	0.144	0.294	NA	NA	NA
1,2,3,7,8,9-HXCDD	0.184	ug/kg	NA	NA	NA	0.105 [0.0677]	0.197	0.904	0.0033 UJ [0.0117 J]	0.0373	0.0799	0.286	NA	NA	NA
1,2,3,7,8,9-HXCDF	0.133	ug/kg	NA	NA	NA	0.154 [0.0782]	0.218	0.721	0.00289 UJ [0.00921 J]	0.0446	0.179	0.294	NA	NA	NA
1,2,3,7,8-PECDD	0.0184	ug/kg	NA	NA	NA	0.0147 J [0.0104 J]	0.0259	0.0899	0.00285 U [0.00239 U]	0.00604	0.00909 U	0.034	NA	NA	NA
1,2,3,7,8-PECDF	0.442	ug/kg	NA	NA	NA	0.039 [0.0229 J]	0.0576	0.142	0.00282 U [0.00336]	0.0103	0.0496	0.0714	NA	NA	NA
2,3,4,6,7,8-HXCDF	0.133	ug/kg	NA	NA	NA	0.258 [0.132]	0.401	1.61	0.00213 UJ [0.0143 J]	0.0835	0.242	0.51	NA	NA	NA
2,3,4,7,8-PECDF	0.0442	ug/kg	NA	NA	NA	0.135 [0.0734]	0.168	0.499	0.00272 UJ [0.00739 J]	0.0378	0.114	0.215	NA	NA	NA
2,3,7,8-TCDD	0.0184	ug/kg	NA	NA	NA	0.00123 U [0.0018 U]	0.00142 U	0.00392 U	0.00238 U [0.00236 U]	0.00255 U	0.00239 U	0.0033 U	NA	NA	NA
2,3,7,8-TCDF	0.133	ug/kg	NA	NA	NA	0.00582 [0.00536]	0.00761	0.0185	0.00221 U [0.00213 U]	0.00291 U	0.00418 U	0.00796	NA	NA	NA
OCDD	61	ug/kg	NA	NA	NA	111 [79.3]	201	789 *	3.32 J [12.1 J]	67.6	165	423	NA	NA	NA
OCDF	44	ug/kg	NA	NA	NA	15.8 [9.32]	32.6	185	0.327 J [1.42 J]	8.1	20.9	56.9	NA	NA	NA
TOTAL HPCDD	- -	ug/kg	NA	NA	NA	20.4 [13]	39.7	222	0.585 J [1.89 J]	9.9	27	64.6	NA	NA	NA
TOTAL HPCDF	- -	ug/kg	NA	NA	NA	28.1 [14]	50.6	340 D	0.342 J [1.5 J]	8.79	23.6	61.3	NA	NA	NA
TOTAL HXCDD	- -	ug/kg	NA	NA	NA	1.81 [1.12]	3.32	15.5	0.0363 J [0.162 J]	0.701	1.82	4.72	NA	NA	NA
TOTAL HXCDF	- -	ug/kg	NA	NA	NA	11.6 D [5.43 D]	16.3 D	84.6 D	0.101 J [0.521 J]	2.91	8.58	18.9 D	NA	NA	NA
TOTAL PECDD	- -	ug/kg	NA	NA	NA	0.0552 [0.0557]	0.117	0.326	0.00285 U [0.00239 U]	0.0205	0.00492	0.168	NA	NA	NA
TOTAL PECDF	- -	ug/kg	NA	NA	NA	1.01 D [0.516 D]	1.3 D	4.39 D	0.00935 J [0.0571 J]	0.307	0.865	1.88 D	NA	NA	NA
TOTAL TCDD	- -	ug/kg	NA	NA	NA	0.00471 U [0.00456 U]	0.00508	0.0181	0.00238 U [0.00236 U]	0.0134	0.00239 U	0.00816	NA	NA	NA
TOTAL TCDF	- -	ug/kg	NA	NA	NA	0.0585 D [0.0545]	0.0822 D	0.29 D	0.00221 U [0.00213 U]	0.0114	0.0102	0.0863	NA	NA	NA
Metals															
ARSENIC	2.39	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BARIUM	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CADMIUM	799	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CALCIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
COPPER	40900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
IRON	100000	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
LEAD	800	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MAGNESIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MANGANESE	22900	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
POTASSIUM	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pesticides															
4,4'-DDD	7.18	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDE	5.07	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,4'-DDT	7.03	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALDRIN	0.101	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ALPHA-BHC	0.274	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
BETA-BHC	0.958	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DELTA-BHC	117	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
DIELDRIN	0.108	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN I	3690	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN II		mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDOSULFAN SULFATE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN	185	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ENDRIN ALDEHYDE	- -	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GAMMA-BHC (LINDANE)	2.06	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR	0.383	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
HEPTACHLOR EPOXIDE	0.189	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
METHOXYCHLOR	3080	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CHLORDANE	6.47	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TOXAPHENE	1.57	mg/kg	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

See Notes on Page 94.

Table 1
Summary of Soil Sample Analytical Results

Former Koppers Inc. Facility
Superior, Wisconsin
Notification of Continuing Obligations and Residual Contamination

Notes:
[ ] = result of duplicate analysis
B = The compound has been found in the sample as well as its associated blank, its presence in the sample may be suspect.
CON = Identification confirmed by GC/MS
D = result based on analysis of diluted sample
DC_RCL = Direct-Contact Soil Residual Contaminant Level
E = compound was quantitated above the calibrated range
J = estimated value (detected concentration is between laboratory reporting limit and detection limit)
JN = value is estimated maximum possible concentration
JX = Due to a matrix effect, compounds benzo(b)fluoranthene and benzo(k)fluoranthene could not be chromatographically resolved by the laboratory. Because the laboratory could not resolve the two compounds, the assumption was made by the laboratory to quantitate and report the entire peak as benzo(b)fluoranthene and to report benzo(f)fluoranthene as non-detect. Because the assumption cannot be made that the compound benzo(k)fluoranthene is non-detect, the validator has calculated a concentration for benzo(f)fluoranthene using the area count associated with the laboratory-reported detection of benzo(b)fluoranthene. Sample results associated with both compounds were qualified as "JX".
mg/kg = milligrams per kilogram, or parts per million (ppm)
ug/kg = micrograms per kilogram, or parts per billions (ppb)
NA = not analyzed
P = estimated maximum potential concentration
U = non-detect (the associated value is the compound quantitation limit)
UJ = The compound was not detected above the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the actual limit of quantitation.
UX = non-detect; reported value is the estimated maximum possible concentration

1. WDNR Industrial DC_RCL = Wisconsin Department of Natural Resources Industrial, Direct Contact Residual Contaminant Level. Values obtained from *RCLs1213.xlsm* (link to spreadsheet at http://dnr.wi.gov/topic/Brownfields/professionals.html).
2. The full sample identification for this sample was "North End of Former Penta Tank Area"
3. Analytical methods for the results reported in this table are as follows:

Parameter Group	1988-1996	2005-2008
VOCs	USEPA 8240	N/A
SVOCs	USEPA 8310 (PAHs) USEPA 8040 (phenolics)	USEPA 8270C or 8270C SIM (PAHs)
Dioxins/Furans	USEPA 8290	USEPA 8290
Penta- and Tetrachlorophenol	Keystone 589	USEPA 8270C or 8270C SIM (penta)
Metals	USEPA 6010	N/A
Pesticides	USEPA 8080	N/A

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination)
Attachment A – Legal Description of Property

853677

Document Number

State Bar of Wisconsin Form 6-2003

SPECIAL WARRANTY DEED

DOCUMENT# 853677
Recorded or Filed on
September 20, 2012 1:35 PM
GAYLE I. WAHNER
DOUGLAS COUNTY RECORDER
SUPERIOR, WI 54880-2769
Fee Amount: $30.00
Transfer Fee: $825.00
Total Pages 6

THIS DEED, made between KOPPERS INC., a Pennsylvania corporation (f/k/a Koppers Industries, Inc.) ("Grantor," whether one or more), and TRP PROPERTIES, LLC, a Nebraska limited liability company ("Grantee," whether one or more). Grantor, for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Douglas County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

THE REAL PROPERTY DESCRIBED ON ATTACHMENT 1 TO THIS DEED.

Name and Retum Address

TRP Properties, LLC
Terry R. Peterson
8202 F Street
Omaha, NE 68127 DCA 30ck

See Attachment 1 - Pg. 4
Parcel Identification Number (PIN)

This IS NOT homestead property.
~~(is)~~ (is not)

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except: THE LIENS AND ENCUMBRANCES SET FORTH ON ATTACHMENT 2 TO THIS DEED.

Dated as of September ~~19~~ 14, 2012.

(SEAL)

*

(SEAL)

*

KOPPERS INC.

By: (SEAL)

* Walter W. Turner, President and CEO

(SEAL)

*

~~**AUTHENTICATION**~~

~~Signature(s)~~

~~authenticated on~~

*

~~TITLE: MEMBER STATE BAR OF WISCONSIN~~
~~(If not, authorized by Wis. Stat. § 706.06)~~

THIS INSTRUMENT DRAFTED BY:

Michael J. Ostermeyer
Quarles & Brady LLP

ACKNOWLEDGMENT

STATE OF PENNSYLVANIA)
) ss.
ALLEGHENY COUNTY)

Personally came before me on September 14, 2012, the above named Walter W. Turner, the President and CEO of Koppers Inc., a Pennsylvania corporation to me known to be the person(s) who executed the foregoing instrument and acknowledge the same.

* Print Name: JANET L. SHAFFER
Notary Public, State of Pennsylvania
My Commission (is permanent) (expires:)

(Signatures may be authenticated or acknowledged. Both are not necessary.)

NOTE: THIS IS A STANDARD FORM. ANY MODIFICATIONS TO THIS FORM SHOULD BE CLEARLY IDENTIFIED.

SPECIAL WARRANTY DEED **© 2003 STATE BAR OF WISCONSIN**

*Type name below signatures.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Janet L. Shaffer, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Nov. 5, 2013
Member, Pennsylvania Association of Notaries

QB\147422.00002\18012967.2

4

853677

ATTACHMENT 1

LEGAL DESCRIPTION

All those certain tracts of or parcels of land situate, lying and being in the County of Douglas, State of Wisconsin, to wit:

PARCEL NO. 1.

Part of the SE-SW of Section 12, Township 48 North, Range 14 West, Town of Superior, lying southeasterly of the right of way of the Burlington Northern Railroad, described as follows:

Commencing at the south one-quarter (S. 1/4) corner of said section 12 which is marked with a railroad spike driven into the bituminous surface; thence N. 00 degrees 43 minutes 16 seconds E. along the east line of said SE-SW for a distance of 644.57' to the southerly right of way line of the Burlington Northern Railway Company; thence S. 61 degrees 44 minutes 00 seconds W. along said right of way line for a distance of 1317.58' to the south line of said Section 12; thence S. 88 degrees 58 minutes 44 seconds E. along the south line of said section 12 for a distance of 1152.54' to the place of beginning.

Above described parcel contains 8.53 acres more or less.

PARCEL NO. 2.

All of the east one half (E. 1/2) of the northwest (NW) one quarter of Section 13, Township 48 North, Range 14 West, Town of Superior, described as follows:

Commencing at the north one quarter (N. 1/4) corner of said Section 13 which is marked with a railroad spike driven into the bituminous surface; thence N. 88 degrees 58 minutes 44 seconds W. along the north line of said Section 13 for a distance of 1331.50' to the northwest (NW) corner of the NE-NW; thence S. 00 degrees 24 minutes 58 seconds W. along the west line of said NE-NW for a distance of 1312.98' to the southwest (SW) corner of the NE-NW; thence continuing S. 00 degrees 24 minutes 58 seconds W. along the west line of the SE-NW for a distance of 914.85' to the easterly right of way of the the Soo Line Railroad; thence S. 15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 436.07'to the South line of the SE-NW; thence S. 89 degrees 07 minutes 30 seconds E. along the south line of said SE-NW for a distance of 1320.00 to the southeast (SE) corner of said SE-NW; thence N. 00 degrees 40 minutes 00 seconds E. along the east line of said SE-NW for a distance of 1311.26' to the northeast corner of said SE-NW; thence continuing N. 00 degrees 40 minutes 00 seconds E. along the east line of the NE-NW for a distance of 1311.26' to the place of beginning.

Above described parcel contains 79.23 acres more or less.

PARCEL NO. 3

All that part of the SW-NE of Section 13, Township 48 North, Range 14 West, Town of Superior, lying westerly of what was formerly the easterly line of the right of way of the Northwestern Coal Company, described as follows:

Commencing at the center 1/4 (C.1/4) corner of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence S. 89 degrees 07 minutes 30 seconds E. 33.00' to the east right of way line of C.T.H. "A"; thence N. 00 degrees 40 minutes 00 seconds E. along the east right of way line of C.T.H. "A" for a distance of 24.33' to the easterly right of way line of the Northwestern Coal Railway Company and the place of beginning; thence N. 00 degrees 40 minutes 00 seconds E. along the right of way of C.T.H. "A" for a distance of 1286.89' to the north line of said SW-NE; thence S. 89 degrees 03 minutes 06 seconds E. along the north line of said SW-NE 468.12' to the easterly right of way line of the Northwestern Coal Company; thence S. 20 degrees 41 minutes 20 seconds W. along said right of way for a distance of 1367.22' to the place of beginning.

Above described parcel contains 7.91 acres more or less.

PARCEL NO. 4

All those parts or parcels of the N. 1/2 of the NE-SW of Section 13, Township 48 North, Range 14 West, Town of Superior, described as follows:

Commencing at the center one quarter corner (C. 1/4) of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence N. 89 degrees 07 minutes 30 seconds W. along the north line of said NE-SW for a distance of 1196.83' to the easterly right of way line of the Soo Line Railway; thence S. 15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 383.26' to the northerly right of way line of the Duluth, Missabe & Iron Range Railway, thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 1092.53' to the east line of said NE-SW; thence N. 00 degrees 40 minutes 00 seconds E. along said east line for a distance of 283.77' to the place of beginning.

Above described parcel contains 8.56 acres more or less.

AND

Commencing at the center one quarter corner of said Section 13; thence N. 89 degrees 07 minutes 30 seconds W along the north line of said NE-SW for a distance of 1196.83' to the easterly right of way line of the Soo Line Rail Road; thence continuing N. 89 degrees 07 minutes 30 seconds W. for a distance of 104.29' to the westerly line of the Soo Line Railroad and the place of beginning; thence continuing N. 89 degrees 07 minutes 30 seconds W. for a distance of 18.88' to the northwest corner (NW) of said NE-SW; thence S. 00 degrees 47 minutes 59 seconds W. along the west line of said NE-SW for a distance of 385.86' to the northerly right of way line of the Duluth, Missabe & Iron Range Railway; thence N. 86 degrees 20 minutes 30" E. along said right of way for a distance of 129.92' to the westerly right of way line of the Soo Line Railroad; thence N. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 391.68' to the place of beginning.

Above described parcel contains 0.65 acres more or less.

AND

Commencing at the center one quarter corner of said section 13; thence S. 00 degrees 40 minutes 00 seconds W. along the west line of said NE-SW for a distance of 662.25' to the south line of said N. 1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along said south line of said N.1/2- NE-SW for a distance of 1003.27' to the easterly right of way line of the Soo Line

Railroad; thence N. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 205.21' to the southerly right of way line of the Duluth, Missabe & Iron Range Railroad ;thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 1063.80' to the east line of said NE-SW; thence S.00 degrees 40 minutes 00 seconds W. along said east line for a distance of 280.81' to the place of beginning. Above described parcel contains 9.90 acres more or less.

AND

Commencing at the center one quarter corner of said section 13 thence S. 00 degrees 40 minutes 00 seconds W. along the north-south quarter line for a distance of 662.25' to the south line of said N.1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along the south line of the N. 1/2 of the NE-SW for a distance of 1003.27' to the easterly right of way line of the Soo Line Railroad ; thence continuing N. 89 degrees 07 minutes 42 seconds, W. along the south line of said N.1/2-NE-SW for a distance of 104.29' to the westerly right of way line of the Soo Line Railroad and the place of beginning; thence continuing N. 89 degrees 07 minutes 42 seconds W. along the south line of said N.1/2-NE-SW for a distance of 213.98' to the west line of said NE-SW; thence N. 00 degrees 47 minutes 59 seconds E. along said west line for a distance of 176.16' to the south right of way line of the Duluth Missabe & Iron Range Railroad; thence N. 86 degrees 20 minutes 30 seconds E. along said right of way for a distance of 158.88' to the westerly right of way line of the Soo Line Railroad; thence S. 15 degrees 36 minutes 27 seconds W. along said right of way for a distance of 196.79' to the place of beginning. Above described parcel contains 0.78 acres more or less.

PARCEL NO. 5

Part of the S. 1/2 of the NE-SW of Section 13, Township 48 North, Range 14 West described as follows, to wit:

Commencing at the center one quarter corner (C. 1/4) of said section 13 which is marked with a railroad spike driven into the bituminous surface; thence S. 00 degrees 40 minutes 00 seconds W. along the north-south one quarter line for distance of 662.25' to the north east corner (NE) of said S. 1/2-NE-SW; thence N. 89 degrees 07 minutes 42 seconds W. along said north line for a distance of 411.53' to the place of beginning; thence continuing N. 89 degrees 07 minutes 42 seconds W. for a distance of 591.74' to the easterly right of way line of the Soo Line Railroad; thence S.15 degrees 36 minutes 27 seconds E. along said right of way for a distance of 895.88' to the south line of said NE-SW; thence S. 89 degrees 07 minutes 54 seconds E. along said south line for a distance of 35.77' to a point on a 8 degree 36 minute 04 second degree curve concave northwesterly; (long chord is 513.94' and bears N. 27 degrees 12 minutes 28 seconds E.); thence along the arc of said curve for a distance of 527.11'; thence N. 49 degrees 52 minutes 33 seconds E. for a distance of 307.45' to the north line of the S.1/2-NE-SW and the place of beginning.

Above described parcel is also identified as parcels D and E respectively, on plat annexed to deed to National Lumber & Cresoting Company dated March 12,1928, recorded in the office of the Register of Deeds for said Douglas County, in Book 171 of Deeds on page 208.

Above described parcel contains 3.27 acres more or less.

Being the same property as that described in the survey dated July 19-23, 1988, prepared by Hugh C. McDonald.

EXCEPTING THEREFROM, that part of the above-described Parcel No. 4 described as follows:

That certain parcel of land situated in the North One-half of the Northeast Quarter of the Southwest Quarter (N 1/2 of NE 1/4 of SW 1/4) of Section Thirteen (13), Township Forty-eight (48) North, Range Fourteen (14) West, in the Town of Superior, in Douglas County, Wisconsin, which is situated between the Southerly boundary line of the 100 foot right of way of the Interstate Branch of the Duluth, Missabe and Iron Range Railway Company and the Northerly boundary line of the right of way, heretofore conveyed by Herman Gasser and J. Lillie Gasser, his wife, to the Northwestern Coal Railway Company, by that certain Deed dated August 22, 1907 and recorded on September 16, 1907 at 9:00 a.m., in Volume 99 of Deeds, page 538, as Document #166118A.

Parcel Identification Numbers:

T5-030-01340-00;
T5-030-01353-00;
T5-030-01356-00;
T5-030-01360-00; and
T5-030-01361-00

ATTACHMENT 2

PERMITTED EXCEPTIONS

1. Railroad rights of way.

2. Public utility easements for services of every kind serving the Property.

3. Recorded building and use restrictions.

4. Municipal zoning and building codes and regulations, and agreements entered into under them.

5. Taxes and assessments, general and special, not yet due and payable.

6. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the title that would be disclosed by an accurate and complete land survey of the land.

7. Easement or claims of easements not shown by the public records.

8. Title to that portion of insured premises laid out, taken, dedicated or used for highway purposes.

9. Any claim of adverse possession or prescriptive easement.

10. Spur tracks and appurtenances thereto on the Property.

11. Railroad rights of way and public utility interests as shown on that survey prepared by Hugh C. McDonald (RLS #1348), dated November 24, 1988 as job description "KOPPERS, INC."

12. Holding Tank Agreement, as set forth in Volume 580 of Records, page 741.

13. Easements to United Power Company, as set forth in Document #736087.

14. Easement to Wisconsin Public Service Commission, as set forth in Document #799101.

15. A certain Deed Restriction by Koppers Inc. entered into in connection with this transaction.

16. A certain Post-Closing Access Easement by and between Koppers Inc. and TRP Properties, LLC entered into in connection with this transaction.

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination)
Attachment B – Operation and Maintenance Plan

ARCADIS
Infrastructure · Water · Environment · Buildings

Imagine the result

Beazer East, Inc.

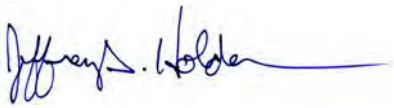
Operation and Maintenance Plan
On-Property Corrective Measures Implementation

Koppers Inc. Facility
Superior, Wisconsin

December 2009
Revised September 2011

ARCADIS

Hillary Evanko, P.E.
Wisconsin P.E. No. 40248-006



Jeffrey Holden
Principal Engineer/Program Manager

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Project Manager

Operation and Maintenance Plan
On-Property Corrective Measures Implementation

Koppers Inc. Facility
Superior, Wisconsin

Prepared for:
Beazer East, Inc.

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Our Ref.:
39165

Date:
December 2009
Revised September 2011

ARCADIS

Table of Contents

1. Introduction

This Operation and Maintenance Plan (O&M Plan) was prepared to detail the long-term monitoring and maintenance of the Resource Conservation and Recovery Act (RCRA) corrective actions that were completed to address impacted soils and ditch sediments within the Koppers Inc. (KI) Facility property in Superior, Wisconsin (the on-property portion of the Site[1]). It has been prepared by ARCADIS on behalf of Beazer East, Inc. (Beazer), former facility owner and operator, and is a companion document to the *On-Property Corrective Measures Implementation Construction Documentation Report* (CMI Documentation Report). The O&M Plan was prepared in accordance with Wisconsin Administrative Code Chapter NR 724 – *Remedial and Interim Action Design, Implementation, Operation, Maintenance and Monitoring Requirements* (Chapter NR 724). This version supersedes a prior version dated December 2009, and reflects the as-built site conditions.

The purpose of this O&M Plan is to provide guidance on the monitoring and maintenance activities necessary to ensure the continued function and effectiveness of corrective actions.

A detailed Site description and history are provided in the *On-Property Corrective Measures Implementation Design Report* (CMI Design Report; ARCADIS, 2009). A KI Facility (Facility) location map is provided as Figure 1 of the CMI Documentation Report.

1.1 Summary of Corrective Actions

The completed corrective actions, as depicted on the Record Drawings (Appendix F of the CMI Documentation Report), included:

- Surface covers over impacted soils at eight non-contiguous areas that exceed human health risk-based cleanup remedial objectives. Three types of surface covers were installed:

[1] The Site includes the KI Facility and affected downgradient areas. This O&M Plan specifically addresses the on-property portion of the Site (i.e., the portion of the Site located within the KI property boundaries). Beazer, in coordination with the WDNR, is evaluating and addressing the off-property portion of the Site separate from the on-property areas.

- Vegetated Surface Cover - A non-woven geotextile overlain by a 12-inch layer of general fill to support vegetative growth.

- Clay Vegetated Surface Cover - A non-woven geotextile overlain by a 12-inch layer of clay general fill and 3-inches of topsoil to support vegetative growth.

- Road Base Surface Cover - A non-woven geotextile overlain by a 12-inch layer of compacted well-graded road base material that consists of appropriate grain size materials to resist live loads from equipment operations, while including sufficient fines to achieve compaction requirements.

- Installation of a liner system over approximately 540 linear feet of the existing Outfall 001 drainage ditch on the KI Facility property. The liner system generally consists of Reactive Core Mat™ (RCM), 6 inches of general fill, and 12 inches of rip-rap,

1.2 Sources for Additional Information

Additional Site-specific information may be found at the following locations:

- Project file in the Wisconsin Department of Natural Resources (WDNR) regional office:

  Wisconsin Department of Natural Resources
  1401 Tower Avenue
  Superior, WI 54880

- Document repository at the Superior Public Library:

  Superior Public Library
  1530 Tower Avenue
  Superior, WI 54880

The WDNR point of contact for questions on specific action is:

Mr. Christopher Saari
2501 Golf Course Road
Ashland, WI 54806
Phone: 715.685.2920

2. Monitoring and Maintenance

Although Chapter NR 724.13 indicates quarterly monitoring and progress reporting is required, quarterly monitoring and progress reporting will be conducted for a period of 1 year following construction completion, and then annual monitoring and progress reporting thereafter. Less frequent inspections are appropriate for the implemented remedies for the following reasons:

- The surface covers are not active remedial systems
- After vegetation is established over the Vegetated and Clay Vegetated Surface Covers, which is anticipated to occur over the first year of quarterly monitoring, the areas will be sufficiently stabilized
- The Road Base Surface Covers have been sufficiently stabilized during the construction process though the application of Portland cement in the subgrade and subgrade and final grade compaction requirements

A Site Inspection Form is included as Attachment A. This form is to be completed during each post-construction monitoring event.

A summary of the monitoring and maintenance activities will be detailed in an annual progress report, prepared in accordance with Chapter NR 724.13 (3) and submitted to the WDNR. Photographs of any damage and repairs will be included in the report, where possible.

The remainder of this section outlines the monitoring and maintenance activities.

2.1 Surface Cover Monitoring and Maintenance Activities

For each monitoring event, the surface covers will be inspected to evaluate whether the surface covers have been compromised from natural erosive forces or from human activities. The surface cover areas will be investigated for cracks, sign of subsidence or failure, unwanted ponding of water, or visible sections of geotextile. The need for additional gravel at Road Base Surface Covers and for additional seeding or planting of Vegetated Surface Covers and Clay Vegetated Surface Covers will also be assessed.

2.2 Outfall 001 Drainage Ditch Monitoring Activities

Monitoring of the restored Outfall 001 drainage ditch will consist of visual reconnaissance to evaluate the integrity of the restored ditch and inspection for signs of erosion.

In addition to monitoring the condition of the restored Outfall 001 drainage ditch, monitoring for dense, non-aqueous phase liquid (DNAPL) accumulations within the constructed sumps will be also be conducted. DNAPL monitoring will be conducted monthly for the first three months following completion of the work. If significant DNAPL accumulations occur during that time, more frequent monitoring may be conducted. If significant DNAPL accumulations do not occur during that time, the frequency will be reduced to quarterly for the remainder of the first year. If significant NAPL accumulations do not occur during that time, the frequency will be reduced to semiannual for the second year, after which time the need for, frequency of, and seasonality of continued monitoring will be assessed. During each DNAPL monitoring event, the standpipes located within each sump will be checked for DNAPL accumulations using an oil/water interface probe or other applicable method (e.g., a weighted string). If present, DNAPL will be removed using a pump or bailer and containerized for off-Site disposal or reuse consistent with applicable state and federal regulations.

3. Contingency Plan

If the inspection reveals that the surface covers or restored Outfall 001 drainage ditch are damaged or not operating as intended, repairs will begin as soon as practical based on the nature of maintenance/repair needed. Vegetation will be established as the season allows.

Damage to surface covers will be defined as areas of erosion or scour greater than 4-inches deep in the cover material. If such damage is noted, it will be repaired by backfilling with a soil or stone with properties similar to those of the surface cover being repaired and will be compacted and graded to match the surrounding grade. For Vegetated Surface Covers and Clay Vegetated Surface Covers, once the cover soil has been repaired, the affected area will be re-seeded or replanted and inspected monthly or as necessary, until a healthy vegetative cover is re-established. If washed out areas of rip-rap are observed in the restored Outfall 001 drainage ditch, additional rip-rap will be placed as necessary to prevent continued or ongoing erosion. In addition, excess sediment buildup that occurs during the period that vegetation is being established in the work areas will be removed.

4. Requirements for Future Work

To achieve the corrective action objectives set forth in the Focused CMS, the following activities, which may compromise the effectiveness of the surface covers and restored Outfall 001 drainage ditch, are prohibited unless performed in accordance with the provisions described in Sections 4.1 and 4.2 below, where applicable, or specifically approved by the WDNR:

- Removal of the surface cover or components of the restored Outfall 001 ditch.
- Replacement of the surface cover, or components of the restored Outfall 001 drainage ditch, with another cover or structure that does not match the intent of the surface covers and Outfall 001 drainage ditch restoration as defined in Section 1 of the CMI Documentation Report.
- Excavating or grading of the land surface within the boundaries of the surface cover or restored Outfall 001 ditch. Placement of additional fill atop the surface cover is permitted without restriction in upland areas.
- Construction or placement of a building or other structure within the boundaries of the surface cover or restored Outfall 001 drainage ditch.
- Any other activity that may disturb, displace, or otherwise compromise the integrity of one or more of the surface covers or restored Outfall 001 drainage ditch.
- Plowing for agricultural cultivation within the boundaries of the surface cover or restored Outfall 001 drainage ditch.

4.1 Regulatory Requirements and Guidance

Intrusive and waste management activities conducted within the corrective action areas shall be conducted in accordance with applicable state and federal rules, regulations, and guidance. The regulatory requirements may include but are not limited to:

- USEPA regulations, including Title 40 of the Code of Federal Regulations (CFR);
- Occupational Safety and Health Administration (OSHA) regulations, including Title 29 CFR Parts 1910 and 1926, OSHA and United States Department of Labor;
- State of Wisconsin Rules and Regulations regarding disposal/treatment, transportation, and management of hazardous waste;

- Recommendations of the National Institute of Occupational Safety and Health (NIOSH);
- Applicable guidelines of the Douglas County Department of Health and Human Services;
- Transportation regulations, including U.S. Department of Transportation (USDOT) regulations (including Title 29 CFR Parts 171 and 172) and Wisconsin Department of Transportation (WisDOT) rules and regulations;
- Wisconsin Administrative Code Chapters NR 151 – *Runoff Management* (Chapter NR 151); and
- Other applicable federal, state, and local government regulations.

4.2 Site-Specific Requirements

Prior to conducting activities that would impact the corrective action components described above, except for the monitoring and maintenance activities described in Sections 2 and 3, a work plan must be developed that describes the proposed activities and, at a minimum, addresses the items below. Any work plan will require approval by the WDNR and Beazer. Minimum items to be included in the work plan are:

- A description and schedule of the proposed activities.
- A description of the proposed material handling procedures and estimate of the impacted material quantities to be generated. This shall include details associated with temporary materials staging areas and decontamination activities.
- Proposed methods of managing groundwater that may be encountered during the proposed activities.
- The proposed method of restoring the affected surface cover or Outfall 001 drainage ditch to match or improve the conditions indicated on the Record Drawings (Appendix F to the CMI Documentation Report).
- Proposed erosion control methods including stormwater management.
- Proposed monitoring activities.
- A Health and Safety Plan.

- Quality Assurance and Quality Control Procedures for material handling and restoration of disturbed corrective action components.

4.3 Notification

Any intrusive work performed within the work areas as specified on the Record Drawings (Appendix F of the CMI Documentation Report) shall be performed only upon prior notification to the WDNR and Beazer. Such work shall only be performed in accordance with an approved work plan. Notification shall be made at least 30 days prior to the commencement of any intrusive work unless in an emergency situation. In an emergency situation, the WDNR and Beazer shall be notified by telephone as soon as possible, but no later than one business day following the initial emergency response action.

Written notifications shall be submitted to:

Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, Pennsylvania 15219
Contact: Jane Patarcity

Wisconsin Department of Natural Resources
Mr. Christopher Saari
2501 Golf Course Road
Ashland, WI 54806
Phone: 715.685.2920

The WDNR and Beazer may have a representative observe any intrusive work.

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Attachment A

Site Inspection Form

Post Construction Site Inspection Form
Beazer East, Inc.
Koppers Inc. Facility, Superior, Wisconsin

Inspection Date: _____

Weather Conditions: _____

Inspector Name and Organization: _____

Inspector Signature: _____

Area A

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Area B

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Area F-1

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Area F-2

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Area G

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Area H

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Areas S-1 and S-2

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Outfall 001 Drainage Ditch

(check one)	No	Yes	If yes, provide description and take photos
Excessive erosion			
Evidence of excessive settling or ponding			
Areas lacking well-established vegetation			

Action Items: _____

Photographs: Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Photo: _____; _____

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination)
Attachment C – RR-617 (Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know)

Using Natural Attenuation to Clean Up Contaminated Groundwater:
What Landowners Should Know

PUB-RR-671 August 2013

What Is Natural Attenuation?
Natural attenuation makes use of natural processes in soil and groundwater to contain the spread of contamination and to reduce the amount of contamination from chemical releases.

Natural attenuation is an *in-situ* treatment method. This means that contaminants are left in place while natural attenuation works on them. Natural attenuation is relied upon to clean up contamination that remains after the source of the contamination is removed. An example of a source of contamination would be a leaking underground petroleum tank.

How Does Natural Attenuation Work?
Natural attenuation processes work at many sites, but the rate and degree of effectiveness varies from property to property, depending upon the type of contaminants present and the physical, chemical and biological characteristics of the soil and groundwater.

Natural attenuation processes can be divided into two broad categories – destructive and non-destructive. Destructive processes destroy contaminants. The most common destructive process is **biodegradation**.

Non-destructive processes do not destroy the contaminant, but reduce contaminant concentrations in groundwater through **dilution**, **dispersion** or **adsorption**.

Biodegradation
Biodegradation is a process in which micro-organisms that naturally occur in soil and groundwater (e.g. yeast, fungi, or bacteria), break down, or degrade, hazardous substances to less toxic or non-toxic substances. Microorganisms, like humans, eat and digest organic compounds for nutrition and energy (organic compounds contain carbon and hydrogen atoms).

Some types of microorganisms can digest organic substances such as fuels or solvents that are hazardous to humans. Microorganisms break down the organic contaminants into harmless products – mainly carbon dioxide and water. Once the contaminants are degraded, the microorganism populations decline because they have used their food sources. These small populations of microorganisms pose no contaminant or health risk.

Many organic contaminants, like petroleum, can be biodegraded by microorganisms in the underground environment. For example, biodegradation processes can effectively cleanse soil and groundwater of hydrocarbon fuels such as gasoline and benzene, toluene, ethylbenzene, and xylene – known as the BTEX compounds, under certain conditions.

Biodegradation can also breakdown other contaminants in groundwater such as trichloroethylene (TCE), a chlorinated solvent used in metal cleaning. However, the processes involved are harder to predict and are less effective at contaminant removal compared to petroleum-contaminated sites

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Wisconsin Department of Natural Resources
P.O. Box 7921, Madison, WI 53707
dnr.wi.gov/topic/Brownfields

Environment Remediation and Redevelopment Program Cleanup Redevelopment Partnership

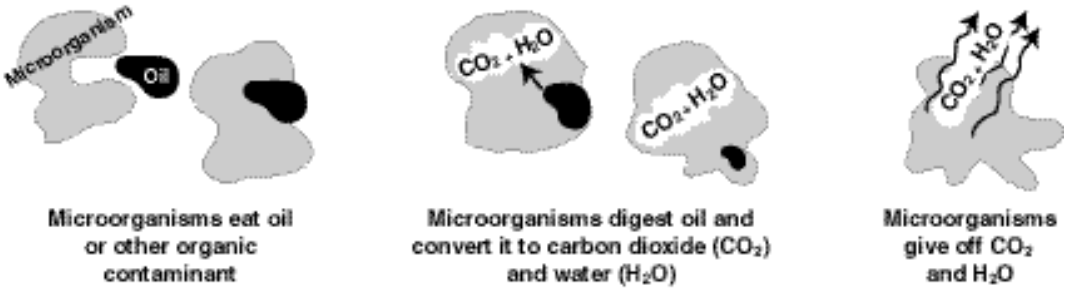

Figure 1. Schematic Diagram of Aerobic Biodegradation in Soil

Dilution and Dispersion

The effects of dilution and dispersion reduce contaminant concentrations but do not destroy contaminants. Clean water from the surface seeps underground to mix with and dilute contaminated groundwater.

Other processes that lead to reduced concentrations of contaminants include clean groundwater flowing into contaminated areas, and the dispersion of pollutants as they spread out and away from the main path of the contaminated plume.

Adsorption

Adsorption occurs when contaminants attach or "sorb" to underground particles. Most oily substances (like petroleum compounds) repel water and escape from the groundwater by attaching to organic matter and clay minerals in the subsurface.

This process holds back or retards contaminant movement and reduces the concentration of contaminants in the groundwater. However, like dilution and dispersion, adsorption does not destroy contaminants.

Why Consider Natural Attenuation To Clean Up Soil And Groundwater?

In certain situations, natural attenuation is an effective, inexpensive cleanup option and the most appropriate way to remediate some contamination problems. Natural attenuation focuses on confirming and monitoring natural remediation processes rather than relying on engineered or "active" technologies (such as pumping groundwater, treating it above ground, then disposing of the treated water).

Contaminants from petroleum are good candidates for natural attenuation because they are among the most easily destroyed by biodegradation. Natural attenuation is non-invasive, which allows treatment to go on below ground, while the surface can continue to be used.

Natural attenuation can also be less costly than active engineered treatment options, and requires no special equipment, energy source, or disposal of treated soil or groundwater.

Will Natural Attenuation Work At My Property?

Whether natural attenuation will work at a particular location is determined by investigating the soil and groundwater. These investigations determine the type of contaminants present, the levels of contamination, and the physical and chemical conditions that lead to biodegradation of the contaminants.

In order to rely on natural attenuation, responsible parties are required to confirm that natural attenuation processes are working by monitoring the soil and groundwater over a period of time to show that the contaminant concentrations are decreasing and that the contamination is no longer spreading.

Those conducting the cleanup need to know whether natural attenuation, or any proposed remedy, will reduce the contaminant concentrations in the soil and groundwater to legally acceptable limits within a reasonable period of time.

Natural attenuation may be an acceptable option for sites where active remediation has occurred and has reduced the concentration of contaminants (for instance, removing leaking underground tanks and contaminated soil).

However, natural attenuation is not an appropriate option at all sites. If the contamination has affected a drinking water well, or has entered a stream or lake, active cleanup options may be necessary to make sure people and the environment are protected from direct contact with the contamination.

The speed or rate of natural attenuation processes is typically slow. Monitoring is necessary to show that concentrations decrease at a sufficient rate to ensure that contaminants will not become a health threat in the future.

Closure Of Contaminated Sites Using Natural Attenuation As A Final Remedy

When contamination is discovered at a property (such as a gas station with leaking underground tanks), the person who is responsible for causing the contamination, and persons having possession or control of hazardous substances that have been discharged, have the responsibility to remove the source of contamination and investigate and clean up the contamination that has escaped into the soil and groundwater.

The contaminant release must be reported to the Wisconsin Department of Natural Resources (DNR) and the site investigation and cleanup are overseen by a state agency. Depending on the type of contaminant, the oversight agency could be the Department of Agriculture, Trade and Consumer Protection or Department of Natural Resources.

When the cleanup has complied with state standards, the person responsible for the contamination will ask the state agency for closure of the case. If natural attenuation is relied upon to finish cleaning up a contaminated property after closure, the responsible person will need to show that contaminant concentrations are not spreading, that contaminant concentrations are stable or decreasing, and that the concentrations will decrease in the future until state groundwater standards are met.

Because natural attenuation processes are slow, it may take many years before the properties with contamination are clean. State rules require that all owners of properties where groundwater contamination has spread must be informed of the contamination below their property.

In addition, the properties with groundwater contamination exceeding state groundwater enforcement standards must be listed on a database to notify future owners and developers of the presence of contamination. If future monitoring occurs and shows that natural attenuation processes have removed the contaminants to state-required cleanup levels, then the properties can be removed from the database.

The state agency will grant closure if the site investigation and monitoring shows that natural attenuation will clean up groundwater to state standards within a reasonable period of time. All state rules for cleanup must be met and the person who is responsible for the contamination must comply with all conditions of the state's closure approval.

For More Information

The following publications provide additional information on natural attenuation. Web sites where these can be downloaded free of charge are also listed.

- *A Citizen's Guide to Bioremediation*, April 2001, EPA 542-F-01-001; www.epa.gov/swertio1/download/citizens/bioremediation.pdf

- *Commonly Asked Questions Regarding the Use of Natural Attenuation for Petroleum-Contaminated Sites at Federal Facilities*, www.afcee.af.mil/shared/media/document/AFD-071211-036.PDF

- *Monitored Natural Attenuation of Petroleum Hydrocarbons: U.S. EPA Remedial Technology Fact Sheet*, May 1999, EPA 600-F-98-021; www.clu-in.org/download/remed/pet-hyd.pdf

- *Monitored Natural Attenuation of Chlorinated Solvents*, May 1999, EPA 600-F-98-0022; www.clu-in.org/download/remed/chl-solv.pdf

- *Guidance on Natural Attenuation for Petroleum Releases, WI DNR, Bureau for Remediation and Redevelopment*, March 2003, PUB-RR-614; dnr.wi.gov/files/PDF/pubs/rr/RR614.pdf

DNR Contacts

Central Office
Terry Evanson, Hydrogeologist
608-266-0941
theresa.evanson@wisconsin.gov

Northern Region
Chris Saari, Hydrogeologist
715-685-2920
christopher.saari@wisconsin.gov

Northeast Region
Keld Lauridsen
920-662-5420
Keld.lauridsen@wisconsin.gov

South Central Region
Denise Nettesheim, Hydrogeologist
608-275-3209

Southeast Region
Pam Mylotta, Hydrogeologist
414-263-8758
pamela.mylotta@wisconsin.gov

West Central Region
Lisa Gutknecht, Hydrogeologist
715-359-6514
lisa.gutknecht@wisconsin.gov

Note: These are the Remediation & Redevelopment Program's designated regions. Other DNR program regional boundaries may may be different.

Form 4400-286 (Notification of Continuing Obligations and Residual Contamination)
Attachment D – RR-819 (Continuing Obligations for Environmental Protection

Continuing Obligations for Environmental Protection

Responsibilities of Wisconsin Property Owners

PUB-RR-819 November 2013

This fact sheet is intended to help property owners understand their legal requirements under s. 292.12, Wis. Stats., regarding continuing obligations that arise due to the environmental condition of their property.

The term "continuing obligations" refers to certain actions for which property owners are responsible following a completed environmental cleanup. They are sometimes called environmental land use controls or institutional controls. These legal obligations, such as a requirement to maintain pavement over contaminated soil, are most often found in a cleanup approval letter from the state.

Less commonly, a continuing obligation may apply where a cleanup is not yet completed but a cleanup plan has been approved, or at a property owned by a local government that is exempt from certain cleanup requirements.

What Are Continuing Obligations?

Continuing obligations are legal requirements designed to protect public health and the environment in regard to contamination that remains on a property.

Continuing obligations still apply after a property is sold. Each new owner is responsible for complying with the continuing obligations.

Background

Wisconsin, like most states, allows some contamination to remain after cleanup of soil or groundwater contamination (residual contamination). This minimizes the transportation of contamination and reduces cleanup costs while still ensuring that public health and the environment are protected.

The Department of Natural Resources (DNR), through its Remediation and Redevelopment (RR) Program, places sites or properties with residual contamination on a public database in order to provide notice to interested parties about the residual contamination and any associated continuing obligations. Please see the "Public Information" section on page 3 to learn more about the database. (Prior to June 3, 2006, the state used deed restrictions recorded at county courthouses to establish continuing obligations, and those deed restrictions have also been added into the database.)

WISCONSIN DEPT. OF NATURAL RESOURCES

Wisconsin Department of Natural Resources
P.O. Box 7921, Madison, WI 53707
dnr.wi.gov, search "brownfield"

Types of Continuing Obligations

1. **Manage Contaminated Soil that is Excavated**
   If the property owner intends to dig up an area with contaminated soil, the owner must ensure that proper soil sampling, followed by appropriate treatment or disposal, takes place. Managing contaminated soil must be done in compliance with state law and is usually done under the guidance of a private environmental professional.

2. **Manage Construction of Water Supply Wells**
   If there is soil or groundwater contamination and the property owner plans to construct or reconstruct a water supply well, the owner must obtain prior DNR approval to ensure that well construction is designed to protect the water supply from contamination.

Other Types of Continuing Obligations
Some continuing obligations are designed specifically for conditions on individual properties. Examples include:

- keeping clean soil and vegetation over contaminated soil;
- keeping an asphalt "cover" over contaminated soil or groundwater;
- maintaining a vapor venting system; and
- notifying the state if a structural impediment (e.g. building) that restricted the cleanup is removed. The owner may then need to conduct additional state-approved environmental work.

It is common for properties with approved cleanups to have continuing obligations because the DNR generally does not require removal of all contamination.

Property owners with the types of continuing obligations described above will find these requirements described in the state's cleanup approval letter or cleanup plan approval, and *must*:

- comply with these property-specific requirements; and
- obtain the state's permission before changing portions of the property where these requirements apply.

The requirements apply whether or not the person owned the property at the time that the continuing obligations were placed on the property.

Changing a Continuing Obligation

A property owner has the option to modify a continuing obligation if environmental conditions change. For example, petroleum contamination can degrade over time and property owners may collect new samples showing that residual contamination is gone. They may then request that DNR modify or remove a continuing obligation. Fees are required for DNR's review of this request and for processing the change to the database ($1050 review fee, $300/$350 database fee). Fees are subject to change; current fees are found in Chapter NR 749, Wis. Adm. Code, on the web at www.legis.state.wi.us/rsb/code/nr/nr749.pdf.

Public Information

The DNR provides public information about continuing obligations on the Internet. This information helps property owners, purchasers, lessees and lenders understand legal requirements that apply to a property. DNR has a comprehensive database of contaminated and cleaned up sites, *BRRTS on the Web*. This database shows all contamination activities known to DNR. Site specific documents are found under the *Documents* section. The information includes maps, deeds, contaminant data and the state's closure letter. The closure letter states that no additional environmental cleanup is needed for past contamination and includes information on property-specific continuing obligations. If a cleanup has not been completed, the state's approval of the remedial action plan will contain the information about continuing obligations.

Properties with continuing obligations can generally be located in DNR's *GIS Registry*, part of the *RR Sites Map*. RR Sites Map provides a map view of contaminated and cleaned up sites, and links to BRRTS on the Web.

If a completed cleanup is shown in *BRRTS on the Web* but the site documents cannot be found in the Documents section, DNR's closure letter can still be obtained from a regional office. For assistance, please contact a DNR Environmental Program Associate (see the RR Program's Staff Contact web page at dnr.wi.gov/topic/Brownfields/Contact.html).

BRRTS on the Web and
RR Sites Map are part of
CLEAN
(the Contaminated Lands
Environmental Action Network***)*** at
dnr.wi.gov/topic/Brownfields/clean.html

Off-Site Contamination: When Continuing Obligations Cross the Property Line

An off-site property owner is someone who owns property that has been affected by contamination that moved through soil, sediment or groundwater from another property. Wisconsin law, s. 292.13, Wis. Stats., provides an exemption from environmental cleanup requirements for owners of "off-site" properties. The DNR will generally not ask off-site property owners to investigate or clean up contamination that came from a different property, as long as the property owner allows access to his or her property so that others who are responsible for the contamination may complete the cleanup.

However, off-site property owners are legally obligated to comply with continuing obligations on their property, even though they did not cause the contamination. For example, if the state approved a cleanup where the person responsible for the contamination placed clean soil over contamination on an off-site property, the owner of the off-site property must either keep that soil in place or obtain state approval before disturbing it.

Property owners and others should check the *Public Information* section above if they need to:

- determine whether and where continuing obligations exist on a property;
- review the inspection, maintenance and reporting requirements, and
- contact the DNR regarding changing that portion of the property. The person to contact is the person that approved the closure or remedial action plan.

Option for an Off-Site Liability Exemption Letter

In general, owners of off-site properties have a legal exemption from environmental cleanup requirements. This exemption does not require a state approval letter. Nonetheless, they may request a property-specific liability exemption letter from DNR if they have enough information to show that the source of the contamination is not on their property. This letter may be helpful in real estate transactions. The fee for this letter is $700 under Chapter NR 749, Wis. Adm. Code. For more information about this option, please see the RR Program's Liability web page at dnr.wi.gov/topic/Brownfields/Liability.html.

Legal Obligations of Off-Site Property Owners

- Allow access so the person cleaning up the contamination may work on the off-site property (unless the off-site owner completes the cleanup independently).
- Comply with any required continuing obligations on the off-site property.

Required Notifications to Off-Site Property Owners

1. The person responsible for cleaning up contamination must notify affected property owners of any proposed continuing obligations on their off-site property **before** asking the DNR to approve the cleanup. This is required by law and allows the off-site owners to provide the DNR with any technical information that may be relevant to the cleanup approval.

   When circumstances are appropriate, an off-site neighbor and the person responsible for the cleanup may enter into a "legally enforceable agreement" (i.e. a contract). Under this type of private agreement, the person responsible for the contamination may also take responsibility for maintaining a continuing obligation on an off-site property. This agreement would not automatically transfer to future owners of the off-site property. The state is not a party to the agreement and can not enforce it.

2. If a cleanup proposal that includes off-site continuing obligations is approved, DNR will send a letter to the off-site owners detailing the continuing obligations that are required for their property. Property owners should inform anyone interested in buying their property about maintaining these continuing obligations. For residential property, this would be part of the real estate disclosure obligation.

More Information

For more information, please visit the RR Program's Continuing Obligations web site at dnr.wi.gov/topic/Brownfields/Residual.html.

Attachment 4

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Mr. Chris Saari
Wisconsin Department of Natural Resources
2501 Golf Course Road
Ashland, WI 54806

ENVIRONMENTAL

Subject:
Koppers Inc. Superior, Wisconsin Facility
Groundwater Monitoring Program

Date:
July 14, 2011

Contact:
Jeffrey S. Holden

Phone:
860.533.9906

Email:
jeffrey.holden@
arcadis-us.com

Our ref:
B0039236.0000

Dear Mr. Saari:

On May 5, 2009, representatives of Beazer East, Inc. (Beazer) met with the Wisconsin Department of Natural Resources (WDNR) to discuss the status of corrective action activities associated with the Koppers Inc. Facility in Superior, Wisconsin (the Site). One of the meeting discussion topics was related to Site groundwater, including the nature of the current monitoring program, the natural-attenuation based approach identified for groundwater in the *Focused Corrective Measures Study Report* (Focused CMS; ARCADIS BBL, 2007a), and the purpose and scope of continued groundwater monitoring at the Site. As an outcome of the May 5, 2009 meeting, and subsequent discussions among Beazer, ARCADIS and the WDNR (including an April 26, 2011 telephone conversation between Jeffrey Holden of ARCADIS and Chris Saari of WDNR), the purpose of this letter is twofold:

1. Outline an approach and request WDNR's concurrence regarding re-commencement of the demonstration of a natural attenuation remedy for on-property groundwater.

2. Present rationale for and solicit WDNR's feedback regarding discontinuation of the current groundwater monitoring program related to the closed Resource Conservation and Recovery Act (RCRA) surface impoundments.

Each of these items is separately discussed below, followed by a discussion of proposed next steps.

Groundwater Natural Attenuation Remedy

As presented in the Focused CMS, the planned Site-wide corrective action approach for groundwater relies on natural attenuation processes to address existing groundwater impacts. Consistent with WDNR regulations and guidance, the

approach relies on extensive characterization and documentation to confirm that natural attenuation is occurring. Such confirmation is required prior to WDNR approval of a natural attenuation approach. Confirmation of conditions supporting natural attenuation was obtained from routine groundwater monitoring data associated with the closed RCRA surface impoundments collected since approximately 1982, data generated as part of RCRA Facility Investigations (RFI) in the 1990s, and supplemental investigations performed between 2004 and 2007 (BBL, 2006a; BBL, 2006b; and ARCADIS BBL, 2007b). Data generated from these sampling programs and investigations confirm that concentrations of constituents of potential concern (COPCs) in groundwater are stable or decreasing, and that natural attenuation of COPCs is occurring.

To supplement the data collected to date to support approval of the natural attenuation remedy, WDNR stated in a November 13, 2007 letter and at the May 5, 2009 meeting that additional data will need to be collected to confirm stable/decreasing trends. Further, such data would need to be collected following completion of the on-property corrective actions (surface covers installation and drainage ditch lining) to suitably demonstrate trends consistent with WDNR requirements.

Because the on-property corrective actions were completed in early July 2011, Beazer would like to re-commence the demonstration of a natural attenuation remedy for groundwater at the Site. Pending WDNR's concurrence regarding this approach, Beazer would prepare a work plan for WDNR's approval that would outline the scope and schedule of the groundwater natural attenuation demonstration monitoring program. Consistent with WDNR's *Guidance on Natural Attenuation for Petroleum Releases*, it is anticipated that the proposed monitoring program will consist of collecting four consecutive quarterly rounds of groundwater samples from selected wells for laboratory analysis of COPCs, and evaluation of COPC trends as a function of time. We propose that this program will focus only on concentration trends, and that the previous demonstration of ongoing natural attenuation processes (i.e., collection/evaluation of geochemical and microbiological indicator parameter data) will not need to be re-demonstrated. This is based on the logical presumption that completed soil- and ditch-related corrective actions will not have affected the continuing occurrence of natural attenuation processes in groundwater.

Discontinuing the Current RCRA Groundwater Monitoring Program

In conjunction with developing and implementing additional monitoring to demonstrate the suitability of natural attenuation of on-property, Beazer is also proposing that the current groundwater monitoring program associated with the closed RCRA surface impoundments be discontinued. The following points provide support for discontinuing the current groundwater monitoring program.

- The current RCRA-unit groundwater monitoring program is conducted under the Wis. Admin. Code, Chapter NR 664 – Hazardous Waste Treatment, Storage and Disposal Facility Standards. Per NR 664.0097(1)(c), the monitoring program should "allow for the detection of contamination when hazardous waste or hazardous constituents have migrated from the waste management area to the uppermost aquifer." However, the detection of COPCs in the RCRA monitoring wells is not necessarily indicative of releases from the closed impoundments. This is evidenced by the detection of pentachlorophenol in several of the RCRA wells, and the fact that the use of pentachlorophenol at the Site was discontinued three years prior to the construction of the RCRA surface impoundments. Rather, the detection of COPCs in RCRA monitoring wells is likely the result of historical operations and releases at the Site, which are the drivers for the Site-wide corrective actions. In other words, although the purpose of the current program is to monitor potential releases from the closed impoundments, the routine detection of COPCs in downgradient groundwater does not trigger any response actions due to the known nature of impacts in areas of the Site beyond the closed impoundments. As such, the data generated by the current monitoring program are not useful for their prescribed purpose.
- Per NR 664.0097(1), the groundwater monitoring program *is intended to monitor the "uppermost aquifer."* NR 660.10 defines "uppermost aquifer" as "the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically interconnected with this aquifer within the facility's property boundary." Further, it defines "aquifer" as "a geologic formation, group of formations or part of a formation capable of yielding a significant amount of groundwater to wells or springs."

  As documented on numerous occasions over the years, most recently in the Focused CMS, the Site is underlain by approximately 170 feet of clay with discontinuous sand/silt lenses present in certain areas generally from 35 to 50 feet below grade, and then sandstone bedrock. The hydraulic conductivity of the

shallow clay (measured by A-zone wells) ranges from $7.2x10^{-7}$ to $8.9x10^{-8}$ centimeters per second (cm/s), which indicates that this unit is not capable of yielding "a significant amount of groundwater" as required to be considered an aquifer under NR 660. This is evidenced by the fact that shallow A-zone wells exhibit extremely slow recharge such that they often run dry during low-flow sampling. Although the hydraulic conductivity of the discontinuous sand/silt lenses, which ranges from $2.4x10^{-2}$ to $4.5x10^{-5}$ cm/s (measured by C-zone wells), is higher than the clay, the discontinuous nature of these lenses also does not allow them to yield a significant amount of groundwater. Accordingly, neither the shallow clay (A zone) nor the discontinuous sand/silt lenses (C zone) meet the NR 660.10 definition of an "aquifer."

- The current groundwater monitoring program includes semiannual sampling at nine wells and was established for the purpose of monitoring groundwater quality in the vicinity of the closed RCRA surface impoundments. Although certain of the wells sampled as part of the current program may be part of the proposed natural attenuation demonstration monitoring scope of work (discussed above), implementation of the current RCRA-unit-specific program is not necessary for demonstrating natural attenuation on a Site-wide basis.

In summary, Beazer is proposing to discontinue the current groundwater monitoring program associated with the closed RCRA surface impoundments because 1) it is generating data that are not used for decision making purposes; 2) the currently monitored hydrogeologic units present immediately below the Site do not meet the definitions of an "aquifer" per the applicable regulations; and 3) the approval process for a Site-wide groundwater natural attenuation remedy is underway and current RCRA-unit-specific monitoring program is not necessary for demonstrating natural attenuation on a Site-wide basis.

Proposed Next Steps

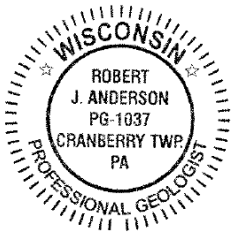
Based on the information presented above, Beazer proposes a meeting or conference call to discuss the proposed re-commencement of the groundwater natural attenuation demonstration monitoring program, proposed discontinuation of the current RCRA unit groundwater monitoring program, and WDNR's associated approval process and permit modification requirements. Please contact Jeffrey Holden of ARCADIS (860.533.9906) or Jane Patarcity of Beazer (412.208.8813) if you have any questions or comments regarding this letter, and to schedule a meeting or conference call.

Sincerely,

ARCADIS

Jeffrey S. Holden
Principal Engineer

Robert J. Anderson
Vice President
WI PG-1037



Copies:
John Robinson, WDNR
Mark Gordon, WDNR
Steve Ashenbrucker, WDNR
Bob Egan, USEPA
Jane Patarcity, Beazer
Linda Paul, Koppers
Jeffrey Holden, ARCADIS
David Bessingpas, ARCADIS
Hank Pappert, FTS

References

ARCADIS BBL, 2007a. Focused Corrective Measures Study (July 2007).

ARCADIS BBL, 2007b. Letter from Robert Anderson (ARCADIS BBL) to James Hosch (WDNR) re: Summary of Supplemental Groundwater Investigations (September 18, 2007).

BBL, 2006a. Letter from Robert Anderson (BBL) to James Hosch (WDNR) re: Summary of Supplemental Groundwater Monitoring and Natural Attenuation Evaluation (January 24, 2006).

BBL, 2006b. Letter from Robert Anderson (BBL) to James Hosch (WDNR) re: Responses to WDNR's February 27, 2006 Comments on the Groundwater Natural Attenuation Evaluation (April 27, 2006).

APPENDIX H

Post-Closure Care Cost Estimate

Table 1
Cost Estimate for Financial Assurance
Former Koppers Inc. Facility
Superior, Wisconsin

Revision date: 7/30/2023

Activity	Quantity	Unit	Unit Cost	Total Cost
1. RCRA Surface Impoundment Post-Closure Care				
Quarterly Inspection				
Inspector (on-site quarterly inspection of Surface Impoundment completed by local subcontractor, reporting; includes 4 quarterly inspections)	50	hours	$60	$3,000
Expenses ($250-Rental vehicle, $100-fuel, and $25-PPE)	4	lump sum	$375	$1,500
Maintenance				
Mowing (annual mowing of approximately 1.62 acres)	1	lump sum	$1,600	$1,600
Erosion Repairs (minor erosion repairs - fill with purchased topsoil , vegetation control - restore vegetation where necessary)	1	lump sum	$500	$500
Well Repairs (repainting, labeling, well pad reconstruction)	1	lump sum	$550	$550
Semiannual Groundwater Monitoring				
Sample Collection (technician labor and expenses to gauge and inspect 37 wells, sample 9 monitoring wells, and sample 1 voluntary deep well; includes 2 semi-annual events)	110	hours	$60	$6,600
Expenses ($1800-Equipment, $2400-Travel, $300-Supplies per each semi-annual event)	2	lump sum	$4,500	$9,000
Report Preparation (labor and expenses to submit semiannual reports, an annual report, and WDNR data files)	120	hours	$80	$9,600
Laboratory Analysis, first semiannual analysis (includes VOCs plus naphthalene, 14 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD, Trip and Field Blanks] x $55/sample; SVOCs less naphthalene, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $210/sample; Dioxins and furans, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $575/sample)	1	lump sum	$10,190	$10,190
Laboratory Analysis, second semiannual analysis (includes VOCs plus naphthalene, 14 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD, Trip and Field Blanks] x $55/sample; SVOCs less naphthalene, 12 samples [9 monitoring wells + 1 voluntary deep well + Quality Assurance Samples - MS/MSD] x $210/sample)	1	lump sum	$3,290	$3,290
Waste Management/Disposal/Reporting (annual reporting in accordance with NR 665.0075 (3 hours x $120), procurement, semi-annual coordination and scheduling of waste haulers (5 hours/event x $120), recertifying of waste profiles (2 hours x $120) and 2 drums x $100	1	lump sum	$2,000	$2,000
Project Management/Administration	4	hours	$125	$500
			Subtotal:	$48,330
			Contingency (10%):	$4,833
			Yearly Total:	**$53,200**
			30 Year Total:	**$1,596,000**
2. On-Property Corrective Measures Inspection/Monitoring/Maintenance				
Annual Inspection/Monitoring/Reporting				
Environmental Professional (annual report preparation)	8	hours	$95	$760
Field Technician (on-site inspection of 8 surface covers and the engineered liner system in the Outfall 001 ditch, monitoring of 2 drainage ditch sumps)	8	hours	$60	$480
Expenses ($250-Rental vehicle, $100-fuel, $125-per diem, and $25-PPE)	1	lump sum	$500	$500
Erosion Repairs minor erosion repairs - fill with purchased topsoil , vegetation control -	1	lump sum	$200	$200
Project Management/Administration	4	hours	$125	$500
			Subtotal:	$2,440
			Contingency (10%):	$244
			Yearly Total:	**$2,700**
			30 Year Total:	**$81,000**
3. Off-Property Corrective Actions				
Indirect	0.5	lump sum	$1,110,200	$555,100
Construction	0.5	lump sum	$5,977,517	$2,988,758
Material Disposal	0.5	lump sum	$622,145	$311,073
Operation and Maintenance	1	lump sum	$358,754	$358,754
			Total:	**$4,213,700**
Total Estimated Costs for Financial Assurance: Task 1 (30 years) + Task 2 (30 years) + Task 3				**$5,890,700**

Notes:
1. Costs for Tasks 1 and 2 are based on actual costing from the Operation and Maintenance Contractor, in 2022 dollars, and applied to an assumed 30 year period. Inflation will be accounted for in annual cost estimate updates.
2. Costs for Task 3 are based on cost estimates for Alternatives A-2, B-1, and C-2 from the 2014 Focused Corrective Measures Study (FCMS). The 2014 FCMS costs estimates have been increased by 22% to adjust for inflation from 2014 to 2022 (based on the U.S. Bureau of Labor Statistics Consumer Price Index Inflation Calculator). In addition, the 2014 unit pricing for Material Disposal ($575/ton; assumed listed hazardous waste) was updated to $78/ton (assumed non-hazardous waste disposed of in a Subtitle D landfill; average pricing from 2020-2021 quotes). It is assumed that Beazer will be responsible for 50% of the off-property corrective action costs (except Operation and Maintenance, which Beazer will be 100% responsible for) as part of a Great Lakes Legacy Act project.