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Subject: 2022-05-05 2022 Annual Progress Report and Master Schedule Update Report
Attachments: 2022-05-05 WPSC 2022 Annual Progress Report and Master Schedule Update.pdf

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Good Afternoon Margaret and Leah –

Please find attached the 2022 Annual Progress Report and Master Schedule Update for Wisconsin Public Service Corporation's (WPSC) former manufactured gas plant (MGP) sites. The 2022 Annual Progress Report and Master Schedule Update was 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. As previously requested, an electronic copy only is being provided to USEPA and a hardcopy (in addition to this electronic) will be provided to WDNR.

Please let us know if you have any questions.

Thanks!

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May 5, 2022

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RE: 2022 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 and Ms. Werner,

Please find attached the 2022 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, 2021 and May 5, 2022 and a proposed schedule for future activities.

This 2022 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: 2022 Annual Progress Report and Master Schedule Update Report

cc: Ms. Sarah Krueger, WDNR (hardcopy and email)
Ms. Carrie Webb, WDNR (email)
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2022 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, 2022

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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
FS	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
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 6, 2021, and May 5, 2022. The Annual Progress Report and Master Schedule Update has been combined, as previously suggested by the USEPA. The Annual Progress Report and Master Schedule Update addresses four of WPSC's former manufactured gas plant (MGP) Sites located in Green Bay, Manitowoc, Oshkosh, and Two Rivers, Wisconsin. 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. The need to further update the RAF as it relates to assessing ecological risk assessment is under evaluation.

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, 2021) 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 2021 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. Groundwater monitoring and treatment system operations were ceased in December 2021 as the Upland OU initiated remediation.

Monthly calls were initiated with the USEPA and WPSC to review status of the site, comments on deliverables and schedule in May 2020. The date and general discussion topics of additional meetings and conference calls conducted during this reporting period for Sediment (OU2) are summarized in the following table:

General Discussion Topic	Date
Agency comments on FS Report – Revision 1 (Sediment)	January 7, 2021
February 22, 2022 e-correspondence topics for Sediment (OU2): Sediment FS Revision 1 Responses to Comments, Sheetpile wall, WDNR statutes, Sediment RI	February 25, 2021
OU2 – Sediment topics included agreement on conclusions reached during last month’s call and path to FS Revision 2 submittal	March 25, 2021
Summarize Sediment (OU2) RI Addendum prepared to incorporate the 2020 data into the Administrative Record and confirmed remedial footprints in Sediment FS Rev 1 are appropriate and encompass MGP obligations. Summarize the path for FS Revision 2 submittal.	April 22, 2021
Decision to resolve Sediment (OU2) RI Addendum before moving forward with FS Revision 2	September 23, 2021
Sediment (OU2) tPAH delineation adequacy and potential urban background sources. Agreement to have USEPA Fields Group evaluate data.	March 3, 2022

3.1.1.1 Planning Documents and Work Plan Submittals

Planning documents, work plan submittals, and on-going reporting for the Sediment (OU2) are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
DRAFT Response to USEPA’s December 22, 2020 comments on FS Report – Revision 1 (Sediment)	-- ¹	February 5, 2021 February 12, 2021	Preliminary Comments: February 21, 2021 January 21, 2021 Final Comments: January 6, 2022
FS Revision 2 (Sediment)	September 20, 2021 ²	-- ¹	
Sediment (OU2) RI Report – Revision 1 Addendum	-- ¹	April 22, 2021	January 6, 2022
Sediment (OU2) RI Report – Revision 2 Addendum	July 21, 2021	-- ^{1,3}	

1. A double dash is entered where the specific deliverable (i.e., response to comments) was not included in the 2021 Master Schedule Update or not completed.
2. Assumed USEPA would respond to draft response to comments, submitted February 12, 2021 and comments on FS Report – Revision 1 would have been provided prior to January 6, 2022 and resolution of the sediment delineation and RI Report would be completed in advance. ...
3. Assumed USEPA comments on the Sediment (OU2) RI Report Addendum would be provided by end of June 2021.

3.1.1.2 Remedial Investigation Field Activities

No RI field activities were completed during this reporting period. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.1.3.

3.1.1.3 Operation Monitoring & Maintenance and Groundwater Monitoring

Operation monitoring & maintenance (OM&M) activities at the Manitowoc site in 2021 included groundwater treatment system maintenance. Treatment system sampling was performed on a semi-annual basis. The influent was sampled for volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs). The effluent was sampled for VOCs, semi-volatile organic compounds (SVOCs) and pH. Intermediate locations within the treatment system samples were collected for benzene, toluene, ethylbenzene, and xylenes (BTEX) on a bi-monthly basis. The groundwater treatment system sampling was ceased in December 2021 in preparation for the Upland (OU1) remediation, which decommissioned the treatment system. The treatment system and the building in which it was housed were dismantled in March 2022 to allow the soils beneath the system to be remediated.

Groundwater levels and the Manitowoc River elevation were measured during 2021 groundwater sampling events. Groundwater monitoring was performed using low-flow sampling techniques to assess concentrations of petroleum volatile organic compounds (PVOCs), PAHs and natural attenuation indicator parameters.

Groundwater sampling was paused during the OU1 remedial action in 2022. Routine semi-annual monitoring will resume once remediation is complete, and will continue until there is a record of decision for the groundwater OU (OU3).

OM&M/Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Influent and Effluent Sample Collection	May 2021	May 19, 2021
Groundwater Sampling Event	May 2021	May 17-19, 2021
Intermediate Sample Collection	June 2021	June 24, 2021
Intermediate Sample Collection	August 2021	September 3, 2021
Intermediate Sample Collection	October 2021	October 21, 2021
Influent and Effluent Sample collection	November 2021	November 11, 2021
Groundwater Sampling Event	November 2021	November 9-11, 2021

3.1.2 Oshkosh

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

Monthly calls were initiated with the USEPA and WPSC to review status of the site, comments on deliverables and schedule in December 2020. 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
Site Specific Work Plan, Addendum 3 plan for submittal- contents to include proposal for pilot shut down of Groundwater Treatment System Shutdown	January 21, 2021
Discuss agency questions and comments on Site Specific Work Plan, Addendum 3	February 18, 2021 March 18, 2021 April 21, 2021

General Discussion Topic	Date
Summary of field activities and data received to date for implementation of Site-Specific Work Plan, Addendum 3	May 20, 2021 June 17, 2021 July 15, 2021
Data review and City of Oshkosh sewer lateral repair status	August 19, 2021
Groundwater Treatment System Shutdown Data Review	September 17, 2021 November 12, 2021
Site Status Overview presentation for new USEPA project manager	October 20, 2021

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	May 8, 2020 ¹	May 15, 2020	September 29, 2020
Response to USEPA’s September 9, 2020 comments on RI Report – Revision 0	-- ²	April 5, 2021 and April 16, 2021	March 4, 2022
Submit RI Report – Revision 1	August 25, 2021 ³	--	--

1. Target Completion date from the 2020 Annual Progress Report and Master Schedule Update was postponed to finalize the Baseline Risk Assessment.
2. A double dash is entered where the specific deliverable (i.e., Response to USEPA’s comments,) was not specified in the 2021 Annual Master Schedule Update or not completed.
3. Assumed USEPA comments on Response to USEPA’s September 9, 2020 RI Report – Revision 0 comments would be received in June 2021. Response to comments and RI Report Revision 1 is pending resolution of the sediment risk assessment. .

3.1.2.2 Remedial Investigation Field Activities

Upland RI field activities were performed per the USEPA-approved Site-Specific Work Plan Addendum 3. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.2.3.

Completed RI activities are summarized in the following table.

Task	Completion Date
Soil borings/geotechnical borings	May 10, 2021

3.1.2.3 OM&M and Groundwater Monitoring

A pilot scale system shut down of the groundwater extraction treatment system was initiated on April 5, 2021, therefore no effluent sampling or OM&M activities were required during this reporting period. In a meeting with USEPA on September 17, 2021, it was agreed to continue to not operate the groundwater treatment system and monitor groundwater containment wells on a bimonthly basis. Post groundwater treatment system shutdown monitoring is summarized below. In addition, biotrap for sampling naphthalene and benzene, in support of monitored natural attenuation, were also deployed during this reporting period. Transducers were deployed in

selected bimonthly monitoring wells to supplement bimonthly groundwater level readings to assess potential groundwater mounding effects due to treatment system shutdown.

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
Post Groundwater Treatment System Shutdown Monitoring	-- ¹	May 13, 2021 June 17, 2021 July 17, 2021 July 19, 2021 August 13, 2021 November 18, 2021 January 26, 2022 March 22, 2022
Biotrap sampling to support monitored natural attenuation	-- ¹	Naphthalene: September 4, 2021 – October 2, 2021 Benzene: October 2, 2021 – October 30, 2021
Second Quarter 2021 Groundwater Levels and Annual Cap Inspection	June 2021	June 17, 2021
Third Quarter 2021 Groundwater Levels and Second Semi-Annual Groundwater Monitoring Event (all wells)	September 2021	September 13-15, 2021
Fourth Quarter 2021 Groundwater Levels	November 2021	November 18, 2021
Groundwater Monitoring Well Repairs	-- ¹	March 16, 2022
First Quarter 2022 First Semi-Annual Groundwater Sampling (all wells)	March 2022	March 21-23, 2022

1. A double dash is entered where the specific activity was not included in the 2021 Master Schedule Update.

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 (ERA) was to be coordinated under the umbrella of the Lower Fox River Remediation, LLC (LFRR) polychlorinated biphenyls (PCB) sediment site. The LFRR Agency/Oversight Team (A/OT) oversaw the sediment ERA. WPSC is currently evaluating a separate ERA for the Upland OU (without LFRR).

Monthly calls were initiated with the USEPA and WPSC to review status of the site, comments on deliverables and schedule in December 2020. 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
Upland (OU1) RI baildown test and sediment (OU2) sheen observation updates	Sept 15, 2021
Site Status Overview presentation for new USEPA project manager	October 5, 2021
Sediment (OU2) sheen, sediment, and surface water sampling updates	October 7, 2021 November 10, 2021
USEPA's comments on Sediment RI Report Revision 1 and path forward.	February 2, 2022
Pre-Design Investigation Work Plan, Addendum 2 and Supplemental Investigation Memorandum comments and questions	March 16, 2022
Evaluating Interim Removal Action - Upland	May 19, 2021 November 10, 2021 February 10, 2022
Letter of Intent and Project Schedule	April 20, 2022

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
Sediment OU2			
Response to December 2, 2020 Comments and RI Report – Sediment – Revision 1	February 21, 2021	February 19, 2021	January 8, 2022
Supplemental Site Assessment Activities Along Utility Corridor	-- ¹	December 21, 2022	January 18, 2022 (comments to be addressed in future reports)
Utility Corridor and Supplemental Sediment Sampling Technical Memorandum – Revision 0	-- ¹	February 18, 2022	March 15, 2022
Response to USEPA's March 15, 2022 Utility Corridor and Supplemental Sediment Sampling Technical Memorandum – Revision 0	-- ¹	March 31, 2022	
Upland OU1			
Letter of Intent of Early Removal Action - OU1	-- ¹	January 13, 2021	February 19, 2021
Pre-Design Investigation Work Plan – Addendum 2 (supports Early Action)	-- ¹	March 25, 2022	April 4, 2022
Response to USEPA's April 4, 2022 comments and Pre-Design Investigation Work Plan – Addendum 2 – Revision 1 (supports Early Action)	-- ¹	April 6, 2022	April 6, 2022 Approved

Task/Submittal	Targeted Completion Date ¹	Actual Completion Date	USEPA Comments Received
Letter of Intent of Early Action – Revision 1	-- ¹	March 25, 2022	April 26, 2022 (Notice to Proceed)
Submit Removal Action Work Plan – Revision 0 to USEPA	August 15, 2021 ²	--	--

1. A double dash is entered where the specific deliverable (i.e., Pre-Design Investigation Work Plan) was not specified in the 2021 Annual Master Schedule Update or not completed.
2. The Removal Action Work Plan assumed approval of the Letter of Intent of Early Action April 2021.

3.1.3.2 Remedial Investigation Field Activities

Sediment RI field activities are complete. Upland RI field activities were performed per the USEPA-approved PDIWP – Revision 2, dated March 25, 2022 and Response to USEPA’s April 6, 2022 comments and the Utility Corridor and Supplemental Sediment Sampling Technical Memorandum-Revision 0 and incorporating USEPA’s January 18, 2022 comments. Groundwater monitoring performed under the USEPA-approved Site-Specific Work Plan as part of the RI field activities are summarized in Section 3.1.3.3.

Completed RI activities are summarized in the following table.

Task	Completion Date
Bail own tests at MW-401 and MW-405 (wells in south parking lot)	July 19, 2021
Sheen assessment sampling and observations	Sediment: September 1, 2021 Sheen nets: October 5, 2021 Utility corridor soil: December 20-21, 2021 Weekly sheen inspections: August 31, 2021 to October 15, 2021 March 17, 2022 to present
Utility corridor soil borings	December 20-21, 2021
Supplemental soil borings	April 11-14, 2022

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 2021 Groundwater Sampling	May 2021	May 24-26, 2021
Second Semi-Annual 2021 Groundwater Sampling	November 2021	November 1-3, 2021
2021 Annual Cap Inspection	September 2021	-- ¹

3. A double dash is entered where the specific OM&M event (i.e., cap inspection) was not specified in the 2021 Annual Master Schedule Update or not completed.

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 meetings and conference calls conducted during this reporting period are summarized in the following table:

General Discussion Topic	Date
USEPA's comments on the Baseline Risk Assessment and the Preliminary Remediation Goals/Remedial Action Objectives memorandum	July 16, 2021 August 6, 2021
USEPA's responses to WPSC response to comments on the Preliminary Remediation Goals/Remedial Action Objectives memorandum	April 21, 2022 April 22, 2022

3.1.4.1 Planning Documents and Work Plan Submittals

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Preliminary Remediation Goal/Remedial Action Objective Memo	May 6, 2020	May 5, 2020	June 17, 2021
Response to USEPA's June 17, 2022 comments		August 31, 2021	

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	October 2021	October 18, 2021
Second Semi-Annual Groundwater Sampling	April 2022	April 4-5, 2022

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 is not included although groundwater sampling will be re-initiated upon OU1 remedial action completion but system operation was discontinued in preparation of the Upland remediation. Manitowoc sediment, continues 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 Green Bay are based on the schedules provided to USEPA in April 2022. Two Rivers is generally consistent with the SSWP and Manitowoc is generally consistent with the 2021 Master Schedule Update, adjusted for progress to date. 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, except as noted in the Green Bay April 2022 schedule. 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 submittal of the Sediment (OU2) RI Report – Addendum (April 22, 2021). USEPA's Fields Group will provide their evaluation and feedback by June 14, 2022 and the revised RI Addendum, Revision 1 will be acceptable to demonstrate extent of MGP-residuals is defined.
- Sediment FS Report – Revision 2 will be approved.
- Semi-annual (May and November) groundwater sampling will not be conducted until after in-situ chemical oxidation injections are completed and conditions are stabilized.
- 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.
- No further supplemental soil sampling activities will be required for completion of the RI.
- The RI Report – Revision 1 will be submitted following re resolution of Baseline Ecological Risk Assessment approach.
- Continued semi-annual (March and September) groundwater sampling.
- Quarterly treatment system sampling and biweekly operation and maintenance inspections will depend on the results of the pilot program to discontinue the groundwater extraction and treatment system operations.

4.3.3 Green Bay

- Separate RODs will be issued for the Upland OU and Sediment OU.
- The need for additional RI activities will be evaluated for upland areas not addressed by the Upland Early Removal Action.
- An Upland Removal Action is being designed. Activities will include further investigation of the source of the sheen to the Sediment (OU2) and subsequent shoreline/sediment remediation as necessary.
- 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.
- Remedial Investigation Report – Revision 1 for OU2 (sediment) will be approved and will support a no further remedial action required ROD following implementation of the upland early action that will address limited impacts observed in the near shore areas.
- Continued semi-annual (May and November) groundwater sampling.

4.3.4 Two Rivers

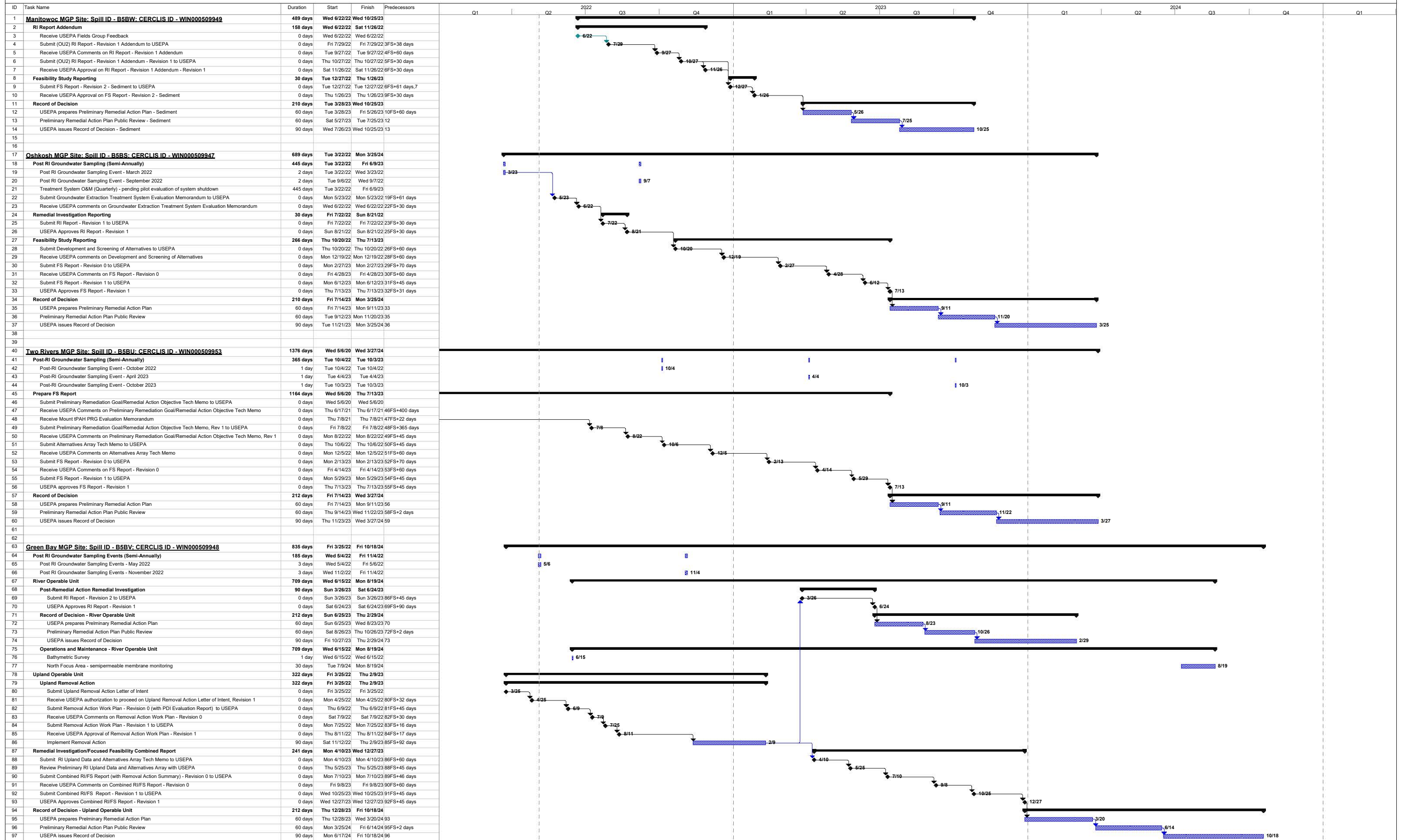
- Additional RI activities are not required.
- Additional risk assessment evaluations will be performed, assumptions reviewed with USEPA, and the Preliminary Remediation Goals/Remedial Action Objectives Memorandum will be resubmitted as Revision 1.

- Concurrence on responses to USEPA comments on the Remedial Action Objectives, Preliminary Remediation Goals will be received in advance of developing an Alternatives Array Technical Screening Memorandum, which will include a revised Applicable or Relevant and Appropriate Requirements table.
- Sufficient data has been collected to support the FS Report.
- Semi-annual (April and October) groundwater sampling.

FIGURE



Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



Project: FINAL WPSC Figure 1 Report Master Schedule Update
Date: 05/05/21



1. This proposed Oshkosh RI schedule is dependent on USEPA-approval of a RAF Addendum of toxicity endpoints.
2. Compressed Green Bay RAWP review timeframes assume workgroup meetings.
3. The Green Bay Sediment OU monitoring will occur in summer, TBD.