

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
March 2019 MONTHLY PROGRESS REPORT (No. 80)

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.

- NSPW issued the February 2019 Monthly Progress Report in March 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, 235 gallons of NAPL were recovered in March 2019 and collected in totes for proper disposal.
 - The groundwater monitoring well network was last sampled in October 2018 (4th Quarter 2018).
 - Initiated a series of weekly meetings between NSPW, EPA, DNR and the City of Ashland related to KP Cap design progress and City redevelopment design and coordination on March 27, 2019.

B. Summary of Results

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

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|---|------|
| • 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.

The draft Groundwater Monitoring Report for the October 2018 sampling has been posted to the O&M, Inc. Project Portal and is 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.
- Schedule Final Inspection with the EPA and WDNR in order to move toward close-out of Phase 1.
- Continued DNAPL recovery from the CFW and Kreher Park wells.
- The groundwater monitoring well network is scheduled to be sampled in April 2019 (2nd Quarter 2019).
- Continue weekly meetings between NSPW, EPA, DNR and City of Ashland to advance KP Cap design, approvals and City redevelopment plans.
- NSPW plans to submit the KP Cap Pre-Final Design on April 19.

D. Challenges Encountered and Corrective Action Taken

No challenges were encountered during this reporting period.

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.