



Wisconsin Public Service Corporation

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May 5, 2017

Ms. Margaret Gielniewski
Ms. Leslie Patterson
Remedial Project Manager
USEPA, Region 5
77 W. Jackson Boulevard
Chicago, IL 60604-3590

RE: 2017 Annual Progress Report and Master Schedule Update – Revision 0
Wisconsin Public Service Corporation’s Former Manufactured Gas Plant Sites
CERCLA Docket No.: V-W-06-C-847

Dear Ms. Gielniewski and Ms. Patterson:

Enclosed is the 2017 Annual Progress Report and Master Schedule Update for six Wisconsin Public Service Corporation’s (WSC) Former Manufactured Gas Plant (MGP) Sites. These reports have been combined to summarize activities performed between May 5, 2016 and May 5, 2017 and a proposed schedule for future activities.

This 2016 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.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'BBA', with a horizontal line extending to the right.

Brian Bartoszek
Manager - Remediation

Mr. Naren Prasad, WEC (email only copy)
Ms. Liz Victor, WDNR (hard copy)
Ms. Kristin Dufresne, WDNR (hard copy)
Ms. Cheryl Bougie, WDNR (three hard copies)
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Mr. Kevin McKnight, WDNR (hard copy)

Mr. Tauren Beggs, WDNR (hard copy)

Ms. Jennifer Knoepfle, USEPA's Contractor, CH2MHill (hard copy)

Ms. Adrienne Korpela, USEPA's Contractor, CH2MHill (hard copy)



OBG | There's a Way

May 5, 2017

Mr. Brian Bartoszek
WEC Business Services, LLC
700 North Adams Street
Green Bay, WI 54307-9001

Subject: 2017 Annual Progress Report and Master Schedule Update – Revision 0
Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites
CERCLA Docket No.: V-W-06-C-847
NRT Project No. 1515


Dear Mr. Bartoszek:

Please find attached the 2017 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, 2016 and May 5, 2017 and a proposed schedule for future activities.

This 2017 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.

Please do not hesitate to contact the undersigned if you have any questions regarding this document.

Sincerely,
NRT | An OBG Company


Jennifer M. Hagen, PE
Principal Engineer

Attachments: As noted above

For distribution to: Ms. Margaret Gielniewski, USEPA (email and hard copy)
Ms. Leslie Patterson (email and hard copy)
Mr. Frank Dombrowski, WBS (email only copy)
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Mr. Tauren Beggs, WDNR (hard copy)
Ms. Jennifer Knoepfle, USEPA's Contractor, CH2MHill (hard copy)
Ms. Adrienne Korpela, USEPA's Contractor, CH2MHill (hard copy)



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**2017 Annual Progress Report
and Master Schedule Update
Remedial Investigation/Feasibility Study
Wisconsin Public Service Corporation's
Former Manufactured Gas Plant Sites
Revision 0**

**CERCLA V-W-06-C-847
NRT Project No. 1515**

May 5, 2017



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Figure 1 Master Schedule

ACRONYMS AND ABBREVIATIONS

ARAR	Applicable or Relevant and Appropriate Requirements
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CSM	Generalized Conceptual Site Model
FS	Feasibility Study
FSP	Field Sampling Plan
HASP	Health and Safety Plan
IBS	Integrus Business Support, LLC
MGP	Manufactured Gas Plant
NAPL	Non-Aqueous Phase Liquid
NTCRA	Non-Time Critical Removal Action
NRT	Natural Resource Technology, Inc.
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
ROD	Record of Decision
RI	Remedial Investigation
RNA	Remedial Natural Attenuation
RPM	Remedial Project Manager
SOW	Statement of Work
SSWP	Site Specific Work Plans
SVOC	Semi-Volatile Organic Compounds
TCRA	Time Critical Removal Action
TSS	Total Suspended Solids
USACE	United States Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
VOCs	Volatile Organic Compounds
WBS	WEC Business Services, LLC
WDNR	Wisconsin Department of Natural Resources
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, 2016 and May 5, 2017. The Annual Progress Report and Master Schedule Update has been combined, as previously suggested by the USEPA, and addresses five of WPSC's former manufactured gas plant (MGP) Sites located in Green Bay, Manitowoc, Marinette, Oshkosh, and Two Rivers, Wisconsin. Remedial action activities were performed at Stevens Point under an October 2014 Consent Decree (2014(ee)) and USEPA issued a Certificate of Completion of Remedial Action on January 25, 2017 (2017(a)). Therefore, Stevens Point is not included in this report.

1.2 OVERVIEW

This report addresses the following:

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

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 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 are used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

2.1 MULTI-SITE RI DOCUMENTS

USEPA has approved all of the Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008 and subsequent addenda. The Multi-Site RI Documents set forth a consistent approach for WEC Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- Multi-Site Quality Assurance Project Plan – Revision 2, dated September 4, 2007 (QAPP, 2007(e))
- Multi-Site Health and Safety Plan – Revision 2, dated August 2, 2007 (HASP, 2007(c))
- Generalized Conceptual Site Model – Revision 0, dated August 5, 2007 (CSM, 2007(d))
- Multi-Site Risk Assessment Framework – Revision 0, dated September 5, 2007 (RAF, 2007(f))
 - » Multi-Site RAF Addendum, dated April 20, 2011 (2011(k))
 - » Multi-Site RAF Addendum Revision 1, dated March 28, 2013 (2013(f))
 - » Multi-Site RAF Addendum Revision 2, dated February 17, 2014 (2014(c))
 - » Multi-Site RAF Addendum Revision 3, dated July 30, 2014 (2014(w))
 - » Multi-Site RAF Addendum Revision 4, dated April 4, 2016 (2016(g))
 - » Multi-Site RAF Addendum Revision 5, dated September 13, 2016 (2016(q))
- Multi-Site Field Sampling Plan – Revision 4, dated September 8, 2008 (FSP, 2008(f))

The Multi-Site RAF Addendum submitted to USEPA on April 20, 2011 (prepared by Exponent, 2011(k)) incorporates the Regional Screening Levels (RSL, 2014(n)) into the hierarchy for human health screening levels and further develops the approach to assessing potential vapor intrusion issues. Subsequent Multi Site RAF Addenda incorporate updates to RSLs which are revised approximately every six months. Not all RSL updates result in a RAF Addenda. For instance, the November 2014 RSL update did not modify RSLs for the MGP constituents of potential concern (COPCs). As part of the RAF Addendum Revision 2, it was acknowledged the RSLs may be modified based on the semi-annual updates, if any, and does not require a formal submittal. In other words, the most current RSLs at the time will be used for comparison of site media.

A Vapor Intrusion (VI) Decision Matrix for the Multi-Site Former MGP Sites was initiated as part of an August 5, 2015 meeting. USEPA provided comments on October 23, 2015 and responses to comments were submitted November 23, 2015. Additional USEPA comments were received December 17, 2015, responses to comments were submitted January 18, 2016 and USEPA approved the VI Decision Matrix on February 10, 2016.

USEPA and WPSC representatives have met, either through conference calls or in person meetings, multiple times to review the site-specific risk based sediment screening levels. Originally the discussions were focused on Manitowoc and have extended to other Wisconsin sites. USEPA and WPSC have agreed to re-visit the approach to selecting sediment screening levels in late May 2017, pending advancement of Green Bay sediment which is being addressed concurrently with the larger Lower Fox River Poly-Chlorinated Biphenyls (PCB) Superfund Sediment Site. As part of the Green Bay meetings, the most significant discussions were related to an alternative approach to selecting sediment screening levels on October 20, 2016. Followed by the Proposed Confirmation

Sampling Decision Tree, submitted to USEPA on March 13, 2017 (2017(d)) and discussed on March 21, 2017. The Confirmation Decision Tree proposes an alternative approach to the two-stepped risk-based screening levels developed through toxicity testing and is designed to provide an expedited approach to selecting “not to exceed” and “surface weighted average concentration” values based on a multi-site data, site specific organic carbon and sand cover to achieve remedial action objectives (RAO).

Site Specific Work Plans (SSWPs) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into baseline risk assessment.

2.2 MULTI-SITE FS SUPPORT DOCUMENT

USEPA has approved (USEPA, 2010(h)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(f)). The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies.

Section 1.2.2 of the SOW discusses the Multi-Site FS Support Document which includes:

- Preliminary Remedial Technology Screening
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document. In addition, USEPA’s comments on FS related documents for IBS’ North Shore Gas Company (NSG) South Plant MGP and WPSC’s Manitowoc MGP are incorporated into each FS. Major deviations from the FS Support Document include providing individual remedial options for each media to be assembled by USEPA (not assembling remedial alternatives) for the Site as a whole and providing volumes/cost estimates for each of three cancer risk ranges (10⁻⁶, 10⁻⁵, and 10⁻⁴). On November 5, 2015, USEPA revised the request for individual remedial options and required assembled remedial alternatives for the Marinette Site which has been carried forward to Manitowoc. As part of the Marinette and Manitowoc Sites, the ARAR tables have also been further refined.

2.3 MULTI-SITE DOCUMENT STATUS

Additional revisions to Multi-Site Documents have not been required.

2.4 MULTI-SITE MEETINGS

As mentioned above, during this reporting period, a technical meeting was held on October 20, 2016 and March 21, 2017 to discuss an alternative approach to developing sediment screening levels.

Site specific meetings were held, as discussed in Section 3.

3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established for three sites (Stevens Point, Manitowoc, and Oshkosh) in Exhibit A, Section A, of the Settlement Agreement. Project start dates for the remaining sites (Marinette, Two Rivers, and Green Bay) were originally established in the 2008 Master Schedule Update (2008(c)) and re-established in subsequent annual Master Schedule Updates.

All of the sites maintain a groundwater monitoring schedule to characterize groundwater quality, regardless of the Project Start Date and site prioritization. The Manitowoc and Oshkosh sites also have groundwater treatment systems that require operation, maintenance, and monitoring (OM&M) on a more frequent basis.

RI activities have been performed at Green Bay, Oshkosh, and Two Rivers during this reporting period. Post-RI activities (i.e., reporting, on-going monitoring) have been performed at Manitowoc and Marinette during this reporting period. Remedial actions have not been performed at any of the other sites during this reporting period.

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the five MGP sites. As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated May 5, 2016 (2016(f)) is compared to the actual progress.

3.1 INITIATED SITES

Site progress and significant deviations from the target dates established in the 2016 Master Schedule Updates are discussed herein.

3.1.1 Manitowoc

The Project Start Date for the Manitowoc MGP Site was established in Exhibit A, Section A, of the SOW, to be seven months after the effective date of the Settlement Agreement (May 5, 2006), which 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
FS Report, ARARs and assembling site wide alternatives	June 28, 2016
FS Report Rev 1 Comments	September 26, 2016
FS Rev 2 Response to Comments	December 2, 2016
ARARs (as part of a Meeting to discuss Marinette Response to Comment)	February 1, 2017

In addition, the multi-site technical meetings to discuss an alternative approach to developing sediment screening levels are relevant to the Manitowoc site.

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
Alternatives Screening Technical Memorandum	July 22, 2014 ¹	December 17, 2014	January 26, 2015
Feasibility Study Report – Revision 0	November 6, 2014 ¹	April 29, 2015	July 9, 2015 May 13, 2016

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Respond to USEPA Comments Feasibility Study Report – Revision 0	--	July 18, 2016	July 29, 2016
Technical Memorandum #5 for VI Assessment – Revision 0	--	September 17, 2015	October 1, 2015
Technical Memorandum #5 for VI Assessment – Revision 1	May 27, 2016 ²	September 13, 2016 (as part of FS Report Revision 1 Response to Comments)	September 22 and November 5, 2016
Feasibility Study Report – Revision 1 and Technical Memorandum #5 for VI Assessment – Revision 1	September 26, 2016 ²	September 13, 2016	September 22 and November 5, 2016
Draft Response to Comments Submittal and Review Meeting		November 28, 2016	December 2, 2016
Feasibility Study Report – Revision 2 and Technical Memorandum #5 for VI Assessment – Revision 2	--	December 21, 2016	March 15, 2017 (ARAR Table)
FS Revision 2 Revised ARAR Table – Resubmittal 1	--	March 22, 2017	April 21, 2017
FS Rev 2 Revised ARAR Table Resubmittal 2	--	April 25, 2017	
USEPA issues ROD	May 2017 ³		

1. The submittal date was established in the 2014 Annual Progress Report and Master Schedule Update (2014(k)) and assumed additional sampling was not required to support RI Report - Revision 0 and sediment breakpoint levels would be resolved which resulted in a delayed submittal of RI Report – Revision 1 and subsequent deliverables.
2. The submittal date was established in the 2016 Annual Progress Report and Master Schedule Update (2016 (f)).
3. The submittal date was established in the 2016 Annual Progress Report and Master Schedule Update (2016 (f)) and assumed the FS Report would be approved in October 2016.

3.1.1.2 Remedial Investigation Field Activities

RI field activities were not performed during this reporting period. However, as previously agreed, indoor air sampling at the Winter Building will continue on an annual basis until the building is not occupied. Completed activities are summarized in the following table. Groundwater sampling events are summarized in Section 3.1.1.3.

Task	Completion Date
Indoor Air Sampling at Winter Building	January 20, 2017

3.1.1.3 OM&M and Groundwater Monitoring

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 PAHs. The effluent is sampled for VOCs, semi-volatile organic compounds (SVOCs) and pH. Intermediate locations within the treatment system samples are collected for 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 2016	May 18, 2016
Groundwater Sampling Event	May 2016	May 18, 2016
Intermediate Sample Collection	June 2016	June 17, 2016
Intermediate Sample Collection	August 2016	August 4, 2016
Intermediate Sample Collection	October 2016	October 6, 2016
Effluent Sample collection	November 2016	November 14, 2016
Groundwater Sampling Event	November 2016	November 14, 2016
Intermediate Sample Collection	December 2016	December 8, 2016
Intermediate Sample Collection	February 2017	March 10, 2017
Intermediate Sample collection	April 2017	March 10, 2017

In addition to the regular monthly treatment system inspections, the extraction well pump was replaced on November 9, 2016. The annual O&M Report was submitted to the City of Manitowoc on January 27, 2017.

3.1.1.4 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
April 2016	May 16, 2016
May 2016	June 15, 2016
June 2016	July 14, 2016
July 2016	August 15, 2016
August 2016	September 15, 2016
September 2016	October 17, 2016
October 2016	November 11, 2016
November 2016	December 13, 2016
December 2016	January 13, 2017
January 2017	February 15, 2017
February 2017	March 14, 2017
March 2017	April 11, 2017

3.1.2 Oshkosh

The Project Start Date for the Oshkosh MGP Site was established in Exhibit A, Section A, of the SOW, to be eighteen months after the effective date of the Settlement Agreement (May 5, 2006), which was re established to February 4, 2008.

No meetings or conference calls were conducted during this reporting period.

3.1.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals were not submitted during this reporting period. RI Report – Revision 0 was anticipated to be submitted in February 2017. However, soil vapor probes were not installed as a result of access agreements not being granted and sediment sampling was revised as a courtesy to the City to avoid sampling activities while the community park events were most active.

3.1.2.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with the Groundwater Containment System Optimization Report (NRT, 2015(w)) and the piezometer installation per SSWP – Revision 0 (NRT, 2008(e)). Completed RI activities are summarized in the following table. Groundwater sampling events are summarized in Section 3.1.2.3.

Task	Completion Date
Monthly groundwater and surface water elevations	May through September 2016
Bathymetric Survey	June 13-14, 2016 March 7 and 27, 2017
Surface Water Sampling	September 15-16, 2016
Sediment Sampling	September 12 through October 18, 2016

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).

Groundwater monitoring was performed on an annual basis using low-flow sampling techniques to assess concentrations of PVOCs and PAHs prior to re-initiating the site when quarterly RI groundwater sampling was initiated with the March 2016 event. Groundwater levels and the Upper Fox River elevation were collected on a monthly basis through August 2016 as described in the Groundwater Containment System Optimization Report. Monthly Upper Fox River water levels are also downloaded from USGS and USACE websites to assist with evaluating groundwater-surface water interactions and for inclusion in groundwater monitoring reports.

OM&M and/or Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Second Quarter 2016 Effluent Treatment System Sampling and Groundwater Levels, and Annual Cap Inspection	June 2016	June 20-21, 2016
Third Quarter 2016 Influent and Effluent Treatment System Sampling, Groundwater Levels, and Annual Groundwater Monitoring Event (all wells)	September 2016	September 26-27, 2016
Fourth Quarter 2016 Effluent Treatment System Sampling and Groundwater Levels	December 2016	December 29, 2016 January 7, 2017
First Quarter 2017 Effluent Treatment System Sampling and Quarterly Groundwater Sampling (all wells)	March 2017	March 13-14, 2017

3.1.2.4 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
April 2016	May 16, 2016
May 2016	June 15, 2016
June 2016	July 14, 2016
July 2016	August 15, 2016
August 2016	September 15, 2016
September 2016	October 17, 2016
October 2016	November 11, 2016
November 2016	December 12, 2016
December 2016	January 13, 2017
January 2017	February 14, 2017
February 2017	March 14, 2017
March 2017	April 17, 2017

3.1.3 Marinette

The Project Start Date for the Marinette MGP Site was established in the 2008 Master Schedule Update as February 12, 2009 (2008(c)). USEPA and IBS mutually agreed to revise the Project Start Date to May 12, 2009 in an email dated February 24, 2009.

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 to discuss FS Revision 2 Comments	February 1, 2017

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	Actual Completion Date	USEPA Comments Received
Alternatives Screening Technical Memorandum	August 26, 2014 ¹	March 23, 2015	May 15, 2015
Summary of Bathymetry Survey in Residual Sand Cover Monitoring Results	--	July 2, 2015	July 27, 2015
FS Report – Revision 0	July 6, 2015	July 10, 2015	September 4, 2015 ARAR comments: February 16, 2016
USEPA feedback on sediment remedial alternatives and groundwater preliminary remediation goal	--	--	February 4, 2016 February 25, 2016 February 26, 2016
FS Report – Revision 1 without ARAR table ²	October 19, 2015 ³	February 18, 2016 ⁴	March 25, 2016
FS Report – Revision 1 ARAR Table	--	March 7, 2016	April 8, 2016
FS Report – Revision 2	May 23, 2016 ⁵	May 20, 2016	November 15, 2016
Technical Memo 3 Supplemental VI Evaluation	November 2016	November 16, 2016	Approval with - December 22, 2016 Edits provided on January 30, 2017
FS Report – Revision 2 Response to Comments Letter	--	February 24, 2017	March 15, 2017 (ARAR Table) ⁶
FS Report - Revision 2 Revised ARAR Table Resubmittal 1	--	April 5, 2017	-- ⁶
USEPA Issues ROD	January 2017 ⁷		

1. Date was modified by mutual agreement to allow WPSC for response to USEPA’s comments on the Manitowoc Alternatives Screening Technical Memorandum to be addressed as a portion of the comments were global in nature and were applicable to the Marinette site.
2. On January 5, 2016, USEPA requested WPSC to expedite the FS Report to allow for a Record of Decision by August 2016. A schedule was identified in the January 19, 2016 workshop meeting and via email January 22, 2016 but ARAR comments were provided two days before the FS Report – Revision 1 submittal date, therefore, the report was submitted without the ARAR table. Additional ARAR comments were provided on April 8, 2016, as summarized above.
3. The targeted completion date was established in the 2015 Annual Progress Report and Master Schedule Update (2015(o)) under the assumption that the USEPA comments on FS Report Revision 0 would be complete in September 2015. Those comments were received on September 4, 2015 and additional comments on February 16, 2016.
4. On November 4, 2015, USEPA notified WPSC to delay the FS Report – Revision 1 until USEPA completed additional review of the Alternatives Array.

5. The submittal date was established in the 2016 Annual Progress Report and Master Schedule Update (2016(f)).
6. Based on correspondence between WPSC and USEPA on April 12, 2017 and April 18, 2017, USEPA is currently focused on reviewing other projects and has not yet finalized review of the WPSC FS Report – Revision 2 Response to Comments Letter.
7. The submittal date was established in the 2016 Annual Progress Report and Master Schedule Update (2016(f)) and assumed the USEPA approval of the FS Report – Revision 2 by June 2016.

3.1.3.2 Remedial Investigation Field Activities

RI field activities were not performed during this reporting period.

3.1.3.3 Groundwater Monitoring

Groundwater sampling has been completed per the requirements of the SSWP- Revision 3, dated May 7, 2012 (2012(s)). In October 2013 groundwater monitoring was reduced back to semi-annual sampling using low-flow sampling techniques. During this reporting period, groundwater was sampled in accordance with the methods of SSWP – Revision 3 (2012(s)) to assess concentrations of BTEX, PAHs, inorganics (aluminum, antimony, copper, iron, manganese, nickel, silver, vanadium, and zinc), and remedial natural attenuation parameters (dissolved iron and manganese, alkalinity, methane, nitrate, and sulfate). Groundwater levels and the Menominee River elevation are also collected during the monitoring events.

Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Semi-Annual 2016 Post-RI Groundwater Monitoring Event	October 2016	October 18-19, 2016
Semi-Annual 2017 Post-RI Groundwater Monitoring Event	April 2017	April 3-4, 2017

3.1.3.1 Non-Time Critical Removal Action Activities

The sediment Non-Time Critical Removal Action (NTCRA) was completed in March 2013 and USEPA provided a Certificate of Completion for Final Report – Revision 1 on October 23, 2013. No further activities related to the NTRCA are anticipated. The FS Report – Revision 3 will include discussion of on-going sand cover monitoring to support the Five-Year Review.

3.1.3.2 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
April 2016	May 16, 2016
May 2016	June 15, 2016
June 2016	July 14, 2016
July 2016	August 15, 2016
August 2016	September 15, 2016
September 2016	October 17, 2016
October 2016	November 11, 2016
November 2016	December 12, 2016
December 2016	January 13, 2017
January 2017	February 14, 2017
February 2017	March 14, 2017
March 2017	April 17, 2017

3.1.4 Green Bay

The Project Start Date for the Green Bay MGP Site was established in the 2014 Master Schedule Update as June 17, 2014 (2014(k)). The sediment portion of the Site was advanced in a separate Sediment Investigation

Technical Memorandum because it is within the footprint of the larger Lower Fox River Polychlorinated Biphenyls (PCB) Superfund Site Project.

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
Potential Interim Sediment Removal Action and sediment screening levels	October 20, 2016
Collaboration with Lower Fox River PCB Superfund Site Project	February 22, 2017
Lower Fox River PCB Superfund Site Project Sediment Sampling Kickoff	March 9, 2017
Sediment Confirmation Sampling Decision Tree	March 21, 2017

3.1.4.1 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	Actual Completion Date	USEPA Comments Received
Revised Focused Sediment Sampling Investigation Report – Revision 2	--	September 14, 2015	September 29, 2015
SSWP – Revision 2 Modified	--	October 9, 2015	Conditional approval September 29, 2015
Technical Memorandum regarding potential vapor intrusion evaluation of Annex Building – Revision 0	--	May 31, 2016	July 6, 2016
Technical Memorandum regarding potential vapor intrusion evaluation of Annex Building – Revision 1	--	July 15, 2016	July 28, 2016 approved
Submit Preliminary RI Data for Pre-RI Report Discussion	--	February 10, 2017	
RI Report – Revision 0	November 15, 2016 ¹		
Confirmation Sampling Decision Tree	--	March 14, 2017	
Submit RI Report – Revision 1	February 28, 2017 ¹		
Submit Development and Screening of Alternatives Array	April 30, 2017 ¹		

1. The submittal date was established in the 2016 Annual Progress Report and Master Schedule Update (2016(f)) and assumed no data gaps would be identified. In addition, the site schedule has been revised per USEPA's email February 22, 2017 to focus on sediment component and coordination with the Lower Fox River PCB Superfund Site Project.

3.1.4.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with SSWP – Revision 2 Modified, dated October 9, 2015 (2015(gg)) and the Technical Memorandum regarding potential vapor intrusion evaluation of the Annex Building (approved July 28, 2016). Completed RI activities are summarized in the following table. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.4.3.

Task	Completion Date
Install vapor probes and sub-slab monitoring ports in Annex Building	July 30, 2016
RI soil vapor probe monitoring per SSWP Revision 2 Modified – Second Event	August 5, 2016

Task	Completion Date
Sample indoor air and sub-slab monitoring ports in Annex Building – First Event	August 6, 2016 Re-sampled September 22, 2016
Monitoring Well Repairs	August 11, 2016
Sample indoor air and sub-slab monitoring ports in Annex Building – Second Event	December 4, 2016
Initiate Pre-Design Investigation - Sediment	March 30, 2017

3.1.4.3 Groundwater Monitoring and Cap Inspection

Groundwater monitoring was performed on a quarterly basis using low-flow sampling techniques to assess concentrations of PVOCs and PAHs as described in the SSWP was implemented when quarterly groundwater sampling was initiated. 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
RI Third Quarter Groundwater Sampling	May 2016	May 8, 2016
RI Fourth Quarter Groundwater Sampling	August 2016	August 23, 2016
Semi-Annual Groundwater Sampling	December 2016	December 12-13, 2016
2016 Annual Cap Inspection	July 2016	September 12, 2016

3.1.4.4 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
April 2016	May 16, 2016
May 2016	June 15, 2016
June 2016	July 14, 2016
July 2016	August 15, 2016
August 2016	September 15, 2016
September 2016	October 17, 2016
October 2016	November 11, 2016
November 2016	December 13, 2016
December 2016	January 13, 2017
January 2017	February 15, 2017
February 2017	March 14, 2017
March 2017	April 11, 2017

3.1.5 Two Rivers

The Project Start Date for the Two Rivers MGP Site was established in the 2015 Master Schedule Update (2015(o)) as July 15, 2015 and mutually delayed to October 13, 2015. A Time Critical Removal Action (TCRA) was completed in May 2015 under a separate Consent Decree.

No meetings or conference calls were conducted during this reporting period.

3.1.5.1 Planning Documents and Work Plan Submittals

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
SSWP – Revision 1	--	April 1, 2016	May 12, 2016
SSWP Revision 1 Response to USEPA’s May 12, 2016 Comments	--	June 13, 2016	August 19, 2016
Response to USEPA’s August 19, 2016 SSWP Rev 1 Response to USEPA’s June 13, 2016 Comments (SSWP Addendum)	--	September 26, 2016	October 19, 2016 Approved

3.1.5.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with SSWP – Revision 1, with SSWP Addendum, dated September 26, 2016 (2016(p)). 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
Groundwater Monitoring Well Abandonment	January 23 through 24, 2017
Groundwater Monitoring Well Installation	January 25 through 27, 2017
Groundwater Monitoring Well Development	January 30 through 31, 2017
Soil Borings and Sampling	February 1 through 2, 2017

3.1.5.3 Groundwater Monitoring

Groundwater monitoring was initiated in March 2017 and will be performed on a quarterly basis using low-flow sampling techniques to assess concentrations of BTEX, PAHs, dissolved 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
RI First Quarter Groundwater Sampling	May 2016	March 2, 2016

3.1.5.4 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
April 2016	May 16, 2016
May 2016	June 15, 2016
June 2016	July 14, 2016
July 2016	August 15, 2016
August 2016	September 15, 2016
September 2016	October 17, 2016
October 2016	November 11, 2016
November 2016	December 13, 2016
December 2016	January 13, 2017
January 2017	February 15, 2017
February 2017	March 14, 2017
March 2017	April 11, 2017

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW (May, 2006) includes a schedule for major deliverables. Remedial design and remedial action activities have been completed under a separate AOC. The schedule for future post-ROD monitoring has been developed under a separate agreement, and is therefore not detailed in this Master Schedule Update. Manitowoc, Oshkosh, Marinette, Green Bay, and Two Rivers sites have all been initiated. RI Reports have been approved at Manitowoc and Marinette. RI field work, as described in the approved SSWPs and Technical Memoranda, has been initiated at Green Bay, Oshkosh, and Two Rivers. Future submittals and/or activities are dependent on USEPA comments/approvals (i.e., Marinette and Manitowoc) and evaluation of the RI data collected to date (i.e., Green Bay, Oshkosh, and Two Rivers). The site-specific schedule for Green Bay, Oshkosh, and Two Rivers have been updated herein to provide a proposed site-specific schedule for field activities and major deliverables.

4.1 OVERVIEW PROGRESS MEETINGS

Monthly Progress Reports are submitted for all of the sites.

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

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. 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, meeting dates are not proposed at this time.

4.3 SCHEDULE FOR INITIATED SITES

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates for Oshkosh and Two Rivers are generally consistent with the SSWPs, 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, 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 AOC/SOW, per the July 9, 2015 modifications for Alternative Array and FS Revision 0 documents, as discussed in the June 17, 2015 meeting.

The proposed schedules are subject to change. 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.

4.3.1 Manitowoc

The Manitowoc RI Report – Revision 1 (2014(dd)), was approved with the response to USPEA's November 24, 2014 (2014(hh)) comments submitted January 22, 2015 (2015(a)). Additional RI activities, other than post-RI semi-annual groundwater sampling and indoor air at the Winter Building, are not anticipated at this time. Please note, this schedule assumes that no further sediment RI field activities will be required because the objectives of the Step II Sediment Sampling Work Plan (2012(p)) were achieved. Major deliverable target dates are summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Post RI Groundwater Sampling	Semi-Annually – May and November
Post RI Indoor Air Sampling (Winter Building)	Annually – January 2018 (assumes access is provided and building continues to be occupied)
Submit FS Report – Revision 3 to USEPA (assumes concurrence on Proposed Confirmation Sampling Decision Tree screening levels and sediment alternatives Summer 2017)	Fall 2017
USEPA issues ROD (assumes FS approved Fall 2017)	Summer 2018

OM&M activities at the Manitowoc site will continue as summarized in the following table.

OM&M Task	Target Date for Completion
Treatment system influent and effluent sampling	Semi-Annually in May and November, beginning in May 2017
Treatment system intermediate sampling	Bi-monthly beginning in June 2017

4.3.2 Marinette

The Marinette RI Report – Revision 2 (2015(e)) was approved on March 30, 2015 (2015(k)). The Non Time Critical Removal Action is complete. Post RI groundwater monitoring is on-going. The scope and schedule of post-construction sand cover monitoring, if implemented, is to be determined and not included below. Major deliverable target dates for remaining RI/FS activities are summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Post RI Groundwater Sampling	Semi-Annually – April and October
Submit FS Report – Revision 3 to USEPA (assumes concurrence with response to USEPA’s FS Report Rev 2 comments in Spring 2017)	Summer 2017
USEPA issues ROD (assumes FS approved Summer 2017 and USEPA issues Proposed Remedial Action Plan within 30 days of FS Approval)	Winter 2018

4.3.3 Oshkosh

The start date for the Oshkosh site coincides with the submittal of the Completion Report, dated February 4, 2008 (NRT, 2008(a)). Proposed target dates for RI/FS activities were presented in the SSWP Revision 1 (NRT, 2016(c)). For purposes of this Master Schedule Update, the target dates have been adjusted based on progress to date. These target dates may be further refined pending contractor availability, weather, and City events on or adjacent to the property, but are provided as general placeholders for planning purposes.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
RI Field Activities	Soil gas sampling – Summer 2017 and Winter 2018 (assumes access can be successfully negotiated with City) Supplemental sediment sampling, if appropriate – Fall 2017 (assumes USEPA concurrence on data gap analysis in Summer 2017 and concurrent agreement on scope of supplemental sediment sampling, if any)

Task/Deliverable	Target Date for Completion
Submit RI Report – Revision 0 to USEPA (assumes supplemental RI soil and groundwater activities are not required and supplemental sediment sampling, if appropriate, are completed in Fall 2017 with Preliminary RI Data Review in Spring 2018)	Summer 2018
Submit RI Report – Revision 1 to USEPA (assumes USEPA comments on RI Report – Revision 0 are received Summer 2018)	Fall 2018
Submit Development and Screening of Alternatives Array (assumes agreement on RI Report Revision 1 media and constituents of concern)	Winter 2018/2019
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Development and Screening of Alternatives received in Winter 2018/2019)	Spring 2019
Submit FS Report – Revision 1 to USEPA (assumes USEPA comments on FS Report – Revision 0 received Summer 2019)	Summer 2019
USEPA issues ROD (assumes FS Approved Summer 2019)	Winter/Spring 2020
Post RI Groundwater Monitoring	To be determined following review of RI Data

Proposed target dates for OM&M activities are generally not influenced by RI/FS activities and are summarized in the following table.

OM&M Event	Target Date for Completion
Second Quarter 2017 OM&M and Cap Inspection	June 2017
Third Quarter 2017 OM&M and Annual Dewatering Pump/System Maintenance	September 2017
Fourth Quarter 2017 OM&M	December 2017
First Quarter 2018 OM&M	March 2018
Second Quarter 2018 OM&M and Cap Inspection	June 2018
Third Quarter 2018 OM&M and Annual Dewatering Pump/System Maintenance	September 2018
Fourth Quarter 2018 OM&M	December 2018
First Quarter 2019 OM&M	March 2019
Second Quarter 2019 OM&M and Cap Inspection	June 2019
Third Quarter 2019 OM&M and Annual Dewatering Pump/System Maintenance	September 2019

4.3.4 Green Bay

The Green Bay site was initiated June 17, 2014. SSWP – Revision 2, dated March 12, 2015 (2015(g)) was approved March 20, 2015 (2015(i)). Proposed target dates for RI/FS activities were presented in the SSWP Revision 1 (NRT, 2016(c)). For purposes of this Master Schedule Update, the target dates have been adjusted based on progress to date.

The sediment removal action will be implemented as part of the larger Lower Fox River PCB Superfund Site and post remedy sample results will be used to prepare an updated Sediment Sampling Investigation Report.

Task/Deliverable	Target Date for Completion
Pre-Design Investigation - Sediment	Summer 2017
Remedial Design - Sediment	Summer 2017
Sediment Remedial Action (implemented by Lower Fox River PCB Superfund Site)	Fall 2017
Submit RI Report – Revision 0 (assumes no data gaps are identified, post confirmation sediment samples are collected in Fall 2017, and Preliminary RI Data Review in Winter 2018/2019)	Winter 2018/2019
Submit RI Report – Revision 1 (assumes USEPA comments on RI Report – Revision 0 are received early Spring 2018)	Summer 2018
Submit Development and Screening of Alternatives Array (assumes agreement on RI Report Revision 1 media and constituents of concern)	Summer 2018
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Development and Screening of Alternatives received in Fall 2018)	Winter 2018/2019
Submit FS Report – Revision 1 to USEPA (assumes USEPA comments on FS Report – Revision 0 received Spring 2019)	Spring 2019
USEPA issues ROD (assumes FS Approved Spring 2019)	Winter 2019/2020
Post RI Groundwater Monitoring	May and November

4.3.5 Two Rivers

The Two Rivers site was initiated October 13, 2015. USEPA approved the SSWP – Revision 1 with the Addendum, dated September 26, 2016 (2016(p)). For purposes of this Master Schedule Update, the target dates have been adjusted based on progress to date.

Task/Deliverable	Target Date for Completion
Continue RI Field Activities	Install vapor probes – Summer 2017 RI Quarterly Groundwater Sampling – May, August, October 2017) Soil Vapor Sampling – Summer 2017 and Winter 2018/2019 Bathymetric Survey – Spring 2017 Sediment Sampling – Summer/Fall 2017 Surface Water Sampling Fall 2017 Supplemental Sediment Sampling, if appropriate – Spring 2018
Submit RI Report – Revision 0 (assumes no additional data gaps are identified and supplemental sediment sampling is not required)	Spring 2018
Submit RI Report – Revision 1 (assumes USEPA approves RI Report – Revision 1, Summer 2018)	Summer 2018
Submit Development and Screening of Alternatives Array (assumes agreement on RI Report Revision 1 media and constituents of concern)	Fall 2018

Task/Deliverable	Target Date for Completion
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Development and Screening of Alternatives received in Winter 2018/2019)	Spring 2019
Submit FS Report – Revision 1 to USEPA (assumes USEPA comments on FS Report – Revision 0 received Spring 2019)	Summer 2019
USEPA issues ROD (assumes FS Approved Summer 2019)	Winter/Spring 2020
Post RI Groundwater Monitoring	To be determined following review of RI Data

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- 2006 May, 5, United States Environmental Protection Agency and Wisconsin Public Service Corporation, *Settlement Agreement and Administrative Order on Consent for the conduct of Remedial Investigations and Feasibility Studies at six WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2006(a) June 5. Natural Resource Technology, Inc. Completion Report, Former Manufactured Gas Plant, Stevens Point, USEPA #WIN000509983.
- 2006(b) December 5. Natural Resource Technology, Inc. Completion Report, Former Manufactured Gas Plant, Manitowoc, USEPA #WIN00509949.
- 2007(a) April 26. Revision 1, Natural Resource Technology, Inc. Remedial Investigation/Feasibility Study Site-Specific Work Plan, Stevens Point Former Manufactured Gas Plant Site, Stevens Point, Wisconsin, WIN 000509983.
- 2007(b) May 7. Revision 0, Natural Resource Technology, Inc. Annual Progress Report and Master Schedule Update, *WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2007(c) August 2. Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Gas Plant Sites, prepared for Integrlys.
- 2007(d) August 5. Revision 0, Generalized Conceptual Site Model, for Former Manufactured Gas Plant Sites, prepared for Integrlys.
- 2007(e) September 4. Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrlys.
- 2007(f) September 5. Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Former Manufactured Gas Plant Sites.
- 2008(a) February 4. Natural Resource Technology, Inc. Completion Report, Former Manufactured Gas Plant, Oshkosh, USEPA #WIN000509947.
- 2008(b) April 10. Revision 1, Natural Resource Technology, Inc. Remedial Investigation/Feasibility Study Site-Specific Work Plan, Manitowoc Former Manufactured Gas Plant Site, Manitowoc, Wisconsin, WIN 000509949.
- 2008(c) May 5. Revision 0, Natural Resource Technology, Inc. Annual Progress Report and Master Schedule Update, *WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2008(d) June 5. Revision 0, Natural Resource Technology, Inc. Remedial Investigation Report, Stevens Point Former Manufactured Gas Plant Site, Stevens Point, Wisconsin, WIN 000509983.
- 2008(e) August 18. Revision 0, Natural Resource Technology, Inc. Remedial Investigation/Feasibility Study Site-Specific Work Plan, Oshkosh Former Manufactured Gas Plant Site, Oshkosh, Wisconsin, WIN 000509947.
- 2008(f) September 8. Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Gas Plant Sites.
- 2009(a) January 7. Revision 0, Natural Resource Technology, Inc. Feasibility Study Report, Stevens Point Former Manufactured Gas Plant Site, Stevens Point, Wisconsin, WIN 000509983.
- 2009(b) January 8. United States Environmental Protection Agency. Comments on Revision 0 Remedial Investigation Report, Stevens Point Former Manufactured Gas Plant Site, Stevens Point, Wisconsin, WIN 000509983.

- 2009(c) May 5. Revision 0, Natural Resource Technology, Inc. Annual Progress Report and Master Schedule Update, *WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2009(d) May 12. Natural Resource Technology, Inc. Completion Report, Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2009(e) May 27. United States Environmental Protection Agency. Comments on Revision 0 Remedial Investigation/Feasibility Study Site-Specific Work Plan, Oshkosh Former Manufactured Gas Plant Site, Oshkosh, Wisconsin, WIN 000509947
- 2009(f) July 16. Revision 0. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2009(g) August 11. Natural Resource Technology, Inc. Revision 0. Remedial Investigation/Feasibility Study Site-Specific Work Plan, Marinette Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2009(h) August 19. Natural Resource Technology, Inc. Technical Memorandum for Sediment Investigation – Step I Data Risk Assessment, Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
- 2009(i) December 23. Natural Resource Technology, Inc. Step II Sediment Investigation Work Plan, Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
- 2010(a) January 12. Natural Resource Technology, Inc. 2009 On-Going Groundwater Monitoring Update, Two Rivers Former Manufactured Gas Plant Site, Two Rivers, Wisconsin, WIN 000509953.
- 2010(b) February 2. Natural Resource Technology, Inc. 2009 On-Going Groundwater Monitoring and Cap Inspection Update, Green Bay Former Manufactured Gas Plant Site, Green Bay, Wisconsin, WIN 000509948.
- 2010(c) March 4. Natural Resource Technology, Inc. 2009 Groundwater Quality Update, Oshkosh Former Manufactured Gas Plant Site, Oshkosh, Wisconsin, WIN 000509947.
- 2010(d) March 5. Natural Resource Technology, Inc. Technical Memorandum for Supplemental Remedial Investigation – Assessment of Potential Vapor Intrusion, Stevens Point Former Manufactured Gas Plant, Stevens Point, WIN000509983.
- 2010(e) March 17. United States Environmental Protection Agency. Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(f) March 26. Revision 1. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(g) April 2. United States Environmental Protection Agency. Response to Technical Memorandum for Supplemental Remedial Investigation – Assessment of Potential Vapor Intrusion, Stevens Point Former Manufactured Gas Plant, Stevens Point, WIN000509983.
- 2010(h) April 20. United States Environmental Protection Agency. Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(i) April 27. United States Environmental Protection Agency. Comments on Revision 0, Remedial Investigation Report, Stevens Point Former Manufactured Gas Plant, Stevens Point, WIN000509983.
- 2010 (j) May 5. Revision 0, Natural Resource Technology, Inc. 2010 Annual Progress Report and Master Schedule Update, *WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2010(k) July 7 and November 8. United States Environmental Protection Agency. Comments on Feasibility Study Report, Stevens Point Former Manufactured Gas Plant Site, Stevens Point, Wisconsin, WIN 000509983

- 2010(l) July 16. Natural Resource Technology, Inc. Technical Memorandum for Supplemental Remedial Investigation Activities (Soil Borings and Soil Vapor), Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
- 2010(m) December 13. United States Environmental Protection Agency. Comments on Technical Memorandum for Supplemental Remedial Investigation Activities (Soil Borings and Soil Vapor), Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
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- 2011(c) January 26. Natural Resource Technology, Inc. 2009 On-Going Groundwater Monitoring Update, Two Rivers Former Manufactured Gas Plant Site, Two Rivers, Wisconsin, WIN 000509953.
- 2011(d) January 28. United States Environmental Protection Agency. Comments on 2004 Sediment Removal Action Plan, Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2011(e) January 28. Natural Resource Technology, Inc. Response to United States Environmental Protection Agency Comments on Technical Memorandum for Supplemental Remedial Investigation Activities (Soil Borings and Soil Vapor), Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
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- 2011(i) March 9. Natural Resource Technology, Inc. Response to United States Environmental Protection Agency Comments on 2004 Sediment Removal Action Plan, Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2011(k) April 20. Exponent, Multi-Site Risk Assessment Framework Addendum Technical Memorandum for Former Manufactured Gas Plant Sites.
- 2011(l) April 26. Natural Resource Technology, Inc. 2010 Groundwater Quality Update, Oshkosh Former Manufactured Gas Plant Site, Oshkosh, Wisconsin, WIN 000509947.
- 2011(m) May 5. Revision 0, Natural Resource Technology, Inc. 2011 Annual Progress Report and Master Schedule Update, *WPSC MGP Sites in Green Bay, Manitowoc, Marinette, Oshkosh, Stevens Point and Two Rivers, Wisconsin*. U.S. EPA Region 5, CERCLA Docket No. V-W-06-C-847.
- 2011(n) May 19. Natural Resource Technology, Inc. Response to United States Environmental Protection Agency Comments on Site Specific Work Plan – Revision 0 and transmittal of Site Specific Work Plan – Revision 1 , Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2011(o) May 27. Natural Resource Technology, Inc. Remedial Investigation Report – Revision 1, Former Manufactured Gas Plant, Stevens Point, USEPA# WIN000509983, NRT Project No. 1177.
- 2011(p) May 31. Natural Resource Technology, Inc. Feasibility Study Report – Revision 1, Former Manufactured Gas Plant, Stevens Point, USEPA# WIN000509983, NRT Project No. 1177.

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- 2011(r) September 1, Critical issues for the Manitowoc Manufactured Gas Plant Site Step II Sediment Sampling Work Plan, dated December 23, 2009, and Appendix A1 – Step I Risk Assessment Technical memorandum – Revision 0, Dated July 2009.
- 2011 (s) September 9. United States Environmental Protection Agency, Comments on Revision 1 of the Remedial Investigation and Feasibility Study Reports, submitted in May 2011, WPSC Former Manufactured Gas Plant Superfund Site, Stevens Point, Wisconsin, CERCLA Docket No. V-W-06-C-8472011
- 2011(t) October 20. United States Environmental Protection Agency. Conditional Approval of the Site-Specific Work Plan – Revision 1, Marinette Former Manufactured Gas Plant, Marinette, WIN000509952.
- 2011(u) October 25. United States Environmental Protection Agency. Conditional Approval of Step II Sediment Sampling Work Plan for the Wisconsin Public Service Corporations Former Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin.
- 2011(v) November 9. United States Environmental Protection Agency. Conditional Approval of Technical Memorandum No. 3, entitled “Supplemental RI Activities - Former Wisconsin Public Service Corporations Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin.
- 2011(w) December 14. Natural Resource Technology, Inc. Remedial Investigation Report – Revision 2, Former Manufactured Gas Plant, Stevens Point, USEPA# WIN000509983, NRT Project No. 1177.
- 2011(x) December 23. Natural Resource Technology, Inc. Feasibility Study Report – Revision 2, Former Manufactured Gas Plant, Stevens Point, USEPA# WIN000509983, NRT Project No. 1177.
- 2012(a) January 30. Natural Resource Technology, Inc. Technical Memorandum for Supplemental Remedial Investigation Activities (Soil Borings and Soil Vapor), Revision1, Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
- 2012(b) January 31. Natural Resource Technology, Inc. Response to USEPA’s September 1, 2011, Critical Issues and October 25, 2011 Conditional Approval of Step II Sediment Sampling Work Plan Revision1, and Transmittal of Revision 2, Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.
- 2012(c) February 13. Natural Resource Technology, Inc. 2011 On-Going Groundwater Monitoring Update, Two Rivers Former Manufactured Gas Plant Site, Two Rivers, Wisconsin, WIN 000509953.
- 2012(d) February 15. Natural Resource Technology, Inc. Response to United States Environmental Protection Agency Comments on Site Specific Work Plan – Revision 1, dated October 20, 2011, and transmittal of Site Specific Work Plan – Revision 2, Former Manufactured Gas Plant, Marinette, WIN000509952.
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- 2012(f) February 28. Natural Resource Technology, Inc. 2011 On-Going Groundwater Monitoring and Cap Inspection Update, Green Bay Former Manufactured Gas Plant Site, Green Bay, Wisconsin, WIN 000509948.
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- 2012(i) March 14. United States Environmental Protection Agency. Comments on Technical Memorandum No. 3, Revision 1, submitted January 30, 2012, Former Wisconsin Public Service Corporations Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin.
- 2012(j) March 14. United States Environmental Protection Agency. Comments on Step II Sediment Sampling Work Plan Revision 2, dated January 31, 2012, Former Wisconsin Public Service Corporations Manitowoc Manufactured Gas Plant, Manitowoc, Wisconsin.
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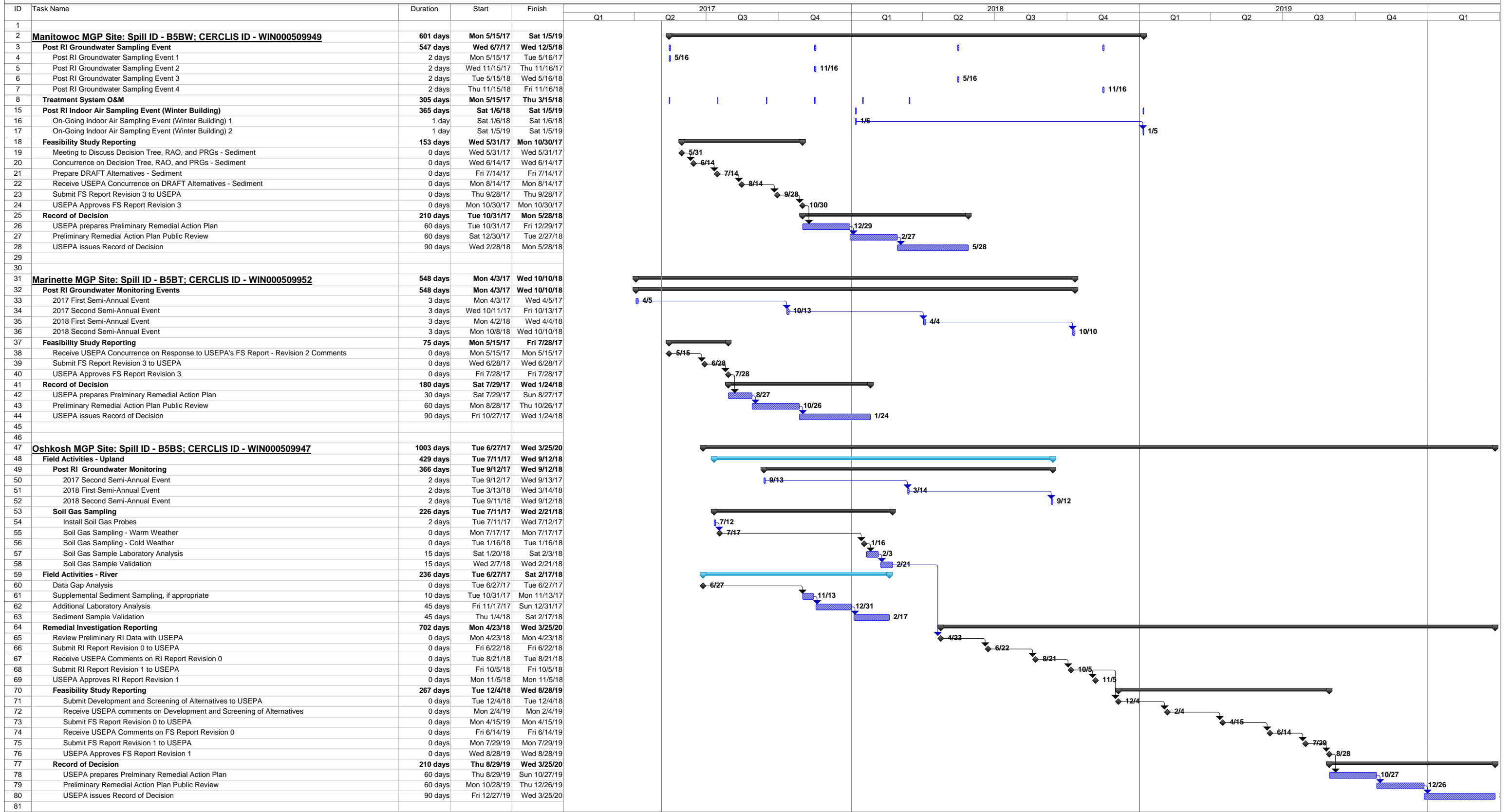
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2017(j) April 25. Natural Resource Technology, Inc., Response to USEPA’s April 21, 2017 Comments and Resubmittal of ARAR Table from Feasibility Study Report – Revision 2 and Technical Memorandum #5 for Vapor Intrusion Assessment– Revision 2, Manitowoc Former Manufactured Gas Plant, Manitowoc, WIN000509949.



Figures

Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites

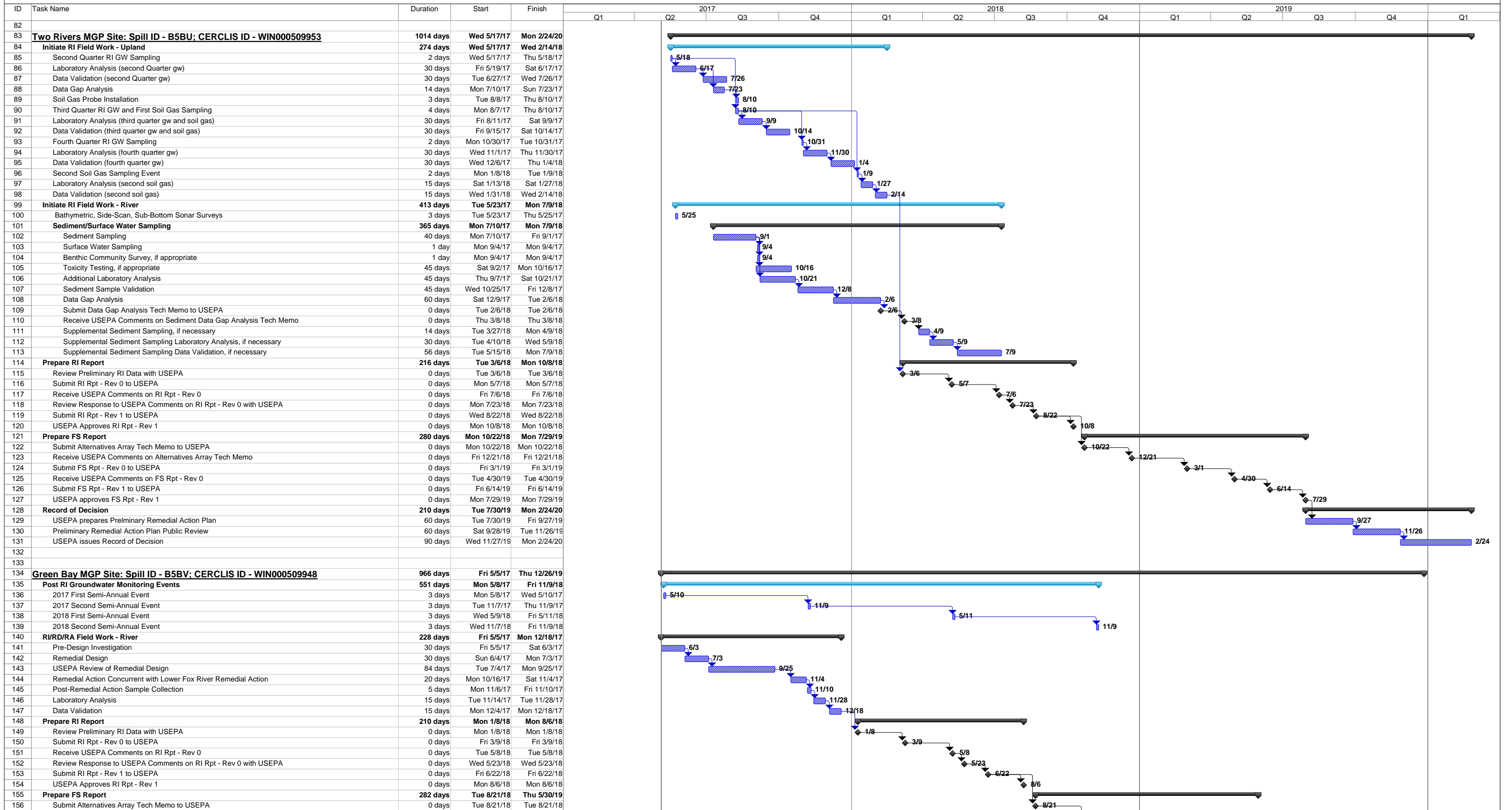


Project: \\pewfile\projects\1500\1515>Status Meeting Agend
Date: 05/05/17

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

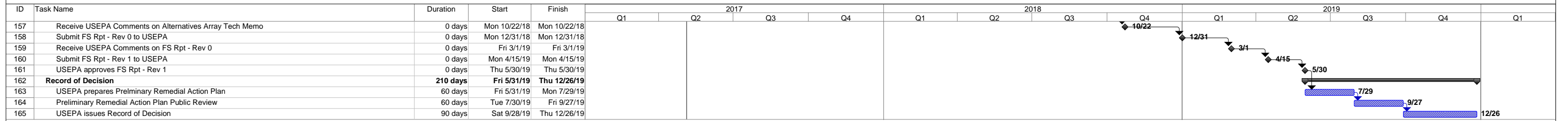


Project: \\pewfile\projects\1500\1515>Status Meeting Agend
Date: 05/05/17

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			

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Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



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