

## Saari, Christopher A - DNR

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**From:** Saari, Christopher A - DNR  
**Sent:** Tuesday, December 06, 2016 11:07 AM  
**To:** Ashenbrucker, Steven J - DNR  
**Subject:** Koppers Drip Pad

Hi Steve:

Here are some questions/comments that you can add to your response letter to Koppers for their proposed drip pad investigation:

- Will the proposed concrete coring locations be biased to areas with surface cracks, or will it be a more even spacing as depicted on Figure 1 of the proposal? Biased sampling would likely lead to a more accurate reflection of the presence of contaminants within and beneath the drip pad.
- What method(s) will be used to collect the soil samples from beneath the drip pad? Based on the description provided, 6 inches of ballast with embedded railroad ties is present between the drip pad and native soil. Attempting to collect soil samples through that substrate with standard hand methods (while confined to the holes cored through the concrete) would seem to be a difficult proposition. The Department recommends that you consider the use of direct-push technologies (e.g., Geoprobe) as your soil sample collection method.
- During the on-property remedial investigation conducted by Beazer, their consultant identified a list of contaminants of concern (COCs) in soil that included polynuclear aromatic hydrocarbons (PAH), phenolics (including pentachlorophenol), and polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans (PCDDs/PCDFs). The soil samples collected from beneath the drip pad should be analyzed for the same list of COCs.
- A more complete description of the concrete core patching/sealing process should be provided. The drip pad currently serves as a barrier to direct contact and infiltration, and you will need to document that your proposed coring activities do not interfere with either of these functions in the future.

That's what I could come up with. Let me know if you have any questions.

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Chris Saari

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