

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
January 2019 MONTHLY PROGRESS REPORT (No. 78)

Pursuant to Paragraph 31 of the Consent Decree effective October 19, 2012, in the United States District Court, Western District of Wisconsin, Case No. 12-cv-00565, Northern States Power Company (NSPW), a Wisconsin Corporation, submits the following Monthly Progress Report for Phase 1 Remedial Design (RD) and Remedial Action (RA).

A. Activity For This Reporting Period

The following is a summary of the actions that were taken toward compliance with the Consent Decree during this reporting period.

LTWTP

- NSPW issued the December 2018 Monthly Progress Report in January to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment System (WTS) equipment.
 - Operation of the hydraulic control wells in the Kreher Park area.
 - Operation of Copper Falls Formation wells for non-aqueous phase liquid (NAPL) recovery. Direct NAPL recovery volumes and measured NAPL layer thickness, for the isolated NAPL recovery wells (CFW-12 thru CFW-15) and select wells in Kreher Park, are presented on the attached Table. As the Table indicates, 249 gallons of NAPL were recovered in January 2019 and collected in a tote for proper disposal.
 - The groundwater monitoring well network was sampled in October 2018 (4th Quarter 2018).

Kreher Park Capping and Restoration

- Submitted preliminary design for KP Cap to EPA and WDNR on December 5, 2018. Review/comment call with agencies is currently on hold due to lapse in EPA appropriations.
- Received written comments from EPA on KP cap preliminary design on Tuesday February 5.
- Held call with EPA and DNR on Friday February 8 regarding preliminary design comments received on February 5.

B. Summary of Results

The following is an estimate of the percent complete of RA through January 2019:

- Percentage of Kreher Park Containment complete: 100%
- Percentage of Upper Bluff complete (based on tons): 100%
- Percentage of Kreher Park complete (based on tons): 100%

- Percentage of Copper Falls Design complete: 100%
- Percentage of Copper Falls construction complete: 100%
- Overall RA complete: 99%

Data are available to EPA and other regulatory agencies on the O&M, Inc. Project Portal site. Data from the Long-Term WTS are also being generated and provided to the regulatory agencies under separate submittal to WDNR.

The draft Groundwater Monitoring Reports for the April 2018 and July 2018 sampling have been posted to the O&M, Inc. Project Portal and are awaiting Xcel Energy review prior to finalizing.

A Long-Term Groundwater Monitoring Optimization Report and a letter summarizing planned installation of monitoring wells were submitted to the WDNR and EPA in October 2018. The monitoring well installation program will be completed as soon as access agreements are finalized. The exact locations of the monitoring wells are being discussed and may require slight modification.

C. Upcoming Actions

The following data collection or other activities are anticipated to be conducted over the next six weeks.

- Operation of the Long-Term WTS.
- Continued DNAPL recovery from the CFW and Kreher Park wells.
- The Groundwater Monitoring Report for October 2018 sampling will be prepared.
- Installation of additional monitoring wells to supplement delineation of contaminant extent tentatively planned 2019.
- Submittal of a revised groundwater sampling plan in first quarter 2019.

D. Challenges Encountered and Corrective Action Taken

EPA staff was furloughed in parts of December 2018, all of January and into February 2019 due to lapse of appropriations. Lack of timely review will impact the design review and comment schedule, critical for moving towards an approved design. 2019 design and construction schedules impacted.

E. Modifications Proposed or Approved

- None.

F. Community Involvement

The following activities associated with the Public Communication and Involvement Plan, led by the WDNR, were either conducted during this reporting period or are being planned over the next six weeks.

- The next CAG and public meetings have not been scheduled.

Ashland Lakefront NAPL Recovery

Date	CFW-12		CFW-13		CFW-14		CFW-15		MW-35T		MW-40U		MW-43T		DNW-18		EQ Tank	Total	
	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Thickness (Feet)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	
2016 Total																			809
2017 Total																			1205
2018 Total																			1827
1-Jan-19																			0
2-Jan-19	3	3	7	7	4	4	21	21		0		0		0		0	0	35	
3-Jan-19																			0
4-Jan-19	2	0	5	5	3	3	20	20		0		0		0		0	0	28	
5-Jan-19																			0
6-Jan-19																			0
7-Jan-19	2	0	5	5	4	4	18	18		0		0		0		0	0	27	
8-Jan-19																			0
9-Jan-19																			0
10-Jan-19	2	0	4	4	3	0	20	20		0		0		0		0	0	24	
11-Jan-19																			0
12-Jan-19																			0
13-Jan-19																			0
14-Jan-19																			0
15-Jan-19	2	0	5	5	3	3	18	18		0		0		0		0	0	26	
16-Jan-19																			0
17-Jan-19																			0
18-Jan-19	4	4	5	5	4	4	20	20		0		0		0		0	0	33	
19-Jan-19																			0
20-Jan-19																			0
21-Jan-19	2	0	4	4	3	3	20	20										27	
22-Jan-19																			0
23-Jan-19																			0
24-Jan-19																			0
25-Jan-19	2	0	4	4	2	0	19	19		0		0		0		0	0	23	
26-Jan-19																			0
27-Jan-19																			0
28-Jan-19	2	0	4	4	3	3	19	19		0		0		0		0	0	26	
29-Jan-19																			0
30-Jan-19																			0
31-Jan-19																			0
Total Jan 2019		7		43		24		175		0		0		0		0	0	249	