

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
September 2019 MONTHLY PROGRESS REPORT (No. 86)

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 August 2019 Monthly Progress Report in September to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment System (WTS) equipment. 2,314,141 gallons of extracted groundwater were treated in the month of September. The total extracted groundwater treated from startup through September is 59,497,417 gallons.
 - 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, 205 gallons of NAPL were recovered in September 2019 and collected in totes for proper disposal.
 - The groundwater monitoring well network was last sampled in April 2019 (2nd Quarter 2019). The EPA approved suspending groundwater sampling until completion of the Final Cap construction. The next groundwater sampling event is anticipated to be in April 2020.

B. Summary of Results

The following is an estimate of the percent complete of RA through September 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%
- Percentage of Kreher Park Cap and Restoration complete: 90%
- 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.

Groundwater and Long Term WTS 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.

Kreher Park Capping and Restoration design, remedial action construction quality assurance documents and other construction related documents are available on the Braun Intertec project portal site.

Kreher Park Capping and Restoration

NSPW received comments on the Pre-Final Design from the EPA on May 15. NSPW submitted a response to comments document and a revised Pre-Final Design on June 17. NSPW received final approval of the Final Design from EPA on July 11. EPA approved the revised City redevelopment plans on July 24. NSPW provided the requested approved Final Design followup responses to EPA on August 2.

As of September 30, Phase 1 area of the cap is 98 percent complete, Phase 2 is 90 percent of complete, Phase 3 is 85 percent complete and Phase 4 is 75 percent complete.

The HDPE liner area and its cap components, through topsoil placement, is 98 percent complete. Along the bulkhead wall in Phase 3 and Phase 4, all extraction well vault placement work is complete. Clay subgrade work below the apron and along the 10 percent slope is 50 percent complete. Concrete apron work in Phase 3 will recommence around October 7 and continue for two weeks and TRM/topsoil placement will follow.

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.
- Installation of the Kreher Park Cap

D. Challenges Encountered and Corrective Action Taken

There was high rainfall at the end of September that slowed construction. However the project remains on schedule to be completed by the end of October. No other challenges were encountered during this reporting period.

E. Modifications Proposed or Approved

- The EPA approved suspension of routine groundwater sampling until completion of Cap construction activities.
- Field Deviation 004 was submitted to the EPA on August 15. Slight grade adjustments are proposed in Phase 4 of the cap to accommodate some additional fill material based on a cut/fill survey and analysis by the project engineers to reduce the amount of material being exported for offsite disposal. EPA approved the deviation on August 16.
- Field Deviation 005 was submitted to the EPA on September 3. Slight grade adjustments are proposed in Phase 4 of the cap to accommodate some additional fill material based on a cut/fill survey and analysis by the project engineers to reduce the amount of material being exported for offsite disposal. EPA approved the deviation on September 10.
- Field Deviation 006 is being prepared at the request of the City of Ashland and pertains to the installation and seeding the remainder of the site with “no mow” grass seed. The City is providing seed mix specifications, seeding rates to Braun for preparation of the deviation. City has stated it will buy and deliver the seed to the site.

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.