

DATE: February 9, 2021

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 Response to WPS Response to EPA Comments on Upland Remedial Investigation Data Summary Report – Revision 0 for Operable Unit 1, Former Green Bay MGP Site

Thank you for the opportunity to provide additional comment on the Green Bay MGP Upland Remedial Investigation Data Summary Report – Revision 0 following the WPS response to comments. Below are the Department of Natural Resources' (DNR's) comments. Please contact me if you have any additional questions.

**Comment 18:** Section 6.1.1, page 38: Please 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 may indicate that there may be an area of source material remaining that is migrating

**WPSC Response:** The thickness of NAPL in MW-401AR and MW-405A has been stable, as discussed in section 4.2.2. No changes will be made.

**DNR Response:** The NAPL thickness in MW-405A has been stable since 2017 based on the information provided. However, prior to 2017 the well did not have NAPL. There was no NAPL observed in the 12/13/2016 monitoring event (Table 6) or in earlier monitoring prior to the 2003 remedial action (Section 4.2.2). The presence of NAPL in a well that was not historically impacted by NAPL may indicate that there may be an area of source material remaining that is migrating. Please provide an explanation of the source of NAPL in MW-405A.