

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
August 2023 MONTHLY PROGRESS REPORT (No.133)

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 2023 Monthly Progress Report in August 2023 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 1,137,645 gallons of extracted groundwater were treated in the month of August. The total extracted groundwater treated from startup through August 2023 is 110,398,970 gallons.
 - Operation of the hydraulic control wells in the Kreher Park area.
 - An Enhanced Extraction Event was conducted the week of June 19, 2023 in the Upper Bluff area and primarily from the Copper Falls Formation wells for non-aqueous phase liquid (NAPL) recovery. The intent of the Extraction Event was focused extraction of a large volume of NAPL that had been emulsified by previous chemical oxidation events, induce NAPL movement in the subsurface toward extraction points, and remove accumulated sediment from the well bottoms.
 - Direct NAPL recovery was performed from select wells in the CFW field and the KP. Direct NAPL recovery volumes for the isolated NAPL recovery wells (CFW-12 thru CFW-15), select wells in Kreher Park, and CFW are presented on the attached Table. As the Table indicates, 652 gallons of total fluids were recovered directly from various wells in August 2023. This volume represents the total fluids recovered. The fluids are then given time to phase separate and the water phase removed for treatment through the Water Treatment Plant. The remaining, more concentrated NAPL is then shipped off-site to Veolia. The total volume of this more concentrated NAPL recovered in August is estimated at 267 gallons.
- The 2nd Quarter 2023 Groundwater Sampling Report was uploaded to the ProjectPortal.
- 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.
- The City of Ashland has raised the top elevation of the DNW-20 well vault, as required to reduce infiltration of storm water into the vault.

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.
- 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

The NAPL Table has recently been reviewed for accuracy. Several small discrepancies were identified and corrected. The edits to the table are as follows:

Year	Prior to Edits		Corrected Volumes	
	Total Fluids	Estimated NAPL	Total Fluids	Estimated NAPL
2016	809	688	769	654
2017	1205	1024	1205	1024
2018	1827	1553	1827	1553
2019	2734	2324	2767	2352
2020	4616	3739	4616	3739
2021	6810	3405	6810	3405
2022	8030	2409	8242	2473
<u>2023 thru August</u>	<u>15344</u>	<u>6291</u>	<u>15344</u>	<u>6291</u>
Total Project	41375	21432	41580	21490

E. Modifications Proposed or Approved

No recent modifications to operations have been requested.

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.

Ashland Lakefront Project
August 2023 Total Fluids/NAPL Recovery

	CFW-12	CFW-13	CFW-14	CFW-15	DNW-18	DNW-19	DNW-21	DNW-15	DNW16	Extraction Event	Injection Area	EQ Tank	Total Fluids	Estimated NAPL
Date	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)	Recovered (Gallons)
2016 Total													769	654
2017 Total													1,205	1,024
2018 Total													1,827	1,553
2019 Total													2,767	2,352
2020 Total													4,616	3,739
2021 Total	19	159	175	1,246	331	210	130	229	311	0	3,040	960	6,810	3,405
2022 Total	19	163	136	1,284	605	490	665	485	790	0	3,605	0	8,242	2,473
Total Jan 2023	2	10	10	107	0	0	0	0	0	0	400	0	529	217
Total Feb 2023	2	12	8	97	0	0	0	0	0	0	350	0	469	192
Total Mar 2023	0	14	10	105	0	0	0	0	0	0	455	0	584	239
Total Apr 2023	2	13	10	80	0	0	0	0	0	0	275	0	380	156
Total May 2023	2	16	8	104	50	30	45	30	0	0	840	0	1125	461
Total June	2	12	12	101	0	0	0	0	0	11000	0	0	11127	4562
Total July	2	14	14	78	40	40	30	20	0	240	0	0	478	196
8/1/2023				5									5	2
8/2/2023				5									5	2
8/3/2023					20	20	20	15		75			150	62
8/4/2023		3		5						175			183	75
8/5/2023													0	0
8/6/2023													0	0
8/7/2023			3	5									8	3
8/8/2023				5									5	2
8/9/2023		3		5									8	3
8/10/2023				5	20	20	20	10		125			200	82
8/11/2023		3		4									7	3
8/12/2023													0	0
8/13/2023													0	0
8/14/2023		3		4									7	3
8/15/2023				4									4	2
8/16/2023				4									4	2
8/17/2023				4									4	2
8/18/2023			3	4									7	3
8/19/2023													0	0
8/20/2023													0	0
8/21/2023		3		5									8	3
8/22/2023				4									4	2
8/23/2023				4									4	2
8/24/2023				4									4	2
8/25/2023		3	3	4									10	4
8/26/2023													0	0
8/27/2023													0	0
8/28/2023	3	3		4									10	4
8/29/2023				4									4	2
8/30/2023			3	4									7	3
8/31/2023				4									4	2
Total August	3	21	12	96	40	40	40	25	0	375	0	0	652	267
2023 Total	15	112	84	768	130	110	115	75	0	11615	2320	0	15344	6,291
PROJECT TOTAL													41,580	21,490