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May 5, 2023

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RE: 2023 Annual Progress Report and Master Schedule Update Report
Wisconsin Public Service Corporation – Former Manufactured Gas Plants (MGP)
CERCLA Docket No. V-W-06-C-847

Dear Ms. Gielniewski and Ms. Werner,

Please find attached the 2023 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, 2022 and May 5, 2023 and a proposed schedule for future activities.

This 2023 Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and WPSC, effective May 5, 2006.

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

Sincerely,

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Enclosures: 2023 Annual Progress Report and Master Schedule Update Report

cc: Ms. Sarah Krueger, WDNR (hardcopy and email)
Ms. Carrie Webb, WDNR (email)
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2023 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

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TABLE OF CONTENTS

FIGURES	i
ACRONYMS AND ABBREVIATIONS	ii
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 Post-Construction Groundwater Monitoring	4
3.1.2 Oshkosh.....	4
3.1.2.1 Planning Documents and Work Plan Submittals	5
3.1.2.2 Remedial Investigation Field Activities	5
3.1.2.3 Groundwater Monitoring	5
3.1.3 Green Bay.....	6
3.1.3.1 RI/FS Planning Documents and Work Plan Submittals.....	7
3.1.3.2 Remedial Investigation and Early Removal Action Field Activities.....	7
3.1.3.3 Groundwater Monitoring, Upland Cap Inspection and Post-Construction Sediment Inspection..	7
3.1.4 Two Rivers	8
3.1.4.1 Planning Documents and Work Plan Submittals.....	8
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
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, 2022, and May 5, 2023. 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 and construction 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, 2022) 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 2022 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. Construction was completed between December 2021 through October 2022, eliminating the need for the on-going groundwater monitoring and treatment system. Post-construction groundwater monitoring is on-going.

Monthly calls were initiated with the USEPA and WPSC to review status of the site, comments on deliverables and schedule in May 2020 and were paused in 2022 to focus on the Upland OU remedial action. Similarly, the Sediment (OU2) was paused until the USEPA’s Fields group reviews sediment data.



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
Sediment (OU2) RI Report Revision 1, Addendum No. 1 – Revision 1	October 27, 2022 ¹	-- ²	
FS Revision 2 (Sediment)	December 27, 2022	-- ³	

1. Assumed USEPA would provide feedback on site delineation prior to June 22, 2022 and resolution of the sediment delineation and RI Report would be completed in advance.
2. Assumed USEPA comments on the Sediment (OU2) RI Report, Revision 1, Addendum No. 1 – Revision 1 would be provided by October 27, 2022.
3. Assumed USEPA would approve Sediment (OU2) RI Report Revision 1, Addendum No. 1 – Revision 1 by November 26, 2022.

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 Post-Construction Groundwater Monitoring

Routine semi-annual and post-construction groundwater monitoring was initiated in November 2022, following in-situ chemical oxidation (ISCO) injections. Groundwater levels and the Manitowoc River elevation were measured during November 2022 and April 2023 groundwater sampling events. Groundwater monitoring was performed using low-flow sampling techniques to assess concentrations of petroleum volatile organic compounds (PVOCs), polycyclic aromatic hydrocarbons (PAHs) and natural attenuation indicator parameters.

Post-construction groundwater monitoring will continue through 2023 and routine semi-annual groundwater monitoring will continue until there is a record of decision for the groundwater OU (OU3).

Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Semi-Annual Groundwater Sampling Event (all wells)	November 2022	November 28-30, 2022
Post-Construction Groundwater Sampling Event (select wells)	March 2023	March 30, 2023

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
USEPA's RI Report – Revision 0 Comments	May 17, 2022 June 23, 2022 September 15, 2022
Site-Specific Sediment Toxicity Testing Work Plan	October 11, 2022 October 28, 2022 November 21, 2022
RI Report – Revision 1 and Baseline Risk Assessment Comments as they inform the Site-Specific Sediment Toxicity Testing Work Plan	February 16, 2023 March 23, 2023

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
Response to USEPA's September 9, 2020 comments on RI Report – Revision 0	-- ¹	April 5, 2021 and April 16, 2021	March 4, 2022
Groundwater Extraction and Treatment System Memorandum	May 3, 2022	May 23, 2022	August 29, 2022
Submit RI Report – Revision 1	July 22, 2022	October 28, 2022 ²	February 13, 2023 (Conditional approval)
Site-Specific Sediment Toxicity Testing Work Plan – Revision 0	--	January 20, 2023	March 10, 2023
Site-Specific Sediment Toxicity Testing Work Plan – Revision 1	--	April 26, 2023	

1. A double dash is entered where the specific deliverable (i.e., Response to USEPA's comments,) was not specified in the 2022 Annual Master Schedule Update.
2. Response to USEPA's September 29, 2020 RI Report – Revision 0 comments and resolution of the sediment risk assessment delayed submittal of RI Report Revision 1.

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 Groundwater Monitoring

A pilot scale system shut down of the groundwater extraction treatment system was initiated on April 5, 2021, therefore no effluent sampling or OM&M activities were required during this reporting period. In a meeting with USEPA on September 17, 2021, it was agreed to continue to not operate the groundwater treatment system and monitor groundwater containment wells on a quarterly basis. The May 23, 2022 Groundwater Extraction and Treatment System Memorandum supported discontinued operation of the system and proposed on-going groundwater containment monitoring to continue on a semi-annual basis as part of groundwater sampling events. Post groundwater treatment system shutdown monitoring is summarized below. Transducers were deployed in

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

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

OM&M and/or Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
Second 2022 Semi-Annual Groundwater Sampling Event (all wells)	September 2022	September 22, 2022
First 2023 Semi-Annual Groundwater Sampling Event (all wells)	March 2023	March 20-22, 2023

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 executing 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. Monthly calls were paused in November 2022 to focus on the Upland Early Removal Action. 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
Removal Action Work Plans	May 19, 2022
	June 22, 2022
	July 14, 2022
	September 7, 2022

3.1.3.1 RI/FS Planning Documents and Work Plan Submittals

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

Task/Submittal	Targeted Completion Date ¹	Actual Completion Date	USEPA Comments Received
Submit Removal Action Work Plan – Revision 0 and Pre-Design Investigation Summary Report (Appendix A) to USEPA	June 9, 2022	June 7, 2022	July 21, 2022
Submit Removal Action Work Plan – Revision 1 to USEPA	July 25, 2022 ¹	August 17, 2022	September 7, 2022 (verbal)
Submit Removal Action Work Plan – Revision 2 to USEPA	-- ¹	September 26, 2022	October 12, 2022 (Authorization to Proceed)
Submit Removal Action Work Plan – Addendum 1 to USEPA		February 3, 2023	February 24, 2023 (reviewed; no comments)
Submit RI Upland Data and Alternatives Array Tech Memo to USEPA	April 10, 2023 ³		

1. Assumed USEPA comments on RAWP Revision 0 would be received by early July 2022.
2. A double dash is entered where the specific deliverable (i.e., RAWP- Revision 2) was not specified in the 2022 Annual Master Schedule Update or not completed.
3. Assumed Removal Action Construction would be complete in February 2023.

3.1.3.2 Remedial Investigation and Early Removal Action Field Activities

Sediment RI field activities are complete. Sheen observations adjacent to the Upland, in the cove area, are on-going until the Early Removal Action is completed. Groundwater monitoring performed under the USEPA-approved Site-Specific Work Plan as part of the RI field activities are summarized in Section 3.1.3.3.

Site activities are summarized in the following table:

Task	Completion Date
Sheen observations	Weekly sheen inspections: March 17, 2022 to present Boom deployed: August 16 through October 21, 2022
Early Removal Action	December 5, 2022 to current

3.1.3.3 Groundwater Monitoring, Upland Cap Inspection and Post-Construction Sediment 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.

The South Focus Area (SFA) OM&M consisted of a bathymetric survey to verify the cover was present and without significant erosion. The North Focus Area (NFA) OM&M also consisted of a bathymetric survey to verify

the cap is present and without significant erosion or settlement. A memorandum will be submitted to USEPA, summarizing these results.

OM&M and/or Groundwater Monitoring Event	Targeted Completion Date	Actual Completion Date
First Semi-Annual 2022 Groundwater Sampling	May 2022	May 9-11, 2022
Second Semi-Annual 2022 Groundwater Sampling	November 2022	November 7-9, 2022
2022 Annual Cap Inspection	September 2022	-- ¹
SFA and NFA OM&M bathymetric survey	June 15, 2022	September 26, 2022

1. A double dash is entered where the specific OM&M event (i.e., cap inspection) was not specified in the 2022 Annual Master Schedule Update or not completed. The Annual Cap Inspection was not performed because the majority of the cap area was being prepared for the Early Removal Action.

3.1.4 Two Rivers

The Project Start Date for the Two Rivers MGP Site is October 13, 2015. The date and general discussion topics of meetings and conference calls conducted during this reporting period are summarized in the following table:

General Discussion Topic	Date
Sediment Toxicity Testing and Biomass Endpoints	April 22, 2022
USEPA's comments on the Proposed Exposure Assumptions for Development of Preliminary Remediation Goals for a Recreational Scenario	November 30, 2022
USEPA RPM Site Walk	December 19, 2022
Analysis of Biomass Endpoint for Sediment Toxicity Tests and Evaluation of Lines of Evidence Supporting Sediment PRGs for TPAH-13 Memorandum	February 24, 2023

3.1.4.1 Planning Documents and Work Plan Submittals

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Proposed Exposure Assumptions for Development of PRGs for a Recreational Scenario	-- ¹	May 16, 2022 September 22, 2022 July 15, 2022	July 6, 2022 (email) August 10, 2022 (email)
Analysis of Two Rivers Sediment Database	--	May 20, 2022	
Analysis of Biomass Endpoint for Sediment Toxicity Tests and Evaluation of Lines of Evidence Supporting Sediment PRGs for TPAH-13 Memorandum	--	August 19, 2022	June 15, 2022 ² February 1, 2023
Proposed Exposure Assumptions for Development of PRGs for a Recreational Scenario – Revision 1	--	September 22, 2022	February 24, 2023 (USEPA accepted assumptions)
Submitted Letter Stating Position Against PRG of 22.8 mg/kg	--	April 3, 2023	--

1. A double dash is entered where the specific deliverable was not specified in the 2022 Annual Master Schedule Update or not completed.
 2. USEPA provided spreadsheets and model outputs from USEPA's Toxicity Relationship Analysis Program.

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 2022	October 10-11, 2022
Second Semi-Annual Groundwater Sampling	April 2023	April 3-4, 2023

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 activities for Marinette and Manitowoc - Upland are being completed under separate AOCs and are not detailed in this Master Schedule Update. Manitowoc groundwater sampling was re-initiated upon OU1 remedial action completion, but system operation was discontinued following Upland remediation. Manitowoc sediment and groundwater 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, Green Bay and Two Rivers are based on the schedules provided to USEPA March 9, 2023, updated as appropriate. Manitowoc is generally consistent with the 2022 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's Fields Group will provide their evaluation and feedback by November 1, 2023 and the revised RI Addendum, Revision 1 will be acceptable to demonstrate extent of MGP-residuals is defined.
- Sediment FS Report – Revision 2 will be approved.
- Post-construction groundwater monitoring will be conducted in June 2023 as well as with Semi-Annual groundwater sampling events in May and September.
- Separate ROD will be issued for the adjacent river area.
- Separate ROD may be issued for groundwater pending effectiveness of upland remedial action.

4.3.2 Oshkosh

- Additional sediment RI activities are required for adjacent river area and will be completed in August when water levels are lower, provided approval of the Sediment Toxicity Work Plan in June 2023.
- No further supplemental soil sampling activities will be required for completion of the RI.
- The RI Report – Revision 2 will be submitted following additional field activities and resolution of PRGs/RAOs.
- Continued semi-annual (March and September) groundwater sampling.
- The groundwater extraction and treatment system operations are not required.

4.3.3 Green Bay

- Separate RODs will be issued for the Upland OU and Sediment OU.
- Additional RI activities will be proposed for the South Parking Lot in upland areas not addressed by the Upland Early Removal Action.
- The Upland Removal Action will be completed in July 2023.
- A RI Report for Upland will be submitted following completion of the Upland Removal Action.
- Remedial Investigation Report – Revision 2 for OU2 (sediment) will be approved and will support a no further remedial action required ROD following implementation of the upland early action that will address limited impacts observed in the near shore areas.
- Continued semi-annual (May and November) groundwater sampling.

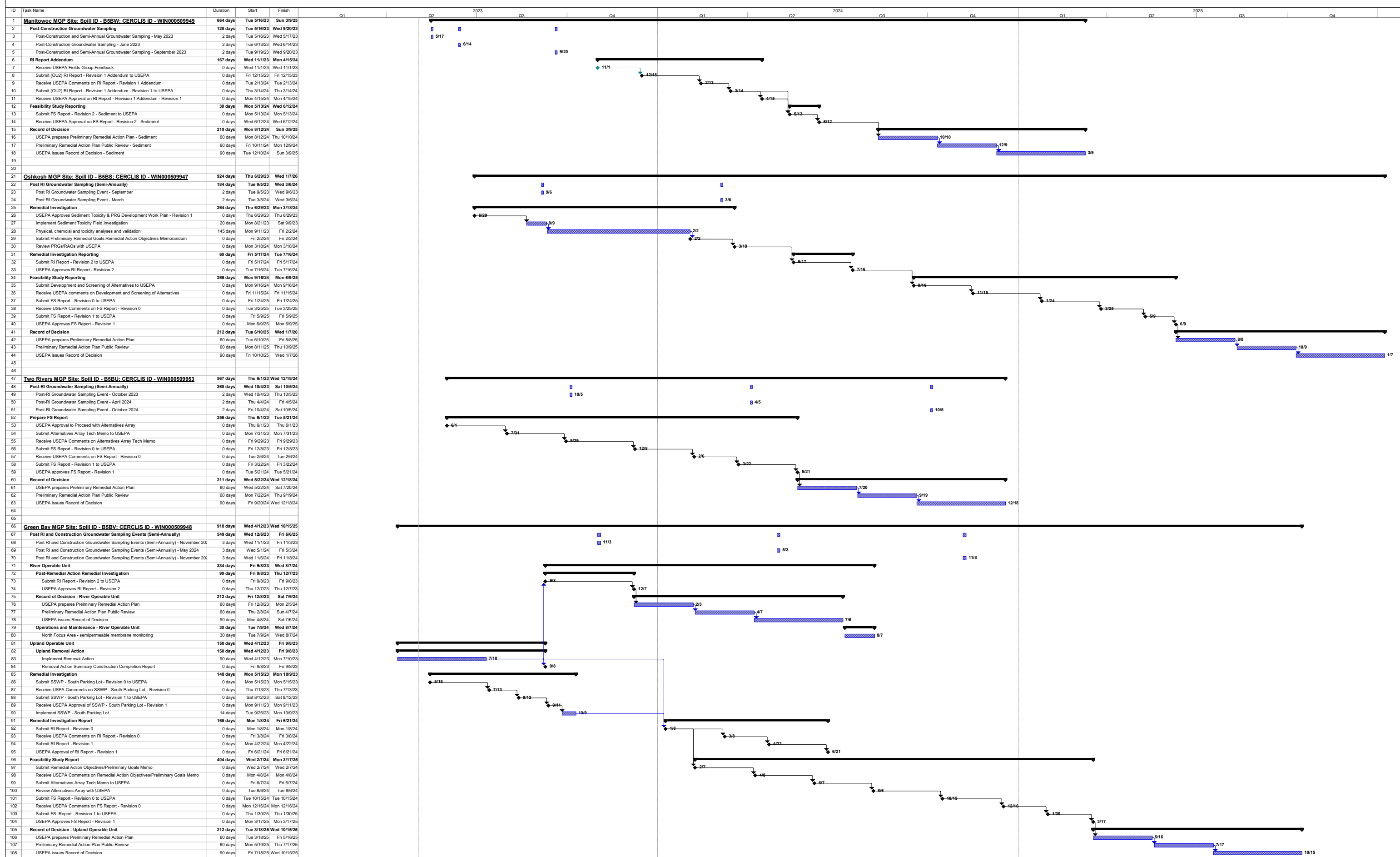
4.3.4 Two Rivers

- Additional RI activities are not required.
- An Alternatives Array Technical Screening Memorandum will be developed to address USEPA's decision on the sediment PRG and remaining unaddressed comments on the RAO/PRG Memorandum.
- Sufficient data has been collected to support the FS Report.
- Semi-annual (April and October) groundwater sampling.

FIGURE



Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



Project Figure 1 2023 WSPC Annual Report Master Sched Date: 05/05/23

1. This preliminary schedule is dependent on USEPA-approval, weather conditions and contractor availability.