

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
May 2020 MONTHLY PROGRESS REPORT (No.94)

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 April 2020 Monthly Progress Report in May 2020 to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment System (WTS) equipment. 1,459,653 gallons of extracted groundwater were treated in the month of May. The total extracted groundwater treated from startup through May is 71,566,158 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, 269 gallons of NAPL were recovered in May 2020 and collected in totes for proper disposal.
 - The groundwater monitoring well network was last sampled in May 2020 (2nd Quarter 2020). The next groundwater sampling event is scheduled to begin in July 2020.

B. Summary of Results

The following is an estimate of the percent complete of RA through May 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%

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 Groundwater Monitoring Report for the April 2019 sampling has been posted to the O&M, Inc. Project Portal.

A Long-Term Groundwater Monitoring Optimization Report and a letter summarizing planned modifications to the sampling frequency and parameter list was submitted to EPA and DNR in 2018.

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, 2019. NSPW submitted a response to comments document and a revised Pre-Final Design on June 17, 2019. NSPW received final approval of the Final Design from EPA on July 11, 2019. EPA approved the revised City redevelopment plans on July 24, 2019. NSPW provided the requested approved Final Design follow-up responses to EPA on August 2, 2019.

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.

A Kreher Park Capping and Restoration project Final Inspection was conducted on April 29, 2020 and attended by representatives from EPA, NSPW, Braun Intertec and Veit Companies. Braun Intertec prepared a memo documenting final punchlist item completion and NSPW submitted the memo along with a letter requesting EPA finalization of Phase 1 certification of completion on May 28, 2020

New electrical power wires, communication wires, pumps and controls are currently being installed to complete the groundwater extraction system infrastructure overhaul. The projected completion date of the infrastructure overhaul is June 2020.

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.
- Weekly construction storm water inspections during vegetation establishment
- Routine inspections of the cap and groundwater extraction system wells

D. Challenges Encountered and Corrective Action Taken

Due to the closing of the laboratory responsible for process water PAH analysis in late 2019, turn-around time for results had increased from 4 days to 2 weeks. This delay was causing a delay in eDMR submittal to after the due date during early 2020. This lab sample processing

delay and monthly reporting delay appears to be remedied by the lab and reporting is returning to normal.

Due to the COVID-19 pandemic there are many potential challenges. Contingencies have been put in place to address situations that may occur.

- Since O&M, Inc. specializes in operating groundwater remediation systems we have additional highly trained and experienced water treatment plant operators on standby, should the Ashland site operators get sick.
- O&M, Inc. has stockpiled an additional supply of carbon, chemicals, equipment, etc. to keep the plant running if the supply chain is interrupted.
- Specific procedures are in place to keep the site operators and vendors from contacting one another during deliveries or pickups, keeping everyone as safe as possible.
- A “Notice of Critical Infrastructure” letter from Xcel Energy was provided to O&M, Inc., contractors and vendors. This letter should allow contractors and vendors to travel to and from the site to perform their various services.

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.