



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

December 4, 2008

REPLY TO THE ATTENTION OF:

Mr. Jerry C. Winslow  
Principal Environmental Engineer  
Xcel Energy  
414 Nicollet Mall (Ren. Sq. 8)  
Minneapolis, Minnesota 55401

SR-6J

RE: Approval of Final Feasibility Study  
Ashland/NSP Lakefront Superfund Site, Ashland, Wisconsin

Dear Mr. Winslow:

In accordance with the Administrative Order on Consent (AOC), CERCLA Docket No. V-W-04-C-764, Section X, Subparagraph 21(c), the United States Environmental Protection Agency (EPA) is modifying the Final Feasibility Study (FS) Report submission to cure certain deficiencies. EPA reviewed the revised Final Draft version of the Feasibility Study (FS) report sent by NewFields on November 21, 2008, on behalf of Northern States Power Company (NSPW), (d.b.a. Xcel Energy). EPA agrees with a majority of the proposed modifications in the FS, therefore, EPA approves the Final Feasibility Study Report dated November 21, 2008. However, there are some minor modifications that need to be incorporated into the final document. Since EPA has already provided a notice of deficiency on the FS, EPA invokes its right to modify the FS pursuant to Subparagraph 21(c). See modifications below.

1. **Table 6-4, Adequacy and Reliability of Controls column** – The bullet item that states, “Construction of a disposal cell at Kreher Park will not meet the State ARARs for siting (e.g. distance from surface water body and depth of waste) the landfill, and therefore, may cause a significant implementation hurdle” needs to be included in the Alternative S-4A column as well as Alternative S-4B, since both remedies include on-site disposal.
2. **Table 6-7, Administrative Feasibility column** – In Alternative S-3B, please add the sentence, “The off-site landfill will meet the U.S. EPA offsite rule.”
3. **Section 7.3.7 Alternative GW-7 - In-situ Treatment using Electrical Resistance Heating** – Please insert “active/passive” in the entire section whenever there is a discussion on the types of vent wells. Since we disagree on whether the venting wells will be passive or active, this will make sure we cover both types.
4. **Section 8.3.5.3, Implementation of Remedy, Containment Wall Installation, 2<sup>nd</sup> paragraph** – After the sentence, “Preliminary structural analysis of the Pipe/AZ wall system without the use of a stone breakwater indicates similar deflections to other systems with the stone breakwater in-place.” Please insert the following sentence, “A

more thorough structural analysis of the Pipe/AZ wall will be performed during remedial design.”

Please revise the FS document based on the modifications above, and submit the revised pages.

In addition, EPA does not agree with some of the estimated remedy costs in the FS document. EPA believes that the assumptions used to determine some of the cost estimates were not accurate, which in turn leaves some uncertainty in the overall estimates. However, according to EPA guidance, the expected accuracy range of the cost estimate is -30 to +50 percent for detailed analysis of alternatives. EPA believes the cost estimates are likely within that range, therefore, is not requiring that you make changes to the cost estimates in the final FS. Note, however, that EPA may elect to prepare some cost estimates of its own, using assumptions it believes to be more accurate, prior to the proposed plan and/or record of decision.

If you have any questions or would like to discuss things further, please contact me at 312-886-1999.

Sincerely,

A handwritten signature in cursive script that reads "Scott Hansen".

Scott K. Hansen  
Remedial Project Manager

cc: Dave Trainor, Newfields  
Jamie Dunn, WDNR  
Omprakash Patel, Weston Solutions, Inc.  
Henry Nehls-Lowe, DHFS  
Lynn Hall, Bad River Band of the Lake Superior Chippewa  
Tracey Ledder, Red Cliff Band of the Lake Superior Chippewa