

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
October 2020 MONTHLY PROGRESS REPORT (No.99)

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 September 2020 Monthly Progress Report in October 2020 to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment System (WTS) equipment. 819,744 gallons of extracted groundwater were treated in the month of September. The total extracted groundwater treated from startup through September is 77,691,694 gallons.
 - Replacement of one of the three mixers in the chemical mixing tank, which caused a limited interruption in plant operations.
 - 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, 551 gallons of NAPL were recovered in October 2020 and collected in totes for proper disposal.
 - The groundwater monitoring well network was sampled in October 2020 (4th Quarter 2020). The next groundwater sampling event is scheduled to begin in April 2021.

B. Summary of Results

The following is an estimate of the percent complete of RA through October 2020:

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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% |

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, 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 for gravel drive and parking surfaces 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. New electrical power wires, communication wires, pumps and controls installation were completed July 1, 2020. Some new sod, placed in July, is taking root. The Contractor watered the sod and other select areas during dry periods in September.

The City no-mow grass is growing but at a less than optimal rate. Following conversations with the City and the capping project landscape contractor, the City authorized overseeding the no-mow cap grass area with turf grass seed that was used on other areas of the project. It was hydroseeded using water the week of September 7. Following seeding, the entire KP cap area, including sod areas, received fertilizer.

EPA issued comments on the KP Cap and Restoration Project Construction Completion Report on August 6. Braun Intertec posted a revised KP Cap and Restoration Project Construction Completion report to the project portal on September 28 for review and concurrence.

The cap construction contractor and engineers are reviewing the vegetation establishment conditions and the need for continued inspections and BMP maintenance. It is likely that the results of the review and inspections will result in recommendations to remove all the silt fence, biorolls and gravel bag ditch checks, etc., which will be completed in November 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 on the KP cap.

- Routine inspections of the KP cap and groundwater extraction system wells.
- Submit a groundwater monitoring report for the October 2020 sampling event.
- EPA/WDNR to approve the KP Cap Construction Completion Report.
- EPA to issue the Phase 1 Certification of Completion. EPA considering giving a construction completion approval for the upland soils and containment part of the work while some consideration is given to the need for monitoring wells at OLL.

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 had increased from 4 days to 2 weeks. This delay was causing a delay in eDMR submittal to after the due date. This is discussed further, below.

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

- 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 had temporarily increased. The turn-around-time has improved. The laboratory has committed to a 6 business-day turn-around time (TAT). The WDNR has formally approved an extension of the eDMR due dates. The eDMR submitted in October met 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.