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Sent: Monday, May 6, 2024 8:47 AM
To: Werner, Leah; Gielniewski, Margaret
Cc: Krueger, Sarah E - DNR; Korpela, Adrienne/MKE; Webb, Carrie A - DNR; Dombrowski, Frank J; Jennifer M Hagen
Subject: 2024-05-06 2024 Annual Progress Report and Master Schedule Update Report
Attachments: 2024-05-06 WPSC 2024 Annual Report and Master Schedule Update.pdf

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Good Morning Margaret and Leah –

Please find attached the 2024 Annual Progress Report and Master Schedule Update for Wisconsin Public Service Corporation's (WPSC) former manufactured gas plant (MGP) sites. The 2024 Annual Progress Report and Master Schedule Update was prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and WPSC, effective May 5, 2006. As previously requested, an electronic copy only is being provided to USEPA and a hardcopy (in addition to this electronic) will be provided to WDNR.

Please let us know if you have any questions.

Thanks!

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May 6, 2024

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

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RE: 2024 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 2024 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, 2023 and May 5, 2024 and a proposed schedule for future activities.

This 2024 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,

A handwritten signature in black ink that reads 'Glenn R. Luke'.

Glenn Luke, PE
Principal Engineer Environmental
Glenn.Luke@wecenergygroup.com
(414) 221-2577

Enclosures: 2024 Annual Progress Report and Master Schedule Update Report

cc: Ms. Sarah Krueger, WDNR (hardcopy and email)
Ms. Carrie Webb, WDNR (email)
Ms. Adrienne Korpela, Jacobs (email)



2024 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 6, 2024

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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
ARAR	Applicable or Relevant and Appropriate Requirements
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
WBS	WEC Energy Group – Business Services, LLC

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, 2023, and May 5, 2024. 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 1 (OU1, soil) in September 2018. Therefore, Stevens Point, Manitowoc OU1, Marinette are 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

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. The complete Multi-Site QAPP is in process of being updated for submittal in 2024.

On May 26, 2023, USEPA provided the *FS Process – Steps to Optimize at MGPs* document to optimize and expedite the Alternatives Array Panel Presentation and FS process, as outlined in Section 6.1 (Site-Specific Alternatives Screening Technical Memorandum) of the Settlement Agreement. USEPA recommended several separate deliverables as part of the FS to ensure there is meaningful input from all Stakeholders and consistency throughout the RI/FS timeline. WBS and USEPA discussed the document during the quarterly USEPA/WBS project manager meeting on June 8, 2023. WBS provided comments on the document on July 19, 2023 and USEPA provided a revised version of the document on August 1, 2023.

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, Manitowoc OU1 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, 2023) 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 OU1	Manitowoc - Upland OU3	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	•	•	•	•	•	•	•	o	•	•	o	•
Remedial Investigation Report	•	•	•	•	•	•	•	o	•	•	o	•
Alternatives Screening Technical Memorandum	•	•		•	•	•			⊖	⊖		na ¹
Feasibility Study Report	•	•		⊖	•	•			o	o		na ¹
Record of Decision	•	•			•	•						
Early Removal Action	na	na		na	na	•			•		•	•

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

1. The Green Bay Sediment - USEPA will provide Applicable or Relevant and Appropriate Requirements and do not require the Alternatives Screening Technical Memorandum and FS Report.

3.1 INITIATED SITES

Site progress and significant deviations from the target dates established in the 2023 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 1 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.

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
North Bank and path forward for Sediment (OU2) RI Addendum and FS	April 18, 2024



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 0	-- ¹	April 22, 2021	November 14, 2023 (Compliance letter) March 8, 2024 (FIELDS Memo)
Sediment (OU2) RI Report Revision 1, Addendum No. 1 – Revision 1	-- ²	2	
Sediment (OU2) FS Revision 2	-- ³	3	

1. A double dash is entered where the specific deliverable (i.e., Sediment (OU2) RI Report, Revision 1, Addendum No. 1 – Revision 0) was submitted prior to the 2023 Annual Master Schedule Update or was not included in the 2023 Annual Master Schedule Update (Sediment (OU2) RI Report, Revision 1, Addendum No. 1 – Revision 1).
2. Resolution of RI Report comments were on hold until USEPA provided FIELDS Memo.
3. Assumed resolution of RI Report comments before FS Revision 2 submittal.

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 post-remedial action and RI field activities are summarized in Section 3.1.1.3.

3.1.1.3 Post-Construction Groundwater Monitoring and OU3 RI

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 May and September 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 was completed in June 2023; however, quarterly 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)	May 2023	May 24-25, 2023
Post-Construction Groundwater Sampling Event (select wells)	June 2023	June 11-12, 2023
Semi-Annual Groundwater Sampling Event (all wells)	September 2023	September 11-13, 2023
RI Groundwater Sampling Event (all wells)	March 2024	March 25-27, 2024

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
Groundwater Monitoring Transducer Relocation	July 20, 2023
Sediment Toxicity Testing Results	October 19, 2023 November 6, 2023 February 22, 2024 March 21, 2024 April 16, 2024

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 2	May 1, 2024	-- ²	
Site-Specific Sediment Toxicity Testing Work Plan – Revision 1	-- ¹	April 26, 2023	June 1, 2023
Applicable or Relevant and Appropriate Requirements (ARAR)	--	September 25, 2023	

1. A double dash is entered where the specific deliverable (i.e., Response to USEPA's comments,) was not specified in the 2023 Annual Master Schedule Update.
2. Conditional approval of RI Report – Revision 1 was received February 13, 2023 and Revision 2 will incorporate the revised Baseline Risk Assessment based on the sediment toxicity testing investigation. A Sediment Toxicity Testing Results Technical Memo will be submitted May 24, 2024, USEPA will provide comments and RI Report – Revision 2 will be submitted.

3.1.2.2 Remedial Investigation Field Activities

Sediment toxicity sampling was completed per the USEPA approved Site-Specific Sediment Toxicity Testing Work Plan – Revision 1, submitted April 26, 2023.

Site 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
Sediment Sampling	October 2-27, 2023

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. The transducers were relocated the week of August 14, 2023.

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 2023 Semi-Annual Groundwater Sampling Event (all wells)	September 2023	September 22, 2023
First 2024 Semi-Annual Groundwater Sampling Event (all wells)	March 2024	March 18-20, 2024

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. Monthly calls were resumed in February 2024 following the completion of 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
Slow recovering groundwater monitoring wells	September 13, 2023
USEPA's preliminary Sediment RI Report - Revision 2 and Operations, Monitoring and Maintenance Results Memorandum - Revision 1 comments related to sediment stability	February 14, 2024

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
South Parking Lot Work Plan (aka SSWP Addendum 1, Revision 0)	May 15, 2023	May 16, 2023	June 21, 2023
South Parking Lot Work Plan (aka SSWP Addendum 1, Revision 1)	August 12, 2023	June 30, 2023	July 12, 2023 (Approved)
Upland Early Action Report – Revision 0	-- ¹	September 15, 2023	October 18, 2023
Upland Early Action Report – Revision 1 and Response to USEPA’s Comments on RI Report Revision 0	--	November 17, 2023	December 7, 2023 (no further comments)
Sediment Operation, Monitoring and Maintenance Results Memorandum – Revision 0	--	June 27, 2023	November 7, 2023
Sediment Removal Action Summary Report – Revision 0	--	August 4, 2023	September 12, 2023
Sediment Removal Action Summary Report – Revision 1 and Response to USEPA’s Comments on Revision 0	--	September 22, 2023	October 17, 2023
Sediment Operation, Monitoring and Maintenance Results Memorandum – Revision 1 and Response to USEPA’s comments on Revision 0	--	December 7, 2023 (with Sediment RI Report Revision 2)	Discussed February 14, 2024
Sediment Removal Action Summary Report – Revision 2 and Response to USEPA’s Comments on Revision 1	--	October 23, 2023	October 25, 2023 (no further comment letter)
Sediment RI Report - Revision 2 and Response to USEPA’s December 2, 2020 comments	September 8, 2023	December 7, 2023 ²	Discussed February 14, 2024
RI Report – Revision 0	January 8, 2024	January 9, 2024	March 14, 2024
Sediment RI Report - Revision 2 and Response to USEPA’s December 2, 2020 comments and Sediment Operation, Monitoring and Maintenance Results Memorandum – Revision 2 and Response to USEPA’s comments on Revision 1	--	March 6, 2024	March 14, 2024 (no further comment letter)
RI Report – Revision 1	April 22, 2024 ³		

1. A double dash is entered where the specific deliverable (i.e., Removal Action- Revision 0) was not specified in the 2023 Annual Master Schedule Update or not completed.

2. The Sediment RI Report Revision 2 was delayed allowing agency acceptance of the Sediment Removal Action Summary Report – Revision 2.

3. The RI Report Revision 1 has been delayed to incorporate April 2024 groundwater data.

3.1.3.2 Remedial Investigation and Early Removal Action Field Activities

Soil and groundwater sampling activities were completed in accordance with the USEPA-approved South Parking Lot Sampling Work Plan. 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
South Parking Lot Sampling (aka SSWP Addendum 1)	July 24-27, 2023
Post Removal Action Groundwater Monitoring Well Installation	July 20, 21 and 24, 2023
Early Removal Action	December 5, 2022 to August 28, 2023

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

Prior to the Early Action, groundwater monitoring was performed on a semi-annual basis. Following completion of the Early Action and installation of new groundwater monitoring wells, groundwater monitoring has been performed quarterly. Groundwater sampling is conducted 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
Second Semi-Annual 2023 Groundwater Sampling	November 2023	October 16-19, 2023 ²
2023 Annual Cap Inspection	September 2023	-- ¹
First Quarterly 2024 Groundwater Sampling	April 2024	April
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 2023 Annual Master Schedule Update or not completed. The Annual Cap Inspection was not performed in 2023 because the majority of the cap area was newly restored as part of the Early Removal Action. Areas where excavation did not occur were inspected as part of the Early Action demobilization in August 2023 and on April 24, 2024.
2. The second semi-annual 2023 groundwater sampling event was to be adjusted to September (with USEPA concurrence) to incorporate new South Lot sampling. Sampling was further adjusted due to slow recovery of re-installed north lot wells and south lot wells.

3.1.4 Two Rivers

The Project Start Date for the Two Rivers MGP Site is October 13, 2015. Monthly status calls were initiated in January 2024. 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
RAO/PRG Memo – Revision 1 Preliminary Comments and Target Risk Level	January 4, 2024

3.1.4.1 Planning Documents and Work Plan Submittals

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
RAO/PRG Memo – Revision 1	-- ¹	September 12, 2023	January 18, 2024
RAO/PRG Memo – Revision 2		January 24, 2024	January 25, 2024 (no further comments)
Alternatives Array Technical Memorandum	July 31, 2023 ²	March 15, 2024	

1. A double dash is entered where the specific deliverable was not specified in the 2022 Annual Master Schedule Update or not completed.
2. Assumed USEPA provided approval to proceed with the Alternatives Array Technical Memorandum by June 1, 2023.

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 2023	October 30-31, 2023
Second Semi-Annual Groundwater Sampling	April 2024	April 8, 2024

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 OU1 - 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 the groundwater extraction system was no longer required following Upland remediation. Manitowoc sediment (OU2) and groundwater (OU3) 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.

A revised Multi-Site QAPP is proposed to be submitted in 2024.

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 2023 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, and USEPA's Alternative Array Panel Presentation prior to submittal of the FS Report for sites where the Alternative Array has been initiated. For planning purposes, it is assumed USEPA's Alternative Array Panel Presentation will be within 60 days of the Alternatives Array Technical Memorandum and feedback will be provided within 60 days. The FS Report will be submitted within 60 days of receiving USEPA's feedback.

For sites where an Alternative Array has not been initiated, the site will follow FS Process that USEPA provided on May 26, 2023 to optimize and expedite the FS. Within 45 days of the RI Report approval, Preliminary Applicable or Relevant and Appropriate Requirements (ARAR), Preliminary Remedial Goals (PRGs)/Remedial Action Objectives (RAOs) and General Response Actions/Process Options/Remedial Technologies will be submitted to USEPA. It is assumed the Alternatives Array Technical Memorandum will be submitted within 45 days of USEPA's comments and within 60 days, USEPA will present to the Alternative Array Panel. As discussed above, it is assumed the feedback will be provided within 60 days and the FS Report will be submitted within 60 days of receiving USEPA's feedback. 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 – Revision 1 Addendum – Revision 1, targeted for submittal mid-September 2024.
- Sediment FS Report – Revision 2 will be approved.
- Post-construction groundwater monitoring will be conducted in June, September and November 2024 and March 2025 to support an Upland Groundwater Operable Unit 3 ROD.
- Separate ROD will be issued for the adjacent river area (OU2).
- Separate ROD will be issued for groundwater (OU3) pending effectiveness of upland remedial action.

4.3.2 Oshkosh

- Additional sediment RI activities are not required for adjacent river area and the October 2023 sediment sampling activities and results will be presented in a Sediment Toxicity Sampling Results Technical Memorandum.
- USEPA's comments on the Sediment Toxicity Sampling Results Technical Memorandum will be provided within 60 days and addressed in the RI Report – Revision 2.
- No further supplemental soil sampling activities will be required for completion of the RI.
- 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.
- No additional soil sampling activities will be required.
- A RI Report for Upland will be submitted in May 2024, pending receipt and validation of the March 2024 groundwater sampling results.
- The USEPA will provide the State's Preliminary ARARs for sediment in mid-May 2024. No Sediment FS will be required to support the USEPA Preliminary Remedial Action Plan (PRAP).
- Post RI and construction groundwater sampling will be performed on a near-quarterly basis (March, June, August, November).

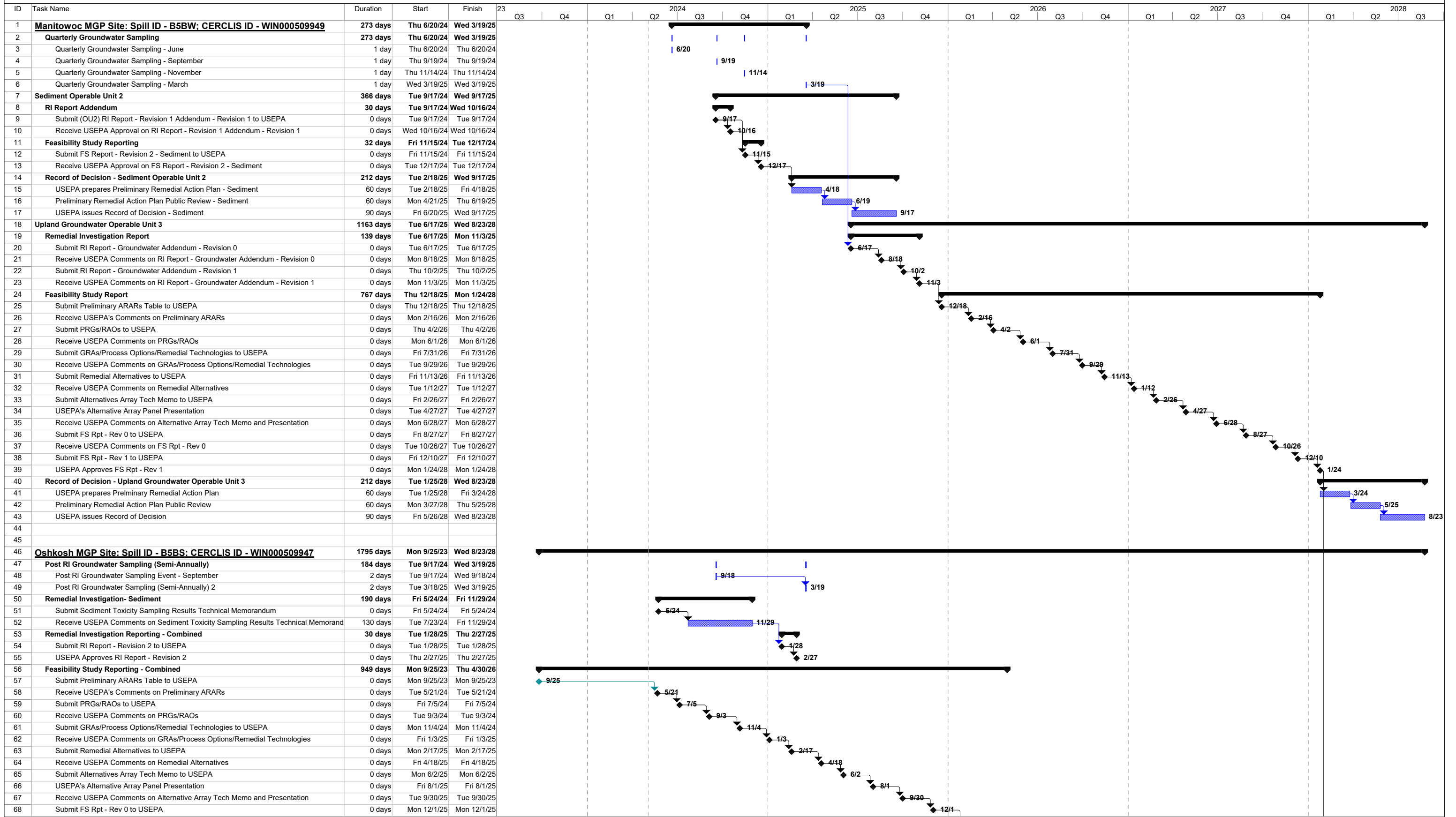
4.3.4 Two Rivers

- Additional RI activities are not required.
- USEPA will present to the Alternatives Array Technical Screening Memorandum in June 2024 and provide comments by August 2024 to support the FS Report.
- Sufficient data has been collected to support the FS Report.
- Semi-annual (April and October) groundwater sampling.

FIGURE



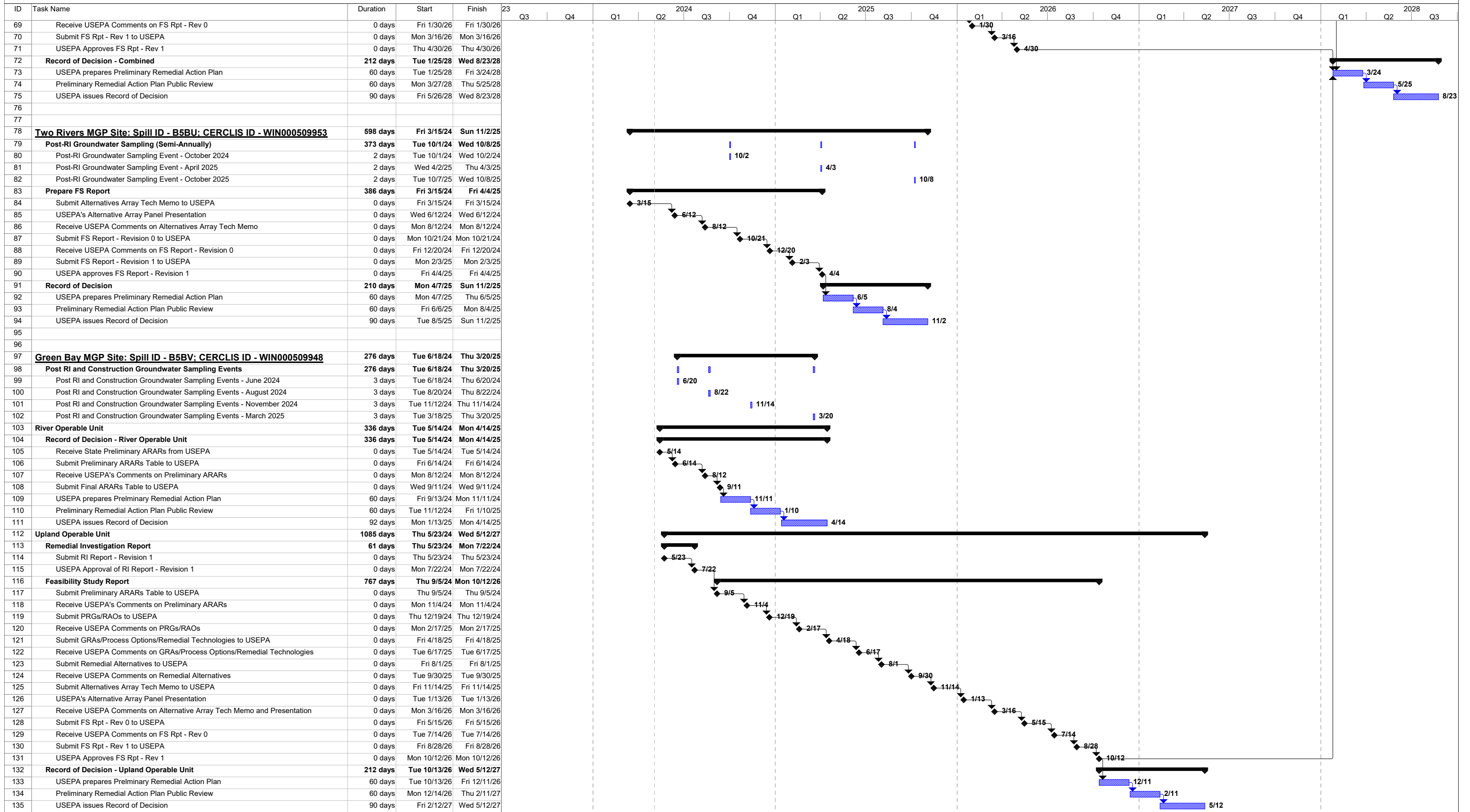
Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



Project: Figure 1 2024 WPSC Annual Report Master Sched Date: 05/06/24	Task	Rolled Up Task	Split	Group By Summary	Inactive Summary	Manual Summary Rollup	Finish-only	Progress
	Milestone	Rolled Up Milestone	External Tasks	Inactive Task	Manual Task	Manual Summary	Manual Summary	Start-only
	Summary	Rolled Up Progress	Project Summary	Inactive Milestone	Duration-only	Start-only	Start-only	Start-only

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

Wisconsin Public Service Corporation's Former Manufactured Gas Plant Sites



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Task	Rolled Up Task	Split	Group By Summary	Inactive Summary	Manual Summary Rollup	Finish-only]
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