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May 6, 2019

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RE: 2019 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation – Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

Dear Ms. Gielniewski, Ms. Rolfes, and Ms. Patterson,

Please find attached the 2019 Annual Progress Report and Master Schedule Update for Wisconsin Public Service Corporation's (WPSC) former manufactured gas plant (MGP) sites. These reports have been combined to summarize activities performed between May 5, 2018 and May 5, 2019 and a proposed schedule for future activities.

This 2019 Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and WPSC, effective May 5, 2006.

If you have any questions, please don't hesitate to contact the undersigned.

Sincerely,

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2019 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation
Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

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FIGURES

Figure 1 Master Schedule

ACRONYMS AND ABBREVIATIONS

AOC	Administrative Order on Consent
AOC/SOW	Administrative Order on Consent/Statement of Work
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
DNAPL	Dense Non-Aqueous Phase Liquid
FS	Feasibility Study
FFS	Focused Feasibility Study
LFRR	Lower Fox River Remediation, LLC
MGP	Manufactured Gas Plant
NAPL	Non-Aqueous Phase Liquid
NFA	North Focus Area
OU	Operable Unit
OM&M	Operation Maintenance and Monitoring
PCB	Poly-Chlorinated Biphenyls
PAH	Polycyclic Aromatic Hydrocarbons
PRAP	Preliminary Remedial Action Plan
PVOCs	Petroleum Volatile Organic Compounds
QAPP	Quality Assurance Project Plan
RAF	Risk Assessment Framework
RCRA	Resource Conservation Recovery Act
ROD	Record of Decision
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RNA	Remediation by Natural Attenuation
RPM	Remedial Project Manager
RSL	Regional Screening Level
Settlement Agreement	Settlement Agreement and Administrative Order on Consent
SFA	South Focus Area
SOW	Statement of Work
SSWP	Site Specific Work Plans
SVOC	Semi-Volatile Organic Compounds
TSS	Total Suspended Solids
USEPA	U.S. Environmental Protection Agency
VOCs	Volatile Organic Compounds
WPSC	Wisconsin Public Service Corporation

1 INTRODUCTION

1.1 SCOPE

This Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Wisconsin Public Service Corporation (WPSC) effective May 5, 2006. The Progress Report summarizes work completed between May 5, 2018 and May 5, 2019. The Annual Progress Report and Master Schedule Update has been combined, as previously suggested by the USEPA. The Annual Progress Report portion addresses four of WPSC's former manufactured gas plant (MGP) Sites located in Green Bay, Manitowoc, Oshkosh, and Two Rivers, Wisconsin. The Master Schedule Update portion addresses four of WPSC's former MGP Sites located in Green Bay, Manitowoc, Oshkosh, and Two Rivers. Records of Decision (ROD) were issued for Stevens Point in September 2012, Marinette in September 2017, and Manitowoc Upland Operable Unit (OU) in September 2018. Therefore, Stevens Point and Marinette are not included in this report and Manitowoc Upland OU remedial design is not included in the Master Schedule Update.

1.2 OVERVIEW

This report addresses the following:

- Section 2: Multi-Site Document Progress
- Section 3: Site Progress
- Section 4: Proposed Master Schedule

2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site Remedial Investigation (RI) documents (Section 1.2.1 of the SOW) are used to maintain a consistent approach to investigate and assess the potential risk of each site. The Multi-Site Feasibility Study (FS) Support Documents (Section 1.2.2. of the SOW) are used to develop general response actions and technologies appropriate for MGP sites.

USEPA has approved all of the Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008 and the Multi-Site FS Support Documents dated March 26, 2010. An update to the Quality Assurance Project Plan (QAPP) Addendum 3, Revision 1, dated February 23, 2018 was approved March 8, 2018.

Multi-Site Risk Assessment Framework (RAF) Addendum are prepared to update the hierarchy for human health screening levels as Regional Screening Levels are updated. In other words, the most current regional screening levels (RSLs) at the time will be used for comparison of site media.

No Multi-Site Documents were submitted during this reporting period.

3 SITE PROGRESS

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the MGP sites (with the exception of Stevens Point and Marinette as discussed in Section 1). Details of each site are provided in monthly progress reports, submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated May 5, 2018) is compared to the actual progress.

The following table provides an overview of milestone status for each site.

	Stevens Point Upland and Sediment	Manitowoc - Upland	Manitowoc - Sediment	Marinette - Upland	Marinette - Sediment	Oshkosh - Upland	Oshkosh - Sediment	Two Rivers - Upland	Two Rivers - Sediment	Green Bay - Upland	Green Bay - Sediment
Completion Report	•	•	•	•	•	•	•	•	•	•	•
Site Specific Work Plan	•	•	•	•	•	•	•	•	•	•	•
Remedial Investigation	•	•	•	•	•	⊖	⊖	⊖	⊖	⊖	•
Remedial Investigation Report	•	•	•	•	•	○	○	⊖	⊖	○	•
Alternatives Screening Technical Memorandum	•	•	•	•	•						
Feasibility Study Report	•	•	⊖	•	•						
Record of Decision	•	•		•	•						
Removal Action (Time Critical or Non-Time Critical)	na	na	na	na	•			•			○

"•" = Completed and Approved by USEPA

"⊖" = Submitted to USEPA and Pending Approval

"○" = In progress

"na" = not applicable

blank = not initiated

3.1 INITIATED SITES

Site progress and significant deviations from the target dates established in the 2018 Master Schedule Updates are discussed herein.

3.1.1 Manitowoc

The Project Start Date for the Manitowoc MGP Site was December 5, 2006.

The date and general discussion topics of meetings and conference calls conducted during this reporting period are summarized in the following table:

General Discussion Topic	Date
Discuss FS Revision 0 (Sediment) submittal	August 14, 2018

3.1.1.1 Planning Documents and Work Plan Submittals

Planning documents, work plan submittals, and on-going reporting are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
FS Revision 3 (Uplands)	March 29, 2018 ¹	March 29, 2018	June 1, 2018 (approved)
USEPA issues Proposed Remedial Action Plan (PRAP) - Uplands	--	July 20, 2018	Public comment period Jul 23-Aug 2018
FS Revision 0 (Sediment)	August 8, 2018	August 8, 2018	April 1, 2019
USEPA issues Upland ROD	September 2018	September 21, 2018	

- The submittal date was established based on receipt of USEPA's comments on FS Revision 2 (Uplands), related to groundwater quality and support for monitored natural attenuation.

3.1.1.2 Remedial Investigation Field Activities

RI field activities were not performed during this reporting period and indoor air sampling at the Winter Building was discontinued as the building is vacant.

3.1.1.3 Operation Monitoring & Maintenance and Groundwater Monitoring

Operation monitoring & maintenance (OM&M) activities at the Manitowoc site includes groundwater treatment system maintenance. Treatment system sampling is performed on a semi-annual basis. The influent is sampled for volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs). The effluent is sampled for VOCs, semi-volatile organic compounds (SVOCs) and pH. Intermediate locations within the treatment system samples are collected for benzene, toluene, ethylbenzene, and xylenes (BTEX) on a bi-monthly basis.

Groundwater levels and the Manitowoc River elevation are measured during groundwater sampling events. Groundwater monitoring is performed using low-flow sampling techniques to assess concentrations of petroleum volatile organic compounds (PVOCs), PAHs and natural attenuation indicator parameters.

OM&M/Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Effluent Sample Collection	May 2018	May 30, 2018
Groundwater Sampling Event	May 2018	May 29-30, 2018
Intermediate Sample Collection	June 2018	Not sampled ¹
Intermediate Sample Collection	August 2018	Not sampled ¹
Intermediate Sample Collection	October 2018	Not sampled ¹
Effluent Sample collection	November 2018	Not sampled ¹
Groundwater Sampling Event	November 2018	November 19-20, 2018
Intermediate Sample Collection	December 2018	Not sampled ¹
Intermediate Sample Collection	February 2019	February 8, 2019
Intermediate Sample collection	April 2019	April 4, 2019

- The groundwater treatment system extraction system was temporarily off-line or pumping at a reduced rate beginning July 20, with trouble shooting and repair activities through pump replacement in November 2018 and acidification the week of January 7, 2019. The system was back on line the same week and functioning in late January/early February.

The annual O&M Report was submitted to the City of Manitowoc on January 25, 2019.

3.1.2 Oshkosh

The Project Start Date for the Oshkosh MGP Site was February 4, 2008.

There were no meetings or conference calls conducted during this reporting period.

3.1.2.1 Planning Documents and Work Plan Submittals

Planning documents, work plan submittals, and on-going reporting are summarized in the following table.

Task/Submittal	Targeted Completion Date ¹	Actual Completion Date	USEPA Comments Received
Site Specific Work Plan (SSWP) – Addendum 1 – Revision 0	June 18, 2018	July 11, 2018	August 9, 2018
Sediment Investigation Data Review Package	--	August 31, 2018	October 12, 2018 (no response required)
SSWP – Addendum 1 – Revision 1	September 9, 2018	September 7, 2018	September 24, 2018 (approved)
SSWP – Addendum 2 – Revision 0 Right-of-Way Access location modification	November 18, 2018	November 16, 2018	December 17, 2018
SSWP – Addendum 2 – Revision 1 Right-of-Way Access location modification	January 16, 2019	January 16, 2019	February 15, 2019 (email)
SSWP – Addendum 2 – Revision 2 Right-of-Way Access location modification	March 17, 2018	March 4, 2019	March 5, 2019
SSWP – Addendum 2 – Revision 3 Right-of-Way Access location modification	April 4, 2019	March 15, 2019	March 18, 2019 (approved)

1. Target Completion dates assume 45 or 30 days from receipt of USEPA comments.

3.1.2.2 Remedial Investigation Field Activities

RI field activities were not performed during this reporting period.

3.1.2.3 OM&M and Groundwater Monitoring

OM&M activities at the Oshkosh site include: groundwater treatment system maintenance (e.g., replacing system fans, thermostats, bag filters, measuring non-aqueous phase liquid (NAPL) accumulations, responding to system alarms), minor groundwater monitoring well repairs, dewatering pump maintenance, and treatment system influent/effluent sampling. The effluent is sampled on a quarterly basis and the influent is sampled on a semi-annual basis for BTEX, PAHs, and total cyanide and semi-annually for total suspended solids (TSS).

Post- RI groundwater monitoring is performed on a semi-annual basis using low-flow sampling techniques to assess concentrations of PVOCs and PAHs.

OM&M and/or Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Second Quarter 2018 Effluent Treatment System Sampling and Groundwater Levels, and Annual Cap Inspection	June 2018	June 21, 2018
Third Quarter 2018 Influent and Effluent Treatment System Sampling, Groundwater Levels, and Second Semi-Annual Groundwater Monitoring Event (all wells)	September 2018	September 4-6, 2018
Fourth Quarter 2018 Effluent Treatment System Sampling and Groundwater Levels	December 2018	December 18, 2018
First Quarter 2019 Effluent Treatment System Sampling and First Semi-Annual Groundwater Sampling (all wells)	March 2019	March 18-20, 2019

3.1.3 Green Bay

The Project Start Date for the Green Bay MGP Site was June 17, 2014.

A joint agency letter was issued in September 2018 clarifying coordination of the sediment early removal action was to be coordinated under the umbrella of the Lower Fox River Remediation, LLC (LFRR) polychlorinated biphenyls (PCB) sediment site. Bi-weekly work group conference calls/meetings were initiated in October 2018 to review North Focus Area design approach, documents and schedule

The date and general discussion topics of significant meetings and conference calls conducted during this reporting period are summarized in the following table.

General Discussion Topic	Date
Weekly Progress of South Focus Area (SFA) Removal Action	Tuesdays from July through September 2018
SFA Remedial Design – Walk through April 30, 2018 Submittal	May 8, 2018
North Focus Area (NFA) Remedial Design Kick-off Meeting	September 25, 2018
NFA Vessel Management and Communication Planning	November 8, 2018

3.1.3.1 RI/FS Planning Documents and Work Plan Submittals

Planning documents, work plan submittals, and on-going reporting are summarized in the following table.

Task/Submittal	Targeted Completion Date ¹	Actual Completion Date	USEPA Comments Received
Submit Preliminary RI Data for Pre-RI Report Discussion	--	February 10, 2017	awaiting
Dense Non-Aqueous Phase Liquid (DNAPL) Mobility Data Summary Report	--	April 10, 2018	awaiting
Remedial Design Report – SFA – Revision 0	April 30, 2018	Dated April 30, 2018 Submitted May 1, 2018	June 13, 2018
Response to USEPA's June 13, 2018 Remedial Design Report – SFA – Revision 0 Comments	--	June 22, 2018	July 11, 2018 with authorization to proceed July 13, 2018
Response to USEPA's July 11, 2018 Remedial Design Report – SFA – Revision 0 Comments	--	July 13, 2018	August 20, 2018
Response to USEPA's August 20, 2018 Remedial Design Report – SFA and Final Remedial Design Report - SFA	--	August 31, 2018	November 28, 2018 (approval)
SFA Confirmation Sampling Work Plan Revision 0	--	August 6, 2018	August 24, 2018
Response to USEPA's August 24, 2018 Comments and Redline SFA Confirmation Sampling Work Plan Revision 1	--	August 29, 2018	October 24, 2019 November 1, 2018 (approved)
SFA Remedy Implementation Completion Report – Revision 0	--	January 31, 2019	April 2, 2019
North Focus Area (NFA) Remedial Design – Revision 0	November 12, 2018	October 31, 2018 (through Lower Fox River LLC)	March 18, 2019
Draft Vessel Management Plan	--	January 15, 2019	February 20, 2019
Final Vessel Management Plan	--	March 5, 2019	April 16, 2019
Sampling and Analysis Plan	--	March 18, 2019	May 1, 2019

1. A double dash is entered where target completion dates were "as soon as possible" to expedite the SFA removal or the specific deliverable (i.e., SFA Confirmation Sampling Plan) was not specified in the 2018 Annual Master Schedule Update.

3.1.3.2 Remedial Investigation Field Activities

Upland RI field activities are complete and no RI field activities were completed in the upland areas during this reporting period. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.4.3.

No sediment RI field activities were completed during this reporting period. The SFA remedial design was implemented between July 9 and November 13, 2018, as described in the SFA Remedy Implementation Completion Report.

3.1.3.3 Groundwater Monitoring and Cap Inspection

Groundwater monitoring is performed on a semi-annual basis using low-flow sampling techniques to assess concentrations of PVOCs and PAHs. Select wells are also analyzed for remediation by natural attenuation (RNA) indicator parameters, arsenic and cadmium. Groundwater levels are collected during the monitoring events. Cap inspection and maintenance, if necessary, is performed on an annual basis.

OM&M and/or Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
First Semi-Annual Groundwater Sampling	May 2018	May 29-31, 2018
Second Semi-Annual Groundwater Sampling	November 2018	November 5-7, 2018
2018 Annual Cap Inspection	September 2018	October 3, 2018

3.1.4 Two Rivers

The Project Start Date for the Two Rivers MGP Site is October 13, 2015.

The date and general discussion topics of significant meetings and conference calls conducted during this reporting period are summarized in the following table.

General Discussion Topic	Date
Review sediment investigation and SSWP deviations	June 7, 2018

3.1.4.1 Planning Documents and Work Plan Submittals

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
RI Report – Revision 0	December 31, 2018	January 31, 2019	Awaiting comments
Groundwater Sampling Modification Memorandum	--	February 8, 2019	March 15, 2019 (approved)

3.1.4.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with SSWP – Revision 1, with SSWP Addendum, dated September 26, 2016. Completed RI activities are summarized in the following table. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.5.3.

Task	Completion Date
Step II Sediment Sampling	May 14 - June 26, 2018
Groundwater Monitoring Well Hydraulic Conductivity Testing	October 31 – November 2, 2018

3.1.4.3 Groundwater Monitoring

Groundwater monitoring is performed on a quarterly basis using low-flow sampling techniques to assess concentrations of BTEX, PAHs, dissolved Resource Conservation Recovery Act (RCRA) Metals, and weak acid dissociable cyanide as described in the SSWP. Field measured parameters and groundwater levels are collected during the monitoring events.

Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Second Quarter 2018 Groundwater Sampling	May 2018	May 7-8, 2018
Third Quarter 2018 Groundwater Sampling	August 2018	July 30-31, 2018
Fourth Quarter 2018 Groundwater Sampling	November 2018	October 30-31, 2018
First Quarter 2019 Groundwater Sampling	February 2019	February 13-14, 2019

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW (May, 2006) includes a schedule for major Remedial Investigation/Feasibility Study (RI/FS) deliverables. In accordance with Exhibit A, the following sections provide an evaluation of the Master Schedule for each site.

Remedial design and remedial action activities have been completed under a separate Administrative Order on Consent (AOC) for Stevens Point. The schedule for future post-ROD monitoring has been developed under a separate agreement, and is therefore not detailed in this Master Schedule Update. Similarly, future post-ROD remedial design for Marinette and Manitowoc - Upland are being completed under a separate AOC and are not detailed in this Master Schedule Update. Manitowoc groundwater sampling and system operation, as well as sediment, continue to be included herein, as the ROD did not present a final groundwater remedial action and did not address sediment.

4.1 OVERVIEW PROGRESS MEETINGS

Monthly Progress Reports are submitted for Manitowoc, Oshkosh, Green Bay and Two Rivers under this AOC. Monthly Progress Reports are submitted for Marinette under the Remedial Design AOC.

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or WPSC. Specific progress meeting dates are not proposed at this time.

4.2 MULTI-SITE RI DOCUMENTS

Additional modifications or updates, primarily anticipated to be RAF Addendum, will be prepared as needed. Additional discussions on the sediment screening level approach are also anticipated, however, specific meeting dates have not been proposed.

4.3 SITE SPECIFIC SCHEDULES

The site-specific schedule for Manitowoc, Oshkosh, Green Bay, and Two Rivers has been updated on Figure 1 for RI/FS field activities and major deliverables. The proposed target dates for Oshkosh and Two Rivers are generally consistent with the SSWPs and Manitowoc is generally consistent with the 2018 Master Schedule Update, adjusted for progress to date. Green Bay has been adjusted based on coordination with the Lower Fox River PCB Superfund Site project. All site schedules are dependent on USEPA approval dates, contractor availability, site access, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., finalize submittals within 45 days from receipt of USEPA comments, etc.). For planning purposes, it is assumed USEPA will provide comments within 60 days of submittals. Additional comments or approvals are assumed to be provided within 45 days for revisions of deliverables. The schedule also includes modifications to the Administrative order on Consent/Statement of Work (AOC/SOW), per the July 9, 2015 modifications for Alternative Array and FS Revision 0 documents, as discussed in the June 17, 2015 meeting.

These target dates may be further refined, but are provided as general placeholders for planning purposes. Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, progress conference calls during RI activities, or other communications.

Assumptions include:

4.3.1 Manitowoc

- Additional RI activities will be required for adjacent river area, pending resolution of the April 1, 2019 comments on Sediment FS Report – Revision 0
- Continued semi-annual (May and November) groundwater sampling
- Treatment system operation and maintenance (bi-monthly)
- A separate ROD is issued for the upland and adjacent river area

4.3.2 Oshkosh

- Additional sediment/surface water RI activities are not required for adjacent river area
- Following focused RI activities (limited soil sampling and installation of two groundwater monitoring wells and one bedrock monitoring well), no additional RI activities are assumed
- Continued semi-annual (March and September) groundwater sampling
- Quarterly treatment system sampling and biweekly operation and maintenance inspections

4.3.3 Green Bay

- Additional RI activities are not required for upland areas
- MGP-affected sediment will be removed from the East River/Lower Fox River in 2019 in coordination with the Lower Fox River Site
- The construction documentation and/or one sampling effort will provide sufficient data for updating the adjacent river area RI post sediment removal
- A combined RI and Focused FS (FFS) will be developed to address upland and sediment to facilitate on ROD for the site
- Continued semi-annual (May and November) groundwater sampling

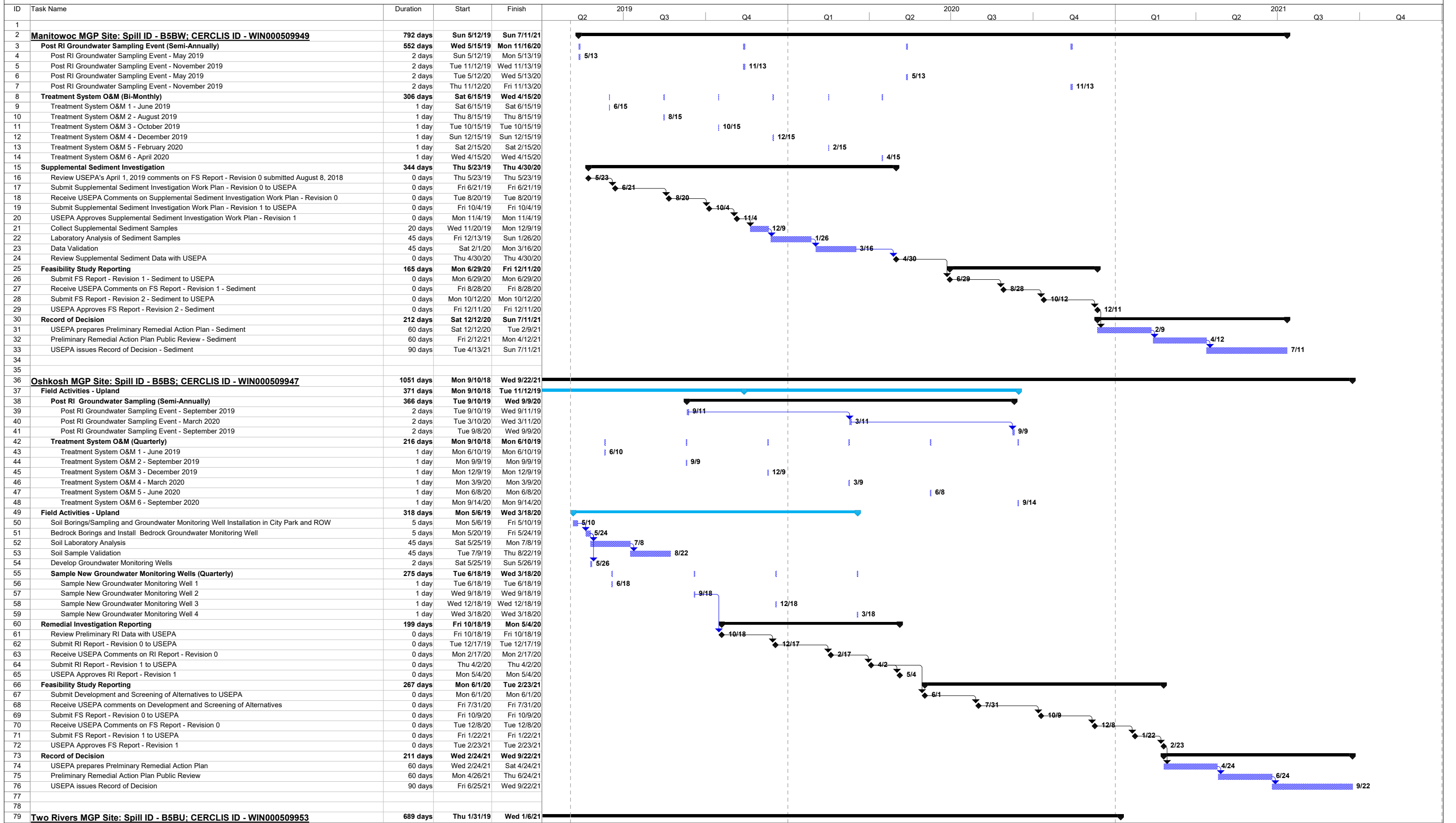
4.3.4 Two Rivers

- Additional RI activities are not required for upland areas
- No Additional data gaps will be identified. USEPA comments on RI Report – Revision 0 will be provided in mid-May (approximately 90 days after submittal versus 60 days)
- Step II Sediment RI activities were sufficient and USEPA will approve RI Report – Revision 1, once submitted
- Sufficient data has been collected to support the FS Report
- Semi-annual (February and August) groundwater sampling beginning August 2019

FIGURE



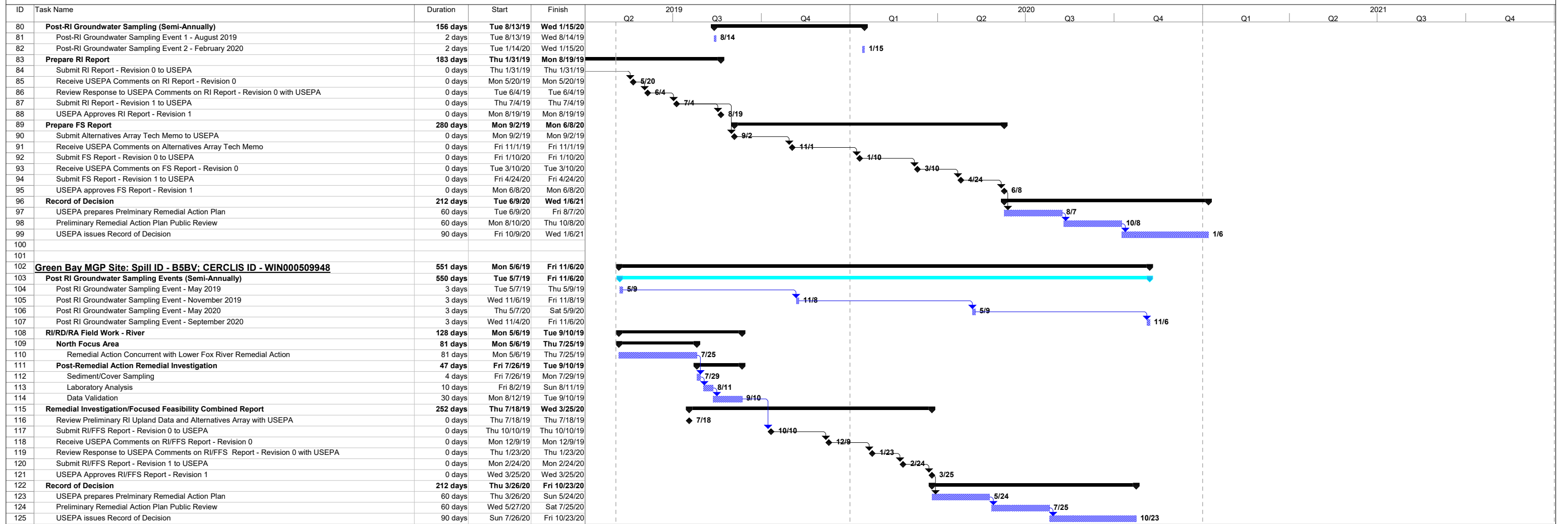
Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



Task		Rolled Up Task		Split		Group By Summary		Inactive Summary		Manual Summary Rollup		Finish-only	
Milestone		Rolled Up Milestone		External Tasks		Inactive Task		Manual Task		Manual Summary		Progress	
Summary		Rolled Up Progress		Project Summary		Inactive Milestone		Duration-only		Start-only			

1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations.

Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations.