

From: Dombrowski, Frank J <frank.dombrowski@wecenergygroup.com>
Sent: Monday, May 4, 2020 4:37 PM
To: Rolfes.sarah@epa.gov; Gielniewski, Margaret <gielniewski.margaret@epa.gov> (gielniewski.margaret@epa.gov); ryan.williamj@epa.gov
Cc: Bougie, Cheryl - DNR; Fitzpatrick, William - DNR; Prasad, Narendra M; Jennifer M Hagen; Paulson, Robert; 'adler.kevin@epa.com'; Krueger, Sarah E - DNR
Subject: 2020 WPSC SAS Sites Annual Progress Report
Attachments: 05-05-2020 WPSC 2020 Annual Progress Report and Master Schedule Update R....pdf

Sarah/Margaret/Bill,

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

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

Thanks,

Frank Dombrowski
Principal Environmental Consultant

WEC Energy Group - Business Services
Environmental Dept. - Land Quality Group
333 W. Everett St., A231
Milwaukee, WI 53203
Office: (414) 221-2156
Cell: (414) 587-4467
Fax: (414) 221-2022

Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities, Minnesota Energy Resources, Peoples Gas and North Shore Gas

From: Dombrowski, Frank J [<mailto:frank.dombrowski@wecenergygroup.com>]
Sent: Monday, May 06, 2019 12:02 PM
To: Rolfes.sarah@epa.gov; Patterson.leslie@epa.gov
Cc: McKnight, Kevin - DNR; Tauren.Beggs@Wisconsin.gov; 'elizabeth.victor@wisconsin.gov'; 'Bougie, Cheryl - DNR (Cheryl.Bougie@wisconsin.gov)' (Cheryl.Bougie@wisconsin.gov); Fitzpatrick, William - DNR; Scott Inman; Prasad, Narendra M; Jennifer M Hagen; Paulson, Robert; 'adler.kevin@epa.com'
Subject: 2019 WPSC Annual Progress Report

Frank Dombrowski
Principal Environmental Consultant

WEC Energy Group - Business Services
Environmental Dept. - Land Quality Group
333 W. Everett St., A231
Milwaukee, WI 53203
Office: (414) 221-2156
Cell: (414) 587-4467
Fax: (414) 221-2022

*Serving WEC Energy Group, We Energies, Wisconsin Public Service, Michigan Gas Utilities,
Minnesota Energy Resources, Peoples Gas and North Shore Gas*



Wisconsin Public Service Corporation

700 North Adams Street
P.O. Box 19001
Green Bay, WI 54307-9001

www.wisconsinpublicservice.com

May 5, 2020

Ms. Margaret Gielniewski
USEPA Region 5 – SR6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Ms. Sarah Rolfes
USEPA Region 5 – SR6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. William Ryan
USEPA Region 5 – SR6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

RE: 2020 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation – Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

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

Please find attached the 2020 Annual Progress Report and Master Schedule Update for Wisconsin Public Service Corporation's (WPSC) former manufactured gas plant (MGP) sites. These reports have been combined to summarize activities performed between May 6, 2019 and May 5, 2020 and a proposed schedule for future activities.

This 2020 Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and WPSC, effective May 5, 2006.

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

Sincerely,

Frank Dombrowski
Principal Environmental Consultant
Frank.Dombrowski@wecenergygroup.com
(414) 221-2156

Robert Paulson
Principal Environmental Consultant
Robert.Paulson@wecenergygroup.com
(414) 221-3948

Enclosures: 2020 Annual Progress Report and Master Schedule Update Report

cc:

Ms. Sarah Krueger, WDNR (hardcopy and email)
Ms. Cheryl Bougie, WDNR (hardcopy and email)
Mr. William Fitzpatrick, WDNR (email)
Mr. Scott Inman, WDNR (email)
Ms. Adrienne Korpela, Jacobs (email)



2020 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation
Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

May 5, 2020

TABLE OF CONTENTS

| | |
|---|------------|
| FIGURES | ii |
| ACRONYMS AND ABBREVIATIONS | iii |
| 1 INTRODUCTION | 1 |
| 1.1 Scope..... | 1 |
| 1.2 Overview..... | 1 |
| 2 MULTI-SITE DOCUMENTS | 2 |
| 3 SITE PROGRESS | 3 |
| 3.1 Initiated Sites | 3 |
| 3.1.1 Manitowoc..... | 3 |
| 3.1.1.1 Planning Documents and Work Plan Submittals..... | 4 |
| 3.1.1.2 Remedial Investigation Field Activities | 4 |
| 3.1.1.3 Operation Monitoring & Maintenance and Groundwater Monitoring | 4 |
| 3.1.2 Oshkosh..... | 5 |
| 3.1.2.1 Planning Documents and Work Plan Submittals..... | 5 |
| 3.1.2.2 Remedial Investigation Field Activities | 5 |
| 3.1.2.3 OM&M and Groundwater Monitoring..... | 6 |
| 3.1.3 Green Bay..... | 6 |
| 3.1.3.1 RI/FS Planning Documents and Work Plan Submittals..... | 6 |
| 3.1.3.2 Remedial Investigation Field Activities | 8 |
| 3.1.3.3 Groundwater Monitoring and Cap Inspection | 8 |
| 3.1.4 Two Rivers | 8 |
| 3.1.4.1 Planning Documents and Work Plan Submittals..... | 9 |
| 3.1.4.2 Remedial Investigation Field Activities | 9 |
| 3.1.4.3 Groundwater Monitoring | 9 |
| 4 PROPOSED MASTER SCHEDULE | 10 |
| 4.1 Overview Progress Meetings..... | 10 |
| 4.2 Multi-Site RI Documents..... | 10 |
| 4.3 Site Specific Schedules | 10 |
| 4.3.1 Manitowoc..... | 11 |
| 4.3.2 Oshkosh..... | 11 |
| 4.3.3 Green Bay..... | 11 |
| 4.3.4 Two Rivers | 11 |

FIGURES

Figure 1 Master Schedule

ACRONYMS AND ABBREVIATIONS

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

1 INTRODUCTION

1.1 SCOPE

This Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Wisconsin Public Service Corporation (WPSC) effective May 5, 2006. The Progress Report summarizes work completed between May 5, 2019 and May 5, 2020. The Annual Progress Report and Master Schedule Update has been combined, as previously suggested by the USEPA. The Annual Progress Report portion addresses four of WPSC's former manufactured gas plant (MGP) Sites located in Green Bay, Manitowoc, Oshkosh, and Two Rivers, Wisconsin. The Master Schedule Update portion addresses four of WPSC's former MGP Sites located in Green Bay, Manitowoc, Oshkosh, and Two Rivers. Records of Decision (ROD) were issued for Stevens Point in September 2012, Marinette in September 2017, and Manitowoc Upland Operable Unit (OU) in September 2018. Therefore, Stevens Point and Marinette are not included in this report and Manitowoc Upland OU remedial design is not included in the Master Schedule Update.

1.2 OVERVIEW

This report addresses the following:

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

2 MULTI-SITE DOCUMENTS

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

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

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

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

3 SITE PROGRESS

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

As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated May 6, 2019) is compared to the actual progress.

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

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

"•" = Completed and Approved by USEPA
 "⊖" = Submitted to USEPA and Pending Approval
 "○" = In progress
 "na" = not applicable
 blank = not initiated

3.1 INITIATED SITES

Site progress and significant deviations from the target dates established in the 2019 Master Schedule Updates are discussed herein.

3.1.1 Manitowoc

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

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

| General Discussion Topic | Date |
|---|-----------------|
| USEPA comments on Sediment FS Report – Revision 0 | May 30, 2019 |
| Discuss Supplemental Sediment Investigation submittal | August 22, 2019 |

3.1.1.1 Planning Documents and Work Plan Submittals

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

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|---|----------------------------|------------------------|-----------------------------|
| FS Revision 0 (Sediment) | August 8, 2018 | August 8, 2018 | April 1, 2019 |
| Response to USEPA's April 1, 2019 comments on FS Report – Revision 0 (Sediment) | June 21, 2019 ¹ | October 15, 2019 | October 29, 2019 (approved) |
| Step II Sediment Sampling Work Plan – Revision 2 Addendum | June 21, 2019 ¹ | October 16, 2019 | October 29, 2019 (approved) |

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

3.1.1.2 Remedial Investigation Field Activities

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

| Task | Completion Date |
|-------------------|------------------|
| Sediment Sampling | April 2-23, 2020 |

3.1.1.3 Operation Monitoring & Maintenance and Groundwater Monitoring

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

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

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

| OM&M/Groundwater Monitoring Event | Targeted Completion Date | Actual Completion Date |
|-----------------------------------|--------------------------|------------------------|
| Effluent Sample Collection | May 2019 | May 22, 2019 |
| Groundwater Sampling Event | May 2019 | May 20-22, 2019 |
| Intermediate Sample Collection | June 2019 | June 14, 2019 |
| Intermediate Sample Collection | August 2019 | August 22, 2019 |
| Intermediate Sample Collection | October 2019 | October 31, 2019 |
| Effluent Sample collection | November 2019 | November 26, 2019 |

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

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

3.1.2 Oshkosh

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

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

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

3.1.2.1 Planning Documents and Work Plan Submittals

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

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

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

3.1.2.2 Remedial Investigation Field Activities

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

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

3.1.2.3 OM&M and Groundwater Monitoring

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

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

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

| OM&M and/or Groundwater Monitoring Event | Targeted Completion Date | Actual Completion Date |
|---|--------------------------|------------------------|
| Second Quarter 2019 Effluent Treatment System Sampling and Groundwater Levels, and Annual Cap Inspection | June 2019 | June 27, 2019 |
| Third Quarter 2019 Influent and Effluent Treatment System Sampling, Groundwater Levels, and Second Semi-Annual Groundwater Monitoring Event (all wells) | September 2019 | September 16-18, 2019 |
| Fourth Quarter 2019 Effluent Treatment System Sampling and Groundwater Levels | December 2019 | December 19, 2019 |
| First Quarter 2020 Effluent Treatment System Sampling and First Semi-Annual Groundwater Sampling (all wells) | March 2020 | March 16-18, 2020 |

3.1.3 Green Bay

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

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

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

| General Discussion Topic | Date |
|---|--------------|
| Evaluating Interim Removal Action - Upland | May 28, 2019 |
| Meeting with new USEPA RPM, RI/FS timeline and next steps | May 30, 2019 |

3.1.3.1 RI/FS Planning Documents and Work Plan Submittals

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

2020 ANNUAL PROGRESS REPORT AND MASTER SCHEDULE UPDATE | SITE PROGRESS

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

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

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

3.1.3.2 Remedial Investigation Field Activities

Upland RI field activities are complete, and no RI field activities were completed in the upland areas during this reporting period. Groundwater monitoring performed as part of the RI field activities are summarized in Section 3.1.3.3.

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

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

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

3.1.3.3 Groundwater Monitoring and Cap Inspection

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

| OM&M and/or Groundwater Monitoring Event | Targeted Completion Date | Actual Completion Date |
|--|--------------------------|------------------------|
| First Semi-Annual Groundwater Sampling | May 2019 | May 28-30, 2019 |
| Second Semi-Annual Groundwater Sampling | November 2019 | November 4-5, 2018 |
| 2019 Annual Cap Inspection | September 2019 | October 25, 2019 |

3.1.4 Two Rivers

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

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

| General Discussion Topic | Date |
|--------------------------|----------------|
| Pre-FS Scoping Meeting | April 27, 2020 |

3.1.4.1 Planning Documents and Work Plan Submittals

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|------------------------|-------------------------------|------------------------|------------------------------|
| RI Report – Revision 0 | December 31, 2018 | January 31, 2019 | May 9, 2019 |
| RI Report – Revision 1 | June 24, 2019 ¹ | June 24, 2019 | September 9, 2019 |
| RI Report – Revision 2 | October 25, 2019 ¹ | October 25, 2019 | March 31, 2020 (approved) |

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

3.1.4.2 Remedial Investigation Field Activities

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

3.1.4.3 Groundwater Monitoring

Groundwater monitoring is performed on a semi-annual basis using low-flow sampling techniques to assess concentrations of BTEX, PAHs, dissolved Resource Conservation Recovery Act (RCRA) Metals, and weak acid dissociable cyanide as described in the Groundwater Sampling Modification memo, submitted February 8, 2019, approved March 15, 2019. Field measured parameters and groundwater levels are collected during the monitoring events.

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

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

4 PROPOSED MASTER SCHEDULE

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

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

4.1 OVERVIEW PROGRESS MEETINGS

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

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

4.2 MULTI-SITE RI DOCUMENTS

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

4.3 SITE SPECIFIC SCHEDULES

The site-specific schedule for Manitowoc, Oshkosh, Green Bay, and Two Rivers has been updated on Figure 1 for RI/FS field activities and major deliverables. The proposed target dates for Oshkosh and Two Rivers are generally consistent with the SSWPs and Manitowoc is generally consistent with the 2019 Master Schedule Update, adjusted for progress to date. Green Bay has been adjusted based on coordination with the Lower Fox River PCB Superfund Site project and dividing the site into two OU. All site schedules are dependent on USEPA approval dates, contractor availability, site access, and sampling seasons (particularly with respect to sediment sampling activities).

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

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

Assumptions include:

4.3.1 Manitowoc

- Additional RI activities will not be required for adjacent river area, following the April 2020 sampling event. April 2020 sediment data and addressing USEPA's April 1, 2019 comments on Sediment FS Report – Revision 0 will be incorporated into Sediment FS Report – Revision 1.
- Continued semi-annual (May and November) groundwater sampling.
- Treatment system operation and maintenance (bi-monthly).
- Separate ROD will be 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 surface soil sampling will be conducted in conjunction with revision/finalization of the RI Report.
- The RI Report – Revision 1 will be submitted following USEPA comments on the RI Report – Revision 0 and receipt of analytical data from the supplemental surface soil sampling.
- Continued semi-annual (March and September) groundwater sampling.
- Quarterly treatment system sampling and biweekly operation and maintenance inspections.

4.3.3 Green Bay

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

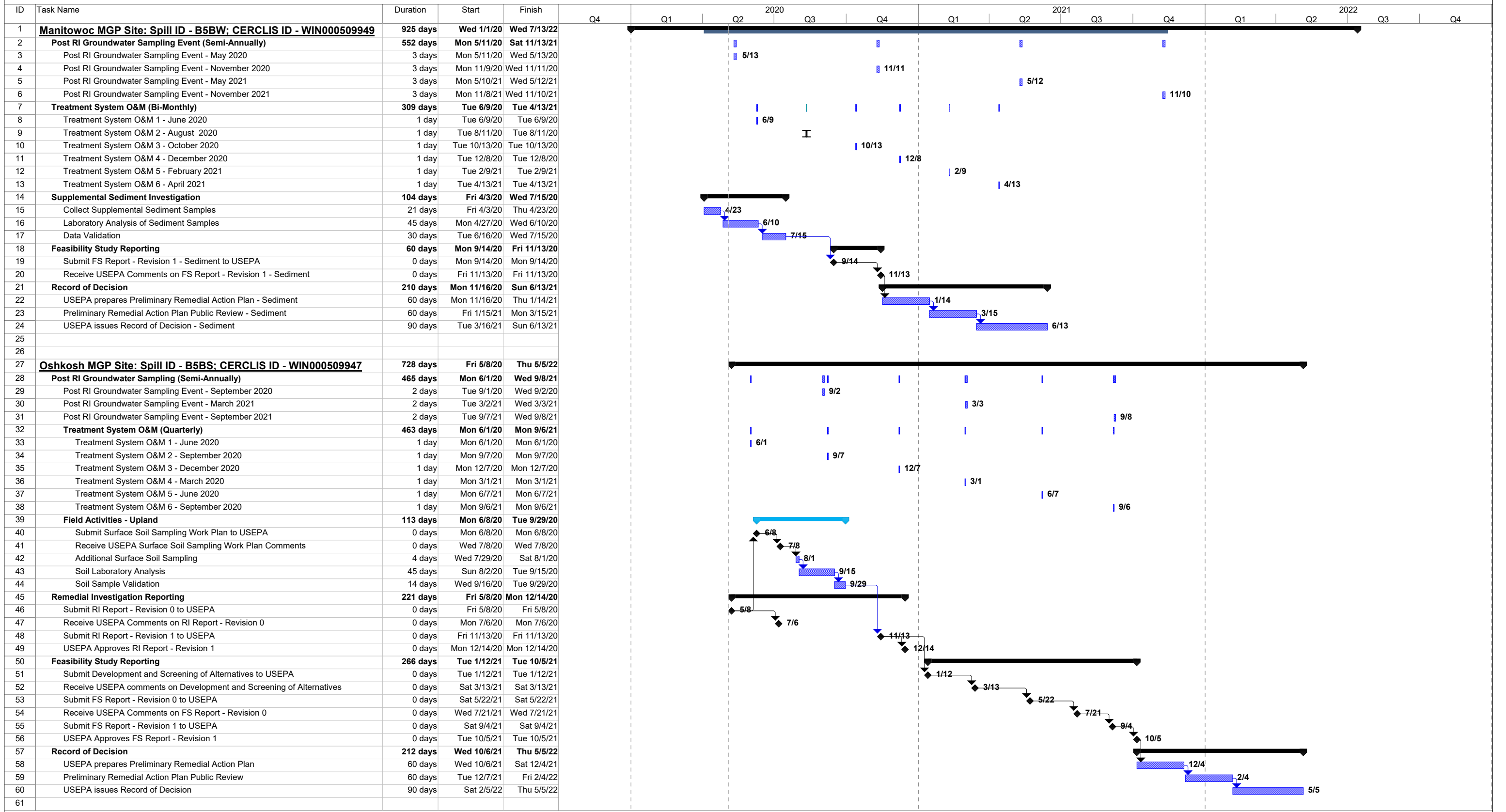
4.3.4 Two Rivers

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

FIGURE



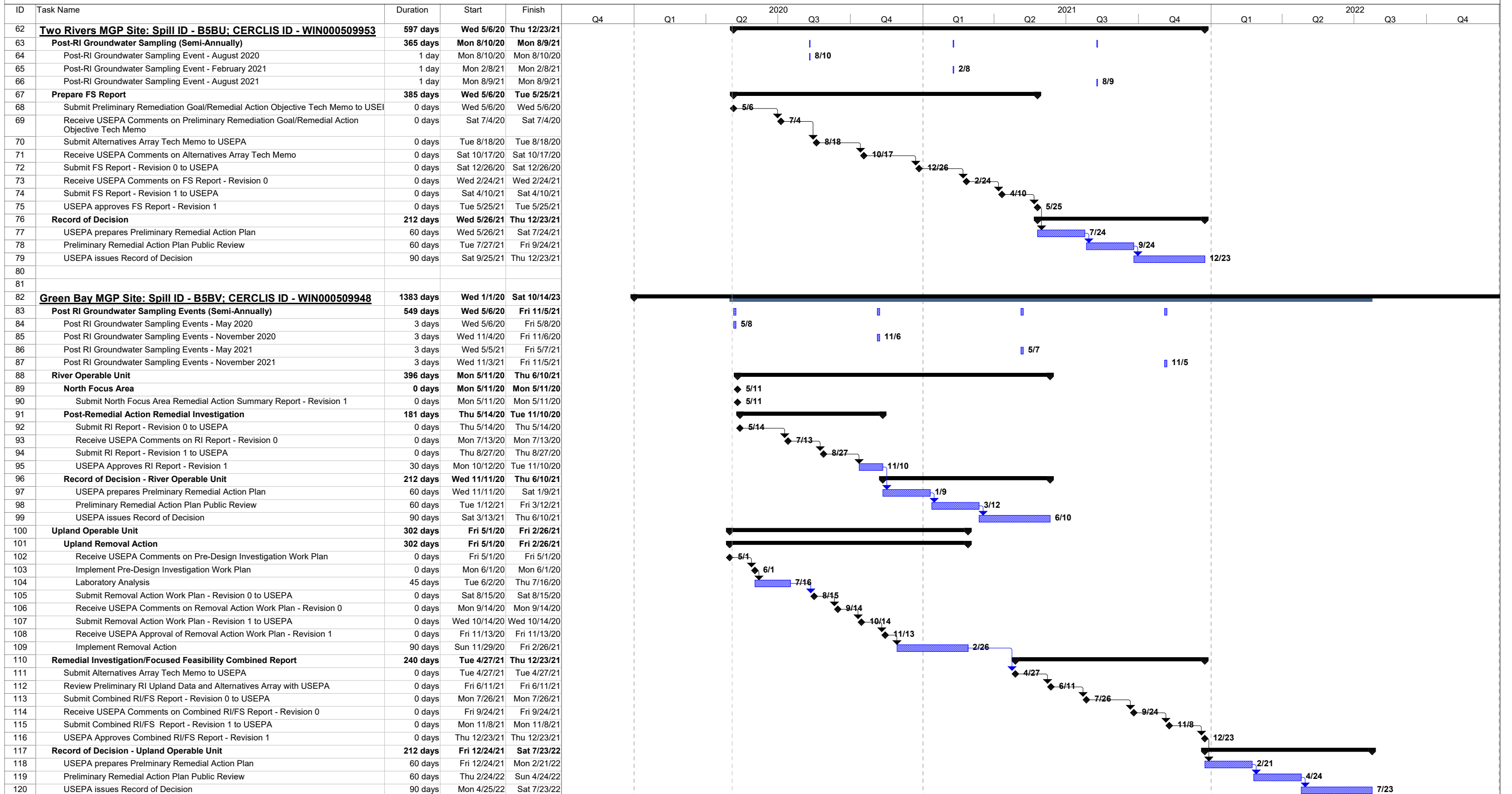
Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



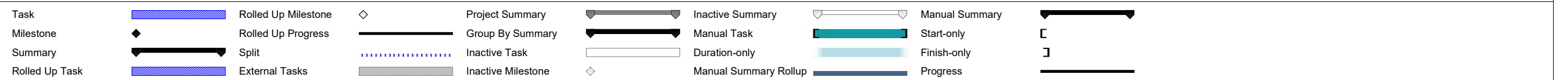
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| Project:WPSC Figure 1 Annual Report Master Schedule Up Date: 05/05/20 | Task | | Rolled Up Milestone | | Project Summary | | Inactive Summary | | Manual Summary | |
| | Milestone | | Rolled Up Progress | | Group By Summary | | Manual Task | | Start-only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

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

Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



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



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