

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
August 2022 MONTHLY PROGRESS REPORT (No.121)

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 July 2022 Monthly Progress Report in August 2022 to EPA and WDNR.
- Site activities included progress on the following:
 - Operation of the Long-Term Water Treatment Plant/System (LTWTP/S) equipment. A total of 1,103,671 gallons of extracted groundwater were treated in the month of August. The total extracted groundwater treated from startup through August is 99,870,499 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), select wells in Kreher Park, and other miscellaneous NAPL recovery are presented on the attached Table. As the Table indicates, 1,314 gallons of NAPL were recovered directly from various wells in August 2022 and collected in totes for proper disposal. The total volume of NAPL recovered year to date is 5,803 gallons.
 - Performed a chemical oxidation pilot test in June 2021, primarily in the area of CFW-1 and CFW-2. The purpose of the pilot test was to assess potential enhancements to continued NAPL recovery. Details of the injection and a summary of the results have been presented to Xcel Energy in the 2021 Injection – Summary Report.
 - Direct NAPL recovery from several wells in the area of chemical oxidation injection was performed summer 2021, again in fall 2021, and periodically in 2022.
- The 2nd Quarter 2022 groundwater sampling event was conducted in May 2022. A draft Groundwater Monitoring Report was submitted to Xcel Energy for review.
- The Site wells were gauged in July 2022 (3rd Quarter). Groundwater sampling was approved by the WDNR to be conducted semi-annually (2nd Quarter and 4th Quarter), therefore groundwater samples are not collected during the 3rd Quarter.

- The City of Ashland approved an amendment to the Framework agreement between the City and Xcel Energy-Wisconsin on May 30, 2021, which turned over the custody and control of the Kreher Park portion of the site to the City, among other items.
- The City of Ashland has completed the current paving plan in the KP area, including the entry, access road, and parking lot. In addition, the City has constructed curb and gutter, and the planned filtration basins.

B. Summary of Results

Phase 1 Remedial Action (RA)

The Phase 1 RA activities took place between 2012 and 2021. EPA issued a Phase 1 Certificate of RA Completion on January 15, 2021. Major components of the remedial action included:

- Kreher Park Containment – Sheetpile and soil-bentonite wall.
- Upper Bluff – Upland soils excavation.
- Kreher Park – Near shore soils excavation, installation of a groundwater/DNAPL extraction system, installation of a subtitle D-type cap over the entire Kreher Park area.
- Copper Falls – Installation of a groundwater/DNAPL extraction system, construction of the LTWTP, start up and operation of the LTWTP/S commencing in April 2016.
- Installation of a long-term groundwater monitoring network.

Ongoing Long-Term Monitoring (LTM)

Ongoing activities include operation, maintenance and monitoring (OM&M), including operation and maintenance of the LTWTP/S, monitoring of the LTWTP influent and effluent, monitoring of groundwater, and inspection of the Kreher Park cap.

Groundwater and LTWTP/S data are available to EPA and other regulatory agencies on the O&M, Inc. Project Portal site. Influent and effluent sampling results from the LTWTP/S are also being generated and provided to the WDNR according to the NPDES wastewater discharge permit and are submitted and certified through the WDNR Switchboard.

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

C. Upcoming Actions

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

- Operation of the LTWTP/S.
- A pilot test to evaluate Enhanced NAPL Recovery/Maintenance Technology will be conducted in October 2022. As part of the evaluation, injection wells will be installed in September 2022 for chemical oxidation injection. The Enhanced NAPL Recovery/Maintenance Technology Evaluation Work Plan details the planned pilot testing.
- Continued DNAPL recovery from the CFW, Kreher Park, and oxidation injection wells.
- Routine inspections of the KP cap and groundwater extraction system wells.
- Inspection of the well field following completion of groundwater sampling activities.
- Continued evaluation of the post-injection site conditions.

D. Challenges Encountered and Corrective Action Taken

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 infected by COVID-19 or otherwise need to quarantine due to exposure.
- O&M, Inc. has increased the inventory 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.

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:

None.