

DATE: November 18, 2020

FILE REF: BRRTS 02-05-000254

TO: Sarah Rolfes – U.S. EPA Region 5

FROM: DNR NER RR: Sarah Krueger and Bill Fitzpatrick

SUBJECT: WDNR Comments on WPSC's September 18, 2020 Upland Remedial Investigation Data Summary Report Revision 0 Former WPSC Green Bay MGP, Green Bay, Wisconsin, Wisconsin Public Service Corporation

Thank you for the opportunity to provide comment on the Green Bay MGP Upland Remedial Investigation Data Summary Report. Below are the Department of Natural Resources' (DNR's) comments. Please contact me if you have any questions.

1. Section 6.1.1, page 38, provide an explanation of the source of NAPL in MW-405A. The presence of NAPL in a well that was not historically impacted by NAPL indicates that there may be an area of source material remaining that is migrating.

In addition to the above comments DNR provided comments on the Upland Remedial Investigation Report to WPSC related to state ARARs on November 11, 2020. WPSC responded to the comments on November 12, 2020. DNR has reviewed WPSC's responses and provided additional comments on November 18, 2020.

The Green Bay MGP Upland Remedial Investigation Data Summary Report does not include the 2020 Pre-Design Investigation sampling results, which the DNR understands will be provided as part of a monthly progress report following validation per the November 12, 2020 WPSC comment responses.

2. The additional PDI sampling results should be integrated into the Upland RI Report.