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Subject: 2020 WPSC SAS Sites Annual Progress Report
Attachments: 05-05-2020 WPSC 2020 Annual Progress Report and Master Schedule Update R....pdf

Sarah/Margaret/Bill,

On behalf of Bob Paulson and myself, attached is the 2020 Annual Progress Report and Master Schedule Update Report for Wisconsin Public Service Corporation – Former Manufactured Gas Plants (MGP) covered under CERCLA Docket No. V-W-06-C-847.

Should you have any questions regarding the update or schedule, Bob and I are available at your convenience to discuss.

Thanks,

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Subject: 2019 WPSC Annual Progress Report

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May 5, 2020

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RE: 2020 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 Mr. Ryan,

Please find attached the 2020 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 6, 2019 and May 5, 2020 and a proposed schedule for future activities.

This 2020 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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Enclosures: 2020 Annual Progress Report and Master Schedule Update Report

cc:

Ms. Sarah Krueger, WDNR (hardcopy and email)
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2020 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

May 5, 2020

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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
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
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, 2019 and May 5, 2020. 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 6, 2019) 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	•	•		•	•						
Early Removal Action	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 2019 Master Schedule Updates are discussed herein.

3.1.1 Manitowoc

The Project Start Date for the Manitowoc MGP Site was December 5, 2006. The Manitowoc Upland OU ROD was issued September 21, 2019 and therefore, the Upland OU is not discussed herein, with the exception of the on-going groundwater monitoring and treatment system.

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
USEPA comments on Sediment FS Report – Revision 0	May 30, 2019
Discuss Supplemental Sediment Investigation submittal	August 22, 2019

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 0 (Sediment)	August 8, 2018	August 8, 2018	April 1, 2019
Response to USEPA's April 1, 2019 comments on FS Report – Revision 0 (Sediment)	June 21, 2019 ¹	October 15, 2019	October 29, 2019 (approved)
Step II Sediment Sampling Work Plan – Revision 2 Addendum	June 21, 2019 ¹	October 16, 2019	October 29, 2019 (approved)

1. The submittal date was established based on assumption that USEPA's April 1, 2019 comments on the FS Report – Revision 0 (Sediment) would be discussed in late May 2019, followed by submittal of Step II Sediment Sampling Work Plan – Revision 2 Addendum.

3.1.1.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with Step II Sediment Sampling Work Plan – Revision 2 Addendum, dated October 16, 2019. Completed RI activities are summarized in the following table. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.1.3.

Task	Completion Date
Sediment Sampling	April 2-23, 2020

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.

During this reporting period, the carbon was changed on July 10, 2019 and routine maintenance and operation of the pump and treat system was performed on October 31, 2019.

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 2019	May 22, 2019
Groundwater Sampling Event	May 2019	May 20-22, 2019
Intermediate Sample Collection	June 2019	June 14, 2019
Intermediate Sample Collection	August 2019	August 22, 2019
Intermediate Sample Collection	October 2019	October 31, 2019
Effluent Sample collection	November 2019	November 26, 2019

OM&M/Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Groundwater Sampling Event	November 2019	November 25-27, 2019
Intermediate Sample Collection	December 2019	December 31, 2019
Intermediate Sample Collection	February 2020	Not sampled
Intermediate Sample collection	April 2020	April 16, 2020

The annual O&M Report was submitted to the City of Manitowoc on January 17, 2020.

3.1.2 Oshkosh

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

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
Meeting with new USEPA Remedial Project Manager (RPM)	November 5, 2019
Review site status and pre-RI Scoping meeting	February 4, 2020

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	Actual Completion Date	USEPA Comments Received
RI Report – Revision 0	December 17, 2109 ¹	-- ²	-- ²
Pre-RI Scoping Meeting Data Review Package	-- ²	January 29, 2020	February 18, 2020

1. Target Completion date from the 2019 Annual Progress Report and Master Schedule Update assumed review of data with USEPA in October 2019 which was delayed as USEPA's RPM was transitioned.
2. A double dash is entered where the specific deliverable (i.e., Pre-RI Scoping Meeting Data Review Package) was not specified in the 2019 Annual Master Schedule Update or was not completed.

3.1.2.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with SSWP Addendum 2 Revision 3, dated March 18, 2019. Completed RI activities are summarized in the following table. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.2.3.

Task	Completion Date
Soil Borings	Week of May 6, 2019 – direct push borings Week of May 20, 2019 – sonic rig and bedrock sampling
NAPL Mobility Testing	July 22, 2019
Groundwater sampling of three new wells	June 11, 2019
Aquifer Testing	February 4, 2020

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).

The system was not operating during the September 18, 2019 sampling event and a contractor supported troubleshooting. Repairs were made and the system was running by the end of November.

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 2019 Effluent Treatment System Sampling and Groundwater Levels, and Annual Cap Inspection	June 2019	June 27, 2019
Third Quarter 2019 Influent and Effluent Treatment System Sampling, Groundwater Levels, and Second Semi-Annual Groundwater Monitoring Event (all wells)	September 2019	September 16-18, 2019
Fourth Quarter 2019 Effluent Treatment System Sampling and Groundwater Levels	December 2019	December 19, 2019
First Quarter 2020 Effluent Treatment System Sampling and First Semi-Annual Groundwater Sampling (all wells)	March 2020	March 16-18, 2020

3.1.3 Green Bay

The Project Start Date for the Green Bay MGP Site was June 17, 2014. On April 27, 2020, WPSC requested to separate the site into an upland and a sediment operable units (OU), OU1 and OU2, respectively.

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 ongoing during this reporting period to review South Focus Area (SFA) documents and North Focus Area (NFA) 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
Evaluating Interim Removal Action - Upland	May 28, 2019
Meeting with new USEPA RPM, RI/FS timeline and next steps	May 30, 2019

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.

2020 ANNUAL PROGRESS REPORT AND MASTER SCHEDULE UPDATE | SITE PROGRESS

Task/Submittal	Targeted Completion Date¹	Actual Completion Date	USEPA Comments Received
Remedial Action Work Plan Addendum-Sediment	--	March 18, 2019	June 10, 2019
NFA Sampling and Analysis Plan – Revision 1 - Sediment	--	May 9, 2019	June 10, 2019
NFA Remedial Action Vessel Management and Communication Plan with Fact Sheet	--	May 9, 2019	--
NFA Remedial Action Work Plan – Sediment (submitted as Anchor QEA’s Appendix N of the Addendum to the Final 2019 Update to Phase 2B RAWP- Manufactured Gas Plant North Focus Area (May 29, 2019))	--	May 29, 2019	June 10, 2019 (conditional approval)
SFA Summary Report – Revision 1	--	June 5, 2019	July 17, 2019
Documenting DNAPL while Dredging in NFA Memorandum – Revision 0	--	June 21, 2019	June 25, 2019
Documenting DNAPL while Dredging in NFA Memorandum – Revision 1	--	June 27, 2019	June 27, 2019 (approved)
2019 SFA Post Removal Action Sampling Plan	--	July 29, 2019	August 5, 2019
NFA Containment Wall Residuals Summary Memorandum – Revision 0	--	August 9, 2019	August 22, 2019
SFA Completion Report – Revision 2	--	August 23, 2019	September 11, 2019 (approved)
NFA Containment Wall Residuals Summary Memorandum – Revision 1	--	August 28, 2019	September 4, 2019 (approved)
RI/Focused FS Report – Revision 0	October 10, 2019 ²	-- ¹	-- ¹
NFA Sampling and Analysis Plan – Revision 2 - Sediment	--	August 30, 2019	September 4, 2019 (approved)
NFA Remedial Action Work Plan – Sediment (Anchor QEA)	--	August 30, 2019	September 4, 2019 (approved)
Chemical Isolation Layer (CIL) Evaluation and Recommended Supplemental Actions Memorandum	--	September 8, 2019	September 9, 2019
NFA MGP Proposed Grouted mattress Panel Extensions Memorandum	--	October 9, 2019	October 10, 2019
NFA MGP Proposed Methods for Filling GAP between Armor Layer and Bulkhead and Connecting Grouted Mattress Panels and Extensions Memorandum		October 10, 2019	October 16, 2019

Task/Submittal	Targeted Completion Date ¹	Actual Completion Date	USEPA Comments Received
NFA Remedial Action Summary Report – Revision 0	--	March 6, 2020	April 1, 2020
Pre-Design Investigation Work Plan – Upland	--	March 19, 2020	May 1, 2020 (preliminary)

1. A double dash is entered where target completion dates were “as soon as possible” to expedite the sediment removal, the specific deliverable (i.e., SFA Completion Report) was not specified in the 2019 Annual Master Schedule Update or was not completed.
2. NFA sediment remedial actions and discussions were ongoing regarding separating the upland and sediment and an upland removal action were ongoing which delayed submittal of RI/Focused FS Report – Revision 0.

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 3.1.3.3.

Sediment RI field activities were performed in the SFA in accordance with the NFA (Appendix N of the Addendum to the Final 2019 Update to Phase 2B RAWP- Manufactured Gas Plant North Focus Area (May 29, 2019)) per USPEA’s August 5, 2019 email. Completed RI and removal action activities are summarized in the following table.

Task	Completion Date
Post removal action sediment sampling - SFA	August 9 and 12, 2019
NFA Removal Action	April 25-November 17, 2019 ¹

1. Refer to the NFA Remedy Implementation Completion Report for additional information.

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 2019	May 28-30, 2019
Second Semi-Annual Groundwater Sampling	November 2019	November 4-5, 2018
2019 Annual Cap Inspection	September 2019	October 25, 2019

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
Pre-FS Scoping Meeting	April 27, 2020

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	May 9, 2019
RI Report – Revision 1	June 24, 2019 ¹	June 24, 2019	September 9, 2019
RI Report – Revision 2	October 25, 2019 ¹	October 25, 2019	March 31, 2020 (approved)

1. Target Completion date based on the AOC requirements for revisions based on receipt of USEPA comments.

3.1.4.2 Remedial Investigation Field Activities

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

3.1.4.3 Groundwater Monitoring

Groundwater monitoring is performed on a semi-annual 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 Groundwater Sampling Modification memo, submitted February 8, 2019, approved March 15, 2019. Field measured parameters and groundwater levels are collected during the monitoring events.

Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
First Semi-Annual Groundwater Sampling	August 2019	August 5 and 14, 2019 ¹
Second Semi-Annual Groundwater Sampling	February 2020	April 22-23, 2020 ¹

1. High water levels required two mobilizations in August 2019 and prevented groundwater sampling in February until April 2020

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 2019 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 and dividing the site into two OU. 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, or other communications.

Assumptions include:

4.3.1 Manitowoc

- Additional RI activities will not be required for adjacent river area, following the April 2020 sampling event. April 2020 sediment data and addressing USEPA's April 1, 2019 comments on Sediment FS Report – Revision 0 will be incorporated into Sediment FS Report – Revision 1.
- Continued semi-annual (May and November) groundwater sampling.
- Treatment system operation and maintenance (bi-monthly).
- Separate ROD will be issued for the adjacent river area.
- Separate ROD may be issued for groundwater pending effectiveness of upland remedial action.

4.3.2 Oshkosh

- Additional sediment/surface water RI activities are not required for adjacent river area.
- Supplemental surface soil sampling will be conducted in conjunction with revision/finalization of the RI Report.
- The RI Report – Revision 1 will be submitted following USEPA comments on the RI Report – Revision 0 and receipt of analytical data from the supplemental surface soil sampling.
- Continued semi-annual (March and September) groundwater sampling.
- Quarterly treatment system sampling and biweekly operation and maintenance inspections.

4.3.3 Green Bay

- The site will be divided into an Upland and a Sediment OU with separate RODs.
- A pre-design investigation will be completed to support an Upland Removal Action. No additional RI activities are not required for upland areas.
- An Upland Removal Action will be initiated in late 2020.
- A summary of the Upland Removal Action will be included in the Combined RI/FS Report for Upland, following completion of the Upland Removal Action.
- NFA Remedial Action Summary Report – Revision 1 incorporating USEPA comments will be completed.
- Remedial Investigation for OU2 (sediment) will be prepared incorporating data collected post-removal in the SFA and post-removal and armored/amended cap construction in the NFA to facilitate a no further remedial action required ROD.
- Continued semi-annual (May and November) groundwater sampling.

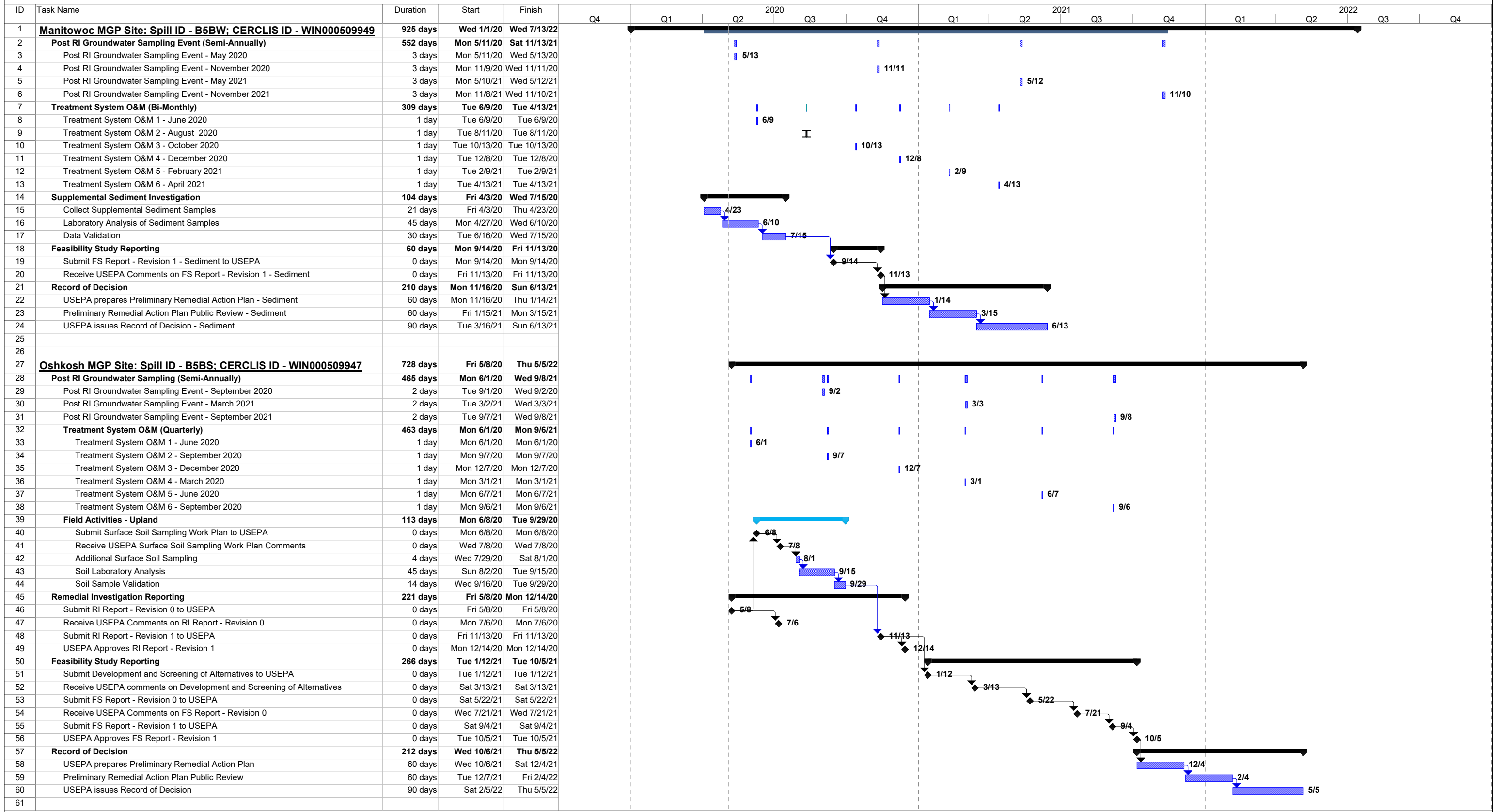
4.3.4 Two Rivers

- Additional RI activities are not required.
- Remedial Action Objectives, Preliminary Remediation Goals and an Applicable or Relevant and Appropriate Requirements table will be presented for discussion in advance of developing an Alternatives Array Technical Screening Memorandum.
- Sufficient data has been collected to support the FS Report.
- Semi-annual (February and August) groundwater sampling.

FIGURE



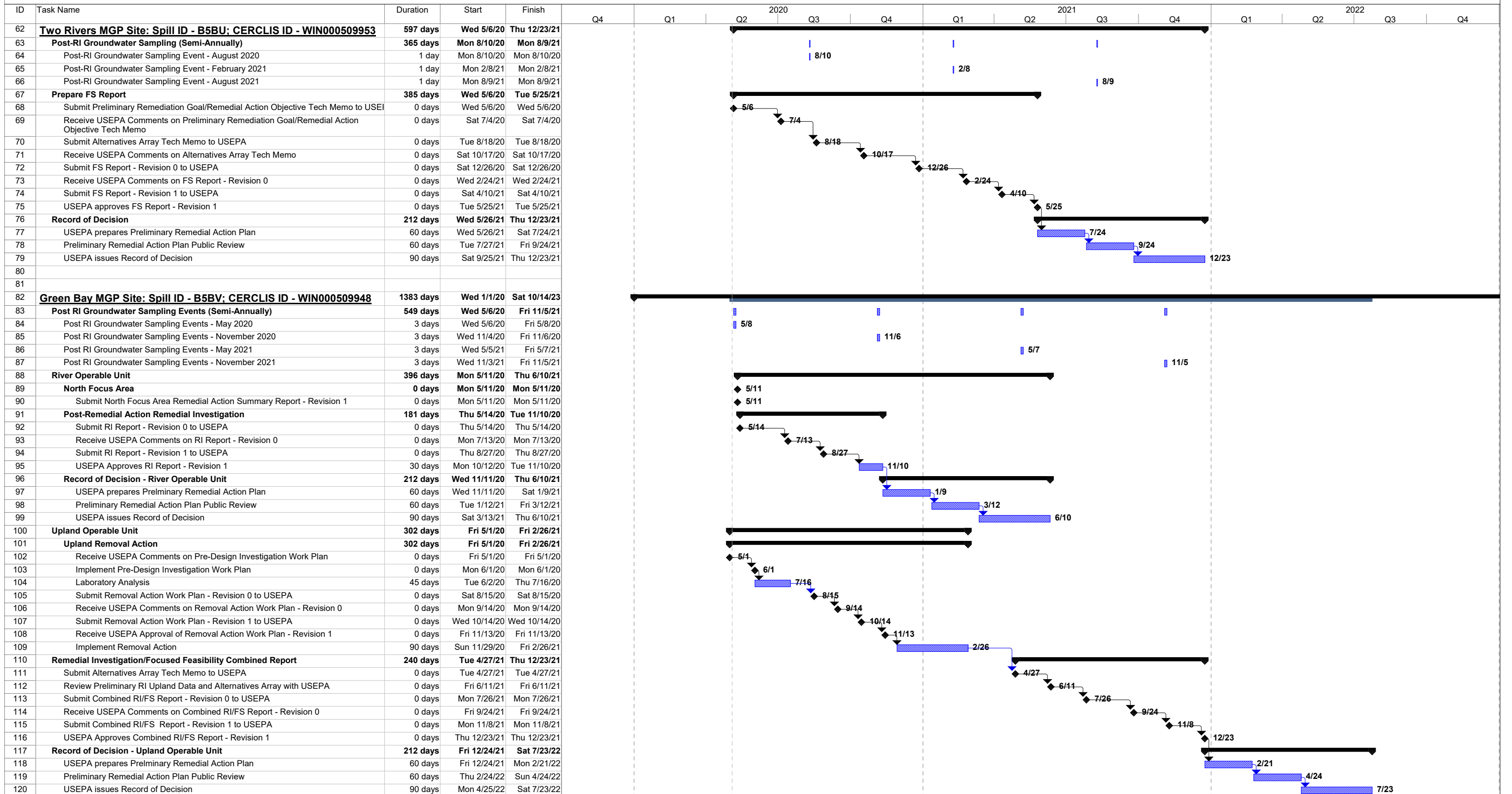
Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



Project:WPSC Figure 1 Annual Report Master Schedule Up Date: 05/05/20	Task		Rolled Up Milestone		Project Summary		Inactive Summary		Manual Summary	
	Milestone		Rolled Up Progress		Group By Summary		Manual Task		Start-only	
	Summary		Split		Inactive Task		Duration-only		Finish-only	
	Rolled Up Task		External Tasks		Inactive Milestone		Manual Summary Rollup		Progress	

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



Project:WPSC Figure 1 Annual Report Master Schedule Up
Date: 05/05/20

Task		Rolled Up Milestone		Project Summary		Inactive Summary		Manual Summary	
Milestone		Rolled Up Progress		Group By Summary		Manual Task		Start-only	
Summary		Split		Inactive Task		Duration-only		Finish-only	
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1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations.