

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
December 2022 MONTHLY PROGRESS REPORT (No.125)

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 November 2022 Monthly Progress Report in December 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 813,982 gallons of extracted groundwater were treated in the month of December. The total extracted groundwater treated from startup through December is 103,397,027 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, 365 gallons of NAPL were recovered directly from various wells in December 2022 and collected in totes for proper disposal. The total volume of NAPL recovered year to date is 8,030 gallons.
 - Injection wells were installed the week of September 12, 2022 in the CFW field in preparation of the chemical oxidation injection event. The injection began on October 10 and was completed on October 14, 2022. The details of the injection will be presented in a Summary Report.
 - Direct NAPL recovery, from several wells in the area of the 2021 chemical oxidation injection, was performed summer 2021, again in fall 2021, and periodically throughout 2022.
 - Some direct NAPL recovery in the area of the 2022 chemical oxidation injection has also been performed since the injection in mid-October, however, the sodium persulfate concentrations are monitored to ensure active treatment chemicals are not being removed.
- Select wells were gauged on October 4, 2022 (Pre-Injection Baseline Gauging).

- The 4th Quarter 2022 groundwater sampling event was conducted in late October 2022.
- Site well gauging was performed in late October 2022 (Post-Injection Gauging) as part of the 4th Quarter 2022 groundwater sampling event.
- 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.
- The 4th Quarter 2022 Groundwater Monitoring Report is currently being prepared.
- As part of the evaluation of the injection event, analytical sampling, DNAPL gauging, sodium persulfate concentration monitoring, and pH measurements will be performed periodically in the injection area.
- Continued DNAPL recovery from the CFW, Kreher Park, and oxidation injection wells.
- Routine inspections of the KP cap and groundwater extraction system wells.

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 on November 5, 2019 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.