

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
January 2020 MONTHLY PROGRESS REPORT (No. 90)

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 December 2019 Monthly Progress Report in January 2020 to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment System (WTS) equipment. Gallons 1,433,912 of extracted groundwater were treated in the month of January. The total extracted groundwater treated from startup through December is 64,583,781 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, 316 gallons of NAPL were recovered in January 2020 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 January 2020:

- 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%

CoolOx injection pilot testing was conducted the week of November 11, 2019. The purpose of the injection was twofold:

- To evaluate this technology as a maintenance task to clear DNAPL from the well screens (CFW-8 and CFW-10) and the adjacent formation, thus increasing DNAPL flow and recovery. This may also reduce pump maintenance.
- To evaluate this technology as a means of accelerating remediation by potentially oxidizing contaminants, emulsifying DNAPL for increased recovery, and by increasing dissolved oxygen that could stimulate bioremediation.

Baseline and post-injection data were collected. The results of the focused post-injection groundwater sampling of select extraction and monitoring wells are pending. Upon receipt of the results, a summary of the data will be prepared.

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.

The draft Groundwater Monitoring Report for the April 2019 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.

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 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 follow-up responses to EPA on August 2.

Cap construction continued through summer and fall 2019. The Cap construction was completed in November 2019. The capping project has been signed off by the EPA as complete. New electrical power and communication wires and new pumps and controls will be installed over the next several months to complete the groundwater extraction system infrastructure overhaul. The projected completion date of the infrastructure overhaul is including start-up and commissioning of the upgraded system is mid-April.

NSPW will submit a Final Construction Completion Report (As-built report) to EPA and DNR in the first week of February 2020.

C. Upcoming Actions

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

- Submit KP Construction Completion Report.
- Submit draft ICIAP for EPA/DNR review.
- Submit revised OM&M Plan incorporating KP Cap.
- Conduct calls and meetings with EPA/DNR to discuss ICIAP and City redevelopment plans.
- Issue IC letters and meet with affected property owners.
- Operation of the Long-Term WTS.
- Continued DNAPL recovery from the CFW and Kreher Park wells.

D. Challenges Encountered and Corrective Action Taken

Due to the closing of the laboratory responsible for process water PAH analysis, turn-around time for results has increased from 4 days to 2 weeks. This delay is causing a delay in eDMR submittal to after the due date. This is discussed further, below.

E. Modifications Proposed or Approved

- The EPA approved suspension of routine groundwater sampling until completion of Cap construction activities.
- The WDNR approved modifications to the WPDES permit requirements that included changing the PAH method from 625 SIM to 8270 SIM and eliminating benzo(e)pyrene from the list of compounds.
- Due to recent laboratory challenges, the turn-around time for process water laboratory results has temporarily increased. The turn-around-time is improving. The laboratory has committed to a 6 business-day turn-around time (TAT). The improved TAT agreement was not in place in January, therefore the eDMR submittal in February will likely be delayed. The WDNR has formally approved an extension of the eDMR due dates. This issue is anticipated to be resolved by the end of February. The eDMR submitted in March is anticipated to meet the previous deadline of the 15th.

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.