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TO: Leah Werner – US EPA Region 5

FROM: Sarah Krueger – DNR Remediation & Redevelopment

SUBJECT: DNR Review of WPSC Green Bay MGP Operable Unit 2 Remedial Investigation Revision 2

The Wisconsin Department of Natural Resources (DNR) has completed review of the WPSC Green Bay MGP Operable Unit 2 Remedial Investigation (RI) Revision 2 dated December 7, 2023. DNR has reviewed the RI in accordance with Wisconsin Administrative Code ch. NR 716 and believes the Operable Unit 2 Site Investigation is complete; however, DNR will not approve the Base Line Risk Assessment, appendix K, nor the NAPL Mobility Data Summary Report, appendix A3, and associated text within the document.

DNR previously provided comments, May 26, 2021, related to both the Base Line Risk Assessment and NAPL mobility on the Operable Unit 2 Remedial Investigation (RI) Revision 1, these comments have not been addressed by the responsible party.

NAPL product in soils and sediment are a risk due to toxicity to receptors and contribution to contamination of groundwater, surface water, and pore water. NAPL can be mobilized by pore to pore movement, facilitated transport via fissures and higher permeability lenses, preferential pathways, and transport of particles, including colloids, containing NAPL in surface water and groundwater. The NAPL mobility study evaluated only one potential transport mechanism which may not be representative of the risk to other media and receptors from the presence of NAPL.

The Base Line Risk Assessment relies on unapproved risk evaluation documents, specifically the “multi-site model” that has not been accepted by EPA or DNR at this or other Wisconsin MGP investigations.

DNR believes that the process can move forward at this time with the RI Rev 2 as is.