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Subject: 2021 WPSC Annual Progress Report and Master Schedule
Attachments: 2021-05-05 WPSC 2021 Annual Progress Report & Master Schedule Update
Report.pdf

Sarah/Margaret/Bill,

Please find attached the 2021 Annual Progress Report and Master Schedule for the former WPSC MGP sites in the SAS program. Please feel free to contact me if there are any questions or if additional information may be needed.

Thanks,

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May 5, 2021

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RE: 2021 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation – Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

Dear Ms. Gielniewski, Ms. Rolfes, and Mr. Murray,

Please find attached the 2021 Annual Progress Report and Master Schedule Update for Wisconsin Public Service Corporation's (WPS) former manufactured gas plant (MGP) sites. These reports have been combined to summarize activities performed between May 6, 2020 and May 5, 2021 and a proposed schedule for future activities.

This 2021 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 WPS, effective May 5, 2006.

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

Sincerely,

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Enclosures: 2021 Annual Progress Report and Master Schedule Update Report

cc: Ms. Sarah Krueger, WDNR (hardcopy and email)
Mr. William Fitzpatrick, WDNR (email)
Ms. Adrienne Korpela, Jacobs (email)
Mr. Dave Klatt, Jacobs (email)



2021 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, 2021

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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, 2020 and May 5, 2021. 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.

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, 2020) 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 2020 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.

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 are summarized in the following table:

| General Discussion Topic | Date |
|--|------------------|
| DRAFT Response to USEPA's December 22, 2020 comments on FS – Revision 1 | February 5, 2021 |
| Technical exchange regarding in-situ stabilization/solidification (ISS) as a sediment remedy | March 12, 2021 |

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 |
|---|---------------------------------|---------------------------------------|--|
| FS Revision 1 (Sediment) | September 14, 2020 ¹ | October 27, 2020 | December 22, 2020 |
| DRAFT Response to USEPA's December 22, 2020 comments on FS Report – Revision 1 (Sediment) | -- ² | February 5, 2021 February 12, 2021 | Preliminary February 21, 2021 January 21, 2021 |
| Sediment (OU2) RI Report – Revision 1 Addendum | -- ³ | April 22, 2021 | Awaiting comments |

1. The submittal date was delayed allowing additional time for alternative assessments.
2. A double dash is entered where the specific deliverable (i.e., response to comments) was not included in the 2020 Master Schedule Update or not completed. Assumed USEPA's comments on FS Report – Revision 1 would include approval.
3. An RI Addendum was not included in the 2020 Master Schedule Update.

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

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

| OM&M/Groundwater Monitoring Event | Targeted Completion Date | Actual Completion Date |
|---|--------------------------|------------------------|
| Influent and Effluent Sample Collection | May 2020 | May 12, 2020 |
| Groundwater Sampling Event | May 2020 | May 11-13, 2020 |
| Intermediate Sample Collection | June 2020 | June 18, 2020 |
| Intermediate Sample Collection | August 2020 | August 26, 2020 |
| Intermediate Sample Collection | October 2020 | October 28, 2020 |
| Influent and Effluent Sample collection | November 2020 | November 17, 2020 |
| Groundwater Sampling Event | November 2020 | November 16-18, 2020 |
| Intermediate Sample Collection | December 2020 | December 17, 2020 |
| Intermediate Sample Collection | February 2021 | February 18, 2021 |
| Intermediate Sample collection | April 2021 | April 22, 2021 |

The annual O&M Report was submitted to the City of Manitowoc on January 28, 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 |
|--|------------------|
| New USEPA Remedial Project Manager (RPM) Meeting | October 26, 2020 |

3.1.2.1 Planning Documents and Work Plan Submittals

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

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|--------------------------------|------------------------|-------------------------|
| RI Report – Revision 0 | May 8, 2020 ¹ | May 15, 2020 | September 29, 2020 |
| Site-Specific Work Plan Addendum 3 – Revision 0 | June 8, 2020 ² | February 16, 2021 | April 21, 2021 |
| RI Bibliography ³ | -- ³ | December 29, 2020 | -- |
| Response to USEPA's September 29, 2020 on RI Report – Revision 0 | -- ³ | February 15, 2021 | -- |
| Response to WDNR's September 29, 2020 on RI Report – Revision 0 | -- ³ | April 16, 2021 | -- |
| Site-Specific Work Plan (SSWP) Addendum 3 – Revision 1 | -- ⁴ | April 28, 2021 | May 4, 2021 |
| Submit RI Report – Revision 1 | November 13, 2020 ³ | -- | -- |

1. Target Completion date from the 2020 Annual Progress Report and Master Schedule Update was postponed to finalize the Baseline Risk Assessment.
2. The 2020 Annual Progress Report and Master Schedule Update included a Surface Soil Sampling Work Plan, assumed to be submitted June 8, 2020, which was expanded to include subsurface soil, groundwater sampling and biotrap. The Work Plan submittal date was delayed as USEPA's RPM was transitioned and the scope of work expanded.
3. A double dash is entered where the specific deliverable (i.e., RI Bibliography,) was not specified in the 2020 Annual Master Schedule Update or not completed. The new USEPA Project Manager requested a bibliography of RI-related submittals for reference.
4. Assumed USEPA comments on RI Report – Revision 0 would be received by July 6, 2020 and supplemental sampling results would be validated by September 29, 2020. Project approvals and review of data was delayed as USEPA's RPM was transitioned.

3.1.2.2 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 3.1.2.3.

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).

A pilot scale system shut down of the groundwater extraction treatment system was initiated on April 5, 2021. The system was not operating during the City’s December 14, 2020 sampling event and a contractor supported troubleshooting on December 16, 2020. Repairs were made and the system was running by the end of December 2020.

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

| OM&M and/or Groundwater Monitoring Event | Targeted Completion Date | Actual Completion Date |
|---|--------------------------|------------------------|
| Second Quarter 2020 Effluent Treatment System Sampling and Groundwater Levels, and Annual Cap Inspection | June 2020 | June 16, 2020 |
| Third Quarter 2020 Influent and Effluent Treatment System Sampling, Groundwater Levels, and Second Semi-Annual Groundwater Monitoring Event (all wells) | September 2020 | September 8-10, 2020 |
| Fourth Quarter 2020 Effluent Treatment System Sampling and Groundwater Levels | December 2020 | December 4, 2020 |
| First Quarter 2021 Effluent Treatment System Sampling and First Semi-Annual Groundwater Sampling (all wells) | March 2021 | March 31-April 2, 2021 |

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 |
|--|--|
| Evaluating Interim Removal Action - Upland | July 16, 2020 January 21, 2021 March 3, 2021 |

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.

2021 ANNUAL PROGRESS REPORT AND MASTER SCHEDULE UPDATE | SITE PROGRESS

| Task/Submittal | Targeted Completion Date¹ | Actual Completion Date | USEPA Comments Received |
|---|---|--|--|
| Sediment OU2 | | | |
| Response to LFRR A/OT's April 1, 2020 Comments on North Focus Area (NFA) Remedial Action Summary Report – Revision 0 and submittal of NFA Remedial Action Summary Report – Revision 1 | May 11, 2020 | May 11, 2020 | June 5, 2020 |
| Response to LFRR A/OT's June 5, 2020 Comments on NFA Remedial Action Summary Report – Revision 1 and submittal of NFA Remedial Action Summary Report – Revision 2 | -- ¹ | June 26, 2020 | July 20, 2020 Accepted |
| RI Report – Sediment – Revision 0 | May 14, 2020 ² | September 28, 2020 | December 2, 2020 |
| Response to December 2, 2020 Comments and RI Report – Sediment – Revision 1 | August 27, 2020 ³ | February 19, 2021 | -- |
| Upland OU1 | | | |
| Pre-Design Investigation Work Plan – Upland – Revision 0 | -- ¹ | March 19, 2020 | May 29, 2020 |
| Pre-Design Investigation Work Plan – Upland – Revision 1 and Response to Comments | -- ¹ | August 12, 2020 | August 21, 2020 Approved |
| Pre-RI Data Summary | -- ¹ | September 18, 2020 | November 6, 2020 (WDNR) November 18, 2020 (WDNR) December 7, 2020 |
| Letter of Intent of Early Removal Action - OU1 | -- ¹ | January 13, 2021 | February 19, 2021 |
| Response to Pre-RI Data Summary Comments | -- ¹ | November 11, 2020 February 1, 2021 (USEPA) March 30, 2021 (WDNR) | Awaiting USEPA approval April 9, 2021 (WDNR accepted) |
| Supplemental Pre-Design Investigation Figure – Upland | -- ¹ | November 13, 2020 | October 29, 2020 Approved November 11 and December 7, 2020 Formal Comments |

1. A double dash is entered where the specific deliverable (i.e., NFA Removal Action Summary Report – Revision 2,) was not specified in the 2020 Annual Master Schedule Update or not completed.
2. The RI Report – Revision 0 submittal date assumed the North Focus Area Remedial Action Summary Report – Revision 1 would be accepted and was delayed to receive data from the LFRR.
3. The RI Report – Revision 1 submittal date assumed comments on Revision 0 would be provided mid July 2020 (received December 2020).

3.1.3.2 Remedial Investigation Field Activities

Sediment RI field activities are complete. Upland RI field activities were performed in per the USEPA-approved PDIWP – Revision 1, dated August 12, 2020. Groundwater monitoring performed 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 |
|-----------------------------------|--|
| Soil borings/geotechnical borings | August 26-27, 2020 September 11, 2020 |
| Monitoring well network survey | September 3, 2020 |
| Supplemental soil borings | November 19-23, 2020 |

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 2020 Groundwater Sampling | May 2020 | May 26-28, 2020 |
| Second Semi-Annual 2020 Groundwater Sampling | November 2020 | November 2-3, 2020 |
| 2020 Annual Cap Inspection | September 2020 | June 19, 2020 |

3.1.4 Two Rivers

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

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

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 | -- ¹ |

1. The 2020 Annual Progress Report and Master Schedule Update assumed USEPA comments would be received in July 2020.

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 2020 | October 14-15, 2020 |
| Second Semi-Annual Groundwater Sampling | April 2021 | April 12, 2021 |

4 PROPOSED MASTER SCHEDULE

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

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

4.1 OVERVIEW PROGRESS MEETINGS

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

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

4.2 MULTI-SITE RI DOCUMENTS

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

4.3 SITE SPECIFIC SCHEDULES

The site-specific schedule for Manitowoc, Oshkosh, Green Bay, and Two Rivers has been updated on Figure 1 for RI/FS field activities and major deliverables. The proposed target dates for Oshkosh and Two Rivers are generally consistent with the SSWP and Manitowoc and Green Bay are generally consistent with the 2020 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. 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 will provide comments and the revised addendum will be acceptable to demonstrate extent of MGP-residuals is defined
- Sediment FS Report – Revision 2 will be approved.
- Continued semi-annual (May and November) groundwater sampling.
- Treatment system operation and maintenance (bi-monthly) until the Upland OU Remedial Action is implemented (assumed to be initiated in late 2021).
- Separate ROD will be are issued for the adjacent river area.
- Separate ROD may be issued for groundwater pending effectiveness of upland remedial action.

4.3.2 Oshkosh

- Additional sediment/surface water RI activities are not required for adjacent river area.
- Supplemental soil sampling activities are not required following implementation of SSWP Addendum 3.
- The RI Report – Revision 1 will be submitted following receipt of analytical data from the SSWP Addendum 3.
- 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.
- No additional RI activities are not required for upland areas.
- An Upland Removal Action is being evaluated.
- 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.
- Continued semi-annual (May and November) groundwater sampling.

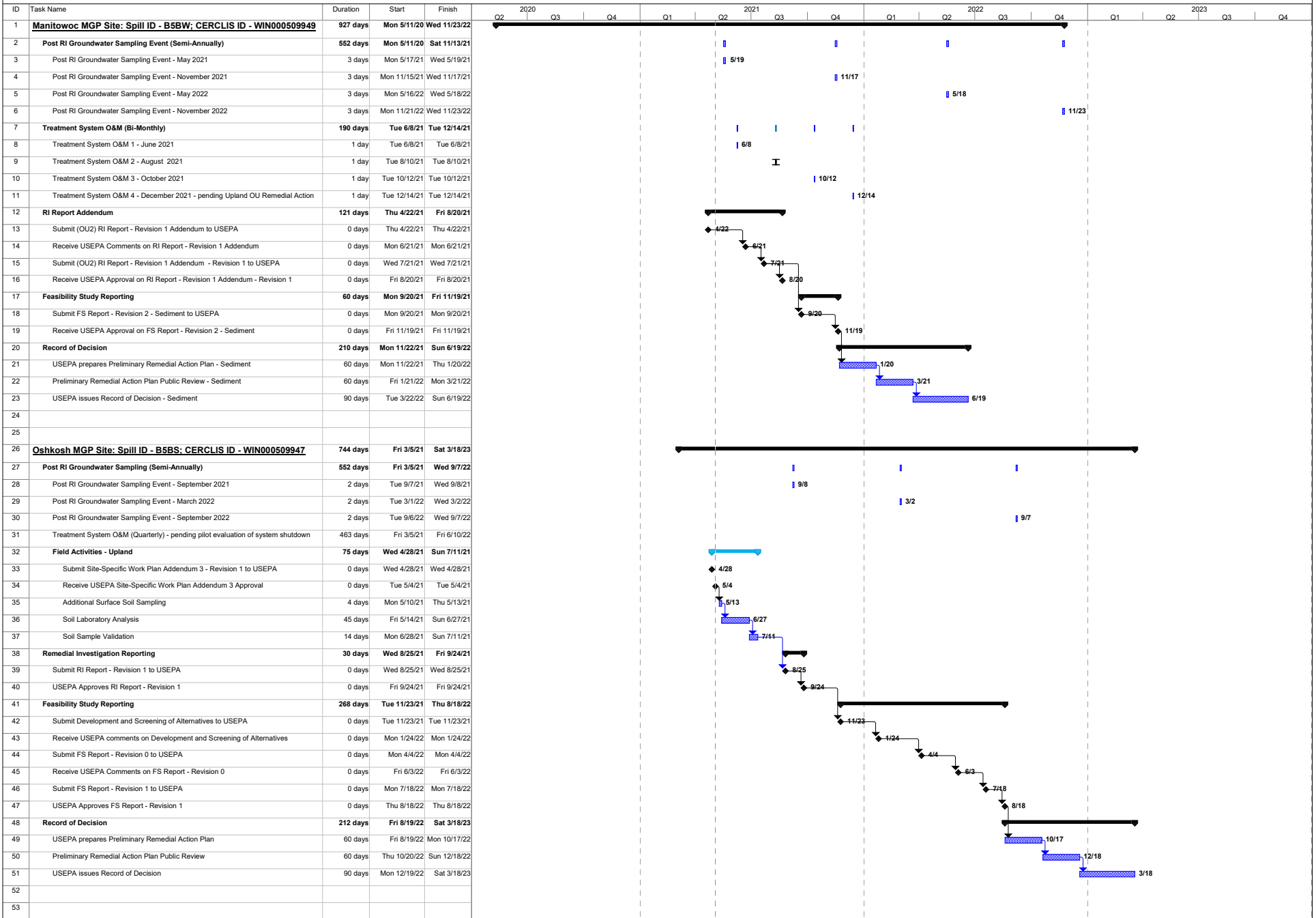
4.3.4 Two Rivers

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

FIGURE



Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites

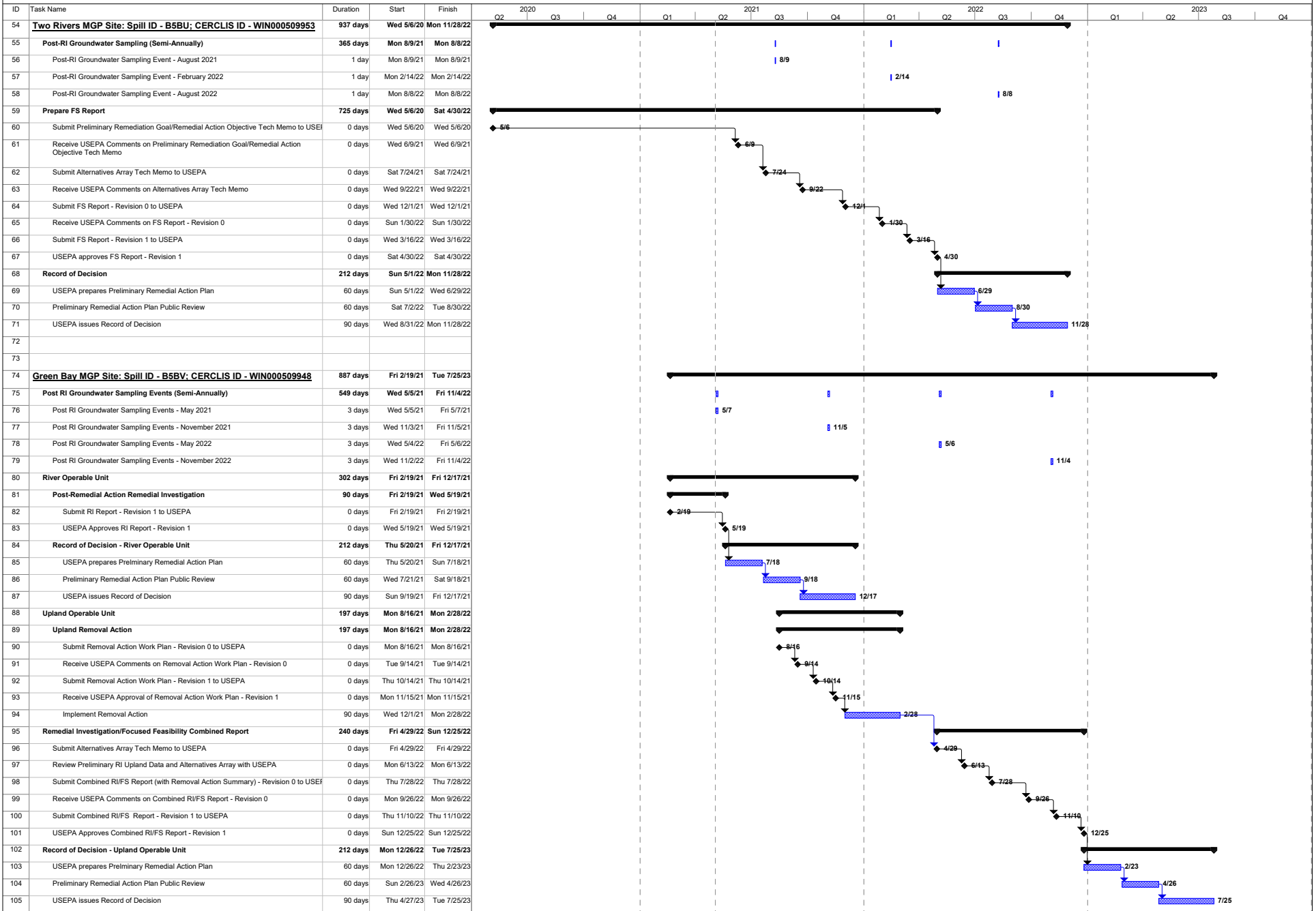


Project: 2021-05-05 FINAL WSPC Figure 1 Annual Report M
Date: 05/05/21

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

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

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