

Our intention is to have in-person meetings going forward. For the time being, we will hold the City Committee Meetings, Plan Commission, Council and most others at the Community Room at 933 Michigan Avenue. This in-person location will meet the legal requirement for our open meetings.

We will have a virtual option available, but the technology for the hybrid style meeting may not be reliable all of the time.

**CITY OF STEVENS POINT
SPECIAL COUNCIL MEETING**

**Community Room
933 Michigan Avenue, Stevens Point, WI**

**October 27, 2025
6:00 PM**

OR

Zoom Teleconferencing

Meeting ID: 816 0287 4308 | Passcode: 829323

By Computer: [Zoom Link](#)

By Phone: +1-312-626-6799 (US Chicago)

AGENDA

1. Roll Call.

Consideration and Possible Action on the Following:

2. Approval of an access agreement with Wisconsin Public Service Corporation to allow ongoing monitoring and supplemental site investigation of the southern portion of Pfiffner Pioneer Park.
3. Adjournment.

RMC – Revised Municipal Code

Persons who wish to address the Common Council may make a statement as long as it pertains to a **specific** agenda item. Persons who wish to speak on an agenda item will be limited to a five (5) minute presentation. Any person who wishes to address the Common Council on a matter which is not on the agenda will be given a maximum of three (3) minutes and the time strictly enforced under the item, "Persons who wish to address the mayor and council on non-agenda items." Individuals should not expect to engage in discussion with members of the City Council and City staff.

Any person who has special needs while attending this meeting or needing agenda materials for this meeting should contact the City Clerk as soon as possible to ensure a reasonable accommodation can be made. The City Clerk can be reached by telephone at (715) 346-1569 or by mail at 1515 Strongs Avenue, Stevens Point, WI 54481.

Copies of ordinances, resolutions, reports and minutes of the committee meetings are on file at the office of the City Clerk for inspection during the regular business hours from 7:30 A.M. to 4:00 P.M.

TO: Common Council
FROM: Andrew Beveridge – City Attorney
DATE: 10-23-25
RE: WPS Access Agreement – Pfiffner Park

Alderspersons:

In connection with the ongoing process of addressing contamination connected to the former WPS site adjacent to Pfiffner Park, WPS has been directed by US EPA to do additional soil borings and install additional monitoring wells within the park. The attached agreement provides authorization and conditions for them to perform that work. The access agreement requires Common Council approval and is time sensitive, which is why we are asking you to act upon it at this Special Common Council Meeting.

Thank you,

Andrew Beveridge
City Attorney

ACCESS AGREEMENT

This Access Agreement ("Agreement") is made this _____ day of _____ 2025, by and between Wisconsin Public Service Corporation ("WPSC") and the City of Stevens Point, Wisconsin ("City") (collectively, the "Parties").

RECITALS

WHEREAS, WPSC is responsible for ongoing monitoring and supplemental site investigation of a former manufactured gas plant site located in the southern portion of Pfiffner Pioneer Park along Crosby Avenue in Stevens Point, Wisconsin (the "Site");

WHEREAS, WPSC, its consultant, Ramboll, and its environmental remediation subcontractors along with the representatives of the United States Environmental Protection Agency ("U.S. EPA") and the Wisconsin Department of Natural Resources ("WDNR") and their contractors, require temporary access to the Site for the purpose of monitoring well installation and soil borings and performing additional soil and groundwater sampling (the "Work") required by and overseen by the U.S. EPA as further described in the approved work plan(s) attached as **Exhibit A**.

In consideration of the mutual promises contained in this Agreement, the sufficiency of which is hereby expressly acknowledged, the Parties agree as follows.

AGREEMENT

1. **Grant of Access**. The City grants to WPSC, its agents, representatives, employees, contractors, subcontractors, consultants, and invitees (collectively, the "WPSC Access Parties"), as well as representatives of U.S. EPA, the WDNR and their contractors (collectively, the "Government Access Parties") temporary access to the Site, under the conditions set forth in this Agreement, to complete the Work, as further described in the work plan(s) attached as **Exhibit A**.
2. **Condition of Site - No Representation**. The City makes no representation as to any physical condition of the Site or the suitability of the Site for the Work intended to be conducted by the WPSC Access Parties. The WPSC Access Parties shall rely solely on their own examination and investigation of the Site, including any surface or subsurface conditions.
3. **Location of Work**. The area where the Work is anticipated to be performed is shown on the Figure 1 within **Exhibit A**. To the extent Work extends beyond property owned by the City, WPSC is responsible for arranging access to such other property.
4. **Scheduling and Conduct of the Work**. The WPSC Access Parties expect to commence the Work by November 1, 2025. Recognizing that the newly installed monitoring wells would be resampled on a semi-annual basis during future ongoing routine monitoring events at the

property. The Work is anticipated to be completed within two weeks of commencement subject to conditions specified below. The City acknowledges this schedule is subject to change, depending upon weather conditions, determinations or additional approvals by U.S. EPA before or during the time the Work is conducted, and/or other unanticipated circumstances, such as but not limited to, adverse weather or contractor availability/delays. The WPSC Access Parties will conduct the Work as set forth in Exhibit A, unless U.S. EPA requires a modification to the work in which case the Work shall be conducted in accordance with the U.S. EPA approved modification. WPSC shall provide the City with a copy of the U.S. EPA approved modification. In the event timely completion of the Work requires the WPSC Access Parties to conduct the Work during times or days other than as set forth in Exhibit A, WPSC will obtain consent from the City prior to conducting the Work during such times (see Paragraph 6 below). WPSC acknowledges and understands that the City may host events at this location. WPSC agrees to take into account the schedule of events in planning its work at this location upon advanced notice of such events. WPSC will provide the City advance notice of at least 7 days prior to initiating and conducting the Work.

5. Performance of Work. The Parties agree to the following conditions with regard to the performance of the Work.

a. WPSC Access Parties will notify Digger's Hotline to identify public utilities and contract with a private utility locating subcontractor to make all reasonable attempts to identify and locate private utilities in the vicinity of the proposed boring locations.

b. *Local Permit Exemption.* WPSC represents that, under Section 121(e)(1) of CERCLA, codified at 42 U.S.C. § 9621(e)(1), and the associated federal regulations (the "Superfund Permit Waiver"), the WPSC Access Parties' are exempt from applying for and/or obtaining any and all federal, state, and local permits in association with the Work. Accordingly, to the extent allowed under federal law and regulation, the WPSC Access Parties are not required to obtain any of the permits or approvals (or pay any fees for such permits or approvals) described in the City's Municipal Code ("City Code"), including but not limited to Chapter 31.

c. Exhibit A to this Agreement is the WPSC Access Parties U.S. EPA approved work plan(s). The terms and conditions of Exhibit A and any U.S. EPA approved modifications are incorporated into this Access Agreement.

d. *Noise, Odor, Dust, and Other Nuisances.* The City acknowledges that elements of the Work will necessarily involve elevated noise levels. To the extent necessary, the City excepts the WPSC Access Parties from any City Code provisions limiting or regulating noise, odor, dust, and any other nuisance that may occur in connection with the Work; provided, however, that the WPSC Access Parties shall not unnecessarily engage in or permit any loud or disturbing noise of such character, intensity or duration as to be detrimental to the life or health of individuals and shall limit the production of high noise levels that may otherwise exceed the City Code levels to between the hours of 7:00 AM and 7:00 PM, Monday through Friday.

6. Cooperation. The Parties will cooperate in good faith with each other

in the performance of the Work. WPSC and the City shall appoint designated representatives for coordinating the Work activities and addressing any issues or concerns that arise during the performance of the Work. The designated representatives also shall coordinate with representatives of the Government Access Parties. To the extent the City is aware of any underground structures and/or utilities (such as pipes or septic systems) located on the Site, the City will provide WPSC with any available information regarding these structures and/or utilities before the WPSC Access Parties commence the Work. The WPSC Access Parties will be responsible for contacting "Diggers Hotline" or a comparable public utility locating service and a private utility locating subcontractor at their own expense to make all reasonable attempts to identify and locate any underground utilities on the Access Property.

7. U.S. EPA Authority. U.S. EPA is directing the Work under the Consent Decree and its authority as set forth in the NCP. Under the Consent Decree, U.S. EPA may require WPSC to perform Work in a manner that is in conflict with this Agreement. In the event U.S. EPA exercises its authority and directs WPSC to undertake work contrary to any term or provision of this Agreement, such direction of U.S. EPA shall control, and WPSC shall not be considered in breach of this Agreement. WPSC will promptly notify the City representative in the event WPSC receives any such direction from U.S. EPA.

8. Restoration and Waste Disposal. The WPSC Access Parties will use their best efforts to minimize disruption to the Site in conducting the Work, consistent with the nature of the Work itself. Boreholes will be properly abandoned and will be completely filled with bentonite granules, bentonite chips, bentonite slurry, etc. Sealing material will be placed via gravity. Sealing material will be placed in the borehole in a manner that detects and prevents bridging and displaces the borehole water column, if present. Borehole bentonite granules and chips will be hydrated in lifts if the borehole is dry or does not contain sufficient borehole water. Monitoring wells will be constructed with flush mount caps, consistent with the description in Exhibit A. WPSC will be responsible for removal, proper handling/management and disposal of any investigative derived waste generated during the Work.

9. Title to the Site. The City represents and warrants that it has good and indefeasible fee simple title to the Site as of the date of this Agreement, free and clear of all liens and encumbrances, and that it has the authority to grant access to the WPSC Access Parties to perform the Work on the Site.

10. Indemnification. WPSC agrees to indemnify and hold the City, its officers, employees, representatives, consultants and agents harmless from and against any and all injuries, death, damages, claims, losses, demands, penalties, expenses, or liabilities (cumulatively "Losses") arising out of or relating to the WPSC Access Parties' performance of the Work, except to the extent such Losses are caused by or arise from the City's or third parties (other than the WPSC Access Parties) negligence, actions or omissions. This indemnity shall not cover any Losses caused by the City or any third party who is not an agent, employee, contractor, subcontractor, or invitee of WPSC unless the Losses to the extent caused by a third party arise from the wrongful, intentional or negligent act or omission of one or more WPSC Access Parties. This indemnity also does not apply to any environmental matters covered in Paragraph 11 below. This paragraph shall survive the termination, revocation or expiration of

this Agreement.

11. Environmental. The WPSC Access Parties will employ the methods and procedures called for in the U.S. EPA approved Work Plan (Exhibit A). WPSC shall require the WPSC Access Parties, as part of the contract with WPSC, to comply with these methods and procedures, as applicable to the Work performed. WPSC shall be solely responsible for and pay for the investigation and remediation for any exacerbation of MGP related environmental contamination on the Site caused by the WPSC Access Parties while performing Work under this Agreement. WPSC Access Parties agree to only collect samples from locations and depth intervals as identified in the Work Plan (Exhibit A) and provide the City with all results from any sampling performed within the park no later than 10 days of WPSC Access Parties receiving the final laboratory reports in accordance with Wisconsin Administrative Code § NR 716.14(2).

12. Insurance. The WPSC Access Parties shall have liability insurance, including comprehensive general liability insurance, automobile liability insurance, and pollution legal liability insurance, of at least \$2,000,000 per occurrence and will provide adequate proof of such insurance upon request. Such insurance shall name the City as an additional insured. WPSC shall have the right to self-insure the above requirements.

13. Binding Effect. All provisions of this Agreement, including the benefits and burdens, run with the land and are binding upon and inure to the benefit of the Parties hereto and their heirs, personal representatives, successors, and assigns.

14. Compliance with Laws. Except as provided elsewhere in this Agreement, the WPSC Access Parties will comply with all applicable federal, state, or local laws, ordinances, rules, orders, or regulations in conducting the Work, with the exception of those laws, ordinances, rules, orders, or regulations from which the WPSC Access Parties are exempt under the Superfund Permit Waiver, or from which the WPSC Access Parties are exempt under the terms of the U.S. EPA approved Work, as may be modified by U.S. EPA (Exhibit A), or where U.S. EPA, exercising its lawful authority, supersedes any contrary laws, ordinances, rules, orders or regulations.

15. Term. This Agreement shall terminate on the date on which the WPSC Access Parties complete the Work or October 1, 2026, whichever is later, unless the Parties mutually agree otherwise in writing.

16. Notices. Notices relating to this Agreement shall be sent to the following:

Notice to WPSC shall be addressed to:

Wisconsin Public Service Corporation
PO Box 19001
Green Bay, Wisconsin 54307-9001
Attn: Real Estate Department

Notice to the City shall be addressed to:

City of Stevens Point
1515 Strongs Avenue
Stevens Point, WI 54481
Attn: _____

17. No Admissions. This Agreement shall not constitute or be used as evidence of any admission of law, fact, or liability or a waiver of any right or defense by WPSC or the City.

18. Choice of Law. This Agreement shall be governed by and construed in accordance with the laws of the State of Wisconsin.

19. Authority to Enter into Agreement. Each person signing this Agreement represents and warrants that he or she has the full power and authority to enter into and be bound by this Agreement.

[Signature Page Follows]

WISCONSIN PUBLIC SERVICE CORPORATION

DATED 10/21/2025

By: WEC Business Services LLC,
Its affiliate and agent

By: KJ JAO
Kory J. Rentmeester
Manager Property Management

CITY OF STEVENS POINT, WISCONSIN

DATED _____

By: _____
Its _____



Wisconsin Public Service Corporation

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

www.wisconsinpublicservice.com

September 19, 2025

Ms. Clara Copps
Remedial Project Manager USEPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**RE: Additional Studies Work Plan Technical Memorandum – Revision 0
Former WPSC Stevens Point MGP, Stevens Point, Wisconsin
Wisconsin Public Service Corporation
CERCLA Docket No. V-W-06-C-847; Civil Action No. 14-cv-546**

Dear Ms. Copps:

On August 4, 2025, United States Environmental Protection Agency (USEPA) issued a letter directing WPS to undertake additional investigation activities in the vicinity of soil and groundwater impacts previously identified in Pfiffner Pioneer Park located adjacent to the Wisconsin Public Service Corporation's (WPSC) Former Stevens Point Manufactured Gas Plant (MGP) Site (the "Site"). In the August 4, 2025 letter, USEPA directed WPSC to carry out the following actions to address concerns regarding the contamination in the park:

1. *Perform step out soil and groundwater sampling to the north and east of SB-324 and SB-325 to a depth of at least 15 feet to further delineate the contamination and assess potential risks to human health and the environment.*
2. *Sample surface water and seep in the rain garden within the Park to determine whether Site-related contamination is reaching the surface and/or impacting the rain garden.*
3. *To carry out the sampling identified under #1 and #2 above, EPA requests the PRPs submit an Additional Studies Work Plan within 90 calendar days of the date of this letter.*

In response to the request by USEPA, please find enclosed the Additional Studies Work Plan Technical Memorandum – Revision 0 for the WPSC Former Stevens Point MGP Site.

If you need additional information or would like to discuss, please contact me at 414-221-2156 or via email at frank.dombrowski@wecenergygroup.com.

Sincerely,

Frank Dombrowski
Principal Environmental Consultant

Enclosures as noted

CC: Elizabeth Nightingale, USEPA
Amanda Urban, USEPA
Rex Key, WPSC
Matthew Vitale, WDNR
Dan Kremer, City of Stevens Point
William Nelson, Godfrey & Kahn
Brian Hennings, Ramboll
Andrew Cawrse, Ramboll

Technical Memorandum

Project name **WPSC Stevens Point MGP Site – Additional Studies Work Plan**
 Project no. **1940105129**
 Client **Wisconsin Public Service Corporation**
 Version **0**
 To **Frank Dombrowski**
 From **Andrew Cawrse**
 Prepared by **Andrew Cawrse**
 Checked by **Brian Hennings**
 Approved by **Brian Hennings**

1. INTRODUCTION

United States Environmental Protection Agency (USEPA) directed in a letter to Wisconsin Energy Corporation, dated August 4, 2025, to further investigate contamination identified in Pfiffner Pioneer Park located to the west of the former Wisconsin Public Service Corporation (WPSC) Stevens Point Manufactured Gas Plant (MGP) site (**Figure 1**) by performing additional soil, groundwater, and surface water sampling.

September 19, 2025

This technical memorandum addresses the following directives from USEPA :

1. Perform step out soil and groundwater sampling to the north and east of SB-324 and SB-325 to a depth of at least 15 feet to further delineate the contamination and assess potential risks to human health and the environment.
2. Sample surface water and sheen in the rain garden within the Park to determine whether Site-related contamination is reaching the surface and/or impacting the rain garden.
3. To carry out the sampling identified under #1 and #2 above, EPA requests the PRPs submit an Additional Studies Work Plan within 90 calendar days of the date of this letter.

Ramboll
 234 W. Florida St
 Fifth Floor
 Milwaukee, WI 53204
 USA

<https://ramboll.com>

2. BACKGROUND

Pfiffner Pioneer Park is located adjacent to the former WPSC Stevens Point MGP site to the west (**Figure 2**). Based on review of historical documentation, the portion of the park adjacent to the former MGP site was historically occupied by a lumber mill and lumber yard with railroad lines and spurs crossing the area. A former slough historically adjoined the MGP site to the south and ran through the present day Pfiffner Pioneer Park. The width of the slough varied over time with a portion of the slough being identified as “filled with mill refuse” in historic Sanborn Fire Insurance Maps. The former slough was filled in as part of the City of Stevens Point storm sewer reconstruction project between 1981 and 1985, with the exception of the western end of the slough which was partially filled to create a pond currently located between wells OW17 and OW16 (**Figure 2**).

3. PRIOR INVESTIGATION

As discussed in the August 10, 2020 *Pfiffner Pioneer Park Water Garden* letter report by Sand Creek Consultants (Sand Creek), a sheen was observed on the water in a rain garden located to the north of the pond and south of the Cultural Commons in Pfiffner Pioneer Park (**Figure 2**). Staff with the City of Stevens Point collected a sample of the water from the rain garden and submitted the sample for analysis of polycyclic aromatic hydrocarbons (PAHs). The laboratory analytical results identified PAHs in the water sample and the City of Stevens Point retained Sand Creek to collect additional samples and evaluate the site conditions. Sand Creek collected two soil samples and two surface water samples from the rain garden for analysis of PAHs. Results of the analysis identified soil and water PAH impacts and the City of Stevens Point notified Wisconsin Department of Natural Resources (WDNR) of a hazardous substance discharge. A WDNR Environmental Repair Program (ERP) case (BRRTS Activity No. 02-50-586876) was opened on August 11, 2020 for the release.

3.1 STANTEC SITE INVESTIGATION SUMMARY

In May 2021, a Limited Site Investigation (LSI) was completed on behalf of the City of Stevens Point by Stantec Consulting Services Inc. (Stantec) to evaluate the nature and extent of soil and groundwater impacts associated with the samples collected from the rain garden. Based on the results of the LSI, Stantec completed additional investigation activities in November 2021 and September 2022. Soil boring and temporary well locations completed by Stantec are depicted on **Figure 3**. Results of the investigations identified select PAHs, volatile organic compounds (VOCs), and lead in soil at concentrations exceeding their respective chapter NR720 Wisconsin Administrative Code (WAC) groundwater pathway residual contaminant levels (RCLs). In addition, select VOCs and PAHs were also detected above their respective non-industrial direct contact and/or industrial direct contact RCLs. Groundwater analysis identified select PAHs at concentrations exceeding their respective chapter NR140 WAC (NR140) enforcement standard (ES) and arsenic at concentrations exceeding the NR140 preventative action limit (PAL) but below the ES in groundwater.

Subsurface conditions encountered during the Stantec investigation consisted of medium to coarse grained sand followed by intervals of wood and silt to depths of 16 feet below ground surface (bgs), the maximum depth of the borings. Fill material consisting of coal fragments, slag, and glass was encountered to depths of 6 feet bgs. Non-aqueous phase liquid (NAPL) was observed between 6 to 8 feet bgs at boring SB5 (boring log included in **Attachment 1**), which is located on the west side of the park near the Wisconsin River (**Figure 3**). A soil sample was collected from the 6-8 foot interval and analyzed for VOCs and PAHs. Based on the results:

- VOCs 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were detected at concentrations exceeding the groundwater pathway RCL and naphthalene was detected at a concentration exceeding the groundwater pathway RCL and industrial direct contact RCL.
- Fourteen PAHs, including naphthalene, were detected at a concentration exceeding their respective groundwater pathway, non-industrial direct contact, and/or industrial direct contact RCLs

Stantec Soil Analytical Results Tables 2b and 2c are included as **Attachment 1**.

Following completion of soil sampling activities, temporary well TW5 was installed in boring SB5 with a screened interval of 3 to 13 feet bgs. A groundwater grab sample was collected from TW5 and analyzed for VOCs, PAHs, arsenic, and lead. Based on the results:

- Naphthalene was the only detected VOC exceeding the ES.
- PAHs benzo(a)pyrene, benzo(b)fluoranthene, chrysene, and naphthalene were detected at concentrations exceeding their respective ESs.
- Arsenic was detected at a concentration exceeding the PAL but below the ES.

Stantec Groundwater Analytical Results Tables 3a, 3b and 3c are included as **Attachment 1**.

3.2 RAMBOLL SITE INVESTIGATION SUMMARY

At the direction of USEPA, on September 4, 2024, additional investigation was performed by Ramboll to further delineate of the nature and extent of the soil and groundwater impacts identified at Stantec soil boring/temporary well SB5/TW5. Soil borings were installed at the seven locations (SB-322 through SB-328) in the vicinity of Stantec soil boring SB5 as shown on **Figure 3**. The soil borings were advanced using a direct-push method to define the presence/absence and vertical extent of impacted soil at each boring location and extend to a depth of at least 15 feet bgs.

During field sampling activities, the presence of MGP-related impacts was observed in four soil boring locations (SB-323 through SB-326) and the monitoring well (OW24) location. As such, two samples were collected from each of these locations for laboratory analysis. Soil samples were not collected from borings SB-322, SB-327, or SB-328 as the presence of MGP-related impacts was not observed at these borings. Soil analytical results were compared to site-specific USEPA Cleanup Levels (CLs) that were established in the Record of Decision (ROD) dated September 25, 2012. Based on the results of the soil investigation:

- Benzene was not detected at concentrations above the laboratory detection limit in any of the soil samples. Low level concentrations of trimethylbenzenes, ethylbenzene, and xylenes were detected but these PVOCs do not have CLs identified in the ROD.
- PAHs, including naphthalene, were detected at concentrations exceeding the CLs in samples collected from impacted fill material. However, there were no PAH CL exceedances in any of the samples collected from the native sand material below the interval of potential impacts.
- PVOCs and PAHs were not detected at concentrations exceeding their respective CLs in the soil samples collected from boring SB-323, which is the southernmost boring closest to the pond.
- Soil impacts were not observed in the three borings located closest to the Wisconsin River.

The soil analytical results are presented in **Table 1**.

Following soil boring installation, one monitoring well (OW24) was installed in the vicinity of Stantec temporary well TW5 as shown on **Figure 3**. The monitoring well was constructed with a 2-inch inner diameter polyvinyl chloride well with a 10 foot 0.01-inch factory slotted screen that was set from 3 to 13 feet bgs, the same screened interval as temporary well TW5.

Monitoring well OW24 was sampled for groundwater using low-flow sample techniques at the same time as the October 2024 and April 2025 semi-annual sampling of existing wells. Field parameters were measured using a flow-through cell. The presence of DNAPL was not observed at well OW24 following installation and development activities or during the groundwater sampling. Groundwater analytical results were compared to site-specific USEPA CLs that were established in the ROD dated September 25, 2012.

Based on the results of the groundwater sampling:

- Benzene and naphthalene were detected at concentrations below their respective CLs at well OW24 during both the October 2024 and April 2025 sampling events.
- Benzo(a)anthracene was detected at a concentration exceeding the CL at well OW24 during the October 2024 sampling event. Benzo(a)anthracene was not detected at well OW24 during the April 2025 sampling event.
- No other PAHs were detected at concentrations exceeding their respective CLs during both the October 2024 and April 2025 sampling events.
- Iron was detected at concentrations exceeding the CL during both the October 2024 and April 2025 sampling events. However, semi-annual sampling results for the site indicates background concentrations of iron in groundwater are significantly higher than the CL.

The groundwater analytical results for well OW24 are presented in **Table 2**.

4. PROPOSED SUPPLEMENTAL SAMPLING ACTIVITIES

Per the directives in EPA’s communication of August 4, 2025, additional investigation will be performed to complete delineation of the nature and extent of the soil and groundwater impacts to the north and east of SB-324 and SB-325. The supplemental investigation activities described below will be performed in accordance with the site-specific information included in the Multi-Site Field Sampling Plan (FSP) – Revision 4 (IBS, 2008).

4.1 SOIL BORING AND SAMPLING

Health and Safety Plan

A site-specific health and safety plan (HASP) was prepared prior to initiating field activities in 2024. The HASP will be updated as necessary and followed by all field personnel for the on-site work.

Underground Utility Locate

The drilling company will notify Digger’s Hotline to identify public utilities in the area of proposed sampling. To obtain subsurface clearance for private utilities on site, Ramboll will discuss proposed boring locations with knowledgeable site personnel, if available, prior to advancement of borings. Ramboll will also contract with a private utility locating subcontractor to locate private utilities in the vicinity of the proposed boring locations.

4.1.1 SOIL BORING LOCATIONS

Soil borings will be installed in the park and Cultural Commons area at the six soil boring locations (SB-329 through SB-334) and seven contingency soil boring locations (SB-335 through SB-341) as shown on **Figure 3**. The contingency soil borings will only be installed in the vicinity of any soil boring locations that exhibit field observations of MGP-residuals. Locations may be field modified as needed based on the field-identified locations of utilities. Soil borings will be advanced using a direct-push method with efforts made to limit disturbances to the park and Cultural Commons. Sampling will be continuous to define the presence/absence and vertical extent of MGP-impacted soil at each boring location and extend to a depth of at least 15 feet bgs.

All borings advanced as part of the investigation will be continuously logged, following Multi-Site standard SOP SAS-05-02, the presence of fill material, moisture content, photoionization detector

readings, the nature of each geologic unit encountered, and visual and olfactory observations indicating the presence of NAPL (e.g., oil-coated, or oil-wetted). Soil boring locations will be recorded per Multi-Site SOP SAS-03-03, and will be abandoned following the methods described in Multi-Site SOP SAS-05-05. Field equipment will be calibrated prior to use, as required by Multi-Site SOP SAS-02-01 from the Multi-Site FSP.

Historical documentation indicates that the area was filled with mill refuse and recent investigation observations confirm that MGP-residuals in the vicinity of the former slough were buried with fill material not associated with the former MGP site. As such, soil samples will not be collected from soil borings that do not exhibit field observations of MGP-residuals since impacts in the shallow fill material are likely attributed to the historical activities at Pfiffner Pioneer Park and mill refuse used to fill this area. The soil impacts associated with the fill material in the park is currently being addressed as part of WDNR ERP case 02-50-586876.

Subsurface soil samples will be collected as follows:

- Soil samples will not be collected for borings that show no visual, olfactory, or PID indication of MGP-related impacts. These borings will be continuously logged, following Multi-Site standard SOP SAS 05-02, the presence of fill material, moisture content, photoionization detector readings, and the nature of each geologic unit encountered.
- For borings that indicate the presence of MGP-related contamination (through visual, olfactory, or PID indication), one sample of impacted material will be collected. A second sample will also be collected below the interval(s) of potential impacts, to document vertical extent.

All soil samples will be submitted to a Wisconsin certified laboratory (Pace Analytical of Green Bay, Wisconsin or Eurofins, Chicago, IL) for Contaminants of Potential Concern (COPCs) consistent with the Sampling and Analysis Plan Summary (Table 8 of the April 26, 2007 Remedial Investigation and Feasibility Study (RI/FS) Site Specific Work Plan Revision 1 (SSWP) included as **Attachment 2**). The SSWP was prepared by Natural Resource Technology, Inc. (NRT) and USEPA conditionally approved the SSWP on July 11, 2007. Soil sample analysis will include:

- Petroleum volatile organic compounds (PVOCs) via USEPA Method 8260 (Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Methyl Tert-Butyl Ether)
- PAHs via USEPA Method 8270 (1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene)

A soil sampling and analysis plan summary is presented in **Table 3**.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03 and as shown in **Table 3**. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

4.2 TEMPORARY WELL INSTALLATION AND GROUNDWATER SAMPLING

4.2.1 Temporary Well Installation

Based on prior groundwater sampling activities, groundwater in the vicinity of the site investigation area flows east-northeast, away from the Wisconsin River. Following soil boring installation, one temporary monitoring well (TW-332) will be installed north and east of the impacted area as shown on **Figure 3**. In addition, one temporary monitoring well may be installed at one of the contingency soil boring locations if any of the contingency soil boring locations exhibit field observations of MGP-residuals, or if groundwater impacts exceeding CLs are documented in TW-332. The exact location of the contingency temporary well will depend on field observations.

The temporary well(s) will be constructed according to Multi-Site SOP SAS-05-03. A 1-inch inner diameter polyvinyl chloride well with a 10 foot 0.01-inch factory slotted screen will be set from approximately 5 to 15 feet bgs, and the annular space around the well will be backfilled with clean sand filter pack, bentonite seal, and finished with a steel flush mount cover. The temporary wells will be constructed with a minimum 3-foot annular seal.

4.2.2 WELL DEVELOPMENT

Following installation, the temporary well(s) will be developed in accordance with Multi-Site SOP SAS-05-04. Field parameters (specific conductance, pH, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity) will be measured during development. The well(s) will be considered developed when field parameters meet the stabilization criteria detailed in Multi-Site SOP SAS-05-04.

4.2.3 GROUNDWATER SAMPLING

The temporary well(s) will be sampled for groundwater using low-flow sample techniques, in accordance with Multi-Site SOP SAS-08-02. Groundwater sampling will be conducted within two months following well installation. Field parameters will be measured using a flow-through cell.

Samples will be submitted to Pace Analytical of Green Bay, Wisconsin for analysis consistent with the Summary Required Analytes Based on Purpose (Table 3 of the Natural Attenuation Implementation Plan (NAIMP), **Attachment 2**). The NAIMP was submitted as an appendix to the August 25, 2014 Final Remedial Design, Revision 0 (Modified) prepared by NRT and approved by USEPA on October 22, 2014.

- Benzene via USEPA Method 8260
- 10 PAHs via USEPA Method 8270 (Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenzo(a,h)anthracene, Fluoranthene, Indeno(1,2,3-cd)pyrene, Naphthalene, and Pyrene)
- Iron, total and dissolved via USEPA Method 6010D
- Field parameters (Specific Conductance, pH, Temperature, Dissolved Oxygen, Oxidation-Reduction Potential, and Turbidity)

A groundwater sampling and analysis plan summary is presented in **Table 3**.

Quality control (QC) samples will be collected as required by Multi-Site FSP SOP SAS-04-03 and as presented in **Table 3**. Samples will be labeled and packaged in accordance with Multi-Site FSP SOP SAS-03-01 and shipped using chain-of-custody procedures described in Multi-Site FSP SOP SAS-03-02. Equipment will be decontaminated after use in accordance with Multi-Site FSP SOP SAS-04-04.

The need for additional sampling of the temporary well(s) will be evaluated once the results of the initial round of sampling results have been received. If groundwater analytical results do not exceed groundwater CLs, the temporary well(s) will be abandoned following approval to do so from USEPA.

5. RAIN GARDEN SURFACE WATER AND SHEEN SAMPLING

If surface water is present in the rain garden at the time of the soil and groundwater investigation activities, one surface water sample will be collected from the rain garden depicted on **Figure 3** in accordance with Multi-Site SOP SAS-09-01. The surface water grab sample will be collected from the top 12 inches of the water column in a manner that avoids disturbance of sediments. If a sheen is present, a sample of the sheen will also be collected. A sampling device will be used to skim the surface of the water to collect a sample of the sheen. The sheen sample collection method will depend on the site conditions (e.g. depth of surface water, quantity of sheen present) observed in the field during the investigation activities. If water is not present in the rain garden at the time of the sampling event, no sample will be collected.

The surface water sample and sheen sample (if present) will be submitted to a Wisconsin certified laboratory (Pace Analytical of Green Bay, Wisconsin or Eurofins, Chicago, IL) for COPCs consistent with the Sampling and Analysis Plan Summary (Table 8 of the April 26, 2007 RI/FS SSWP included as **Attachment 2**). Surface water sample and sheen sample analysis will include:

- PVOCs via USEPA Method 8260 (Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Methyl Tert-Butyl Ether)
- PAHs via USEPA Method 8270 (1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene)

A surface water and sheen sampling and analysis plan summary is presented in **Table 3**.

6. DISPOSAL OF INVESTIGATIVE DERIVED WASTE

Investigative derived wastes (IDW) will be containerized during site investigation activities. Soil, purge water, and investigation decontamination water will be disposed of offsite. Disposal activities will be completed in accordance with applicable state and federal regulations, and the methods described in Section 9 of the Multi Site FSP, Rev 4 (IBS, 2008). All disposal will be completed in accordance with the "Off-Site Rule" (September 1993, USEPA) for the disposal of IDW.

7. SCHEDULE AND REPORTING

Soil boring and temporary monitoring well installation is proposed to be completed in October or November 2025 following USEPA-approval of this work plan pending subcontractor availability and access agreement execution with the current landowner. Results of the investigation, if available, will be incorporated into the 2025 Groundwater Annual Report, which will be submitted within 90 days of the October 2025 sampling event.

TABLES

Table 1	Soil Analytical Results
Table 2	Groundwater Analytical Results
Table 3	Sampling and Analysis Plan

FIGURES

Figure 1	Site Location Map
Figure 2	Site Layout
Figure 3	Proposed Soil Boring and Temporary Well Locations

ATTACHMENTS

Attachment 1	Stantec Boring Log SB5 and Tables 2b, 2c, 3a, 3b, and 3c
Attachment 2	Sampling and Analysis Plan Summary and Summary Required Analytes Based on Purpose

REFERENCES

Natural Resource Technology. Remedial Investigation / Feasibility Study Site Specific Work Plan. April 26, 2007

Natural Resource Technology. Final Remedial Design, Revision 0 (Modified). August 25, 2014

Sand Creek Consultants. Pfiffner Pioneer Park Water Garden. August 10, 2020

Stantec Consulting Services Inc. Limited Site Investigation. June 14, 2021

TABLES

Table 2. Groundwater Analytical Results

Wisconsin Public Service Corporation - Former Stevens Point Manufactured Gas Plant Site
 1111 Crosby Avenue, Stevens Point, Wisconsin
 USEPA WIN000509983 / BRRTS # 02-50-000079 / FID # 750081200

Sample Location	Sample Date	VOC	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	PAH	Metal	Metal	Metal	Inorganic	Inorganic	Inorganic	Organic	
		Benzene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Naphthalene	Pyrene	Iron, Dissolved	Iron, Total	Manganese, Dissolved	Alkalinity, Total	Nitrogen, NO2 + NO3, Total	Sulfate, Total	Methane
Reporting Units		µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	
		Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	Result Flag	
Groundwater Clean-Up Levels:		5	0.029	0.2	0.2	0.29	0.2	0.0029	400	0.029	100	250	300	300	NS	NS	NS	NS	
OW24	10/16/2024	0.49 J	0.080 J	0.056 U	0.040 U	0.098 U	0.055 U	0.078 U	1.2	0.068 U	44.6	0.73	14,800	14,800	849	72,100	59 U	2,200 U	4,140
OW24	4/22/2025	0.55 J	0.071 U	0.066 U	0.047 U	0.12 U	0.066 U	0.093 U	0.57	0.081 U	42.8	0.36	16,900	16,200	823	57,900	92 J	1,400 J	--

[O: GKJ 5/19/25, QC: LDH 5/19/25, C: AGC 5/20/25]

Sorted by Sample Location

Bold	concentration attains or exceeds the WI Groundwater ES
<u>Underlined</u>	concentration attains or exceeds the WI Groundwater PAL

Groundwater Clean-Up Levels:

The Remedial Action Objectives (RAOs) to protect the public and the environment for this Site are non-numerical. Therefore, a set of numerical cleanup levels were established in the Record of Decision (ROD) to provide guidance for cleaning up the (Stevens Point) Site to provide protection of human health and the environment.

Results & Flags:

- = Analysis not performed
- J = Estimated Concentration
- U = Concentration was not detected above the reported limit
- Lab comments, additional data qualifiers and definitions can be found in associated laboratory reports.

Acronyms:

- = Analysis not performed
- µg/L = micrograms per liter
- BRRTS = Bureau for Remediation and Redevelopment Tracking System
- EPA = Environmental Protection Agency
- FID = facility identification number
- MGP = Manufactured Gas Plant
- NO2 + NO3 = nitrite plus nitrate
- NS = A groundwater quality standard has not been established.
- PAH = Polycyclic Aromatic Hydrocarbon
- USEPA ID = United States Environmental Protection Agency site identification number
- VOC = Volatile Organic Compound
- WDNR = Wisconsin Department of Natural Resources
- WI = Wisconsin

Table 3. Sampling and Analysis Plan

Wisconsin Public Service Corporation - Former Stevens Point Manufactured Gas Plant Site
 1111 Crosby Avenue, Stevens Point, Wisconsin
 USEPA WIN000509983 / BRRTS # 02-50-000079 / FID # 750081200

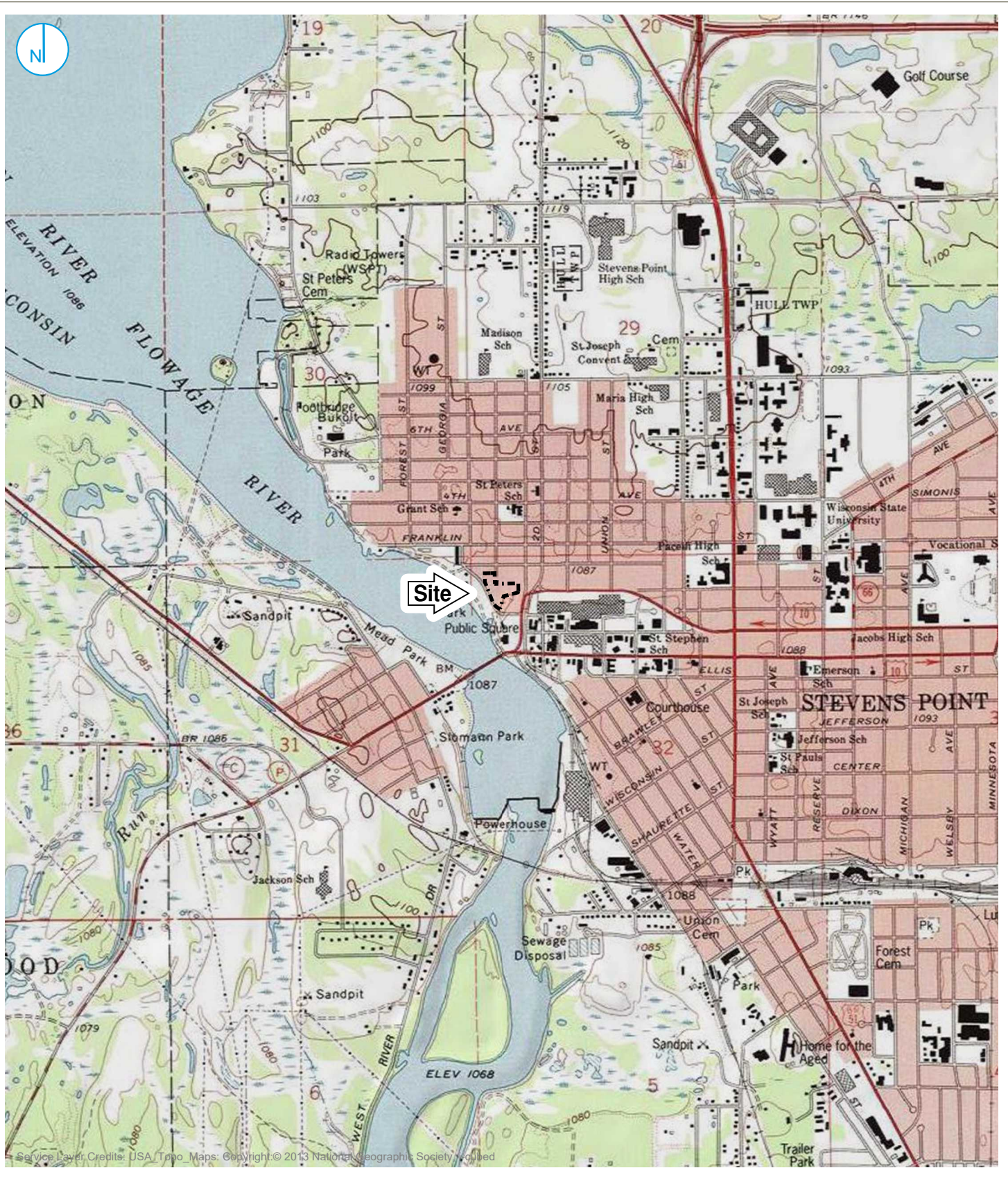
Sample Type	Proposed Number of Samples	Proposed Number of Locations	Parameter	Method	Field Duplicates ¹ (1 extra volume)	MS/MSD ² (2 extra volumes)	Trip Blanks	Container Type	Minimum Volume	Preservation (Cool All Samples to 4° ± 2°C Unless 'None' Indicated)	Holding Time from Sample Date
Soil	12-26	6 Soil Borings (SB-329 - SB-334)	PVOCs ³	8260	1 per 20	1 per 20	VOC trip blanks will accompany each cooler containing VOC samples	Glass Vial	2 oz.	MeOH	48 hours to freeze 14 days to analyze
		7 Contingency Soil Boring (SB-335 - SB-341)	PAHs ⁴	8270	1 per 20	1 per 20	--	Glass	4 oz.	--	14 days to extract 40 days to analyze
Groundwater	1-2	1 Temporary Monitoring Well (TW-332)	Benzene	8260	1 per 20	1 per 20	VOC trip blanks will accompany each cooler containing VOC samples	Glass Vial	3-40 mL	HCl to pH<2, Zero Headspace	14 days
		1 Contingency Temporary Monitoring Well (Location to be determined)	PAHs ⁵	8270	1 per 20	1 per 20	--	Amber Glass	70 mL	--	7 days to extract 40 days to analyze
			Iron, total and dissolved	6010D	1 per 20	1 per 20	--	Plastic	250 mL	HNO3 to pH<2	6 months
Surface Water and Sheen Sample	1 -2	1 Surface Water Sample 1 Sheen Sample (if present) (SW-01-2025)	PVOCs ³	8260	1 per 20	1 per 20	VOC trip blanks will accompany each cooler containing VOC samples	Glass Vial	2 oz.	MeOH	48 hours to freeze 14 days to analyze
			PAHs ⁴	8270	1 per 20	1 per 20	--	Glass	4 oz.	--	14 days to extract 40 days to analyze

Notes:

- Field duplicates will be collected at a frequency of 1 per 20 or fewer samples.
- Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples will be collected at a frequency of 1 per group of 20 or fewer samples. Additional volume will be determined by laboratory requirements.
- Petroleum volatile organic compounds (PVOCs) include Benzene, Ethylbenzene, Toluene, Total Xylenes, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, Methyl Tert-Butyl Ether
- Soil polycyclic aromatic hydrocarbon (PAHs) include 1-Methylnaphthalene, 2-Methylnaphthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene, Dibenzo(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd)pyrene, Naphthalene, Phenanthrene, Pyrene
- Groundwater PAHs include Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenzo(a,h)anthracene, Fluoranthene, Indeno(1,2,3-cd)pyrene, Naphthalene, and Pyrene

BRRTS - Bureau for Remediation and Redevelopment Tracking System
 HCL - Hydrochloric acid
 HNO3 - Nitric acid
 H2SO4 - Sulfuric acid
 MeOH - Methanol
 MGP - manufactured gas plant
 mL - milliliter
 MS/MSD - Matrix Spike/Matrix Spike Duplicate
 -- - not applicable
 oz. - ounce
 PAH - polycyclic aromatic hydrocarbon
 PVOC - petroleum volatile organic compound
 USEPA - United States Environmental Protection Agency

FIGURES



PROPERTY BOUNDARY

SITE LOCATION MAP

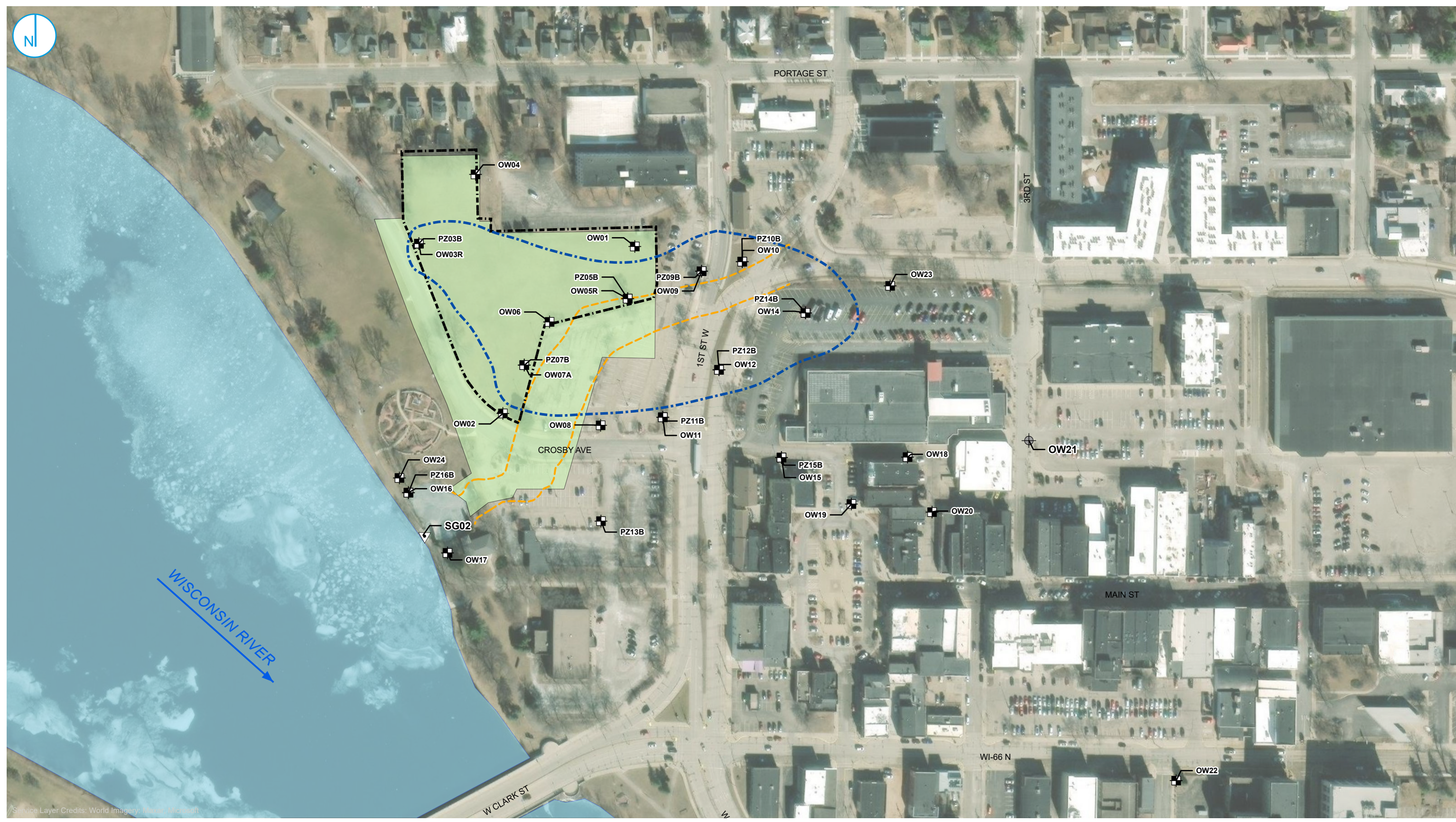
FIGURE 1

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

ADDITIONAL STUDIES WORK PLAN
FORMER MANUFACTURED GAS PLANT
WISCONSIN PUBLIC SERVICE CORPORATION
STEVENS POINT, WISCONSIN

Map Scale: 1:1,24,000;
Map Center: 89°35'17"W 44°31'30"N

0 1,000 2,000 Feet



- MONITORING WELL LOCATION
- STAFF GAUGE LOCATION
- ABANDONED MONITORING WELL LOCATION
- GROUNDWATER INSTITUTIONAL CONTROLS AREA
- FORMER SLOUGH
- SOIL INSTITUTIONAL CONTROLS AREA
- PROPERTY BOUNDARY
- RIVER



SITE LAYOUT

FIGURE 2

RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

FORMER MANUFACTURED GAS PLANT
WISCONSIN PUBLIC SERVICE CORPORATION
STEVENS POINT, WISCONSIN

ATTACHMENT 1
STANTEC BORING LOG SB5 AND TABLES 2B, 2C, 3A, 3B, AND 3C

Table 2b - Soil Analytical Results, Volatile Organic Compounds, Pffnner Pioneer Park, 1200 Crosby Avenue, Stevens Point, Wisconsin

Borehole Number	Sample Number	Date	Depth (feet below grade)	Soil Description	PID Response (iui)	Detected Volatile Organic Compound Laboratory Result (µg/kg)																						
						1,1,2-Trichloroethane	1,1-Dichloroethane	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	1,2-Dichloroethane	Benzene	Bromobenzene	Bromomethane	Chloroform	Ethylbenzene	Isopropylbenzene	Methyl tert-butyl ether (MTBE)	Methylene chloride	n-Butylbenzene	Naphthalene	n-Propylbenzene	p-Isopropyltoluene	sec-Butylbenzene	Tetrachloroethene (PCE)	Toluene	Trichloroethene (TCE)	Vinyl Chloride	Total Xylenes
WDNR Direct Contact RCL					Non-Industrial	1,590	5,060	219,000	182,000	652	1,600	342,000	9,600	454	8,020	NE	63,800	61,800	108,000	5,520	NE	162,000	145,000	33,000	818,000	1,300	67	260,000
WDNR RCL for Groundwater Protection					Industrial	7,010	22,200	219,000	182,000	2,870	7,070	679,000	43,000	1,980	35,400	NE	282,000	1,150,000	108,000	24,100	NE	162,000	145,000	145,000	818,000	8,410	2,080	260,000
WDNR RCL for Groundwater Protection						3.2	483.4	1378.7 combined		2.8	5.1	NE	5.1	3.3	1,570	NE	27	2.6	NE	658.2	NE	NE	NE	4.5	1,107.2	3.6	0.1	3,960
B1	SB1 (0-2)	5/5/2021	0-2	Loamy sand w/ trace coal frags to medium sand	2.6	<22	<26	<22	<24	<24	14 J	<22	<27	<23	<11	<24	<25	<100	<24	71	<26	<23	<25	<23	40	<10	<16	51
B2	SB2 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand	2	<19	<22	26 J	<21	<21	16	<19	<43	<20	12 J	<21	<22	<89	<21	150	<23	<20	<22	<20	63	<8.9	<14	97
B3	SB3 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand w/ trace gravel	1.6	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	SB3 (2-4)	5/5/2021	2-4	medium sand w/ gravel w/ fine coal frags	0.9	<26	<31	<27	<29	<29	<11	<27	<60	<28	<14	<29	<30	<120	<29	<25	<31	<27	<30	<28	<11	<12	<20	<17
B4	SB4 (0-2)	5/5/2021	0-2	Sandy topsoil to fine sand	1.4	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	SB4 (2-4)	5/5/2021	2-4	Fine sand to medium sand w/ fine coal frags	2.1	<21	<24	83	<22	<23	68	<21	<25	<22	73	<23	<23	<96	<23	280	49 J	<21	<23	<22	350	<9.6	<15	410
B5	SB5 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand	1	<21	<25	<22	<23	<24	<8.9	<22	<48	<22	<11	<23	<24	<99	<24	23 J	<25	<22	<24	<22	<8.9	<10	<16	<13
	SB5 (6-8)	5/5/2021	6-8	Sand w/ black tar binding, sticky, to wood chips	46.2	<290	<340	20,000	9,000	<330	<120	<300	<670	<310	1,300	1,800	<330	<1400	<320	1,100,000	610 J	2,600	<330	<310	430	<140	<220	3,300
B6	SB6 (0-2)	5/5/2021	0-2	Medium sand w/ loamy layers	2.6	<24	<28	<24	<26	<27	<9.9	<24	<54	<25	<12	<26	<27	<110	<26	<23	<28	<25	<27	<25	<10	<11	<18	<15
B7	SB7 (0-2)	5/5/2021	0-2	Loamy topsoil to sand w/ slag and coal	1.3	<25	<29	60 J	<27	<28	36	<25	<56	<26	45	<27	<28	<120	<27	120	30 J	<26	<28	<26	170	<12	<18	250
B8	SB8 (0-2)	5/5/2021	0-2	Loamy topsoil to medium sand w/ slag and coal	0.6	<23	<27	<24	<25	<26	<9.7	<24	<53	<24	<12	<25	<26	<110	<26	<22	<27	<24	<26	<24	<9.7	<11	<17	<15
B9	SB9 (0-1)	5/5/2021	0-1	Sandy topsoil to medium sand	1	<20	<24	<21	<22	<23	<8.5	<21	<46	<21	<11	<22	<23	<94	<22	32 J	<24	<21	<23	<21	<8.5	<9.5	<15	<13
B10	SB10 (0-1.5)	5/5/2021	0-1.5	Sandy topsoil to medium sand	0.8	<20	<23	<20	<22	<22	19	<20	<45	<21	<10	<22	<22	<93	<22	340	<24	<21	<23	<21	49	<9.3	<15	44

Key:

- <x = compound not detected to a detection limit of x
- = not analyzed
- XXX = exceeds WDNR RCL for direct contact risk (Non-Industrial)
- XXX = exceeds WDNR RCL for direct contact risk (Industrial)
- XXX = exceeds WDNR RCL for protection of groundwater
- RCL = residual contaminant level
- "B" = analyte detected in laboratory blank and sample
- µg/kg = micrograms per kilogram
- NE = not established by Wisconsin Administrative Code (Wis. Adm. Code) or WDNR Soil RCL Summary Table
- ** = sample collected below the observed low water table
- "J" = analyte detected between limit of detection and limit of quantification
- iui = Instruments Units of Isobutylene

Notes:

1. WDNR soil RCL Summary table (December 2018) used to establish RCLs for groundwater protection and direct contact.
2. No VOCs detected above limits of detection in Trip Blank accompanying soil VOC samples.

Table 2c - Soil Analytical Results, Polynuclear Aromatic Hydrocarbons, Piffner Pioneer Park, 1200 Crosby Avenue, Stevens Point, Wisconsin

Boring Number	Sample Number	Date Collected	Depth (fbg)	Soil Description	PAH Compound Laboratory Result (milligram/kilogram)																	
					Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methyl naphthalene	2-Methyl naphthalene	Naphthalene	Phenanthrene	Pyrene
WDNR RCL for Protection from Direct Contact Risk				Non-Industrial	3,590	NE	17,900	1.14	0.115	1.15	NE	11.5	115	0.115	2,390	2,390	1.15	17.6	239	5.52	NE	1,790
				Industrial	45,200	NE	100,000	20.8	2.11	21.1	NE	211	2,110	2.11	30,100	30,100	21.1	72.7	3,010	24.1	NE	22,600
WDNR RCL for Protection of Groundwater				NE	NE	196.9	NE	0.47	0.478	NE	NE	0.144	NE	88.877	14.829	NE	NE	NE	0.658	NE	54.545	
B1	SB1 (0-2)	5/5/2021	0-2	Loamy sand w/ trace coal frags to medium sand	0.22	1	0.64	4.5	6.9	8.7	2.9	3.3	5.9	0.74	7.6	0.15 J	2.6	0.190 J	0.081 J	0.24	2.3	11
B2	SB2 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand	0.18	0.48	0.31	2.6	2.7	2.5	1.4	1.5	2.6	0.39	4.1	0.087 J	1.4	0.29 J	0.32 J	0.36	0.86	5.2
B3	SB3 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand w/ trace gravel	1.9	12	20	48	61	76	19	21	47	5.9	50	1.5 J	19	1.7 J	0.73 J	3.4	6.2	63
	SB3 (2-4)	5/5/2021	2-4	medium sand w/ gravel w/ fine coal frags	0.31 J	2.3	1.9	9.2	10	14	3.4	5	8.6	0.8	18	0.37 J	2.8	0.23 J	0.28 J	0.67	5.1	15
B4	SB4 (0-2)	5/5/2021	0-2	Sandy topsoil to fine sand	<0.033	0.32	0.19	1.2	1.6	2.1	0.44	0.69	1.2	0.13 J	2	0.053 J	0.43	<0.044	0.036 J	0.10 J	0.46	2
	SB4 (2-4)	5/5/2021	2-4	Fine sand to medium sand w/ fine coal frags	0.26 J	3.7	3.3	17	20	28	5.7	8.7	17	1.7	37	0.71	5.5	1.1 J	1.6	2.2	12	31
B5	SB5 (0-2)	5/5/2021	0-2	Sandy topsoil to medium sand	<0.032	0.25	0.11 J	1.2	1.7	2.3	0.55	0.93	1.3	0.15 J	1.8	<0.025	0.51	<0.043	0.045 J	0.15 J	0.22	1.9
	SB5 (6-8)	5/5/2021	6-8	Sand w/ black tar binding, sticky, to wood chips	520	35	400	230	240	300	46	110	190	16	770	380	48	240	430	1100	1300	690
B6	SB6 (0-2)	5/5/2021	0-2	Medium sand w/ loamy layers	0.099	0.074	0.24	0.58	0.65	1	0.2	0.26	0.56	0.059	1.3	0.11	0.18	0.042 J	0.048 J	0.14	0.9	1
B7	SB7 (0-2)	5/5/2021	0-2	Loamy topsoil to sand w/ slag and coal	0.023 J	0.17	0.082	0.6	0.9	1.4	0.32	0.4	0.63	0.071	1.1	0.026 J	0.27	0.25	0.33	0.24	0.41	1.5
B8	SB8 (0-2)	5/5/2021	0-2	Loamy topsoil to medium sand w/ slag and coal	0.22	1.4	0.71	5.8	9.6	12	2.7	4.5	6.1	0.74	7.3	0.15 J	2.5	0.26 J	0.20 J	0.57	1.3	12
B9	SB9 (0-1)	5/5/2021	0-1	Sandy topsoil to medium sand	0.010 J	0.16	0.069	0.69	0.94	1.3	0.26	0.33	0.65	0.084	1.1	0.013 J	0.25	0.013 J	0.024 J	0.069	0.13	1.2
B10	SB10 (0-1.5)	5/5/2021	0-1.5	Sandy topsoil to medium sand	<0.32	4.2	2.1	19	28	32	8.2	13	18	2.4	29	0.39 J	7.7	<0.43	0.39 J	1.7	2.9	30

Key:

- <x = compound not detected to a detection limit of x
- = not laboratory analyzed
- XXX = exceeds WDNR RCL for direct contact risk (Non-Industrial)
- XXX = exceeds WDNR RCL for direct contact risk (Industrial)
- XXX = exceeds WDNR RCL for protection of groundwater and/or BTV
- NE = not established by WAC (Wis. Adm. Code) or WDNR Soil RCL Summary Table
- "J" = analyte detected between the limit of detection and limit of quantification
- iui = instrument units as isobutylene
- PID = photoionization detector
- RCL = residual contaminant level

Notes: WDNR soil RCL Summary table (December 2018) used to establish RCLs for groundwater protection and direct contact.

Table 3a Groundwater Analytical Results, RCRA Metals, Pfiffner Pioneer Park, 1200 Crosby Avenue, Stevens Point, WI

Well Number	Date Collected	Laboratory Results (µg/L)	
		RCRA Metals	
		Arsenic	Lead
NR 140 Preventive Action Limit (µg/l)		1	1.5
NR 140 Enforcement Standard (µg/l)		10	15
TW1	5/5/2021	<0.23	0.40 J
TW5	5/5/2021	1.3	1.1
TW7	5/5/2021	1.1	1.3
TW8	5/5/2021	1.1	0.6

Key:

- RCRA = Resource Conservation and Recovery Act
- <X = analyte not detected above method detection limit
- "J" = analyte detected between limit of detection and limit of quantitation
- X** = concentration detected above Chapter NR 140, Wisconsin Administrative Code(NR 140, Wis. Adm. Code) preventive action limit (PAL)
- X** = concentration detected above NR 140, Wis. Adm. Code enforcement standard (ES)
- NE = not established
- = not analyzed

Table 3b Groundwater Analytical Results, Volatile Organic Compound, Piffner Pioneer Park, 1200 Crosby Avenue, Stevens Point, WI

Well Number	Date Collected	Volatile Organic Compounds (µg/L)																		
		Benzene	Isopropylbenzene	n-Butylbenzene	n-Propylbenzene	sec-Butylbenzene	1,2-Dichloroethane	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Ethylbenzene	p-Isopropyltoluene	Methylene Chloride	MTBE	Naphthalene	Tetrachloroethene (PCE)	Toluene	Trichloroethene (TCE)	Total Trimethylbenzene	Vinyl Chloride	Total Xylenes
NR 140 Preventive Action Limit (µg/l)		0.5	NE	NE	NE	NE	0.5	7	20	140	NE	0.5	12	10	0.5	160	0.5	96	0.02	400
NR 140 Enforcement Standard (µg/l)		5	NE	NE	NE	NE	5	70	100	700	NE	5	60	100	5	800	5	480	0.2	2,000
TW1	5/5/2021	<0.15	<0.39	<0.39	<0.41	<0.40	<0.39	<0.41	<0.35	<0.18	<0.36	<1.6	<0.39	<0.34	<0.37	<0.15	<0.16	<0.61	<0.20	<0.22
TW5	5/5/2021	<0.29	<0.77	<0.78	<0.83	<0.80	<0.78	<0.82	<0.70	0.98 J	61	<3.3	<0.79	1100	<0.74	<0.30	<0.33	13.2	<0.41	1.3 J
TW7	5/5/2021	<0.15	<0.39	<0.39	<0.41	<0.40	<0.39	<0.41	<0.35	<0.18	<0.36	<1.6	<0.39	<0.34	<0.37	<0.15	<0.16	<0.61	<0.20	<0.22
TW8	5/5/2021	<0.15	<0.39	<0.39	<0.41	<0.40	<0.39	<0.41	<0.35	<0.18	<0.36	<1.6	<0.39	<0.34	<0.37	<0.15	<0.16	<0.61	<0.20	<0.22
DUP	5/5/2021	<0.29	<0.77	<0.78	<0.83	<0.80	<0.78	<0.82	<0.70	1.4	78	<3.3	<0.79	1200	<0.74	0.43 J	<0.33	14.7	<0.41	1.3 J

Key:
 "J" = Analyte detected between Limit of Detection and Limit of Quantitation
 X = Concentration detected above Chapter NR 140, Wisconsin Administrative Code (NR 140, Wis. Adm. Code) preventive action limit (PAL)
X = Concentration detected above NR 140, Wis. Adm. Code enforcement standard (ES)
 µg/L = micrograms per liter

Notes: 1. No VOCs detected above limits of detection in Trip Blank accompanying groundwater VOC samples.

Table 3c Groundwater Analytical Results, Polynuclear Aromatic Hydrocarbons, Piffner Pioneer Park, 1200 Crosby Avenue, Stevens Point, WI

Well Number	Date Collected	Polynuclear Aromatic Hydrocarbons (µg/L)																	
		Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g, h, i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a, h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	1-Methyl naphthalene	2-Methyl naphthalene	Naphthalene	Phenanthrene	Pyrene
NR 140 Preventive Action Limit (µg/l)		NE	NE	600	NE	0.02	0.02	NE	NE	0.02	NE	80	80	NE	NE	NE	10	NE	50
NR 140 Enforcement Standard (µg/l)		NE	NE	3,000	NE	0.2	0.2	NE	NE	0.2	NE	400	400	NE	NE	NE	100	NE	250
TW1	5/5/2021	7.3	1.3	1.4	5.2	6	7.2	1.5	3	4.7	0.48	9.4	2.7	1.8	0.38 J	0.32 J	1.1	3.8	9.5
TW5	5/5/2021	130	2	11	5.2	5.5	6.3	1.3	2.2	4.6	0.4	14	36	1.5	94	130	1100	43	12
TW7	5/5/2021	2	<0.21	<0.26	0.072 J	<0.076	<0.062	<0.29	<0.049	<0.052	<0.039	0.35 J	0.97	<0.057	<0.23	0.056 J	0.32 J	0.54 J	<0.33
TW8	5/5/2021	0.23 J	<0.20	<0.25	0.35	0.45	0.49	<0.28	0.19	0.28	<0.038	0.39 J	<0.18	<0.057	<0.23	0.084 J	0.46 J	<0.23	0.47 J
DUP	5/5/2021	130	1.9	11	4.4	4.5	5.4	1.2	2.6	4	0.24	13	41	1.3	99	140	1100	47	11

Key:
 "J" = Analyte detected between Limit of Detection and Limit of Quantitation
 X = Concentration detected above Chapter NR 140, Wisconsin Administrative Code (NR 140, Wis. Adm. Code) preventive action limit (PAL)
X = Concentration detected above NR 140, Wis. Adm. Code enforcement standard (ES)
 µg/L = micrograms per liter

**ATTACHMENT 2
SAMPLING AND ANALYSIS PLAN SUMMARY AND SUMMARY REQUIRED
ANALYTES BASED ON PURPOSE**

Table 8. Sampling and Analysis Plan Summary

Wisconsin Public Service - Former Stevens Point Manufactured Gas Plant Site

1111 Crosby Avenue, Stevens Point, Wisconsin

USEPA WIN000509983 / BRRTS # 02-50-000079 / FID # 750081200

Sample Type/Location	Matrix / Laboratory	Parameter	Method	Sample Quantity	Field Duplicates ²	Equipment Blanks ³	MS/MSD ⁴	TOTAL	Container Type	Minimum Volume	Preservation (Cool to 4° ≥ 2°C All Samples)	Holding Time from Sample Date
Soil - Pond Area (Source area and vertical migration)	Soil Fixed	PVOCs	8021 or 8260B	up to 9 ¹	1	0	1	up to 11	glass	4 oz.	methanol	14/40 days
		PAHs	8270C or 8270-SIM	up to 9 ¹	1	0	1	up to 11	amber glass	8 oz.		14/40 days
		Metals ⁹	6020A or 7471A	up to 9 ¹	1	0	1	up to 11	plastic	125 mL		28 days (Hg)
		Cyanide	9012A	up to 9 ¹	1	0	1	up to 11	plastic	125 mL		14 days
		Phenols ¹⁰	8270C	up to 9 ¹	1	0	1	up to 11	amber glass	8 oz.		14/40 days
Soil - Pioneer Park (Surface Soils [0'-2'])	Soil Fixed	PVOCs	8021 or 8260B	6	1	0	1	8	glass	4 oz.	methanol	14/40 days
		PAHs	8270C or 8270-SIM	6	1	0	1	8	amber glass	8 oz.		14/40 days
Soil - City Parking Lot (Shallow Subsurface Soils [2'-6'])	Soil Fixed	PVOCs	8021 or 8260B	8	1	0	1	10	glass	4 oz.	methanol	14/40 days
		PAHs	8270C or 8270-SIM	8	1	0	1	10	amber glass	8 oz.		14/40 days
Groundwater First Quarter (Risk Assessment, Feasibility Study, On-going monitoring)	Water Fixed	Benzene	8021 or 8260B	20	2	0	1	23	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
		PAHs	8270C or 8270-SIM	20	2	0	1	23	amber glass	1 L		14 days
		Alkalinity	EPA 310.2	20	2	0	1	23	plastic	100 ml		14 days
		Nitrate+Nitrite	EPA 300.0	20	2	0	1	23	plastic	100 ml	H ₂ SO ₄ to pH<2	48 hours
		Sulfate	EPA 300.0	20	2	0	1	23	plastic	50 ml	Cool to 4° ≥ 2°C	28 days
		Iron (dissolved)	6010	20	2	0	1	23	plastic	250 ml	HNO ₃ to pH <2	6 months
		Methane	8015	20	2	0	1	23	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
Field Parameters ¹²	Field	20	2	0	0	22	field measured					
Groundwater Quarters 2-4 (Risk Assessment, Feasibility Study, On-going monitoring)	Water Fixed	Benzene	8021 or 8260B	28	3	0	2	33	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
		PAHs	8270C or 8270-SIM	28	3	0	2	33	amber glass	1 L		14 days
		Alkalinity - Only Oct. 2007	EPA 310.2	28	3	0	2	33	plastic	100 ml		14 days
		Nitrate+Nitrite - Only Oct. 2007	EPA 353.3	28	3	0	2	33	plastic	100 ml	H ₂ SO ₄ to pH<2	48 hours
		Sulfate - Only Oct. 2007	EPA 300.0	28	3	0	2	33	plastic	50 ml	Cool to 4° ≥ 2°C	28 days
		Iron (dissolved) - Only Oct. 2007	6010	28	3	0	2	33	plastic	250 ml	HNO ₃ to pH <2	6 months
		Methane - Only Oct. 2007	8015	28	3	0	2	33	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
Field Parameters ¹²	Field	28	3	0	0	31	field measured					
Storm Water 3 Quarters	Water Fixed	PAHs	8270C or 8270-SIM	4	1	0	0	5	amber glass	1 L		14 days
		PVOCs	8021 or 8260B	4	1	0	0	5	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
River Surface Water (Human Health and Ecological Risk Assessment)	Water Fixed	PVOCs	8021 or 8260B	9	1	0	1	11	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
		PAHs	8270C or 8270-SIM	9	1	0	1	11	amber glass	1 L		14 days
		Metals ⁹	6010 or 7470	9	1	0	1	11	plastic	500 ml	HNO ₃ to pH <2	28 days
		Cyanide	OIA-1677	9	1	0	1	11	amber glass	500 ml	PbCO ₃ ; NaOH to pH>12	14 days
		Phenols ¹⁰	8270C	9	1	0	1	11	amber glass	1 L		14 days
Field Parameters ¹²	Field	9	0	0	0	9	field measured					
River Sediment (Human Health and Ecological Risk Assessment)	Sediment Mobile	PVOCs	8021 or 8260B	20 cores ⁸	TBD	TBD	TBD	TBD	Glass	4 oz.	methanol	7/28 days
		34 PAHs ⁵	8270C or 8270-SIM	20 cores ⁸	TBD	TBD	TBD	TBD	amber glass	8 oz.		14/40 days
		Metals ¹¹	6020A or 7471A	20 cores ⁸	TBD	TBD	TBD	TBD	plastic	125 mL		6 months
		Phenols ¹⁰	8270C	20 cores ⁸	TBD	TBD	TBD	TBD	amber glass	8 oz.		14/40 days
	Percent Solids	Various	20 cores ⁸	TBD	TBD	TBD	TBD	Glass	4 oz	keep in dark	28 days	
	Fixed	Cyanide	9012A	20 cores ⁸	TBD	TBD	TBD	TBD	plastic	125 mL		14 days
		"Soot" Carbon ¹³	Refer to Note 6	20 cores ⁸	TBD	TBD	TBD	TBD	Plastic	500 g	keep in dark	28 days
Total Organic Carbon ¹³		Various	20 cores ⁸	TBD	TBD	TBD	TBD	plastic	100 g	keep in dark	28 days	
Biological Testing ¹³	Refer to Note 7	20 cores ⁸	TBD	TBD	TBD	TBD	Plastic	2L	keep in dark			

Table 8. Sampling and Analysis Plan Summary

Wisconsin Public Service - Former Stevens Point Manufactured Gas Plant Site
 1111 Crosby Avenue, Stevens Point, Wisconsin
 USEPA WIN000509983 / BRRTS # 02-50-000079 / FID # 750081200

Sample Type/Location	Matrix / Laboratory	Parameter	Method	Sample Quantity	Field Duplicates ²	Equipment Blanks ³	MS/MSD ⁴	TOTAL	Container Type	Minimum Volume	Preservation (Cool to 4° ≥ 2°C All Samples)	Holding Time from Sample Date
Pond Surface Water (Human Health and Ecological Risk Assessment)	Water Fixed	PVOCs	8021 or 8260B	1	0	0	0	1	glass vial	2-40 ml	HCl to pH<2, Zero Headspace	14 days
		PAHs	8270C or 8270-SIM	1	0	0	0	1	amber glass	1 L		14 days
		Metals ⁹	6010 or 7470	1	0	0	0	1	plastic	500 ml	HNO3 to pH <2	28 days
		Cyanide	OIA-1677	1	0	0	0	1	amber glass	500 ml	PbCO3; NaOH to pH>12	14 days
		Phenols ¹⁰	8270C	1	0	0	0	1	amber glass	1 L		14 days
		Field Parameters ¹²	Field	1	0	0	0	1	field measured			
Pond Sediment (Human Health and Ecological Risk Assessment)	Sediment Mobile	PVOCs	8021 or 8260B	3 cores ⁸	TBD	TBD	TBD	TBD	Glass	4 oz.	methanol	7/28 days
		34 PAHs ⁵	8270C or 8270-SIM	3 cores ⁸	TBD	TBD	TBD	TBD	amber glass	8 oz.		14/40 days
		Metals ¹¹	6020A or 7471A	3 cores ⁸	TBD	TBD	TBD	TBD	plastic	125 mL		6 months
		Phenols ¹⁰	8270C	3 cores ⁸	TBD	TBD	TBD	TBD	amber glass	8 oz.		14/40 days
		Percent Solids	Various	3 cores ⁸	TBD	TBD	TBD	TBD	Glass	4 oz.	keep in dark	28 days
Sediment (FS Parameters)	Soil Fixed	Grain Size Distribution	ASTM D421, 422	6	0	0	0	6	5 gal bucket	5 gal.		
		Atterberg Limits	ASTM D4318	6	0	0	0	6	Glass or Plastic	8 oz.		
		Organic Content	ASTM D2974	6	0	0	0	6	plastic	100 g	keep in dark	28 days
		Moisture Content	ASTM D2216	6	0	0	0	6	Glass or Plastic	8 oz.		

Notes:

- Actual number of soil samples collected dependent on recovery and impacts observed. Number of QC samples collected is based on an estimate of 9 samples, numbers will change according to footnote 2 depending on actual number of analytical samples.
- Field duplicates will be collected at a frequency of one per group of ten or fewer investigative water samples and one per group of twenty or fewer investigative soil/sediment samples.
- Equipment blanks will be collected at a frequency of one per sampling day with non-dedicated sampling equipment.
- Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples will be collected at a frequency of one per group of twenty or fewer investigative samples. Additional volume will be determined per laboratory requirements.
- May include a list of 34 PAHs, including chain parameters as provided in USEPA Guidance Procedures for the Derivation of Equilibrium Partitioning Sediment Benchmarks (ESBs) for the Protection of Benthic Organisms: PAH Mixtures, 2002 by SW-846 Method 8270C with gas chromatograph/mass spectrometry in selected ion mode of operation.
- "Soot" Carbon is the remaining carbon after muffle furnace drying and acid treatment of sediments to remove other forms of carbon. Used to estimate the bioavailable concentration of PAHs in sediment from the "freely-dissolved" chemical in the interstitial water based on USEPA Bioavailability Procedure, 2000, Gustafsson, et al. 1997, and Accardi-Day and Gschwend, 2003.
- The *Hyalella* (amphipod) 28-day test may be used to evaluate the toxicity of whole sediments. This test will be performed in accordance with USEPA guidance.
- Additional sediment cores may be collected based on mobile laboratory analytical results as described in Sections 6.7/6.8 of the Site Specific Work Plan. Sediment cores will be subdivided into 0-6 inch, 6-18 inch, 18-30 inch, 30-42 inch, and so on in one foot intervals as described in Section 6.7 of the Site Specific Work Plan. Field duplicates, equipment blanks and MS/MSD samples will be collected as described above. Final sample numbers will be determined based on field conditions.
- Metals include aluminum, antimony, arsenic, barium, cadmium, chromium, copper, iron, lead, manganese, mercury, nickel, selenium, silver, vanadium and zinc.
- Phenols include 2,4-dimethylphenol, 2-methylphenol, 4-methylphenol and phenol.
- Metals for sediment include aluminum, antimony, arsenic, barium, chromium, iron, manganese, nickel, selenium, silver and vanadium.
- Field parameters include temperature, pH, specific conductivity, oxidation-reduction potential, and dissolved oxygen.
- These parameters may be analyzed as part of additional Step 1 assessment sampling.

Acronyms:

BTEX = Benzene, Toluene, Ethylbenzene, Xylenes
 PAHs = Polynuclear Aromatic Hydrocarbons

TBD = To be determined based on field encountered conditions
 PVOC = Petroleum Volatile Organic Compounds
 VOC = Volatile Organic Compounds

**Table 2. Summary Required Analytes Based on Purpose
Natural Attenuation Implementation and Monitoring Plan (Modified)**

Wisconsin Public Service - Former Stevens Point Manufactured Gas Plant Site

1111 Crosby Avenue, Stevens Point, Wisconsin

USEPA WIN000509983 / BRRTS # 02-50-000079 / FID # 750081200

Analytes	Analytical Method	Lateral Plume Definition	Vertical Plume Definition	Inside/Outside Plume MNA Monitoring	Plume Concentration Trends	GW to Vapor	Groundwater Flow
Benzene	8021 or 8260B	X	X		X	X	
Benzo[a]anthracene	8270-SIM	X	X		X		
Benzo[a]pyrene		X	X		X		
Benzo[b]fluoranthene		X	X		X		
Benzo[k]fluoranthene		X	X		X		
Chrysene		X	X		X		
Dibenz[a,h]anthracene		X	X		X		
Fluoranthene		X	X		X		
Indeno[1,2,3-cd]pyrene		X	X		X		
Naphthalene		X	X		X	X	
Pyrene		X	X		X		
Iron, Dissolved		6010	X	X	X	X	
Iron, Total	6010	X	X	X	X		
Manganese, Dissolved	6010			X			
Alkalinity, Total	310.2			X			
NO3 + NO2, Total	300			X			
Sulfate, Total	300			X			
Methane	8015B			X			
Field Parameters	Field	X	X	X	X	X	
Groundwater Elevation	Field						X

Analyte list originates from clean up levels identified in the ROD

Field Parameters: Temperature, Dissolved Oxygen, Oxidation-Reduction Potential, pH, Specific Conductance, Turbidity

The potential vapor risk will be assessed as described in Section 5.5 of the NAIMP