

ASHLAND/NSP LAKEFRONT SITE
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN0507952
October 2023 MONTHLY PROGRESS REPORT (No.135)

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 2023 Monthly Progress Report in October 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 1,113,993 gallons of extracted groundwater were treated in the month of October. The total extracted groundwater treated from startup through October 2023 is 112,679,521 gallons.
 - Operation of the hydraulic control wells in the Kreher Park area.
 - 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, 2,329 gallons of total fluids were recovered directly from various wells in October 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 October is estimated at 955 gallons.

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 Siemens Fire Detection System was found to not be communicating properly. Siemens has since replaced the outdated LAN Line communication with more reliable IP-based communication equipment. The upgrade was completed November 2nd.

The City of Ashland conducted repair of the erosion that was occurring at the apron of the proposed boat launch area in the KP. Rip-rap that had been placed during the initial erosion was removed and the areas backfilled with 5 inches of clay and compacted using a mechanical plate compactor. Topsoil was placed followed by grass seed and overlaid a Scour Stop mat. The idea is that the grass seed will grow underneath the Scour Stop mat. Coconut erosion mat was placed over the Scour Stop to further protect against erosion until the grass seed takes.

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
October 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
Total August	3	21	12	96	40	40	40	25	0	375	0	0	652	267
Total Sept	0	21	30	74	60	60	60	30	0	415	0	0	750	308
10/1/2023													0	0
10/2/2023			3	5									8	3
10/3/2023				4									4	2
10/4/2023		3	3	4	20	20	20	10		125			205	84
10/5/2023				4									4	2
10/6/2023			3	5									8	3
10/7/2023													0	0
10/8/2023													0	0
10/9/2023		3	3	4									10	4
10/10/2023				4									4	2
10/11/2023												1,680	1680	689
10/12/2023													0	0
10/13/2023		3	3	4									10	4
10/14/2023													0	0
10/15/2023													0	0
10/16/2023			3	4									7	3
10/17/2023				4									4	2
10/18/2023		3		4									7	3
10/19/2023				4									4	2
10/20/2023			3	4									7	3
10/21/2023													0	0
10/22/2023													0	0
10/23/2023		3	3	4									10	4
10/24/2023				4									4	2
10/25/2023			3	4	20	20	20	10		250			327	134
10/26/2023				4									4	2
10/27/2023		3		5									8	3
10/28/2023													0	0
10/29/2023													0	0
10/30/2023		3	3	4									10	4
10/31/2023				4									4	2
Total Oct	0	21	30	83	40	40	40	20	0	375	0	1680	2329	955
2023 Total													18423	8928
PROJECT TOTAL													44,659	24,127