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June 25, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
Metro Square – Suite 350
212 7th Place East
St. Paul, MN 55101-2147

Re: Response to Commission Additional Questions for Joint Petitioners

In the Matter of a Request for Approval of the Asset Purchase & Sale Agreement Between Interstate Power and Light Company and Minnesota Energy Resources Corporation, Docket No. G001,G011/PA-14-107

Dear Dr. Haar:

Enclosed for filing with the Minnesota Public Utilities Commission ("Commission"), please find Interstate Power and Light Company ("IPL") and Minnesota Energy Resources Corporation's ("MERC") Responses to the Commission's Additional Questions dated July 7, 2014. IPL and MERC will submit a separate filing responding to the Office of the Attorney General-Antitrust & Utilities Division's questions on or before the August 8, 2014 deadline established in the Commission's Order Requiring Additional Record Development (June 30, 2014).

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Office of the Attorney General-Antitrust & Utilities Division, and the attached service list.

Please contact me at (612) 340-2881 if there are any questions regarding this filing.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

Enclosures

cc: Service List

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	**Chair**
David C. Boyd	**Commissioner**
Nancy Lange	**Commissioner**
Dan Lipschultz	**Commissioner**
Betsy Wergin	**Commissioner**

IN THE MATTER OF A REQUEST FOR APPROVAL OF THE ASSET PURCHASE AND SALE AGREEMENT BETWEEN INTERSTATE POWER AND LIGHT COMPANY AND MINNESOTA ENERGY RESOURCES CORPORATION	**DOCKET NO. G001,G011/PA-14-107**

RESPONSE TO COMMISSION ADDITIONAL QUESTIONS FOR JOINT PETITIONERS

On June 30, 2014, the Minnesota Public Utilities Commission (the Commission) issued an Order Requiring Additional Record Development in this docket. The Order required that Interstate Power and Light Company (IPL) and Minnesota Energy Resources Corporation (MERC) (collectively Joint Petitioners) file comments responding to any additional questions posed by the Commission, the Minnesota Department of Commerce, Division of Energy Resources (the Department), the Minnesota Office of the Attorney General – Antitrust and Utilities Division (the OAG), or any other interested person. On July 7, 2014, the Commission issued Additional Questions for Joint Petitioners. Joint Petitioners submit these comments in response to the Commission's Additional Questions.

The Joint Petitioners are also submitting the First Amendment to the Asset Purchase and Sale Agreement between MERC and IPL (the Amendment) as

Attachment A to these Comments. The Amendment relates directly to some of the Commission's Additional Questions. Pursuant to the Amendment, MERC has agreed to acquire IPL's existing regulatory asset for clean-up costs associated with IPL's former manufactured gas plant (FMGP) sites for expenses incurred but not yet recovered. MERC's purchase of IPL's FMGP regulatory asset will be financed through a promissory note for the amount of the regulatory asset to be held in favor of IPL. MERC will then be obligated to pay IPL the value of that note (i.e., the value of the regulatory asset) from ratepayer supplied funds authorized in MERC's next rate case, with such payments to be made only after MERC's directly incurred cleanup costs at the Austin site are first recovered.

The Joint Petitioners respond to each of the Commission's Additional Questions below.

1. **How much responsibility for the former manufactured gas plant (FMGP) cost is being transferred to MERC?**

Under the terms of the Agreement and the Amendment MERC will assume responsibility for the remaining environmental remediation at the Austin FMGP Site. The future FMGP clean-up costs of the Austin site are estimated at between $2.7 million and $4.1 million.[1] IPL will retain responsibility for remediation of all of the remaining Minnesota FMGP sites. IPL has estimated liability for those sites to be approximately $1.56 - $5.61 million as of December 31, 2013.[2] As further explained in the response to

[1] *See* Joint Petitioners' Reply Comments at 5 (May 9, 2014). The range given represents the amount IPL estimates it has yet to spend on remediation activities at Austin as of year-end 2013, consistent with its MPCA-approved plan, and the estimate MERC has received based on its remediation plan. See also IPL response to Department Information Request No. 7, attached as Attachment B to these Comments.

[2] The status of IPL's FMGP sites as of year-end 2013 was provided in response to OAG Information Request Nos. 101 and 102. IPL's responses to those requests are attached as Attachment C to these Comments.

Question 2 below, IPL's existing regulatory asset for previously incurred, but not yet recovered FMGP clean-up costs (net of environmental and regulatory liabilities) is also being transferred to MERC. The amount of this existing regulatory asset was estimated at $2.6 million as of December 31, 2013.

2. What happens to any remaining unrecovered FMGP costs at (a) the Austin site, and (b) the sites other than Austin?

Under the terms of the Agreement and Amendment MERC will acquire IPL's existing regulatory asset as of the date of closing (net of environmental and regulatory liabilities)[3] for clean-up costs paid, but not yet recovered by IPL, for all of the Minnesota FMGP sites. As a result, remaining unrecovered costs incurred through the date of closing (which have been deferred in accordance with prior Commission orders),[4] will be transferred to MERC as a regulatory asset. This regulatory asset is associated with deferred costs and expenses for all of IPL's Minnesota FMGP sites, which include Austin, Albert Lea, Fairmont, Owatonna, New Ulm, and Rochester.

MERC will defer all future remediation costs at the Austin FMGP site and expects to seek recovery of those costs, along with the amount of the regulatory asset acquired from IPL, in future rate case proceedings. As discussed above, all future costs at the Minnesota FMGP sites other than the Austin FMGP site will remain the responsibility of

[3] *See* Attachment A, page 3, for a calculation of the Regulatory Asset.

[4] The Commission granted IPL authority to defer cleanup costs for FMGP sites in Rochester and Albert Lea *In the Matter of a Request by Interstate Power Company for Deferral of Expenses Associated with Former Manufactured Gas Plants*, Docket No. G-001/M-94-633, ORDER APPROVING REQUEST FOR AUTHORITY TO DEFER COSTS AND REQUIRING FILINGS (April 13, 1995). The Commission granted IPL authority for deferred accounting of FMGP investigation and remediation costs for the New Ulm, Owatonna, and Austin FMGP sites in *In the Matter of a Request by Interstate Power Company for Deferral of Expenses Associated with Former Manufactured Gas Plants*, Docket No. G-001/M-95-687, ORDER ALLOWING DEFERRAL OF COSTS AND REQUIRING FILINGS (April 2, 1996).

IPL. Recovery for the future costs associated with the remediation of the FMGP sites, other than the Austin FMGP site, will not be sought from Minnesota ratepayers.

3. Does MERC propose a limit for its customers' exposure for FMGP cost at (a) the Austin site, and (b) the other sites?

As noted above, with respect to all FMGP sites other than the Austin FMGP site, customers' exposure would be limited to only those environmental remediation costs and related expenses incurred through the date of closing. IPL will retain all responsibility for future cleanup costs at those sites.

As also noted above, with respect to the Austin FMGP site, MERC is proposing to track all environmental remediation costs and expenses at the Austin site from the date of closing and to seek recovery of these costs from ratepayers in a subsequent rate case. Customers' exposure for FMGP costs are limited to cleanup activities approved by the Minnesota Pollution Control Agency (MPCA) for remediation of the Austin site. As a result, future FMGP cost recovery sought by MERC will be limited to necessary environmental remediation costs and associated expenses and will be subject to review by the Commission for prudence of the costs incurred.

4. What happens to the cleanup (and its related costs) of the other sites?

Any future cleanup and related costs for the Minnesota FMGP sites other than the Austin FMGP site will remain the responsibility of IPL. The MPCA will continue to have authority over the remediation efforts and required remediation measures at those sites. All possible investigation and remediation activities have been completed for all sites other than the Austin site. New Ulm, Albert Lea and Owatonna are expected to receive site closure from the MPCA in 2014, 2015 and 2016, respectively. Rochester and Fairmont have already received site closure from the MPCA.

Dated this 25th day of July, 2014.

Respectfully submitted,

Interstate Power and Light Company

By: /s/ Samantha C. Norris
Samantha C. Norris
Senior Attorney

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Attorneys on Behalf of Interstate Power
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Minnesota Energy Resources Corporation

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Attachment A

FIRST AMENDMENT TO ASSET PURCHASE AND SALE AGREEMENT

THIS FIRST AMENDMENT TO ASSET PURCHASE AND SALE AGREEMENT (this "Amendment") is made, as July 15, 2014 ("Effective Date"), by and between Interstate Power and Light Company, an Iowa corporation ("Seller"), and Minnesota Energy Resources Corporation, a Delaware corporation ("Purchaser"). Capitalized terms used but not defined in this Amendment shall have the meaning given to such terms in the APA (as defined below).

WITNESSETH:

WHEREAS, Seller and Purchaser are party to that certain Asset Purchase Agreement, dated as of September 3, 2013 (the "APA"); and

WHEREAS, in connection with the transactions contemplated by the APA, Seller and Purchaser desire to amend the APA with respect to certain matters relating to the FMGP Sites as set forth in this Amendment.

NOW, THEREFORE, in consideration of the respective representations, warranties, covenants and agreements contained in this Agreement, each of Seller and Purchaser agrees as follows:

1. Amendment to APA. The APA shall be amended as follows:

a. A new Section 2.1(l) shall be added to the APA as follows:

> "(l) FMGP Regulatory Asset. Seller's regulatory asset for the approved costs and expenses incurred by Seller in connection with Remediation of Environmental Conditions on, over, under or about or migration off of the FMGP Sites located in Rochester, Albert Lea, Austin, Fairmont, New Ulm, and Owatonna, Minnesota or any portion thereof (the "FMGP Regulatory Asset")."

b. Section 2.3(b) shall be deleted in its entirety and replaced with the following:

> "(b) Assumed FMGP Austin Site Environmental Liabilities. Remediation of, and responsibility and liability for, all Environmental Conditions on, over, under or about or migration off of the FMGP Austin Site or any portion thereof (collectively, "Assumed FMGP Austin Site Environmental Liabilities");"

c. The introductory paragraph of Section 2.7 shall be deleted in its entirety and replaced with the following:

> "**Section 2.7** Purchase Price. The consideration for the purchase of the Purchased Assets is the payment of the Final Purchase Price,

the payment of the FMGP Regulatory Asset Price and the assumption by Purchaser of the Purchaser's Assumed Liabilities."

d. The first sentence of Section 2.7(e) shall be deleted in its entirety and replaced with the following:

"Seller and Purchaser shall endeavor to agree upon an allocation of the Final Purchase Price (including, for purposes of this Section 2.7(e) (Purchase Price - Allocation of Final Purchase Price), the FMGP Regulatory Asset Price and the assumption of the Purchaser's Assumed Liabilities) solely among the Purchased Assets consistent with the provisions of Section 1060 of the Code and the regulations thereunder."

e. Section 2.8 shall be deleted in its entirety and replaced with the following:

"At the Closing, Purchaser shall deliver to Seller a Promissory Note, in the form of Exhibit C in respect of the payment of the FMGP Regulatory Asset Price."

f. A new Section 9.1(i) shall be added to the APA as follows:

"A Promissory Note, in the form of Exhibit C, in respect of the payment of the FMGP Regulatory Asset Price."

g. The following defined terms shall be added to the APA:

""FMGP Regulatory Asset" has the meaning set forth in Section 2.1(l).

"FMGP Regulatory Asset Price" means an amount equal to (a) the value immediately prior to the Closing of the FMGP Regulatory Asset, as determined in accordance with U.S. generally accepted accounting principles, less (b) the value immediately prior to the Closing of any liability of Seller for future environmental investigation and Remediation costs associated with the FMGP Sites, as determined in accordance with U.S. generally accepted accounting principles, and less (c) $2,038,000 (the FMGP Sites insurance proceeds received by Seller). As of December 31, 2012, the FMGP Regulatory Asset Price was $2,585,000. The following is an example of the computation of the FMGP Regulatory Asset Price as of December 31, 2012:

	Description	Estimated Amount ($000s)
1.	Value of the FMGP Regulatory Asset	13,882
2.	Value of FMGP investigation and remediation liability	(9,199)
3.	Value of FMGP insurance proceeds	(2,038)
4.	**FMGP Regulatory Asset Price (1+2+3)**	**2,585.**"

h. A new Exhibit C shall be added to the APA in the form of Annex 1 to this Amendment.

i. The following defined terms shall be deleted from the APA:

"FMGP Adjustment"

"FMGP Adjustment Annual Payment"

j. Schedule 2.8 to the APA shall be deleted in its entirety.

2. Miscellaneous. The terms and conditions of Article 11 of the APA are incorporated herein by reference. Except as specifically provided in this Amendment, no other amendments, revisions or changes are made or have been made to the Agreement. All other terms and conditions of the Agreement remain in full force and effect, and Purchaser and Seller hereby ratify and confirm their respective rights and obligations under the Agreement, as amended hereby. This Amendment embodies the entire agreement and understanding of Purchaser and Seller in respect of the subject matter of this Amendment. Upon the effectiveness of this Amendment, each reference in the Agreement to "this Agreement", "hereunder", "hereto", "herein", or words of like import, shall mean and be a reference to the Agreement as amended hereby.

[The next page is the signature page.]

IN WITNESS WHEREOF, the Parties have executed this First Amendment to Asset Purchase and Sale Agreement as of the date first above written.

INTERSTATE POWER AND LIGHT COMPANY	MINNESOTA ENERGY RESOURCES CORPORATION
By: _____	By: _____
Name: John E Kratchmer	Name: _____
Title: VP and Treasurer	Title: _____

IN WITNESS WHEREOF, the Parties have executed this First Amendment to Asset Purchase and Sale Agreement as of the date first above written.

INTERSTATE POWER AND LIGHT COMPANY	MINNESOTA ENERGY RESOURCES CORPORATION
By: _____	By: _____
Name: _____	Name: William J. Guc
Title: _____	Title: Treasurer

Annex 1

Form of New Exhibit C to APA

[see attached]

EXHIBIT C

FORM OF PROMISSORY NOTE

PROMISSORY NOTE

$_____[1] _____, _____

FOR VALUE RECEIVED, Minnesota Energy Resources Corporation, a Delaware corporation ("Purchaser"), hereby promises to pay to Interstate Power and Light Company, an Iowa corporation ("Seller"), without setoff or counterclaim, at the principal office of Seller in Cedar Rapids, Iowa or such place as the Seller may from time to time designate, the principal sum of _____ Dollars ($_____), payable on the dates and in the amounts described below.

1. Reference to Other Documents. This Note is issued pursuant to the Asset Purchase Agreement.

2. Certain Definitions. Capitalized terms used and not otherwise defined herein shall have the meaning set forth in the Asset Purchase Agreement. The following terms shall have the following meanings:

"Asset Purchase Agreement" means that certain Asset Purchase and Sale Agreement dated as of September 3, 2013 by and between Purchaser and Seller, as amended by the First Amendment to Asset Purchase and Sale Agreement, dated as of July 15, 2014 and any subsequent amendments.

"FMGP Adjustment Annual Payment" means the amount equal to (a) the cumulative amount that Purchaser collected from Customers through rates on file with and approved by the MPUC for the FMGP Regulatory Asset acquired by Purchaser under the Asset Purchase Agreement plus any deferred costs and expenses incurred by Purchaser subsequent to the Closing in connection with Remediation of Environmental Conditions on, over, under or about or the migration off of the FMGP Austin Site, less (b) the cumulative amount of Assumed FMGP Austin Site Environmental Liabilities costs and expenses then incurred by Purchaser, regardless of whether then approved by the MPUC for recovery, taking into account such amounts in items (a) and (b) that were included in the calculation of any prior FMGP Adjustment Annual Payments made to Seller to avoid any double counting of such amounts in such calculation and payments. The calculation of the amount that Purchaser collects from Customers

[1] The principal amount of the Note will be equal to the FMGP Regulatory Asset Price. "FMGP Regulatory Asset Price" means an amount equal to (a) the value immediately prior to the Closing of the FMGP Regulatory Asset, as determined in accordance with U.S. generally accepted accounting principles, less (b) the value immediately prior to the Closing of any liability of Seller for future environmental investigation and Remediation costs associated with the FMGP Sites, as determined in accordance with U.S. generally accepted accounting principles, and less (c) $2,038,000 (the FMGP Sites insurance proceeds received by Seller).

through rates shall be determined based on the actual amount of recovery approved by the MPUC in any future rate case or other regulatory proceeding.

"FMGP Regulatory Asset" means Seller's regulatory asset for the approved costs and expenses incurred by Seller in connection with Remediation of Environmental Conditions on, over, under or about or migration off of the FMGP Sites located in Rochester, Albert Lea, Austin, Fairmont, New Ulm, and Owatonna, Minnesota or any portion thereof.

3. Repayment.

(a) Commencing with the one (1) year anniversary of the date of implementation of final rates in a rate case to be filed by Purchaser after the Closing Date wherein the Minnesota Public Utilities Commission ("MPUC") approves rate recovery by Purchaser of the FMGP Regulatory Asset acquired by Purchaser under the Asset Purchase Agreement plus any deferred costs and expenses incurred by Purchaser subsequent to the Closing Date in connection with Remediation of Environmental Conditions on, over, under or about or the migration off of the FMGP Austin Site, Purchaser shall make an annual calculation of the FMGP Adjustment Annual Payment and shall prepare and deliver to Seller a statement setting forth an accounting of the FMGP Adjustment Annual Payment. If the FMGP Adjustment Annual Payment is a positive amount, then Purchaser shall pay to Seller such amount or portion thereof within forty-five (45) days of such anniversary date. Purchaser shall continue to make such payments until the face amount of the Promissory Note has been paid in full, conditioned on continued approval of rate recovery by the MPUC.

(b) All amounts payable on this Note shall be payable in lawful money of the United States of America.

(c) This Note may be prepaid in full or in part at any time without premium or penalty.

(d) For the avoidance of doubt, the principal amount of this Note shall not bear interest except as provided in Section 5 below.

4. Rights of holder; Waiver.

Without affecting the liability of Purchaser, Seller may, from time to time and without notice, renew or extend the time for payment or accept partial payments. Purchaser hereby waives presentment for payment, protest and demand and notice of protest, demand, dishonor, nonpayment, intent to accelerate and acceleration of this Note.

5. Default

If any payment from Purchaser to Seller pursuant to this Note is not made within five (5) Business Days of the date due, the unpaid balance of this Note shall, at the option of Seller and without notice or demand, mature and become immediately payable and as long as default continues, this Note shall bear interest at the lesser of: (a) the rate of twelve percent (12%) per annum; and (b) the highest rate of interest permitted by applicable law. The unpaid

balance of this Note shall automatically mature and become immediately payable in the event that Purchaser becomes the subject of bankruptcy or other insolvency proceedings. Seller's receipt of any payment after the occurrence of an event of default shall not constitute a waiver of such default or of any of Seller's rights and remedies. Whether or not suit is brought Purchaser shall pay on demand all costs and expenses, including reasonable attorneys' fees and costs, reasonably incurred by or on behalf of Seller in the collection of this Note with regard to amounts then due and payable. A failure by Seller to exercise any other rights to which it may be entitled after the occurrence of a default shall not constitute a waiver of the right to exercise such option or any such rights in the event of a continuation of the default or in the event of any subsequent default, whether of the same or a different nature.

6. Miscellaneous.

a. Governing Law. The validity, interpretation and effect of this Note are governed by and will be construed in accordance with the laws of the State of Minnesota applicable to contracts made and performed in such State and without regard to conflicts of law doctrines, except as set otherwise provided in Sections 11.8(b) and 11.14 of the Asset Purchase Agreement, each of which are incorporated herein by reference, or to the extent that certain matters are preempted by Federal law.

b. Successors and Assigns. This Note shall be binding upon Purchaser and Purchaser's successors and assigns.

Executed as of the date first set forth above.

MINNESOTA ENERGY RESOURCES CORPORATION

By: _____

Name:

Title:

[CORPORATE SEAL]

Attachment B

☐ **Confidential/Trade Secret**

Response of
Interstate Power and Light Company
to
Minnesota Department of Commerce
Division of Energy Resources
Information Request No. 7

Docket No.:	G001,G011/PA-14-107
Date of Request:	February 27, 2014
Response Due:	March 11, 2014
Information Requested By:	Eilon Amit
Date Responded:	March 11, 2014
Author:	Jill Stevens
Author's Title:	Manager Environmental Services
Author's Telephone No.:	(608) 458-0446
Subject:	
Reference:	Section 5.1, (ii) of the Sale Agreement

Information Request No. 7

Please provide the mutually agreed upon high level estimate of the Remediation costs and expenses for the FMGP Austin site referred to in Section 5.1, (ii)

Response:

IPL has attached the Austin site remediation estimate provided by MERC and its consultants (see Attachment A). If the scope of work proposed by MERC and its consultants was performed, the estimate of costs would be reasonable.

SITE: Austin Former MGP
Interstate Power and Light Company, Austin, MN
Environmental Liability Cost Estimate

NRT PROJECT NO.: 2164
BY: RJB CHKD BY: JMH/LLP
DATE: 11/22/13

	EST. QTY	UNIT	UNIT COST	ITEM COST	ESTIMATED COSTS SUBTOTAL	REVISED COSTS 12/20/2013 ITEM COST	REVISED COSTS 12/20/2013 COSTS SUBTOTAL	12/20/2013 REVISION NOTES
Remedial Action Component								
REMEDIAL ACTION DESIGN / REPORTING								
REMEDIAL INVESTIGATION					$405,000		$355,000	
Supplemental Soil Borings	1	LS	$40,000	$40,000		$40,000		
Supplemental Sediment Investigation	1	LS	$150,000	$150,000		$150,000		
Vapor Intrusion Evaluation	1	LS	$25,000	$25,000		$0		Reflects completed vapor intrusion eval.
Supplemental Groundwater Investigation (shallow/bedrock wells)	1	LS	$75,000	$75,000		$75,000		
Investigation planning/reporting	1	LS	$100,000	$100,000		$75,000		Reflects better understanding of Agency planning/reporting requirements
Investigation oversight/logging	1	LS	$15,000	$15,000		$15,000		
REMEDIAL ACTION DESIGN					$135,000		$135,000	
Remedial Work Plan	1	LS	$20,000	$20,000		$20,000		
Plans and Specifications	1	LS	$100,000	$100,000		$100,000		
Operation and Maintenance Plan	1	LS	$15,000	$15,000		$15,000		
BIDDING & CONTRACTOR PROCUREMENT					$30,000		$30,000	
DOCUMENTATION REPORT					$30,000		$30,000	
CLOSEOUT REPORT					$15,000		$15,000	
Closure Request	1	LS	$15,000	$15,000		$15,000		
INSTITUTIONAL CONTROLS					$20,000		$20,000	
Subtotal					**$635,000**		**$585,000**	
WEST AREA REMEDIAL ACTION								
Vapor Mitigation System Installation	2,475	SF	$11	$26,000		$26,000		
Remedial Action Oversight	1	LS	$3,500	$3,500		$3,500		
ESTIMATING CONTINGENCY - (25% OF CONSTRUCTION COSTS)				$6,500		$6,500		
Vapor Mitigation System Installation					$31,600		$31,600	
Remedial Action Oversight					$4,400		$4,400	
Subtotal					**$36,000**		**$36,000**	
MAIN (CENTRAL) AREA REMEDIAL ACTION					**$0**		**$0**	

SITE: Austin Former MGP
Interstate Power and Light Company, Austin, MN
Environmental Liability Cost Estimate

NRT PROJECT NO.: 2164
BY: RJB CHKD BY: JMH/LLP
DATE: 11/22/13

	EST. QTY	UNIT	UNIT COST	ITEM COST	ESTIMATED COSTS SUBTOTAL	REVISED COSTS 12/20/2013 ITEM COST	REVISED COSTS 12/20/2013 COSTS SUBTOTAL	12/20/2013 REVISION NOTES
EAST AREA REMEDIAL ACTION								
General								
Site Preparation	1	LS	$25,000	$25,000		$25,000		
Surveying	1	LS	$5,000	$5,000		$5,000		
Electrical, Trailer, Temporary Fence	1	LS	$25,000	$25,000		$25,000		
Environmental Management (i.e., Fugitive Emission control)	1.8	Months	$45,000	$81,000		$81,000		
Construction								
Source Area - Excavation/Handling	7,760	TONS	$22	$170,800		$136,700		Considered shallower excavation due IPL prior remediation to the west
Source Area - Non-Haz Subtitle D Disposal and Transport	2,590	TONS	$40	$103,600		$103,600		
Shoring - Source Area Excavations	390	LF	$650	$253,500		$253,500		
Excavation Dewatering	1.8	Months	$40,000	$72,000		$72,000		
Source Area - General Backfill	3,370	TONS	$15	$50,600		$50,600		
Slurry Wall Construction	5,250	SF	$20	$105,000		$105,000		
Groundwater Collection Trench Backfill	580	CY	$36	$20,900		$20,900		
Sumps (Pump, Riser, Piping)	1	Each	$4,000	$4,000		$4,000		
GW Conveyance Pipe (4-inch)	170	LF	$8	$1,400		$1,400		
GW Collection Pipe (6-inch)	350	LF	$3	$1,100		$1,100		
Pretreatment System (filtration)	1	Each	$15,000	$15,000		$15,000		
Utility Relocation/Protection (natural gas line)	1	LS	$200,000	$200,000		$50,000		Allows for protection measures for gas line (not relocation)
Engineering								
Laboratory Analyses (Disposal, Confirmation)	1	LS	$10,000	$10,000		$10,000		
Air Monitoring	1.8	Months	$76,000	$136,800		$136,800		
Remedial Action Oversight	1	LS	$136,100	$136,100		$136,100		
ESTIMATING CONTINGENCY - (25% OF CONSTRUCTION COSTS)				$283,000		$237,000		
Soil Remedial Action Costs					$1,529,700		$1,299,600	
Remedial Action Oversight					$170,100		$170,100	
Subtotal					**$1,699,800**		**$1,469,700**	

SITE: Austin Former MGP
Interstate Power and Light Company, Austin, MN
Environmental Liability Cost Estimate

NRT PROJECT NO.: 2164
BY: RJB CHKD BY: JMH/LLP
DATE: 11/22/13

	EST. QTY	UNIT	UNIT COST	ITEM COST	ESTIMATED COSTS SUBTOTAL	REVISED COSTS 12/20/2013 ITEM COST	REVISED COSTS 12/20/2013 COSTS SUBTOTAL	12/20/2013 REVISION NOTES
CEDAR RIVER DREDGE AND CAP REMEDIAL ACTION								
General								
Site Preparation	1	LS	$25,000	$25,000		$25,000		
Surveying	1	LS	$5,000	$5,000		$5,000		
Electrical, Trailer, Temporary Fence	1	LS	$22,000	$22,000		$22,000		
Environmental Management (i.e., Fugitive Emission control)	0.2	Months	$45,000	$9,000		$9,000		
Construction								
Sediment Dredging, Disposal, and Transport	1,300	CY	$400	$520,000		$520,000		
Laboratory Analyses (Disposal, Confirmation)	1	LS	$6,000	$6,000		$6,000		
Sediment Cap (Engineered Barrier)	1,950	SY	$100	$195,000		$195,000		
Post-Dredge Residual Sand Layer	1,950	SY	$30	$58,500		$58,500		
Post-Dredge Sampling and Testing	1	LS	$20,000	$20,000		$20,000		
Remedial Action Oversight	1	LS	$80,000	$80,000		$80,000		
Engineering								
Laboratory Analyses (Disposal, Confirmation)	1	LS	$6,000	$6,000		$6,000		
Air Monitoring	0.2	Months	$76,000	$15,200		$15,200		
Remedial Action Oversight	1	LS	$94,100	$94,100		$94,100		
ESTIMATING CONTINGENCY - (25% OF CONSTRUCTION COSTS)				$264,000		$264,000		
Cedar River Remedial Action Costs					$1,202,200		$1,202,200	
Remedial Action Oversight					$117,600		$117,600	
Subtotal					**$1,319,800**		**$1,319,800**	
ANNUAL COSTS								
Engineered Barrier Maintenance and Monitoring (Asphalt)	11,890	SF	$0.12	$1,400	$1,400		$1,400	
Engineered Barrier Maintenance and Monitoring (Earthen)	235,200	SF	$0.05	$11,800	$11,800		$11,800	
Long-term Groundwater Monitoring and O&M	1	LS	$15,000	$15,000	$15,000		$15,000	
Cap/Natural Attenuation Monitoring (every year for 30 years)	1	Event	$15,000	$15,000	$15,000		$15,000	
Cap Maintenance (25% of initial construction over 30 years)	1	Allowance	$1,600	$1,600	$1,600		$1,600	
Vapor Mitigation System Operation and Maintenance	1	YR	$1,000	$1,000	$1,000		$1,000	
Subtotal of Annual Costs					**$46,000**		**$46,000**	
TOTAL ESTIMATED DESIGN AND CONSTRUCTION COSTS					**$3,691,000**		**$3,410,500**	
TOTAL ESTIMATED COSTS - W/ 30 YR ANNUAL COSTS					**$5,071,000**	**W/ 15 YR**	**$4,100,500**	Adjusted for a 15 yr monitoring period

NOTES:
1. This opinion of possible cost is planning level, based on limited site information, and should be expected to change upon further investigations and remedial design work.
2. Costing methods used are consistent with industry standard practices with reasonable contingency applied using best professional judgment.
3. Costs are based on the current information known about the site, developed for the purpose of understanding future potential remediation requirements.
4. Line items based on published resources (e.g. RS Means) or design/construction experience on other projects in the Midwest. Not project specific.

Attachment C

☐ **Confidential/Trade Secret**

Response of
Interstate Power and Light Company
to
State of Minnesota
Office of The Attorney General
Information Request No. 101

Docket No.:	G001,G011/PA-14-107
Date of Request:	March 12, 2014
Response Due:	March 24, 2014
Information Requested By:	Ian Dobson
Date Responded:	March 25, 2014
Author:	Jill Stevens
Author's Title:	Manager Environmental Services
Author's Telephone No.:	(608) 458-0446
Subject:	
Reference:	Former Manufactured Gas Plant site in Austin, Minnesota

Information Request No. 101

Provide a historical description of the identification, remediation, and current status of the required cleanup obligation by IPL. Also provide a historical description of the accounting for cleanup costs and recovery from ratepayers since the site was identified for cleanup.

Response:

Please see Attachment A, "Austin MGP Site", for a historical description of the identification, remediation, and current status of Interstate Power and Light Company's (IPL) efforts at the Austin FMGP site.

For the historical description of the accounting for cleanup costs and recovery from ratepayers, please see IPL's response to the Office of the Attorney General's Information Request No. 100, which contains the response of IPL to the Minnesota Department of Commerce, Division of Energy Resources, Information Request No. 3, dated March 4, 2014.

Please note that the response to Minnesota Department of Commerce, Division of Energy Resources, Information Request No. 3, dated March 4, 2014 reflects total cost recoveries and is necessarily not specified per site.

AUSTIN MGP SITE

History:

The Austin MGP was originally owned and operated by the Austin Gas Manufacturing Company which was founded in 1896. However, gas manufacturing did not begin until approximately 1905. By 1910, the facility consisted of the gas plant building, a single gas holder, a coal bin, and an oil tank. By 1917, a gas holder had been constructed across the street from the main portion of the site, and the MGP had expanded. At some time between 1905 and 1924, Utilities Power and Light acquired the assets of Austin Gas. In 1924, Interstate Power Company (IPC) became the owner of the property and facilities. By 1931, a third gas holder had been constructed on the main portion of the site. In 1935, the MGP discontinued production, and the pipelines were turned over to the City of Austin.

IPC sold the property in 1947. The Sanborn Map for 1950 shows an agricultural implement dealer on the main gas plant property, and the portion of the site to the west was vacant. In 1956, the main portion of the site was sold to Hill Heating and Roofing Company who then sold the property to the current owner in 1962.

In 1991, Ecology & Environment, Inc., under contract with the USEPA completed a Screening Site Inspection Report for the site. A total of four soil and three Cedar River sediment samples were collected for analysis. PAHs and VOCs were detected in all background and onsite sampling locations.

In 1994, the city of Austin conducted a limited subsurface investigation in the vicinity of the site. The investigation was conducted to evaluate subsurface conditions along the likely route of a sewer project. A total of five boreholes were advanced for collection of soil samples. PAH and diesel range organic compounds were detected in several of the samples. The City of Austin reported the results to the MPCA which categorized the site as a leaking underground storage tank site.

Activity summary:

VIC Project Number: VP# 0250
LUST Project Number: The site has also been assigned LEAK# 00007847 under the MPCA Petroleum Brownfields Program as a leaking underground tank site.

1998

Site related activities in 1998 were limited to general planning and project management. A Phase II Site Investigation Work Plan was prepared for the site in 1995 and approved by the MPCA in 1996. However, implementation of the work plan was pending legal access to the site.

Other activities conducted in 1998 for the Austin site consisted of developing input parameters to the GRI cost model for IPL's environmental liabilities management program.

1999

Activities conducted in 1999 for the Austin site were limited to revising the input parameters to the GRI cost model for IPL's environmental liabilities management program. No on-site activities were conducted.

2000

No on-site activity. Implementation of the site investigation continued to be pending authorization of site access by the property owner. Expenditures related to the Austin site were for annual updates and revisions to the GRI cost model, a site visit by IPL staff and consultant, general project management and planning, and a meeting with the MPCA to discuss the status of the site.

2001

Site activities for 2001 continued to be limited pending an access agreement with the owners of the main portion of the site. Investigative activities consisted of a review of historic site maps and aerial photos to identify MPG structures, tanks, or nearby potential sources. Other activities included preparation of quarterly reports to the MPCA, project management, and the annual cost model update.

2002

IPL continued to pursue an access agreement with the owners of the main portion of the site. In addition, the Phase II Site Investigation Work Plan was reviewed and proposed changes were developed based on site data and previous experiences at other MGP sites. The proposed changes were submitted to the MPCA. Other activities included preparation of quarterly reports to the MPCA, project management, and the annual cost model update.

2003

In 2003, IPL obtained an access agreement with the owners of the main portion of the site. As part of the agreement, IPL was to remove 2 existing underground storage tanks (USTs) in

conjunction with the site investigation. Notice of completing the access agreement was conveyed to the MPCA in a letter dated June 5, 2003.

In preparation of the UST removal, a letter to the MPCA was prepared which outlined the plans for the removal and updated the site status for the LEAK project number reporting requirements. In the third quarter of 2003, on-site activities to remove the underground storage tanks began. One of the tanks was a used oil tank from the car dealership. This tank was partially covered by the floor of the existing building and was abandoned in place by filling with concrete. The other apparent UST was actually a condenser from the gas plant that had been buried on site after the plant was decommissioned. The condenser was removed from the site and scrapped. Additional information regarding the tanks and the required soil and groundwater sampling for UST abandonment/removal was gathered. A Notification/Change in Status for Underground Storage Tanks form was completed and submitted to the MPCA on November 17, 2003.

The proposed changes to the Phase II Site Investigation Work Plan were approved by the MPCA in a August 15, 2003 letter. Implementation of the Phase II Site Investigation began in the fourth quarter of 2003 with advancement of 27 direct-push sampling points for collecting soil and groundwater samples. Results of the soil and groundwater samples were received and summarized in letter report to the MPCA dated December 23, 2003. Included in the report were recommendations for placement of permanent monitoring wells.

Also in 2003, the annual cost model update was completed.

2004

Comments on the proposed well placement were received from the MPCA in a January 21, 2004 letter. Based on the comments and recommendations of the MPCA, the Phase II Site Investigation was completed. The investigation consisted of advancing and collecting soil samples from 28 soil boring locations. Groundwater samples were collected from 27 of the borings and 10 groundwater monitoring wells constructed on the site. Results from the investigation were evaluated, and conclusions and recommendations for continued site work were developed.

Data was also gathered for a groundwater receptor survey in 2004. Data included a review of MDH well records, municipal water service records, and a walking tour of the vicinity of the site. The date was reviewed and compiled for a preliminary report.

A report documenting the underground storage tank abandonment and removal of the condenser was also prepared and submitted to the MPCA on December 30, 2004.

In September 2004, the Cedar River flooded the site and surrounding properties. Because of repeated flooding and damage to the buildings, the City of Austin declared the buildings on the site and surrounding properties could not be repaired and must be removed from the floodplain.

2005

Activities for 2005 are described on a monthly basis in the paragraphs below.

Recommendations for additional remedial investigation that were presented in the Phase II report were approved by the MPCA. Implementation of the additional remedial investigation was held pending IPL's purchase of the site. Other activities consisted of collecting quarterly water levels and providing support to IPC for the purchase of the site.

January. Continued to develop recommendations for additional site investigation and prepared a draft site investigation report. Compiled remaining data for the groundwater receptor survey. Obtained flood information from the Austin City Engineer's office.

February. Completed the draft site investigation report and conducted internal review.

March. Finalized the site investigation report and submitted it to the MPCA on March 11, 2005. Processed MDH well maintenance permits for 10 monitoring wells. Conducted a site visit to verify accessibility of proposed additional sampling locations. Conducted quarterly groundwater elevation measurements.

April. Obtained and reviewed an electronic database search report to identify potential environmental concerns for the site or surrounding properties that may be relevant for potential site purchase.

May. Planning and project management related to continued remedial investigation for the remainder of the year. Searched archived newspaper articles for information regarding site flooding and any proposed plans for future development or restrictions on the site or adjacent properties.

June. Reviewed proposed additional soil boring and monitoring well locations. Collected quarterly water level measurements from site monitoring wells and the Cedar River. Additional data search for future plans and site issues.

July. Site visit by IPL and consultants to review building and site conditions to evaluate potential purchase of the site in order to better manage the site investigation and cleanup activities. Received review comments and a request for additional work from the MPCA in a letter dated July 29, 2005. The comments were based on the Phase II Site Investigation summary report. The MPCA letter also served to notify that two former fuel oil tanks associated with the MGP operations needed to be removed or abandoned in place. Completed the initial revision of the annual cost model update.

August. Planned probing to verify the presence and locations of the former fuel oil tanks. Prepared draft specifications for the removal or abandonment of the former fuel oil tanks. Finalized the annual cost model update.

September. Scheduled probing of the former fuel oil tank locations to verify presence and locations of the tanks and construction materials. Collected quarterly water level measurements from the site monitoring wells and the Cedar River.

October. Conducted the fuel oil tank probe. Verified the location and construction of "Tank 3." No evidence was found that "Tank 4" was an underground tank. Prepared a letter summarizing the results of the probing and submitted it to the MPCA on October 26, 2005. Located overhead and underground utilities near the tanks. Prepared a scope of work for in-place abandonment of "Tanks 3." Scheduled the next round of direct-push soil and groundwater sampling. Requested access from the City of Austin and 21st Century Enterprises to complete additional site investigation.

November. Finalized plans for removal and disposal of water contained in "Tank 3". Completed in-place abandonment of "Tank 3." Collected soil and groundwater samples to meet MPCA tank closure requirements. Requested an extension from the MPCA for the tank abandonment and assessment report. MPCA verbally approved the extension and requested the report be in the form of a Limited Site Investigation (LSI) per MPCA UST rules. Met with the City of Austin to discuss plans for future redevelopment of the area around the site.

December. Completed direct-push and rotary soil borings. Collected soil and groundwater samples for in-field and laboratory analysis. Collected soil and soil vapor samples from the vicinity of "Tank 3" for the LSI. Completed installation and development of additional monitoring wells. Surveyed locations and elevations of monitoring wells and soil borings.

2006

Recommendations for additional remedial investigation previously approved by the MPCA were implemented throughout the year. The data collected has largely defined the extent of impacts on the site. Additional work will be required to investigate potential impacts to the Cedar River adjacent to the site. Monthly activities are summarized below:

January
Sampling was completed for all groundwater monitoring wells installed in 2005.
Analytical results were received for the soil and groundwater samples collected during the direct-push sampling conducted in 2005. The soil and soil vapor sample results were also received for the fuel oil UST abandoned in place in 2005. Preparation of a Limited Site Assessment report for the abandoned fuel oil tank was started.

February
Analytical results for groundwater samples collected in January were received and reviewed.

March.
The abandonment summary report was completed for the fuel oil tank and submitted to IPL for review. Processed MDH well maintenance permits for monitoring wells were processed. Quarterly groundwater elevation measurements were collected

April
The fuel oil abandonment report was finalized and submitted it to the MPCA. A site survey using ground penetrating radar was completed in an attempt to identify underground structures.

May
Results of ground penetrating radar survey were evaluated. Progress continued on the Limited Site Investigation report.

June
A probing survey of the Cedar River was conducted to determine sediment thickness and type, and the potential extent of impacts. A draft sediment sampling work plan was completed for internal review. MDH well maintenance permits were processed for monitoring wells.

July
The sediment sampling plan was finalized and submitted to the MPCA. Verification sampling of recently installed monitoring wells was completed. An initial draft update of the site cost model was written.

August
Plans and a schedule were developed for additional remedial investigation activities.

September
A summary of the proposed work and a schedule were submitted to the MPCA. Direct-push sampling and installation of additional water table wells were completed. Work progressed on the Limited Site Investigation report and a summary of the overall remedial investigation activities. Plans and a schedule were developed for installation of bedrock monitoring wells. The annual cost model update was completed.

October
Analytical results were received for the soil and groundwater samples collected during the direct-push sampling and water table well installation. Plans were finalized for construction of bedrock monitoring wells and installation began the week of October 30, 2006.

November
Installation, development, and sampling of the bedrock wells was completed.

December
Analytical results were received and analyzed for the groundwater samples collected from the bedrock wells. Progress continued on the remedial investigation summary report.

2007

In the beginning of 2007, a site-wide groundwater monitoring was conducted which included recently installed monitoring wells. Based on the results of the site remedial investigation, it was determined that the extent of soil impacts was adequately defined to proceed with a soil remediation to reduce the potential for continued leaching to groundwater and direct contact. Plans were developed for a fast-track implementation of an interim removal and site preparations

were completed to prepare for full scale remedial activities to be conducted in the first quarter of 2008. Monthly activities are summarized below:

January

Conducted a site-wide groundwater monitoring event collecting samples from 21 monitoring wells and measuring groundwater and surface water elevations. Also conducted a site-wide topographic survey and mapped surface contours and features on the site.

February

Received and reviewed the analytical reports for the groundwater monitoring event and developed potentiometric maps from the groundwater elevation data. Processed travel and equipment charges and invoices for a portion of the groundwater sample analysis. Processed MDH well maintenance permits for 6 site monitoring wells.

March

Processed invoices for the remaining groundwater sample analysis and for the site topographic survey. Collected quarterly groundwater elevation data and further evaluated the groundwater sample results against previous data and remediation goals.

April

Continued to prepare a summary report for the remedial investigation activities. Also began to consider implementation of a soil remediation to remove source material and impacted soil.

May

Set up continuous water level recorders in select monitoring wells and in the Cedar River to record changes in groundwater elevations in response to changes in river stage. Also collected water levels from all other site monitoring wells as baseline data. Continued to prepare the summary report for the remedial investigation.

June

Met with the MPCA to discuss potential remedial actions and schedules. Removed the continuous water level recorders from the wells and river and began to process the data. Contacted DCI Environmental, Inc. (DCI) regarding the potential for conducting an on-site soil remediation on the site in the winter of 2007-2008. Processed MDH well maintenance permits for 10 site monitoring wells.

July

Contacted the City of Austin regarding the potential to implement an on-site soil remediation and the potential schedule. Identified potential areas of excavation, determined depth limits, and

prepared site figures depicting the excavation. Met with DCI on the site to discuss logistics of implementing the soil remediation and began to prepare an interim response action work plan for the MPCA. Prepared a summary of the proposed remedial actions and submitted it to the City of Austin. Processed the invoice for the continuous water level recorders and continued to prepare the remedial investigation summary report. Completed the initial draft of the annual site cost model update.

August

Met with the City of Austin and DCI to discuss implementation of the remedial action and on-site soil treatment, and City requirements for access and the required permits and approval processes. Continued to prepare the interim response action work plan consisting of the overall work plan, quality assurance project plan, ambient air monitoring plan, and a site health and safety plan. Collected soil samples from the southern end of the site to better delineate the potential extent of excavation. Continued to process data from the continuous water level recorders. Finalized the annual cost model update for the site.

September

Finalized the interim response action work plan and submitted it to the MPCA for review. Presented the proposed project to the Austin Planning Commission and requested approval of a conditional use permit. Also presented the project to the Austin City Council for final approval of the permit. Conducted a site-wide groundwater monitoring event to gather baseline data prior to the soil remediation. Identified and area of PCB impacted soil. Collected additional soil samples to better delineate the area and processed associated subcontractor charges. Conducted a geotechnical evaluation of the sites upward hydraulic gradient relative to the removal of overburden. Ordered equipment and media for conducting the perimeter background air monitoring.

October

Met with the MPCA to discuss the interim response action work plan. Set up air monitoring equipment and collected the background air samples. Worked with the City of Austin regarding an access agreement and design to reroute a sanitary sewer crossing the site. Prepared a stormwater pollution prevention plan. Mobilized equipment to the site, coordinated with DCI for site preparations, set up field offices, and erected site fencing.

November

Received MPCA approval of the interim response action work plan. Continued to coordinate with DCI on site preparations and implementation plans. Had additional discussions with the City of Austin regarding approvals, the access agreement, and the sewer design. Began collected air monitoring samples during site preparations. Finalized the stormwater pollution prevention plan and submitted an application for a NPDES/SDS permit from the state of Minnesota. Proposed wastewater discharge concentrations to the City of Austin and request a discharge permit. Collected soil samples from the area to be used for the soil treatment to document conditions prior

to the remedial activities. Completed the geotechnical evaluation to determine the maximum safe depth of excavation to prevent hydraulic failure of the floor of the excavation.

December

Finalized the design of the sanitary sewer rerouting and received an access agreement to install the sewer across a private property. Completed construction of the sewer reroute on the site. Completed removal and off site disposal of the PCB impacted soil. Receive authorization from the City for wastewater discharge to the sanitary sewer. Received the NPDES/SDS construction activity stormwater permit from the State of Minnesota. Processed charges for analysis of air, soil, and water samples for the background sampling, verification of the PCB removal, and dewatering effluent samples. Completed most site set up for the interim response action, including set up of the on-site laboratory; construction of the treatment area work pad; set up of the thermal treatment unit; connections for water, electricity, and gas; installation of stormwater runoff controls, and equipment and personnel decontamination facilities.

2008

In 2008, an interim response action was completed to remove MGP-impacted soil and source material on the site. Approximately 31,328 tons of impacted soil and fill were excavated and thermally treated on site. Additional elements of the response action included removal and disposal of approximately 28 tons of polychlorinated biphenyl (PCB) impacted soil, 995 tons of concrete, 561 tons of asphalt, 74 tons of metal, and 8 tons of wood. Treated soil was used as backfill on site and additional clean fill soil and top soil were imported to complete the final grade. Site restoration activities consisted of planting the site with prairie grasses and select trees to create an urban prairie green space as part of the Cedar River floodway through the City of Austin. Monthly activities conducted in 2008 are summarized below:

January

Finalized site preparations and adjustments to the thermal treatment unit in preparation of the interim response action. Began excavation and on-site thermal treatment of impacted soil and fill as outlined in the Interim Response Action Work Plan. Approximately 9,151 tons of impacted soil and fill were treated during the month of January. Also removed and disposed of approximately 249 tons of asphalt and 360 tons of concrete. Related activities included conducting site perimeter and work zone air monitoring, collection and analysis of soil samples to verify the extent of excavation and the effectiveness of the thermal treatment, off-site disposal of PCB-impacted soil, and on-site project management. Invoices for the site preparations and thermal treatment, on-site and fixed base laboratory services for soil and groundwater analyses, travel and equipment charges, and air monitoring equipment and analysis were processed.

February

Continued excavation and treatment of impacted soil and fill. Treated approximately 10,481 tons of impacted soil on site and transported approximately 307 tons of concrete and 48 tons of scrap metal off site for disposal. Also, approximately 6,600 gallons of water was discharged to the City sanitary sewer for treatment and disposal. DCI Environmental, Inc. conducted a stack test on the

thermal treatment unit to verify compliance with their operating permit and to document the efficiency of the unit. Other activities related to the interim response action included continued air monitoring at the site perimeter and in the work zone, collection and analysis of soil samples from the floor and sidewalls of the excavation to direct the extent of the removal, collection and analysis of treated soil samples to verify the effectiveness of the treatment, on-site project management and data management. Processed invoices for the soil excavation and thermal treatment, on-site and fixed base laboratory services for soil and groundwater analyses, travel and equipment charges, and air monitoring equipment and analysis. Processed MDH well maintenance permit renewals for 7 site monitoring wells.

March

Excavation and treatment of impacted soil and fill was completed. Treated approximately 11,696 tons of impacted soil on site and transported approximately 187 tons of concrete and 26 tons of scrap metal off site for disposal. Also, approximately 39,670 gallons of water was discharged to the City sanitary sewer for treatment and disposal. Other activities related to the interim response action included continued air monitoring at the site perimeter and in the work zone, collection and analysis of soil samples from the floor and sidewalls of the excavation to direct the extent of the removal, collection and analysis of treated soil samples to verify the effectiveness of the treatment, on-site project management and data management. Processed invoices for the soil excavation and thermal treatment, on-site and fixed base laboratory services for soil and groundwater analyses, travel and equipment charges, and air monitoring equipment and analysis.

April

Transported an additional 140 tons of concrete and 311 tons of asphalt off site for disposal. Completed the post-remediation perimeter air monitoring. Demobilized the thermal treatment unit from the site. Met with City officials to discuss site restoration plans. Processed invoices for the soil excavation and thermal treatment, on-site and fixed base laboratory services for soil and groundwater analyses, travel and equipment charges, and air monitoring equipment and analysis.

May

Collected the final verification soil samples for laboratory analysis. Developed the final landscape plan and obtained approval of the plan from the City of Austin. Demobilized the field office trailer. Completed the final connections for the sewer replacement and replaced the corresponding sections of street. Imported fill material and top soil, graded the site to final grade, and installed erosion control measures Other site restoration activities included seeding the disturbed areas with prairie grasses, planting trees, and paving the parking area. Off site activities included processing invoices for the response action contractor, on-site and fixed base laboratory services for soil analyses, travel and equipment charges, and air monitoring equipment and analysis. Began to compile data to prepare the Interim Response Action Report.

June

Continued to complete the site restoration activities. Processed invoices for the response action contractor, laboratory services for soil sample analyses, travel and equipment charges, and air monitoring equipment and analysis. Continued to evaluate data and prepare the Interim Response Action Report. Also reviewed and updated the text summary for the annual cost model update.

July

Processed invoices for the response action contractor and the remaining laboratory services for soil and air sample analysis. Processed the remaining contractor travel costs for the interim response action. Continued to prepare the Interim Response Action Report. Began to revise the site cost model for the annual update.

August

Received, reviewed and tabulated the final soil sample reports for the interim response action on-site laboratory. Continued to prepare the Interim Response Action Report. Also completed the pre-inflation cost model update and adjusted the cost model to account for inflation.

September

Conducted internal review of the Interim Response Action Report.

October

Began to revise the Interim Response Action Report per the internal review comments.

November

Finalized the Interim Response Action Report and submitted it to the MPCA for review.

December

No site related activities were conducted during the month of December.

2009

Major activities conducted for the Austin MGP site in 2009 consisted of preparing and submitting a Limited Site Investigation Report to the MPCA to obtain closure of the petroleum release number assigned to the site for the petroleum impacts related to the MGP operations. Additional follow-up work to the interim response action was completed, as well as additional investigation as required by the MPCA. Monthly activities conducted in 2009 are summarized below:

January

Continued to prepare the Limited Site Investigation (LSI) Report for the MPCA Petroleum Group for the site. Scheduled installation of monitoring wells to replace those removed for the interim response action and processed 7 MDH monitoring well maintenance permit renewals.

February

Continued to prepare the LSI Report and updated the tables with data from the interim response action. Completed installation of the replacement monitoring wells and had discussions with MPCA staff from the VIC and petroleum groups about the status of the site.

March

Continued to prepare the LSI Report. Completed development of the replacement monitoring wells. Sampled the replacement monitoring wells, conducted slug tests, and surveyed the top of casing elevations. Processed the driller's invoice for installation of the monitoring wells and processed travel and costs for the well installation and sampling.

April

Received the analytical results from the replacement monitoring well samples and reviewed the data for consistency with the quality parameters. Processed travel and costs for the well installation and sampling. Conducted internal review of the LSI Report and processed 5 MDH monitoring well maintenance permit renewals.

May

Finalized the LSI Report and submitted it to the MPCA. Began to compile soil and groundwater data to for the Risk Based Screening Evaluation and to develop an outline for the Remedial Investigation Report. Conducted a site visit to inspect the prairie plantings to determine if the storm water permit could be terminated. Processed the laboratory invoice for analysis of the samples collected from the replacement wells and processed the remaining travel and equipment costs for sampling the replacement wells.

June

Conducted a follow-up site visit to inspect the density of the prairie planting cover and prepared a Notice of Termination for the storm water permit. Continued to compile soil and groundwater data to for the Risk Based Screening Evaluation and to develop an outline for the Remedial Investigation Report. Began to compile the spatial data for the soil boring and monitoring well locations and populate the MPCA spreadsheet. Scheduled a site-wide groundwater monitoring event and coordinated with the laboratory.

July

Continued preparation of the MPCA spatial data spreadsheet. Conducted a site visit to investigate reports of groundwater seepage in to the flower shop building on the western portion of the site. Verified that the stormwater permit Notice of Termination had been received and processed by the MPCA. Submitted information to the MPCA about off-site disposal during the interim response action. Continued to compile soil and groundwater data to for the Risk Based Screening Evaluation and began to prepare the Remedial Investigation Report.

August

Received a letter from the MPCA notifying IPL of closure of the petroleum release file for the site. Received a letter from the MPCA indicated the Interim Response Action Report is complete for the soil and requesting site wide groundwater data, a soil vapor assessment, and an environmental covenant. Conducted a site-wide groundwater monitoring event and processed the related travel expenses. Completed the spatial data spreadsheet for the monitoring well and soil boring locations and submitted it to the MPCA.

September

Received the analytical results for the site-wide groundwater monitoring and reviewed the results for compliance with the quality assurance parameters. Processed the laboratory invoice for analysis of the groundwater samples and processed charges for equipment and supplies for the monitoring event. Replaced the upper portion of a damaged well casing and processed the driller's invoice for the repair work. Began to develop an approach for conducting a soil vapor assessment for the site.

October

Tabulated the results of the site-wide groundwater monitoring and prepared potentiometric surface maps and contaminant distribution figures. Continued to compile the soil and groundwater data for the Risk Based Screening Evaluation and prepare the remedial investigation report. Prepared a plan for the soil vapor assessment and scheduled the soil gas sampling for November 2009. Processed 3 MDH monitoring well maintenance permit renewals.

November

Conducted the soil gas sampling at the locations proposed on and around the site and submitted the samples for laboratory analysis. Continued to compile the soil and groundwater data for the Risk Based Screening Evaluation and prepare the remedial investigation report.

December

Continued to compile the soil and groundwater data for the Risk Based Screening Evaluation and prepare the remedial investigation report. Received and reviewed the results for the soil vapor assessment. Processed the invoices from the driller for installation of the soil gas sampling points

and from the laboratory for analysis of the soil gas samples. Also processed travel and equipment charges for the soil vapor sampling activities.

2010

Major activities conducted for the Austin MGP site in 2010 consisted of preparing a comprehensive Remedial Investigation (RI) and risk evaluation report. The report was submitted to the MPCA for review and approval. A site-wide groundwater monitoring event was also conducted and a summary report prepared. Other activities included general site maintenance and communications with the MPCA. Monthly activities conducted in 2010 are summarized below:

January

MWH continued to compile the soil and groundwater data for the Risk Based Screening Evaluation (RBSE) and to prepare the comprehensive RI report for the site. Evaluated the results of the soil vapor assessment sampling against screening values. Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting. Renewed MDH well maintenance permits for 7 site monitoring wells.

February

Continued to compile and evaluate the soil and groundwater data for the RBSE and to prepare the comprehensive RI report for the site.

March

Continued to compile and evaluate the soil and groundwater data for the RBSE and to prepare the comprehensive RI report. MWH resurveyed several monitoring wells to check for frost heaving and verify questionable elevations.

April

Continued to compile and evaluate the soil and groundwater data for the RBSE and to the comprehensive RI report. Processed travel costs for resurveying select monitoring wells.

May

Continued to compile and evaluate the soil and groundwater data for the RBSE and to the comprehensive RI report for the site.

June

MWH completed the initial draft of the RI report, conducted internal review, and submitted the report to IPL for review. Renewed MDH well maintenance permits for 11 site monitoring wells.

July

Contacted the MPCA to set up a meeting to discuss the status of the site and developed an agenda for the meeting.

August

Met with the MPCA to discuss the status of the site and future work needed. Conducted a site inspection to evaluate the prairie plantings and review general site conditions.

September

Finalized the RI report and submitted it to the MPCA for review. MWH scheduled and prepared to conduct a site-wide groundwater monitoring event. Renewed MDH well maintenance permits for 3 site monitoring wells.

October

Completed a site-wide groundwater monitoring event. Received and reviewed the analytical results for the groundwater samples. Repaired patches in asphalt on the Hardy Geranium property (west side of the site) from soil gas probe holes advanced during the 2009 soil vapor survey. Processed travel and equipment charges for the groundwater monitoring event.

November

Tabulated the analytical results for the site-wide groundwater monitoring and compared the results to previous data. Processed invoices for analysis of the groundwater samples and disposal of accumulated purge water. Processed the remaining travel and equipment charges for the groundwater monitoring.

December

MWH completed the initial draft of the draft groundwater monitoring report, conducted internal review of the report, and submitted it to IPL for review. Renewed MDH well maintenance permits for 7 site monitoring wells.

2011

Major activities conducted for the Austin MGP site in 2011 consisted of preparing a Response Action Work Plan for groundwater and residual soil impacts and initiation of a quarterly groundwater monitoring program. Other activities included general site maintenance and communications with the MPCA. Monthly activities conducted in 2011 are summarized below:

January

Finalized the 2010 Groundwater Monitoring Summary report per IPL comments and submitted it to the MPCA for review. Completed the annual update of the site cost model and text summary for the basis for the SEC liability reporting.

February

Developed an overall Response Action Work Plan for the site based on the conclusions of the site investigation and previous soil removal action and submitted it to IPL for review.

March

Finalized the Response Action Work Plan and submitted it to the MCPA. Conducted the first of eight quarterly groundwater monitoring events. Renewed MDH well maintenance permits for 5 site monitoring wells.

April

Received MPCA approval of the Response Action Work Plan in an e-mail dated April 15, 2011. Received and reviewed the results of the first quarterly groundwater monitoring event. Processed laboratory and sampling costs.

May

Conducted data verification for results of the first quarterly monitoring event.

June

Conducted the second quarterly groundwater monitoring event and received the analytical results.

July

Reviewed the groundwater analytical data, conducted data verification, and calculated and plotted the potentiometric surfaces for the water table and confined aquifers. Processed laboratory charges for analysis of the second quarter groundwater samples.

August

Compared recent analytical data with historic results.

September

Conducted the third quarterly groundwater monitoring event. MWH also met with the owner of the portion of the site not owned by IPL to discuss groundwater seepage in to the basement of the building.

October

Received and reviewed the analytical results for the groundwater samples, conducted data verification, and calculated and plotted the potentiometric surfaces for the water table and confined aquifers. Renewed MDH well maintenance permits for 9 site monitoring wells.

November

Coordinated disposal of accumulated purge water. Processed laboratory charges for analysis of the third quarter groundwater samples.

December

Conducted the fourth quarterly groundwater monitoring event. Processed charges for disposal of accumulated purge water.

2012

In accordance with the Response Action Plan, quarterly groundwater monitoring was conducted in March, June, September, and December 2012, and site visits to gauge and remove DNAPL from monitoring well MW-9 were conducted throughout the year. Other activities included preparation of a groundwater monitoring report summarizing the results of monitoring conducted in 2011 and disposal of accumulated purge water. Monthly activities conducted in 2012 are summarized below:

January

Received and reviewed the analytical results from the fourth quarter 2011 groundwater monitoring event. Completed the annual update of the site cost model and text summary for the SEC liability reporting.

February

Processed laboratory charges for analysis of the fourth quarter 2011 groundwater samples. Revised the site cost model to account for inflation.

March

Scheduled and conducted the quarterly groundwater monitoring event. Purged DNAPL from monitoring well MW-9.

April

Received and reviewed the analytical results for the first quarter 2012 groundwater monitoring. Gauged and purged DNAPL from MW-9 and processed travel and equipment costs for the

groundwater monitoring and DNAPL purge. Began to prepare an interim groundwater monitoring report summarizing the 2011 monitoring activities and results. Renewed MDH well maintenance permits for 11 site monitoring wells.

May

Gauged and purged DNAPL from MW-9 on two occasions. Tabulated the analytical results of the first quarter groundwater monitoring and processed the laboratory invoices for the analyses. Finalized the interim groundwater monitoring report summarizing the 2011 monitoring activities and results, and submitted it to the MPCA.

June

Conducted the second quarterly groundwater monitoring event. Gauged and purged DNAPL from MW-9 on two occasions.

July

Reviewed the groundwater analytical data, conducted data verification, and calculated and plotted the potentiometric surfaces for the water table and confined aquifers. Gauged and purged DNAPL from MW-9 on two occasions. Processed a portion of the laboratory charges for analysis of the second quarter groundwater samples.

August

Gauged and purged DNAPL from MW-9 on two occasions. Processed the remaining laboratory charges for analysis of the second quarter groundwater samples and additional travel and equipment charges for the monitoring and DNAPL purge events.

September

Conducted the third quarterly groundwater monitoring event and purged DNAPL from MW-9 on two occasions.

October

Received and reviewed the analytical results for the groundwater monitoring samples, conducted data verification, and calculated and plotted the potentiometric surfaces for the water table and confined aquifers. Purged DNAPL from MW-9. Renewed MDH well maintenance permits for 3 site monitoring wells.

November

Tabulated and evaluated the analytical results for the third quarter groundwater monitoring samples. Gauged and purged DNAPL from MW-9. Processed laboratory, equipment, and travel charges for analysis of the third quarter groundwater samples.

December

Conducted the fourth quarterly groundwater monitoring event. Gauged and purged DNAPL from MW-9 and conducted a bail-down test. Processed travel and equipment charges for quarterly groundwater monitoring and DNAPL purging events.

2013

An annual groundwater monitoring event was conducted in June, and site visits to gauge and remove DNAPL from monitoring well MW-9 were conducted monthly throughout the year. Additional DNAPL related activities consisted of preparing a DNAPL Assessment and Extraction Work Plan which was submitted to the MPCA and approved on March 7, 2013, and a DNAPL bail-down and recovery test was conducted on MW-9. In accordance with the plan, nine temporary piezometers were installed around MW-9 and the piezometers were gauged on several occasions to identify the area of thickest DNAPL accumulation. Based on the boring logs and gauging results, a DNAPL recovery well was then installed.

Also in 2013, a preliminary investigation was conducted to evaluate sediment impacts in the Cedar River adjacent to the site. An investigation work plan was developed and submitted to the MPCA for review and comment; then modified accordingly. The sediment sampling plan was implemented and samples collected from up to 3 depth intervals at 30 sample locations. Based on the results of the sampling, prepared a summary report was prepared and submitted to the MPCA on November 26, 2013.

Other activities included preparation of the groundwater monitoring report summarizing the results of the annual monitoring conducted after the quarterly monitoring program, disposal of accumulated purge water, completion the annual cost model update for SEC liability disclosure, and processing of the annual monitoring well permit renewals. Monthly activities conducted in 2013 are summarized below:

January

The analytical results from the fourth quarter 2012 groundwater monitoring event were received and reviewed and the laboratory invoice for analysis of the samples was processed. The draft DNAPL assessment plan for the area around MW-9 was completed along with gauging and purging DNAPL from the well.

February

A draft technical memorandum summarizing the results of the 2012 annual groundwater monitoring was written. The draft DNAPL Assessment and Recovery Work Plan was finalized and submitted to the MPCA. The nine DNAPL gauging piezometers proposed in the work plan were then installed to gauge DNAPL thicknesses and extent, and DNAPL was purged from monitoring well MW-9.

March

In March, approval of the DNAPL Assessment and Recovery Work Plan was received from the MPCA. The newly installed piezometers were gauged and DNAPL purged from MW-9 on two occasions.

April

The DNAPL piezometers were gauged and DNAPL purged from MW-9 on two occasions and MDH well maintenance permits were renewed for 11 monitoring wells.

May

The DNAPL piezometers were gauged and DNAPL purged from MW-9. Discussions were held with the MPCA and the City of Austin regarding future use of the site and potential institutional controls.

June

The annual groundwater monitoring event was conducted and DNAPL was gauged in the piezometers and purged from MW-9.

July

The groundwater analytical data was received and reviewed, data verification was conducted, and the potentiometric surfaces for the water table and confined aquifers were determined and plotted. The DNAPL piezometers were gauged and DNAPL was purged from MW-9.

August

The DNAPL piezometers were gauged and the core logs reviewed to determine the location of the proposed DNAPL recovery well. The DNAPL piezometers were abandoned and a soil probe was advanced at the location of the proposed recovery well to verify the lithology and planned depth of the well. The driller's invoice for abandonment of the piezometers and advancement of the soil probe was processed. In addition to the DNAPL activities, a draft sediment sampling plan was drafted for the Cedar River and submitted to the MPCA for review.

September

In September, the DNAPL extraction well was installed near MW-9. The sediment sampling plan was revised per MPCA comments and the sediment sampling activities were conducted. The sediment sampling consisted of collecting up to 3 samples from each of the 30 proposed sampling locations and submitting the samples for laboratory analysis of the constituents of concern. Additional samples were collected from three locations for geotechnical analysis.

October

In October, disposal of soil cuttings from the installation of the DNAPL recovery well was completed and the driller's invoice for installation of the recovery well was processed. MW-9 and the DNAPL recovery well were also gauged for DNAPL thickness and DNAPL was purged from MW-9.

The analytical results for the sediment samples were received and reviewed, and a report summarizing the sampling activities and results was prepared. MDH well maintenance permits were renewed for 3 site monitoring wells.

November

The sediment sampling report was finalized and submitted to the MPCA. MW-9 and the DNAPL recovery well were also gauged for DNAPL thickness and MW-9 was purged of DNAPL.

December

MW-9 and the DNAPL recovery well were gauged for DNAPL thickness and MW-9 was purged of DNAPL. The DNAPL well was developed to try to improve DNAPL transmission between the formation and the well. Based on the results of the sediment sampling, cost estimates were developed and evaluated for potential remedial alternatives.

Austin Site Environmental Investigation/Remediation Status

The remedial investigation and interim response action have been completed for the on-site portion of the Austin site. The Response Action Work Plan submitted to the MPCA in 2012 outlined the remaining activities for groundwater at the site, which consisted of eight quarters of groundwater monitoring and institutional controls. The quarterly monitoring program has been completed, however, due to the presence of DNAPL, additional activities are needed to better define the extent of the DNAPL and recover the product. Therefore, groundwater monitoring is continuing on an annual basis.

The initial sediment investigation conducted in 2013 identified a general area of impacted sediment as well as an area of DNAPL in the Cedar River. Additional work will be required to more fully define the extent of impacts in the Cedar River adjacent to the site and remediate the areas of unacceptable risk.

☐ **Confidential/Trade Secret**

Response of
Interstate Power and Light Company
to
State of Minnesota
Office of The Attorney General
Information Request No. 102

Docket No.:	G001,G011/PA-14-107
Date of Request:	March 12, 2014
Response Due:	March 24, 2014
Information Requested By:	Ian Dobson
Date Responded:	March 25, 2014
Author:	Jill Stevens
Author's Title:	Manager Environmental Services
Author's Telephone No.:	(608) 458-0446
Subject:	
Reference:	Former Manufactured Gas Plant sites other than Austin, Minnesota

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Information Request No. 102

Provide a historical description of the identification, remediation, and current status of the required cleanup obligation by IPL for sites in Minnesota. Also provide a historical description of the accounting for cleanup costs and recovery from ratepayers since these sites were identified for cleanup.

Response:

Please see Attachments A-E for a historical description of the identification, remediation, and current status of Interstate Power and Light Company's (IPL) efforts at the Albert Lea, Fairmont, New Ulm, Owatonna and Rochester FMGP sites.

For the historical description of the accounting for cleanup costs and recovery from ratepayers, please see IPL's response to the Office of the Attorney General's Information Request No. 100, which contains the response of IPL to the Minnesota Department of Commerce, Division of Energy Resources, Information Request No. 3, dated March 4, 2014.

ALBERT LEA MGP SITE

History:

In 1901, Frank Moore Jeffrey was granted a franchise to construct a gas manufacturing plant and install distribution lines. The plant was completed and began operation in 1903 and soon merged with the Albert Lea Electric Light Company to form the Albert Lea Light and Power Company. The Albert Lea Light and Power Company was subsequently acquired by the Minnesota Gas and Electric Company (MGEC). In 1913, MGEC constructed a new electric generating power plant to the north of the manufactured gas plant. MGEC was acquired by the Southern Minnesota Gas and Electric Company in 1919. The electric plant was enlarged in 1923 to meet the increased demand for electricity and, in 1925, the gas and electric operations were acquired by Interstate Power Company (IPC).

The gas plant operated until approximately 1933, when natural gas became available in Albert Lea. The plant may also have been operated occasionally to supplement early natural gas supplies. Gas was manufactured using the Lowe process. Reportedly, the gas and purifier wastes were temporarily stored onsite in an above-ground tank and were later sold as materials for other processes and products.

Following generation of gas at the site, the gas plant building was used for vehicle maintenance and transformer maintenance and storage. The gas holders were used as a garage and for general storage and were later modified to store fuel oil for the electric power plant. In 1950, the gas plant and associated structures were demolished. In 1980, the electric plant was demolished.

With the exception of the southern portion, the site has been owned by IPC since initially acquired in 1925. The southern portion of the site was previously sold and developed into the existing car wash. However, due to the presence of MGP related impacts, IPC and the owners of Bubbles Car Wash reached an agreement in which IPC has repurchased the property and allowed the car wash facility to continue operating until June 1999.

IPC proceeded to take responsibility for investigation and remediation of the Albert Lea MGP site.

Activity summary:

VIC Project Number: VP# 0090
LUST Project Number: The site has also been assigned LEAK# 00003169 under the MPCA Petroleum Brownfields Program as a leaking underground tank site.

1998

In 1998, the data from the site investigations was reviewed and used to identify potential remediation areas (areas of similar impacts and physical characteristics). The data was also used to complete a Site Screening Evaluation (SSE) which estimated the exposure risks related to the potential remediation areas. Several remedial scenarios were then developed and evaluated for technical and economic feasibility. A preliminary draft of the feasibility study was prepared and submitted to IPL for review. No formal reports were submitted to the MPCA in 1998.

Additional costs were incurred for disposal of 400 gallons of investigation-derived water held on site from the supplemental site investigation conducted in 1997, and for annual monitoring well maintenance permit fees required by the Minnesota Department of Health (MDH).

In 1998, IPL began an annual cost estimating process to project potential environmental liabilities related to their MGP sites. The estimates were developed using the MGP Probabilistic Cost Model software developed by the Gas Research Institute (GRI).

1999

In 1999 the site data was re-evaluated in accordance with new MPCA guidelines for the SSE process (now called the Risk-Based Screening Evaluation [RBSE]). The feasibility study was revised to match the new site evaluation criteria and potential remediation areas and submitted to IPL for review. No formal reports were submitted to the MPCA in 1999.

Additional activities and expenditures related to the Albert Lea site in 1999 included the annual cost model update and the annual MDH monitoring well maintenance permit renewals.

2000

Major activities for the Albert Lea MGP site in calendar year 2000 consisted of continued evaluation of site data and remedial alternatives. In September of 2000, IPL met with the MPCA to discuss the site status and next steps. No formal reports were submitted to the MPCA in 2000. Annual expenditures continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2001

Major activities completed for the Albert Lea MGP site in calendar year 2001 included completing the Focused Feasibility Study and submitting it to the MPCA, conducting an annual groundwater monitoring event, and preparing a pilot scale remedial action work plan. The Focused Feasibility Study was submitted to the MPCA in July 2001, and evaluated

several remedial alternatives with in-situ chemical oxidation of impacted saturated soil recommended as the preferred remedial alternative. In support of the recommended remedial alternative, a work plan proposing a pilot scale injection of a chemical oxidant in select areas of the site was developed and submitted to the MPCA on December 12, 2001. A letter requesting an evaluation of the in-situ chemical oxidation injection with respect to the subsurface injection rules was submitted to the MDH.

In July 2001, a site-wide groundwater monitoring event was conducted to further develop the groundwater database and provide current site data. The analytical results were received and evaluated in 2001, and a draft technical memorandum prepared which summarized the results.

Annual expenditures continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2002

On February 8, 2002, the technical memorandum summarizing the July 2001 groundwater monitoring event was submitted to the MPCA. Planning for the chemical oxidation pilot study continued with discussions with the MPCA and MDH. The MDH issued a letter on June 8, 2002 verifying that the proposed activities were not regulated under the MDH subsurface injection rules.

On July 10, 2002, the MPCA issued an Office Memorandum which provided comments on the Focused Feasibility Study. On August 13, 2002, the MPCA issued a letter with addition comments on the Focused Feasibility Study and approving the pilot study. A response to the MPCA comments were sent on October 21, 2002. Also on October 21, 2002, a request was submitted to the United States Environmental Protection Agency (USEPA), Region V requesting the pilot study injection be exempt from Class 5 injection rules by rule-authorization. The approval of the rule authorization was sent in a November 29, 2002 letter from the USEPA.

Implementation of the pilot study began in November 2002 with collection and analysis of baseline soil and groundwater samples. Injection of the chemical oxidant was also completed in December 2002.

Annual expenditures continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2003

Major activities conducted at the Albert Lea MGP site during the 2003 reporting period were related primarily to verification sampling and evaluation of the chemical oxidation pilot study. These activities included post-injection soil and groundwater monitoring events at 30-, 90-, and 180-days following the chemical oxidation injection. A technical memorandum was submitted to the MPCA on May 20, 2003 that summarized the results of the baseline sampling, provided a discussion of the chemical oxidation injection activities, and included the results of the 30- and 90-day post-injection sampling. Another technical memorandum

was prepared and submitted to the MPCA on September 12, 2003 that discussed the results of the 180-day post-injection sampling. Groundwater monitoring was conducted quarterly at the site throughout 2003 as outlined in the chemical oxidation pilot study work plan.

To meet the reporting requirements for the MPCA Petroleum Brownfields Program, a separate report summarizing the site data was prepared in the required format. The report was submitted to the MPCA on November 7, 2003.

Annual expenditures continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2004

Major activities conducted at the Albert Lea MGP site during 2004 consisted of completing the post-injection groundwater monitoring and reporting, and developing the recommendations for full scale remediation. Results of the third quarter 2003 groundwater monitoring were summarized in a technical memorandum to the MPCA dated January 8, 2004.

In a July 2, 2004, the MPCA requested additional off-site delineation of soil and groundwater impacts to better define the full extent of contamination, and completion of a groundwater receptor survey. A letter work plan was submitted to the MPCA on August 18, 2004. IPL received approval from the MPCA for the proposed additional remedial investigation. Access agreements were sought with the City of Albert Lea and several other private property owners. However, the private property owners declined.

The annual groundwater monitoring event conducted in November 2004. Receptor survey activities consisted of requesting well inventory data for private, municipal, and industrial wells in the vicinity of the site. Other annual expenditures continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2005

Activities for 2005 are described on a monthly basis in the paragraphs below.

January. Tabulated the results of the annual groundwater monitoring and off-site delineation sampling conducted in November 2004. Began to compile the data for the receptor survey report. Prepared a quarterly report to the MPCA for the MGP site activities conducted during the 4th quarter of 2004.

February. Continued to prepare the groundwater receptor survey report. Because access for installation of permanent off-site wells on private property was denied, additional discussions were held with the City of Albert Lea regarding potential alternate locations and well construction requirements on city property.

March. Processed MDH well maintenance permits for 5 monitoring wells. Continued to review potential off-site locations for permanent monitoring wells. Contacted the Iowa,

Chicago, and Eastern Railroad (ICE) regarding potential access to install wells in their right-of-way.

April. Submitted a quarterly report to the MPCA for MGP site activities conducted during the 1st quarter of 2005.

May. Continued to prepare the groundwater receptor survey report, incorporating it in to the chemical oxidation pilot study summary report. Continued to evaluate alternate off-site well locations for the off-site delineation.

June. Continued to review potential off-site well locations. Visited the site to confirm physical access and locations of overhead and underground utilities. Received permission from the MPCA to collect soil and groundwater samples using direct-push equipment and temporary wells for the off-site delineation where permanent wells were not feasible.

July. Discussed the use of the direct-push equipment instead of permanent wells with the City of Albert Lea. Scheduled field work for installation of a permanent monitoring well northeast of the site on IPL property. Prepared a quarterly progress report for the MPCA summarizing the MGP site activities for the 2nd quarter of 2005. Completed the draft annual revision of the site cost model.

August. Finalized access agreement with the City of Albert Lea. Installed the permanent well on IPL property. Scheduled field work for the off-site direct-push sampling activities. Final revisions to the annual cost model update.

September. Completed the direct-push sampling of the off-site locations proposed for the additional site investigation. Collected soil and groundwater samples from five locations. Sampled the newly installed well on IPL property. Received analytical results for the soil samples collected during the installation of the new permanent well. Scheduled verification sampling of the new points in conjunction with the annual site-wide monitoring in November.

October. Received and reviewed the analytical results from the off-site sampling locations. Completed a draft of the chemical oxidation pilot study summary report. Processed invoices for drilling and laboratory charges.

November. Completed the annual site-wide groundwater monitoring event. Collected samples from 27 wells and 5 direct-push temporary wells. Completed internal review of the chemical oxidation pilot study summary report.

December. Received and reviewed analytical results from the annual groundwater monitoring event. Incorporated the results in to the chemical oxidation pilot study report. Processed some of the subcontract charges for laboratory analysis and the direct-push contractor.

2006

Major activities for the Albert Lea site consisted of 1) finalizing and submitting a report summarizing the results of the additional remedial investigation and groundwater monitoring activities and 2) preparing and implementing a work plan for full scale chemical oxidation injection to treat impacted soil and groundwater. Monthly activities are summarized below:

January.
A remedial investigation and groundwater monitoring report were submitted it to the MPCA. Data collection for the vapor survey was completed and a draft report was prepared. Preparation of a work plan began for full scale BIOX® injection on the central and southern portions of the site.

February
Work continued on the receptor survey report, the draft of the full scale BIOX® injection work plan, and the groundwater receptor survey report.

March
The BIOX® pilot study summary report and the receptor survey report were submitted to the MPCA for review. Notification of injection letters were submitted to all utility and service providers that may have underground utilities on or near the site. Minnesota Department of Health (MDH) well maintenance permits were processed for 28 site monitoring wells.

April
Submitted and received approval for both the rule authorization and MDH injection variance requests. The full scale BIOX® injection work plan was submitted to the MPCA. A site survey was conducted using ground penetrating radar to help located buried structures that may inhibit the injection activities.

May
Verbal approval was received from the MPCA to proceed with the injection activities as an interim treatment. Baseline perimeter air monitoring was completed and the results were received. The BIOX® injection was initieated

June
The BIOX® treatment, site cleanup, and demobilization were completed. Quarterly groundwater elevations were collected.

July
The draft of the annual site cost model was updated.

August
The Focused Feasibility Study comment response and addendum were submitted to the MPCA. Field work for the 3-month post-injection soil and groundwater sampling activities was scheduled.

September
Collection of the 3-month post-injection soil and groundwater verification samples and quarterly groundwater elevation data were completed. The annual cost model update was finalized.

October
The analytical results from the 3-month post-injection sampling activities were received and tabulated.

November
Laboratory invoices for the 3-month post-injection sample analysis were processed. The 6-month post-injection sampling was scheduled and equipment and supplies were ordered.

December
The 6-month post-injection soil and groundwater sampling was completed.

2007

Major activities for the Albert Lea MGP site in 2007 included preparing a report for the MPCA that summarized the chemical oxidation treatment and monitoring conducted in 2006, and planning and implementing an additional site-wide chemical oxidation treatment event. Monthly activities for the site are summarized below:

January

Soil and groundwater data from the 6-month sampling event following the 2006 in-situ chemical oxidation injection treatment (using BIOX®) were reviewed and evaluated against the baseline data to evaluate the effectiveness of the treatment. Work began on preparing a report summarizing the results, and arrangements were made for disposal of accumulated drums of soil cuttings from site investigation activities.

February

Work continued on preparing the chemical oxidation treatment summary report. Minnesota Department of Health (MDH) well maintenance permits were renewed for 27 site monitoring wells.

March

Based on the results of the site-wide 2006 chemical oxidation treatment, recommendations were prepared for additional treatment. Plans for the additional treatment were discussed with the MPCA and the treatment vendor. The additional treatment was tentatively scheduled for August 2007.

April

The draft chemical oxidation treatment summary report was completed and reviewed internally. The document was then finalized and submitted to the MPCA. On site activities consisted of collected groundwater elevation data from the site monitoring wells. Additional discussions regarding the chemical oxidation treatment and schedule were held with the vendor.

May

Began planning and coordination for the chemical oxidation treatment and finalized the implementation schedule. The long term projected schedule and associated costs for the site were reviewed.

June

Met with the MPCA to discuss the proposed chemical oxidation treatment and monitoring activities. Requested and received a rule authorization from EPA Region 5 and an injection variance from the MDH for the chemical oxidation treatment. Processed MDH well maintenance permits for 5 site monitoring wells.

July

Continued planning and coordination for the chemical oxidation treatment. Ordered necessary air monitoring equipment and supplies for the treatment and collected groundwater elevation data for baseline data prior to the BIOX® injection. Also completed the initial draft of the annual cost model update for the site.

August

Conducted the site-wide chemical oxidation treatment. Injected approximately 39,596 gallons of BIOX® solution in 820 holes across the site. Conducted site perimeter air monitoring and work zone air monitoring. Processed travel charges for oversight of the injection and invoices for predrilling injection holes. Also incorporated inflation costs and finalized the annual cost model update.

September

Completed site cleanup following the chemical oxidation treatment. Processed the remaining travel charges, invoices for air monitoring equipment, and perimeter air monitoring sample analysis.

October

Scheduled the 3-month post-injection groundwater monitoring and ordered sample containers and equipment. Processed MDH well maintenance permits for 3 site monitoring wells.

November

Conducted the 3-month post-injection groundwater monitoring and annual site-wide groundwater monitoring Collected groundwater elevations and groundwater samples for laboratory analysis.

December

Received and reviewed the analytical results from the post-injection and annual monitoring activities. Processed charges for travel and sampling and for direct-push services for collecting off-site groundwater samples.

2008

Major activities for the Albert Lea MGP site in 2008 consisted of soil and groundwater sampling and laboratory analysis of the samples in order to evaluate the effectiveness of the 2007 chemical oxidation injection using the BIOX® process. Other activities included preparing a report for the MPCA that summarized the chemical oxidation treatment and subsequent monitoring. Monthly activities for the site are summarized below:

January

Reviewed the analytical results from the 3-month post-injection/annual groundwater monitoring and soil sampling activities for completeness and compliance with the quality assurance parameters and tabulated the analytical results. Processed invoices for the laboratory analysis of the soil and groundwater samples and for equipment rental for the groundwater sampling.

February

Completed preparations for conducting the 6-month post-injection groundwater monitoring, but rescheduled the sampling due to extreme cold weather. Renewed Minnesota Department of Health (MDH) well maintenance permits for 21 site monitoring wells.

March

Conducted the 6-month post-injection groundwater monitoring and received the analytical results from the laboratory. Processed charges for travel expenses, equipment, and supplies associated with the 6-month post-injection groundwater monitoring.

April

Reviewed the analytical results from the 6-month post-injection/annual groundwater monitoring and soil sampling activities for completeness and compliance with the quality assurance parameters. Processed the laboratory invoices for analysis of the groundwater samples.

May

Began to develop an outline for the summary report for the 2007 BIOX® injection activities and the subsequent groundwater monitoring.

June

Tabulated the results from the 6-month post-injection groundwater monitoring and calculated percent reduction values for all of the sampling points and evaluated the data for trends. Began to prepare the summary report for the 2007 BIOX® injection and follow-up sampling activities. Also reviewed and updated the text summary for the annual cost model update.

July

Continued preparation of the BIOX® injection and monitoring report and completed preparations for an interim groundwater monitoring event. Began to revise the site cost model for the annual update.

August

Conducted the interim groundwater monitoring event consisting of all existing site monitoring wells and off-site locations that were sampled via direct-push temporary wells. Processed the travel and equipment costs and the invoice from the direct-push contractor for the groundwater sampling activities. Also completed the pre-inflation cost model update and adjusted the cost model to account for inflation.

September

Received the analytical results from the interim groundwater monitoring event and reviewed the data for completeness and compliance with the quality assurance parameters and tabulated the data. Processed the laboratory invoices for analysis of the groundwater samples and the remaining travel and additional equipment costs associated with the monitoring event.

October

Evaluated the groundwater monitoring results and integrated the data in to the BIOX injection and monitoring report. Processed the remaining equipment charges for the groundwater monitoring event.

November

Completed the draft BIOX® injection and monitoring report. Processed the remaining laboratory invoice for the groundwater monitoring. Began to prepare a draft restrictive covenant for the site.

December

Conducted internal review of the BIOX® injection and monitoring report. Processed MDH monitoring well permit renewals for 4 monitoring wells.

2009

Major activities for the Albert Lea MGP site in 2009 consisted primarily of a site-wide groundwater monitoring event and reporting of the results. Other activities included a review of other chemical oxidation treatment options and evaluating the potential applicability at the Albert Lea site. Monthly activities for 2009 for the site are summarized below:

January

Renewed Minnesota Department of Health (MDH) well maintenance permits for 21 site monitoring wells.

February

Had discussions with the MPCA regarding the site status.

March

Finalized the chemical oxidation and follow-up monitoring report and submitted the report to the MPCA for review. Reviewed the adequacy of the existing soil and groundwater data with respect to delineating the extent of impacts for completing the remedial investigation.

April

Processed 5 MDH monitoring well maintenance permit renewals.

May

No activities completed during the month.

June

Began to compile the spatial data for the soil boring and monitoring well locations and populate the MPCA spreadsheet. Scheduled the site-wide groundwater monitoring event and coordinated with the laboratory and ordered equipment.

July

Conducted the interim groundwater monitoring event consisting of all existing site monitoring wells and off-site locations that were sampled via direct-push temporary wells. Processed the travel and equipment costs and the invoice from the direct-push contractor for the groundwater sampling activities. Continued preparation of the MPCA spatial data spreadsheet. MWH visited

IPL's MGP site in Vinton, Iowa to discuss the chemical oxidation process and procedures being tried at that site.

August

Received the analytical results from the interim groundwater monitoring event and reviewed the data for completeness and compliance with the quality assurance parameters and tabulated the data. Processed the laboratory invoices for analysis of the groundwater samples and the remaining travel and additional equipment costs associated with the monitoring event. Began to prepare a draft report summarizing the results of the 2009 annual groundwater monitoring event. Also completed the MPCA spatial data spreadsheet for the soil borings and monitoring wells and submitted the spreadsheet to the MPCA.

September

Completed the draft groundwater monitoring report and conducted internal review. Processed the laboratory invoice for analysis of the groundwater samples and the remaining equipment and supply costs for the groundwater monitoring event. Resurveyed the top of casing elevations for the site monitoring wells due to potential frost heaving.

October

Processed 3 MDH monitoring well maintenance permit renewals. Processed travel and equipment costs for resurveying the monitoring well casings.

November

Collected samples of soil cuttings and purge water stored on the site and submitted the samples for analysis of disposal characterization parameters. Processed travel costs for the waste sampling.

December

Finalized the 2009 annual groundwater monitoring report and submitted it to the MPCA. Arranged for disposal of the purge water stored on site. Processed invoices for laboratory analysis of the purge water and disposal of the water.

2010

Major activities for the Albert Lea MGP site in 2010 consisted primarily of a site-wide groundwater monitoring event and a vapor intrusion investigation. Other activities included a review of chemical oxidation treatment options and evaluating their potential applicability at the Albert Lea site. Monthly activities for 2010 for the site are summarized below:

January

Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting.

February

Renewed Minnesota Department of Health (MDH) well maintenance permits for 21 site monitoring wells.

March

Conducted a literature review of in-situ chemical oxidation processes for PAHs in soil and groundwater and evaluated their potential applicability for the site.

April

Conducted additional review and evaluation of chemical oxidation alternatives.

May

No activities completed during the month.

June

MWH contacted another of IPL's consultants to discuss the chemical oxidation process, procedures, and preliminary results for a remediation being implemented at site IPL's MGP site in Vinton, Iowa. Renewed MDH well maintenance permits for 5 site monitoring wells.

July

Contacted the MPCA to set up a meeting to discuss the status of the site and developed an agenda for the meeting. MWH reviewed the logistics and possible schedule for conducting another full scale chemical oxidation injection.

August

Met with the MPCA to discuss the status of the site and future work needed. Calculated potential volumes of soil that could be excavated from the central and southern portions of the site. Reviewed the results of the chemical oxidation verification sampling to develop an estimate of mass removal and potential effectiveness of further treatment at the site.

September

Installed an additional deep monitoring well on the southern portion of the site to better define the extent of impacts in the deeper aquifer. Developed a draft vapor intrusion screening work plan

and coordinated with the City of Albert Lea regarding access for the soil vapor sampling. MWH obtained an estimate from a surveyor to delineate the extent of city property on the south side of Front Street. MWH scheduled and prepared to conduct a site-wide groundwater monitoring event. Renewed MDH well maintenance permits for 3 site monitoring wells.

October

Conducted a boundary survey of City property to identify areas for conducting the soil vapor survey. Finalized the vapor intrusion screening work plan and submitted it to the MPCA for review. Received approval of the vapor intrusion screening work plan from the MPCA and installed 24 Gore™ passive sampling modules along the southern and southeastern edges of the site. Completed a site-wide groundwater monitoring event. Processed subcontractor charges for installation of temporary off-site monitoring wells for the site-wide groundwater monitoring and for laboratory analysis of soil samples collected during the installation of the additional deep monitoring well. Processed travel and equipment charges for the groundwater monitoring event.

November

Recovered the soil vapor sampling modules and submitted them for laboratory analysis. Received and reviewed the analytical results for the site-wide groundwater monitoring. Coordinated disposal of soil cuttings and accumulated purge water. Processed invoices for laboratory analysis of the groundwater samples, the City property boundary survey, and disposal of accumulated purge water. Also processed travel and equipment charges for the vapor intrusion investigation.

December

Received and reviewed the analytical results and report for the soil vapor screening modules. Indentified locations to collect soil gas confirmation samples, collected samples from 4 locations, and submitted the samples for laboratory analysis. Processed subcontractor invoices for supplies and laboratory analysis of the Gore soil vapor modules, installation of soil gas sample points, and laboratory analysis of soil physical properties. Also processed travel and equipment charges for collection of the soil gas verification samples. Renewed MDH well maintenance permits for 21 site monitoring wells.

2011

Initially in 2011, major activities for the Albert Lea MGP site consisted of evaluation and reporting of the results of the 2010 site-wide groundwater monitoring event and vapor intrusion investigation. Subsequently, IPL determined the former car wash building, which was being used for truck and equipment storage, could be demolished. This provided an opportunity to excavate impacted soil and significantly reduce the mass of source material in the soil and reduce the extent of groundwater impacts. Therefore, a soil removal action was planned, a contractor selected, and preparations undertaken to implement the removal action in early 2012. Monthly activities for 2011 for the site are summarized below:

January

Prepared a report summarizing the results of the 2010 groundwater monitoring and submitted the report to the MPCA. Completed the annual update of the site cost model and text summary for the basis for the Securities and Exchange Commission (SEC) liability reporting.

February

Prepared a vapor intrusion investigation report and submitted it to the MPCA. Processed the laboratory invoice for analysis of the soil gas samples collected in December 2010.

March

Continued to evaluate remedial alternatives for the site and renewed Minnesota Department of Health (MDH) well maintenance permits for 3 site monitoring wells.

April

Calculated the volume of impacted soil that would be potentially accessible by excavation and investigated potential off-site disposal options. Discussed the possibility of a soil removal action with the MPCA and began to develop plans for conducting a removal action.

May

Began to prepare a draft removal action work plan for impacted soil and update the site-specific health and safety plan to include soil removal activities. Developed preliminary cost estimates for the removal action and reviewed alternatives for disposal.

June

Continued to prepare a soil removal action work plan, developed air monitoring screening values for site perimeter monitoring, and finalized the health and safety plan update.

July

Continued to finalize logistics and prepare the soil removal action work plan. Coordinated with a nearby landfill regarding expansion of its facility and permit status.

August

Finalized the soil removal action work plan and submitted it to the MPCA. Scheduled an asbestos and regulated substance survey for the former car wash building and prepared a preliminary scope of work for the removal action bid process.

September

Completed the asbestos and regulated substance survey of the former car wash building. Identified potential removal action contractors. Scheduled an on-site meeting with the MPCA and the City of Albert Lea to discuss the removal action and future plans for the site. Finalized the scope of work for the removal action contractor bid.

October

Submitted a request for proposal to select contractors, conducted an on-site meeting to discuss the removal action, and received bids. Prepared amendments to the removal action work plan based on MCPA comments. Renewed MDH well maintenance permits for 4 site monitoring wells.

November

Evaluated contractor bids for the removal action and awarded the contract. Obtained an Industrial Wastewater Discharge Permit from the City of Albert Lea for the removal action and subsequent monitoring. Scheduled the removal action, met on-site with the selected contractor to develop detailed plans for site layout and removal action logistics. Completed demolition and disposal of the former car wash building on the southern portion of the site.

December

Collected additional soil samples along the railroad right-of-ways to evaluate the need for access agreements in order to remove additional impacted soil. Completed site set up, including fencing, establishing a field office trailer, set up of a personnel decontamination trailer, mobilization of excavation equipment, mobilization of a water treatment system, and abandoned monitoring wells in the proposed area of excavation. Set up the perimeter air monitoring stations and completed the baseline air monitoring. Prepared a public relations fact sheet and conducted door-to-door canvassing of the neighboring residences and businesses regarding the removal action activities.

2012

Major activities for the Albert Lea MGP site consisted of completing the Interim Response Action (IRA) and site restoration activities. The IRA was initiated in December 2011 to reduce potential exposure to MGP-impacted soil by the public or the environment. The IRA consisted of excavation and off-site disposal of MGP-impacted soil and fill. The excavated material was

transported to the SKB Lansing industrial waste landfill near Austin, Minnesota. Verification samples were collected to direct the extent of excavation and characterize residual impacts remaining after removal activities were completed. In February 2012, the removal of MGP-impacted soil was completed. Most activities related to site restoration (final cover soil, gravel, and seeding) were completed by the end of June 2012.

The IRA activities included:

- Excavation and disposal of 15,043 tons of impacted soil and source materials.
- Disposal of approximately 195 tons of concrete and approximately 321 tons of asphalt as construction and demolition debris.
- Disposal of approximately 9 tons of scrap metal for recycling.
- Collection of air monitoring samples during and after the soil removal activities.
- Backfill and grading of the site, with placement of gravel on the southern portion and topsoil/seed on the central portion.
- Demobilization and site restoration; including removal of the temporary fencing, electrical supply, air monitoring stations, weather station, field office, and heavy equipment.
- Installation of seven replacement monitoring wells in the area of the excavation and conversion of four wells from flush to stick-up completions.

Subsequent work consisted primarily of quantifying potential exposure risks due to residual impacts, developing a Response Action Plan to address those exposures, and collection of groundwater samples. Activities conducted as part of the IRA, including the results of the verification samples collected from the floor and sidewalls of the excavation and air monitoring results were summarized in an Interim Response Action Implementation Report which was submitted it to the MPCA on November 2, 2012. Monthly activities for 2012 for the site are summarized below:

January

Began excavation activities for the Interim Response Action on January 6, 2012. Soil removal and backfill continued throughout the month. Other activities related to the soil removal included air monitoring of the work zone and site perimeter, collection and analysis of verification samples, and coordination of off-site disposal of impacted materials.

Other activities included completing the annual update of the site cost model and text summary for the basis for the Securities and Exchange Commission (SEC) liability reporting, and renewal of MDH well maintenance permits for 16 site monitoring wells.

February

Continued the impacted soil removal and related activities as described above. Excavation was completed on February 15, 2012, with placement of subgrade backfill completed on February 16, 2012. Revised the annual site cost model to account for inflation.

March

Continued site restoration activities: gravel placement on the southern portion of the site; installation of replacement monitoring wells; restoration of original fencing; and removal of temporary fencing, electrical service, and earth moving equipment. Completed the post-excavation perimeter air monitoring and removed the air monitoring stations. Received the remaining analytical results and began to prepare a report summarizing the soil removal activities. Processed additional invoices from the excavation contractor, disposal landfill, laboratories, etc.

April

Continued site restoration activities: placement of top soil, grading, and seeding of the central portion of the site; replacement of sidewalk panels and east driveway. Received notification from the City of Albert Lea of the requirement to pave parking/storage lots (i.e., the southern portion of the site) and requested a one-year variance to allow settling and compaction. Processed additional contractor invoices for site restoration and related costs. Continued to prepare the Interim Response Action Implementation Report. Renewed MDH well maintenance permits for 3 site monitoring wells.

May

Continued site restoration activities: replacement of sidewalk panels and the east driveway, and addition of more gravel to the southern portion. Conducted site visits to inspect seeding and new concrete. Continued to prepare the Interim Response Action Implementation Report.

June

Conducted a site visit to inspect turf growth in the central portion and gauge groundwater levels to evaluate re-saturation of the backfill. Processed final invoices for analysis of personal pump air samples collected during the IRA. Continued to prepare the Interim Response Action Implementation Report.

July

Evaluated exposure risks due to residual impacted materials: grouped data based on exposure area and concentration, calculated exposure point concentrations, input the data into the MPCA Risk Based Screening Evaluation spreadsheets, and evaluated the results. Continued to prepare the Interim Response Action Implementation Report. Canceled the bond with the City for the concrete work completed on the sidewalks and driveway.

August

Completed the draft the Interim Response Action Implementation Report and conducted internal review. Conducted a site-wide groundwater monitoring event and processed travel and equipment charges.

September

Received and reviewed the analytical results for the site-wide monitoring and began to group the data for the risk based screening evaluation. Processed invoices for laboratory analysis of the samples, installation and abandonment of temporary monitoring wells, and remaining travel and equipment charges.

October

Determined exposure concentrations for soil and groundwater for the various exposure areas. Began to prepare the groundwater monitoring and risk based screening evaluation report. Obtained approval from the City of Albert Lea to discharge accumulated purge water to the City sanitary sewer and discharged the water. Renewed MDH well maintenance permits for 3 site monitoring wells.

November

Finalized the Interim Response Action Implementation Report and submitted it to the MPCA. Continued to prepare the groundwater monitoring and risk based screening evaluation report. Renewed MDH well maintenance permits for 6 site monitoring wells.

December

Continued to prepare the groundwater monitoring and risk based screening evaluation report. Obtained a contractor's estimate for paving the southern portion of the site as required by the City of Albert Lea.

2013

In 2013, IPL received MPCA approval of the Interim Response Action Implementation Report. Using the residual concentrations gathered during the Interim Response Action and the MPCA Risk Based Screening Evaluation (RBSE) spreadsheets, the risks associated with the site were updated and summarized in a Risk Evaluation Addendum Report which was submitted it to the MPCA on March 13, 2013. In conjunction with the revised risk evaluation, a Response Action Work Plan was prepared and also submitted to the MPCA on March 13, 2013. Approval of the risk evaluation and work plan documents was received from the MPCA on April 25, 2013.

In accordance with the approved Response Action Work Plan, quarterly post-remediation groundwater monitoring was conducted on all site-related wells plus six off-site temporary wells. Other site activities consisted of placing asphalt paving on the southern portion of the site in accordance with the City of Albert Lea ordinance, and disposal of purge water and soil cuttings stored at the site. Support activities included updating the annual cost model for the Securities and Exchange Commission (SEC) liability disclosure and processing annual monitoring well

permit renewals for the site monitoring wells. Monthly activities for 2013 for the site are summarized below:

January

The draft Risk Evaluation Addendum Report was drafted along with preparation of the final Response Action Work Plan for the site, and planning and scheduling of the proposed quarterly groundwater monitoring began. Approval of the 2012 Response Action Implementation Report was received from the MPCA.

Other activities included completing the annual update of the site cost model and text summary for material changes due to work completed in 2012. Also, MDH well maintenance permits were renewed for 16 monitoring wells.

February

The draft Response Action Work Plan was finalized and reviewed internally. Additional planning and preparations were completed for the first quarter groundwater monitoring event scheduled for March 2013, and the annual site cost model was revised to account for inflation.

March

In March 2013, the Risk Evaluation Addendum Report and the Response Action Work Plan were submitted to the MPCA for review. The first quarterly groundwater monitoring event was completed. Sampling and analysis were conducted in accordance with the Response Action Work Plan and consisted of sampling 24 permanent and 6 temporary wells with laboratory analysis for the constituents of concern and select natural attenuation parameters. Related activities included receipt and review of the analytical results, processing travel and equipment charges, and processing the driller's charges for installation and abandonment of the temporary wells.

Other activities conducted in March included coordination with the paving contractor regarding schedule and an updated cost estimate for asphalt paving the southern portion of the site, and final revisions to the cost model and report.

April

Activities conducted during April included data validation of the first quarter monitoring results, processing the laboratory invoices for the sample analysis, and processing remaining travel and equipment charges for the sampling event. IPL also received approval from the MPCA of the Risk Evaluation Addendum Report and the Response Action Work Plan, and renewed MDH well maintenance permits for 3 site monitoring wells.

May

Primary activities conducted in May consisted of coordinating with the paving contractor regarding subgrade preparation and the paving schedule, and working with the local landfill for

approval to dispose of any additional soil generated during final grading and subgrade preparation.

June

In June, the second quarter groundwater monitoring event was conducted in accordance with the Response Action Work Plan. Travel and equipment charges were processed along with the driller's charges for installation and abandonment of the temporary wells. Subgrade preparations for the paving of the southern portion of the site began with removal and disposal of surface soil along the fence lines and grading of the site. Other activities included disposal of drums and storage tanks no longer needed for storage of investigation derived waste.

July

In July, the results of the second quarter groundwater monitoring event were received and validated, and the laboratory invoices processed.

August

The base course of the asphalt paving was placed on the southern portion of the site and preparations for the third quarter groundwater monitoring event were completed.

September

The third quarter groundwater monitoring event was conducted in accordance with the Response Action Work Plan. Related activities included receipt and review of the analytical results, processing travel and equipment charges, and processing the driller's invoice for installation and abandonment of the temporary wells.

October

Placement of the wear course of asphalt was completed during October. In addition, the data from the third quarter groundwater monitoring event was validated and tabulated, and the laboratory invoice for approximately half of the samples was processed. Arrangements were made for disposal of accumulated water and other investigation derived waste stored at the site.

November

Disposal of accumulated water and other investigation derived waste was completed and DNAPL thickness and persistence was evaluated in monitoring well MW-17. Other activities included processing the laboratory invoice for the remaining samples from the third quarter monitoring event, renewing MDH well maintenance permits for 6 site monitoring wells, and making preparations for the fourth quarter groundwater monitoring.

December

The fourth quarter groundwater monitoring event was completed and the samples were submitted for laboratory analysis. The invoices for the laboratory and for the driller's charges for installation and abandonment of the temporary wells were processed, as well as travel and equipment charges for the sample collection. The analytical results of the monitoring were received and reviewed.

Albert Lea Site Environmental Investigation/Remediation Status

Site investigation and removal of accessible source material are complete at the Albert Lea site. Exposures risks due to residual impacts have been determined and a response action plan developed and approved by the MPCA. Quarterly groundwater monitoring began in March 2013 and will be conducted at least through 2014 to evaluate the effects of the removal action on groundwater concentrations. Institutional controls in the form of an Affidavit for Real Property Contaminated with Hazardous Substances will be required for the central and southern portions of the site to address residual impacts.

NEW ULM MGP SITE

History:

The first developed use of the New Ulm property appears to have consisted of a building measuring approximately 20 feet by 30 feet and a second, smaller building immediately to the north. These buildings were constructed before 1905 on what later became the eastern portion of the MGP site. These buildings were presumably used as a residence and storage shed. Between 1922 and 1935, the use of these buildings changed to miscellaneous storage, possibly associated with the MGP operations.

Construction of the MGP by the New Ulm Gas Company in 1914 appears to have been the first developed use of the western portion of the site. The plant was operated by the New Ulm Gas Company from 1914 to 1926 and by Interstate Power Company (IPC) from 1926 to 1939. The plant began operation as a water gas plant, and, by 1930, had been converted to a carbureted water gas plant using the Tenney process.

In 1926, a 40,000-cubic foot gas holder was constructed on the eastern portion of the site, and an addition to the gas plant building was built on the western portion. A crude oil storage tank and a storage shed were also present on the eastern portion of the site. All structures associated with gas production had been removed by 1946, except for the gas plant building (on the western portion of the site) and the 40,000-cubic foot gas holder (on the eastern portion of the site). By 1946, the gas holder had been converted to a steel coal holder.

After gas manufacturing activities ended in 1939, the City of New Ulm used the main gas plant building as a warehouse and installed a natural gas regulating station inside the building. A second building, located immediately north of the main gas plant building, was constructed sometime after 1951. The exact use of this building has not been determined.

The main plant building and the adjacent building were demolished in 1985 or 1986 by the City. Portions of the concrete block and the poured concrete foundation from the adjacent building are still in place. The City currently uses the foundation as a storage crib to stockpile gravel, sand, and dirt for use at offsite locations. A wood-sided building, constructed by the City in approximately 1975, exists at the north end of the western portion of the site. This building was originally used to house City vehicles. A gas regulating station was constructed at the south end of the western portion of the site before the main gas plant building was demolished.

The eastern portion of the site has been operated as a dairy foot processing plant from shortly before 1946 to the present by the following owners: New Ulm Milk Processing Company; Borden; and Firmenich. The 40,000-cubic foot gas holder was demolished after 1951.

Activity summary:

VIC Project Number: **VP# 0260**

1998

The MPCA sent a letter dated January 23, 1998 approving the site investigation work plan previously submitted for the site. The MPCA letter also contain comments on the proposed work. A response letter addressing the comments was submitted to the MPCA on April 16, 1998. Site related activities for the remainder of the year were focused on obtaining access agreements with the property owners: the City of New Ulm and Firmenich, Inc.

Other activities conducted in 1998 for the New Ulm site consisted of developing input parameters to the GRI cost model for IPL's environmental liabilities management program.

1999

The primary activity completed for the New Ulm site for 1999 consist of obtaining a site access agreement between Firmenich, Inc. (owner of the eastern portion of the site). Other activities conducted in 1999 for the New Ulm site consisted of revising the input parameters to the GRI cost model for IPL's environmental liabilities management program. No on-site activities were conducted.

2000

Activities in 2000 for the New Ulm site consisted of implementing the additional remedial investigation to further define the extent of soil and groundwater impacts. Drilling, soil sampling, and well construction began in June 2000 and were completed in July 2000. Groundwater sampling was completed in August 2000. Data collected from this and previous investigations were evaluated under the MPCA's risk based site evaluation (RBSE) program to determine areas where exposures and health risks may need to be remediated or managed. Analytical data from the investigation and the RBSE spreadsheets were evaluated and a summary report was started.

In September of 2000, IPL met with the MPCA to discuss the site status and next steps. No formal reports were submitted to the MPCA in 2000. Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2001

Activities in 2001 for the New Ulm site consisted of completion of the additional remedial investigation report and RBSE evaluation. A well inventory was also completed for the vicinity of the site. The results of the remedial investigation, risk evaluation, and well inventory were summarized in the Phase II Remedial Investigation Report submitted to the MPCA in August of 2001. An annual groundwater monitoring event was conducted in September of 2001. Results of the groundwater monitoring event were validated and a draft summary report was prepared.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2002

During the 2002 reporting period, major site activities included evaluation of potential remedial alternatives and completion of the Focused Feasibility Study. The Focused Feasibility Study was submitted to the MPCA in August 2002. In a letter dated November 30, 2002, the MPCA approved the Phase II Remedial Investigation Report submitted in August of 2001.

Additionally, two monitoring wells on the east side of the site were abandoned in March 2002 to allow Firmenich to construct a warehouse adjacent to their facility. Three replacement wells were installed in December 2002 after the construction was completed. The annual groundwater monitoring was delayed until January 2003 for the replacement wells to be installed and developed.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2003

Site activities during the 2003 consisted of completing the delayed 2002 annual groundwater monitoring in January, along with the data review and tabulation. Details of the replacement well installation and results of the monitoring were summarized in a technical memorandum submitted to the MPCA on April 21, 2003.

Other activities conducted during 2003 consisted primarily of developing a remedial action work plan for in-situ chemical oxidation of impacted soil on the western portion of the site. An annual groundwater monitoring event was conducted in October 2003. Repairs of three monitoring well surface completions were conducted in November 2003.

Other annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2004

The results of the 2003 annual groundwater monitoring were summarized in a technical memorandum submitted to the MPCA on March 18, 2004. Other site activities conducted during the 2004 reporting period consisted primarily of planning, preparations and implementation of the removal activities. The Remedial Action Work Plan was submitted to the MPCA in April 2004 and proposed in-situ chemical oxidation of minor impacted soil on the western portion of the site and a monitored natural attenuation (MNA) program for the entire site. While the Remedial Action Work Plan was being reviewed by the MPCA, requests for a variance from subsurface injection rules and a Class 5 rule-authorization for the injection were requested and received from the MDH and USEPA Region V, respectively. The MPCA approved the Remedial Action Work Plan in a letter dated July 8, 2004. The chemical oxidation injection was completed in July 2004, followed by soil and groundwater sampling events at 30 and 90 days following the injection.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2005

Activities for 2005 are described on a monthly basis in the paragraphs below.

January. Completed the 6-month (180-day) post-injection groundwater monitoring. Completed an initial draft chemical oxidation injection summary report.

February. Received and tabulated the results of the 6-month post-injection groundwater monitoring. Validated data and processed laboratory invoices.

March. Scheduled the 9-month post-injection groundwater monitoring. Processed MDH well maintenance permits for 8 monitoring wells.

April. Completed the 9-month post-injection groundwater monitoring. Prepared a quarterly report to the MPCA for the MGP site activities.

May. Received the 9-month post-injection groundwater monitoring results and began to incorporate them in to the chemical oxidation summary report.

June. Completed a draft chemical oxidation summary report and conducted internal review of the report. The report included the baseline and post-injection soil and groundwater sample results and a discussion of the chemical oxidation injection. Processed MDH maintenance permits for three monitoring wells.

July. Conducted the 12-month post-injection groundwater monitoring. Completed the initial revision of the annual cost model for 2005. Processed MDH maintenance permits for four monitoring wells.

August. Incorporated 12-month post-injection groundwater monitoring results in the chemical oxidation summary report. Discussed additional chemical oxidation injection to further reduce contaminant concentrations. Requested rule-authorization from USEPA Region V to conduct additional chemical oxidation injection and discussed additional injection with the MPCA.

September. Completed the chemical oxidation summary report and conducted internal review. Prepared a work plan for conducting a second round of chemical oxidation injection. Received rule-authorization from USEPA Region V. Received permission from the City of New Ulm to proceed with the second round of injection. Finalized the annual cost model update.

October. Submitted the chemical oxidation summary report to the MPCA on October 3, 2005. Completed the work plan for the second round of chemical oxidation injection and

submitted it to the MPCA on October 6, 2005. Completed the second round of chemical oxidation injection.

November. Completed the 30-day post-injection soil and groundwater monitoring.

December. Received and reviewed analytical results and began to prepare a summary report for the second chemical oxidation injection.

2006

Activities for the New Ulm site in 2006 consisted primarily of verification sampling following a second round of BIOX® chemical oxidation injection in 2005. Activities are described on a monthly basis in the paragraphs below.

January
The 3-month post-injection groundwater monitoring was completed. Data was compiled and a summary report for the 1-month post-injection soil and groundwater data was prepared.

February
Results of the 3-month post-injection groundwater monitoring were received and tabulated. The annual well license application fee was submitted to the Dakota, Minnesota, and Eastern Railroad for a monitoring well located on their right-of-way.

March
MDH well maintenance permits were processed for monitoring wells.

April
The 6-month post-injection groundwater monitoring was completed along with the semiannual monitored natural attenuation (MNA) sampling.

May
The summary report for the second BIOX® injection was finalized and submitted to the MPCA. Monitoring well MW-6 was replaced after it had been damaged by a snow plow.

June
The analytical results for the 6-month post-injection sampling were reviewed and tabulated. Processed MDH maintenance permits for monitoring wells.

July
The 9-month post-injection groundwater monitoring was conducted. The initial revision of the annual cost model for 2006 was completed. Initial revisions were made to the annual cost model update.

August
The results of the 9-month post-injection groundwater monitoring were received and tabulated. A draft summary report was prepared for the BIOX® treatment and follow-up sampling completed.

September
The draft BIOX® summary report was finalized and submitted to the MPCA. Discussions took place with Firmenich and City of New Ulm personnel regarding potential plans for expansion of the Firmenich plant. The initial draft of the restrictive covenant was completed. The annual cost model update was completed.

October
The draft restrictive covenant was submitted to the City of New Ulm and the MPCA for review. The 12-month post-injection groundwater monitoring was completed along with the semiannual MNA sampling. All monitoring well casing elevations were resurveyed. Monitoring wells MW-7 and MW-8 were properly abandoned on the Firmenich property for the Firmenich plan expansion.

November
The restrictive covenant was revised per City of New Ulm comments. The analytical results for the 12-month post-injection monitoring and the semiannual MNA sampling were received and analyzed. Discussions continued with Firmenich, the MPCA, and the City of New Ulm regarding the plant expansion.

December
A direct-push soil sampling survey was conducted in the vicinity of the proposed plant expansion. The results of the 12-month post-injection and MNA sampling were tabulated. Discussions continued with Firmenich and the MPCA regarding the plant expansion.

2007

The major activities conducted at the New Ulm MGP site during 2007 consisted of working with Firmenich, Inc. to coordinate removal of impacted soil and installation of a subsurface vapor control system to allow them to proceed with an expansion of their facility on the eastern portion of the MGP site. Other activities included collecting groundwater samples on an semiannual basis for laboratory analysis. Monthly activities are summarized below:

January

Had discussions with the MPCA and Firmenich, Inc. regarding Firmenich's proposed expansion of their plant at the MGP site and the potential impacts on the site investigation and need for vapor intrusion controls. Also received analytical results for soil samples collected in 2006 from a soil survey conducted in the area of the proposed expansion. Processed invoices for collection and analysis of the soil samples.

February

Continued to have discussions with the MPCA and Firmenich regarding the proposed expansion. Worked with the Brown County Landfill to determine if impacted soil from the site could be disposed of at their facility. Processed invoices for the remaining soil samples collected during the soil survey. Processed MDH well maintenance permits for 3 site monitoring wells.

March

Obtained cost estimates for various soil disposal options. Had additional communications with Brown County Landfill's consultant regarding the acceptability of the soil for disposal.

April

Evaluated vapor barriers against sub-slab depressurization as alternatives for vapor intrusion control. Initiated discussions with Firmenich's architect on integration of the vapor control system with the plant expansion plans. Developed a summary for excavation and disposal of impacted soil and submitted it to the MPCA. Conducted the semiannual groundwater monitoring and prepared a draft report summarizing the 2006 BIOX injection and groundwater monitoring activities.

May

Evaluated active versus passive sub-slab depressurization systems for controlling potential vapor intrusion. Had additional discussions with Firmenich's architect regarding the vapor control system. Received the analytical results for the semiannual groundwater monitoring and processed the laboratory invoice. Also processed charges for equipment and travel associated with the groundwater monitoring.

June

Met with the MPCA to discuss the status of the site and the proposed activities. Continued working with Firmenich on including the vapor control system in their plant expansion. Prepared a cost estimate for design and installation of a vapor control system. Prepared an excavation verification sampling plan and submitted it to the MPCA. Received comments from the MPCA on a draft restrictive covenant for the portion of the site owned by the City of New Ulm and contacted the City regarding the changes.

July

Provided oversight and direction of soil excavation and collected soil samples from the side walls and base of the excavation of the first phase of excavation for the Firmenich plant expansion. Also provided oversight of the installation of the first part of the vapor control system. Conducted work zone air monitoring during the excavation of impacted soil. Re-evaluated site data with respect to exposure risks using the MPCA Site Screening Evaluation spreadsheets. Completed the initial draft of the annual cost model update.

August

Continued to provide oversight and verification sampling during soil excavation for the Firmenich plant expansion. Provided oversight of the installation of the initial portion of the vapor control

piping as well. Received and reviewed analytical results for excavation verification samples and processed laboratory invoices. Finalized the annual cost model update.

September

Continued to provide oversight and verification sampling during soil excavation for the Firmenich plant expansion and oversight of the installation of the vapor control piping. Received and reviewed analytical results for excavation verification samples and processed laboratory invoices.

October

Provided additional oversight and verification sampling during soil excavation for the Firmenich plant expansion and oversight of the installation of the vapor control piping. Received and reviewed analytical results for excavation verification samples and processed laboratory invoices.

November

Conducted the fourth quarter monitored natural attenuation (MNA) groundwater sampling event. Began preparing a report summarizing the 2007 groundwater sampling activities and provided continued assistance for the soil excavation at the Firmenich plant.

December

Received and tabulated the analytical results for the MNA groundwater sampling event and processed the laboratory invoices. Continued to prepare a summary report for the 2007 groundwater monitoring activities.

2008

Major activities conducted at the New Ulm MGP site during 2008 consisted of working with Firmenich, Inc. to coordinate removal of impacted soil and installation of a sub-slab depressurization system to allow them to proceed with an expansion of their facility on the Eastern portion of the site. Other activities included collecting groundwater samples on a semiannual basis for laboratory analysis and collecting soil samples to assess contaminant impact ahead of the Firmenich expansion. Monthly activities for 2008 are summarized below:

January

Converted Firmenich well MW-1 to a flush mount completion ahead of Firmenich constructing a loading dock driveway in that area. Completed draft chemical oxidation injection and monitoring summary memorandum and submitted it to IPL for review. Processed invoices for analysis of the 4th quarter 2007 MNA monitoring samples.

February

Processed driller's invoice for converting monitoring well (F)MW-1 to a flush mount completion to allow truck traffic on that portion of the site.

March

Discussion with Firmenich and their general contractor about status of facility expansion and possible timing for a site visit to obtain soil samples in the large gas holder area.

April

Contacted Firmenich regarding status of their facility expansion. Revised the draft chemical oxidation memorandum per IPL comments and submitted it to the MPCA for review. Coordinated with the laboratory for the upcoming quarterly groundwater monitoring event.

May

Collected quarterly groundwater samples for analysis of compliance and MNA parameters. Collected soil samples from under the former gas holder slab prior to demolition for the Firmenich plan renovations. Continued coordination with Firmenich and their general contractor regarding soil sampling results and installation of the sub-slab depressurization system. Processed invoices for soil samples collected under the gas holder slab and the invoice from the drilling subcontractor for advancing probe holes for soil sampling. Processed travel and equipment charges for the quarterly groundwater monitoring event.

June

Received, reviewed, and tabulated quarterly groundwater analytical data. Continued coordination with Firmenich and their general contractor regarding soil sampling results and installation of the sub-slab depressurization system. Reviewed and updated the text summary for the annual cost model update.

July

Participated in the annual modeling kick-off conference call and began to revise the cost model. Continued coordination with Firmenich regarding the soil excavation and installation of sub-slab depressurization system as construction continued. Began to prepare a summary report for the semiannual groundwater data.

August

Finalized the draft (pre-inflation) cost model and participated in the summary conference call. Revised the cost model to include inflation costs and finalized the model. Continued preparation of summary report for the semiannual groundwater data.

September

Advanced three soil borings on the Eastern portion of the site in the vicinity of Firmenich's proposed thermal oxidizer to collect samples for analysis of compounds of concern. Received analytical results for the soil samples and relayed results to Firmenich ahead of their construction activities. Processed the invoice from the driller for advancing soil borings for sample collection. Processed travel and equipment charges for the site visit for soil boring and sample collection. Scheduled the semiannual groundwater monitoring event for October and coordinated with the laboratory.

October

Conducted the semiannual groundwater monitoring event. Continued to coordinate with Firmenich regarding installation of the sub-slab depressurization system and the future construction activities for their thermal oxidizer. Completed a draft summary report for the semiannual groundwater data. Began to prepare draft environmental covenants for the City (Western portion of site) and Firmenich (Eastern portion of site). Processed the laboratory invoice for analysis of soil samples collected near the proposed thermal oxidizer. Processed MDH monitoring well permit for one well.

November

Received and reviewed the analytical data from the October semiannual groundwater monitoring event. Prepared draft environmental covenants for the City (Western portion of site) and Firmenich (Eastern portion of site). Processed remaining travel charges for the site visit for soil boring and sample collection. Processed the laboratory invoice for a portion of the analytical services for the October semiannual groundwater monitoring event.

December

Reviewed and tabulated the analytical results from the October semiannual groundwater monitoring event. Finalized the groundwater monitoring summary report submitted it to the MPCA. Processed eight MDH monitoring well permits. Processed remaining equipment charges for the October semiannual groundwater monitoring event. Processed invoices from the laboratory for some of the analytical services for the semiannual groundwater monitoring.

2009

In 2009, the major activities were reevaluating potential exposure risk related to groundwater and soil as separate data sets for the Western and Eastern portions of the site. Two separate exposure risk evaluation reports were submitted to the MPCA for review and included recommendations for placement of institutional controls on both the Western and Eastern portions of the site. A draft restrictive covenant for the Western portion of the site was prepared and submitted to IPL in January 2009 for review. Monthly activities for 2009 are summarized below:

January

Submitted a draft environmental covenant for the Western portion of the site (City owned) to IPL for review and comment. Continued to evaluate the groundwater monitoring results and prepare a draft summary report. Processed three MDH monitoring well permits.

February

Received final trucking costs and landfill soil disposal tickets from Firmenich general contractor related to contaminated soil excavation for the construction activities. Reviewed soil disposal documentation and submitted letter to MPCA to document the contaminated soil disposal. Continued to prepare a report summarizing the most recent groundwater data and proposed recommendations. Updated the site screening risk evaluation for the Eastern portion of the site based on the results of the soil samples collected during the Firmenich expansion. Discussions with the MPCA regarding the status of the site.

March

Continued to update the site screening risk evaluation for the Eastern portion of the site based on the results of the soil samples collected during the Firmenich expansion. Continued report preparation for the Eastern portion of the site.

April

Conducted internal review of the groundwater monitoring and risk evaluation summary report and submitted the draft report to IPL for review. Revised the report per IPL comments and submitted a final to the MPCA. Processed 4 MDH monitoring well maintenance permits.

May

Evaluated and grouped the groundwater monitoring data and revised the associated risk evaluation forms for the Western portion of the site. Prepared a draft report summarizing the groundwater data risk evaluation and reevaluated the soil risk using updated MPCA evaluation sheets. Prepared a summary of the current site status.

June

Conducted internal review of the groundwater and soil risk evaluation report for the Western portion of the site and submitted the draft report to IPL for review. Compiled spatial data for the soil boring and monitoring well locations, populated the MPCA spreadsheet and submitted it to the MPCA.

July

Finalized the groundwater and soil data risk report for the Western portion of the site per IPL review comments and submitted it to the MPCA for review.

August

Processed reproduction charges for the groundwater monitoring data and revised risk evaluation report for the Western portion of the site.

September

Processed the renewal of the annual MDH monitoring well maintenance permit for the two Firmenich wells used for the MGP monitoring.

October

Processed the renewal of the annual MDH monitoring well maintenance permits for 4 monitoring wells.

November

Reviewed the status of the site and the recommendation included in the previous reports submitted in 2009.

December

Reviewed MPCA guidance to determine next steps to move the site toward a no further action letter. Prepared a draft letter report summarizing the work completed at the site and the various reports submitted.

2010

In 2010, the major activities included meeting with the MPCA to discuss additional requirements for the site, then collecting surface soil and groundwater samples and conducting a soil vapor intrusion screening investigation. The western side of the site had never been platted; therefore, a boundary survey was conducted to define the area that would be proposed for an environmental covenant as part of the overall remedial action. Monthly activities for 2010 are summarized below:

January

Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting. Began to prepare a vapor intrusion investigation work plan. Renewed MDH well maintenance permits for 3 site monitoring wells.

February

Continued to prepare a vapor intrusion investigation work plan. Identified potential sub-slab vapor sampling locations in the Firmenich plant on the east side of the site. Collected an air

sample from the sub-slab depressurization piping in the Firmenich plant. Discussed platting requirements for the west side of the site with Brown County personnel.

March

Received the results of the sub-slab depressurization system sample and prepared a draft report discussing the results. Had additional discussions with Brown County personnel regarding platting requirements for the west side of the site.

April

MWH conducted internal review of the sub-slab depressurization sample summary report and submitted it to IPL for review. MWH revised the report per IPL comments and submitted a final to the MPCA. MWH scheduled a boundary survey for the western portion of the site to develop a legal description for the area to be subject to an environmental covenant.

May

MWH coordinated with the surveyor for the boundary survey. Prepared a utility contingency plan and conducted internal review.

June

MWH submitted the draft utility contingency plan to IPL for review and received comments. Renewed MDH well maintenance permits for 7 site monitoring wells.

July

Field work for the boundary survey was completed by the surveyor. MWH finalized the utility contingency plan and contacted the MPCA to set up a meeting to discuss the status of the site and developed an agenda for the meeting.

August

Met with the MPCA to discuss the status of the site and future work needed. Prepared a draft work plan for a vapor intrusion screening investigation using passive Gore™ module samplers. MWH updated the draft environmental covenant for the western portion of the site based on the current MPCA template and submitted it to IPL for review.

September

Revised the draft work plan for the vapor intrusion screening and indoor air sampling for the eastern portion of the site. Renewed MDH well maintenance permits for 2 site monitoring wells.

October

MWH received the boundary survey data for the west side of the site. MWH scheduled a site-wide groundwater monitoring event, surface soil sampling on the west side of the site, and the vapor intrusion investigation and coordinated with the corresponding subcontractors.

November

MWH completed the site-wide groundwater monitoring and the surface soil sampling on the west side of the site. MWH also installed the Gore module soil vapor screening points and sample media on the east side of the site, then removed the sample media and submitted them for laboratory analysis. Processed subcontractor invoices for installation and abandoned the soil vapor screening probe holes and the site boundary survey. Processed travel and equipment charges for the groundwater monitoring, surface soil sampling, and soil vapor screening field work.

December

Received and reviewed the analytical results for the groundwater samples, surface soil samples, and soil vapor screening samples. Processed subcontractor invoices for the analytical results for the groundwater samples, surface soil samples, and soil vapor screening samples. Processed a subcontractor invoice for pumping and transportation of purge water for off-site disposal. Processed the remaining travel and equipment charges for the sampling activities. Renewed MDH well maintenance permits for 3 site monitoring wells.

2011

In 2011, the major activities for the New Ulm MGP site included reporting the results of the surface soil and groundwater sampling conducted in 2010 and collecting soil gas verification samples based on the results of the soil vapor intrusion screening investigation also conducted in 2010. Monthly activities for 2011 are summarized below:

January

Evaluated the analytical results for the groundwater samples, surface soil samples, and soil vapor screening samples. Processed the remaining invoices for analysis of the groundwater samples. Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting.

February

Began to prepare a summary report for the groundwater and surface soil sampling events.

March

Had additional discussions with Firmenich's construction contractor regarding the sub-slab depressurization system. Firmenich Company owns a portion of the property where the MGP site was located. Renewed MDH well maintenance permits for 4 site monitoring wells.

April

Evaluated the analytical results and concentration plots for the soil vapor survey and identified locations for collecting soil gas confirmation samples. MWH also completed the draft surface soil and groundwater sampling report and submitted it to IPL for review.

May

Finalized the surface soil and groundwater sampling report per IPL comments and submitted it to the MPCA.

June

Discussed potential locations for collecting soil gas confirmation samples with Firmenich personnel.

July

General project management and planning. Collection of soil gas confirmation samples was pending a response from the MPCA on the results of the soil vapor screening survey.

August

General project management and planning. No on-site activities.

September

General project management and planning. No on-site activities.

October

Confirmed the proposed soil gas verification sampling locations with Firmenich and received verbal approval for access to complete the work. Renewed MDH well maintenance permits for 5 site monitoring wells.

November

Scheduling and general preparations for the soil gas verification sampling.

December

Completed the soil gas verification sampling and received the analytical results.

2012

In 2012, major activities conducted for the New Ulm site included preparation and submittal of a report summarizing the results of the soil vapor sampling activities and vapor intrusion evaluation. The report also requested site closure from the MPCA. No response to the report has been received. Other activities for the site consisted of preparation of proposed institutional controls in the form of Affidavits Concerning Real Property Containing Hazardous Materials for the east and west sides of the site. The draft affidavits were submitted to the City of New Ulm and Firmenich for review. Monthly activities for 2012 are summarized below:

January

Processed the invoice for analysis of the soil gas samples. Completed the annual update of the site cost model and text summary for the SEC liability reporting. Renewed MDH well maintenance permits for 3 site monitoring wells.

February

Began to prepare a summary report for the vapor intrusion investigation. Revised the annual site cost model to account for inflation.

March

Continued to prepare a draft report summarizing the vapor intrusion investigation. Prepared electronic versions of 5 older reports and submitted them to the MPCA per their request.

April

Continued to prepare a draft report summarizing the vapor intrusion investigation and conducted internal review. Renewed MDH well maintenance permits for 4 site monitoring wells.

May

Continued to prepare the report summarizing the vapor intrusion investigation and conducted internal review.

June

Finalized the report summarizing the vapor intrusion investigation and submitted it to the MPCA.

July

Conducted historic ownership searches for the east and west sides of the site. Worked with the Brown County Recorder to get copies of deeds, stub abstracts, leases, etc. Received a notarized ownership summary from the Brown County Recorder. Prepared draft affidavits of environmental contamination for the east and west sides of the site. Renewed MDH well maintenance permits for 3 site monitoring wells.

August

Finalized the draft affidavits of environmental contamination for the east and west sides of the site and submitted them to the respective property owners for review.

September

Revised the draft affidavits of environmental contamination for the eastern and western portions of the site based on comments received from the City of New Ulm. Prepared electronic copies of old site reports and submitted them to the MPCA per their request.

October

Had discussions with the property owner of the east side of the site regarding the affidavit of environmental contamination. Renewed MDH well maintenance permits for 2 site monitoring wells.

November

Had additional discussions with the property owner of the east side of the site regarding the affidavit of environmental contamination.

December

Had additional discussions with the property owner of the east side of the site regarding the affidavit of environmental contamination.

2013

In 2013, major activities conducted for the New Ulm site consisted primarily of preparation and revision of Affidavits Concerning Real Property Containing Hazardous Materials for the east and west sides of the site. Initially, a revised plat survey drawing of the western portion of the site was developed based on the site survey previously conducted. Draft affidavits were then prepared and submitted to the City of New Ulm and Firmenich for review, then submitted to the MPCA for comments. After the terms of the affidavits were agreed upon, the affidavit for the west side of the site was signed and recorded by the City of New Ulm. The affidavit for the east side of the site has been signed by a Firmenich, Inc. representative and will be recorded in early 2014.

Monthly activities for 2013 are summarized below:

January

Firmenich, the owner of the eastern portion of the site was contacted regarding the draft Affidavit of Real Property Contaminated with Hazardous Substances. In addition, MDH well maintenance permits were renewed for 3 site monitoring wells.

February

Environmental Liability estimates were calculated.

March

Environmental Liability estimates were completed.

April

Renewed MDH well maintenance permits for 4 monitoring wells.

May

The draft Affidavit of Real Property Contaminated with Hazardous Substances for the east and west portions of the site were revised based on comments received from Firmenich and the City of New Ulm, respectively, and were submitted to the MPCA for review.

June

In June, legal descriptions of the affected parcels were obtained from Brown County and corrections to the plat survey drawings for the western portion of the site were requested from the survey company. The draft affidavits were revised per MPCA comments and sent back to Firmenich and the City of New Ulm for review and any additional comments.

July

The corrected plat survey drawings were received for the western portion of the site and additional comments from the MPCA were incorporated into the affidavits. MDH well maintenance permits were renewed for 3 monitoring wells.

August

The draft affidavits for the east and west sides of the site were revised and submitted to the MPCA for final review.

September

The affidavits of environmental contamination for the eastern and western portions of the site were finalized and complete packages affidavits were prepared and submitted to Firmenich and the City of New Ulm to be signed and recorded.

October

MDH well maintenance permits were renewed for 2 site monitoring wells.

November

Received notice from the City of New Ulm that their affidavit of environmental contamination had been signed and recorded with the County. Approval from the MPCA to abandon the site monitoring wells was requested.

December

A copy of the recorded affidavit was received from the City for the western portion of the site.

New Ulm Site Environmental Investigation/Remediation Status

The investigation and response actions for the New Ulm MGP site are complete. Following recording of the affidavit of environmental contamination for the eastern portion of the site and approval from the MPCA, abandonment of the site monitoring wells will be completed and site closure will be requested.

OWATONNA MGP SITE

History:

The Owatonna MGP site was originally subdivided in 1866 and was purchased by the Owatonna Electric Light Company in 1890. By 1894, an electric power plant and storage building had been constructed onsite. The MGP was constructed in 1901 and was operational as of August 6, 1901. By 1915, several additions to the gas and electric plants had been constructed. In 1922, the property and facilities were sold to the Southern Minnesota Gas and Electric Company who in turn sold them to Interstate Power Company (IPC) in 1924.

Also in 1924, the City of Owatonna constructed a municipal electric plant and revoked the electric franchise held by IPC. IPC continued to own and operate the gas plant until 1936 when the site was purchased by the City to acquire the gas distribution system for the distribution of natural gas. In May 1936, the Owatonna Public Utilities Commission began to dismantle the gas plant.

The City owned the site until 1942, when it was sold and used by the Owatonna Milk Processing Company for drying and condensing milk products. The site was subsequently purchased by the Borden Company. Milk processing activities continued until the mid-1950s when the site was sold to the Elevator and Supplies Company. Reportedly, the property again changed owners in 1963, when it was sold to the Owatonna Creamery Supplies Company. In 1964, the site was sold to National Propane Corporation/Central Co-Operative Oil Association. The uses of the site during this period have not been determined.

The site was purchased in 1970 by Associated Milk Producers, Inc., and was used for drying and processing milk products. The site was finally sold to the current owner, Eugene Sander, in 1986. Mr. Sander is the President of Zumbro/IFP, the current food product processing company utilizing the site.

Activity summary:

VIC Project Number: VP# 0270

1998

In June of 1998, the MPCA approved a previously submitted work plan for supplemental site investigation. The approval letter also requested that a groundwater receptor survey be completed. During the remainder of 1998, data was gathered from the Owatonna Public Utilities, the site owner, the county well index, and a walking tour of the vicinity of the site. Data was reviewed in an attempt to identify any private wells near the site.

Other activities conducted in 1998 for the Owatonna site consisted of developing input parameters to the GRI cost model for IPL's environmental liabilities management program.

1999

In 1999, some additional work was completed for the groundwater receptor survey for the site. Site investigation activities were held pending resolution of the access agreement for the site. Other activities related to the Owatonna site in 1999 consisted of updating the cost model for the IPL MPG management program and renewal of MDH well maintenance permits.

2000

The groundwater receptor survey was completed and submitted to the MPCA on September 27, 2000. Also in September, IPL met with the MPCA to discuss the site status and concerns with access issues.

On November 7, 2000, a letter was sent to the MPCA requesting permission to proceed with the off-site portion of the approved work plan. Verbal approval to proceed was granted. Field activities were implemented with plans for installation of one soil borings and four monitoring wells to better define the lateral extent of impacted soil and groundwater.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2001

Obtaining access agreements with various private property owners and installation of the off site wells continued through much of 2001. Results of these activities, along with recommendations for additional investigation, were summarized in Technical Memorandum No. 5 submitted to the MPCA on August 2, 2001. Other field activities included sampling the newly installed wells and collecting quarterly groundwater level measurements.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2002

The off-site activities proposed in Technical Memorandum No. 5 were implemented in 2002. These activities included additional monitoring wells in the water table and bedrock aquifers on the surrounding properties. Drilling, well construction, and groundwater sampling occurred periodically over much of the year. Quarterly water level measurements were collected from the accessible monitoring wells and the adjacent Straight River. No additional work was conducted on the pending a renewed access agreement with the site owner. No formal reports were submitted to the MPCA.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2003

Results and conclusions of the off site investigation were summarized in Technical Memorandum No. 6 submitted to the MPCA on April 17, 2003. Activities conducted during 2003 consisted primarily of evaluating the data collected during the off site investigation and preparing the technical memorandum. Additional records research was conducted regarding the fuel oil tank on the north end of the site and assessment work conducted prior to IPL's involvement with the site. Quarterly water level measurements of all off site monitoring wells and the Straight River continued, and an annual groundwater monitoring event was conducted in December 2003.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals

2004

The results of the annual groundwater monitoring conducted in December 2003 were received and summarized in a technical memorandum submitted to the MPCA on March 31, 2004. Soil and groundwater data were evaluated using the RBSE spreadsheets to determine whether the number and distribution of samples was adequate. Other activities conducted during 2004 consisted of conducting quarterly water level measurements of all off site monitoring wells and the Straight River, and collection of annual groundwater samples from the accessible, off-site wells.

Annual activities continued to include the cost model update and MDH monitoring well maintenance permit renewals.

2005

Activities for 2005 are described on a monthly basis in the paragraphs below.

January. Received and tabulated analytical results from the annual groundwater monitoring event conducted in December 2004.

February. Completed data validation of the annual groundwater monitoring results.

March. Began preparation of a report summarizing the results of the annual monitoring. Collected quarterly water level measurements. Processed MDH well maintenance permits for seven monitoring wells.

April. Continued preparation of the annual groundwater monitoring summary report. Processed MDH well maintenance permit for one monitoring well.

May. Completed the annual groundwater monitoring summary report and conducted internal review.

June. Submitted the annual groundwater monitoring report to the MPCA on June 2, 2005. Collected quarterly water level measurements from the monitoring wells and the Straight River. Received approval from the MPCA to proceed with the recommended additional bedrock investigation.

July. Prepared an access agreement for a new off-site property where additional wells are proposed. Completed the initial revision to the annual cost model update.

August. Finalized the annual cost model for 2005. Discussed probing proposed bedrock well locations to collect soil samples prior to drilling the wells.

September. Follow-up with off-site property owner regarding the proposed access agreement. Collected quarterly water level measurements from the monitoring wells and the Straight River.

October. Additional discussions regarding soil probing and bedrock well installation.

November. Scheduled the annual groundwater monitoring. Additional inquiries regarding the access agreement with the off-site property owner. Collected quarterly water level measurements from the monitoring wells and the Straight River.

December. Received completed access agreement from the off-site property owner. Rescheduled annual monitoring to January 2006 due to extremely cold weather.

2006

Site activities at the Owatonna MGP site focused on completing the remedial investigation. Several additional soil borings and monitoring wells were installed that have largely defined the extent of site-related impacts. Activities for 2006 are described on a monthly basis in the paragraphs below.

January

The annual site-wide groundwater monitoring was completed. Processed MDH well maintenance permits for monitoring wells.

February

Results from the site-wide monitoring were tabulated and additional investigation was planned.

March
Preparation began for a draft report summarizing the results of the annual monitoring. Quarterly water level measurements were collected. MDH well maintenance permits were processed for monitoring wells.

April
The draft annual groundwater monitoring summary report was completed for internal review.

May
The report summarizing the 2005 site activities was finalized and submitted to the MPCA. Drillers were scheduled for installation of off-site bedrock wells.

June
The schedule for bedrock well installation was finalized with drillers. Equipment and supplies were ordered for probing and bedrock well installation. Quarterly water level measurements were collected. MDH well maintenance permits were processed.

July
Soil probing and soil sampling were completed at the proposed off-site bedrock well locations. The initial revision to the annual cost model update was completed.

August
Bedrock drilling and installation of additional off-site wells was completed. A meeting was held with Zumbro River Brand personnel to discuss the site and future work. A site access agreement was finalized with Zumbro River Brand. Revisions were made to the annual cost model for 2006.

September
Development of off-site bedrock wells was completed. A geophysical evaluation, down-hole camera logging, and sampling of a deep water supply well located on the site were completed. The annual cost model for 2006 was finalized.

October
On-site bedrock drilling and well construction were completed. Groundwater samples from the recently completed bedrock wells were collected. Accumulated well development and equipment decontamination water was disposed.

November
Analytical results from bedrock well samples were received and reviewed. All data was tabulated and the aggregate of remedial investigation data was reviewed for completeness.

December
Evaluation of all site data was completed.

2007

Site activities at the Owatonna MGP site focused on assisting Zumbro River Brand with evaluation of potential vapor intrusion issues or consideration of remedial activities that might affect their ability to renovate and expand their business on the site. Other activities included investigation of the interaction between surface water and groundwater at the site and completion of annual site-wide groundwater monitoring. Monthly activities are summarized below:

January

Bedrock wells installed in 2006 were redeveloped to remove additional sediment and clear the filter sand and a site-wide groundwater monitoring event was conducted. A meeting was held with Zumbro River Brand to discuss their plans for renovation of the building on site and the potential impacts on the site investigation and remediation. To evaluate subsurface conditions in the area of proposed renovation, a soil boring was advanced to collect soil samples.

February

The analytical results of the groundwater monitoring and soil boring were received and tabulated and the invoices processed. Preparations began on a summary report for Zumbro River Brand describing the extent of impacts on their property. Processed MDH well maintenance permits for 13 site monitoring wells.

March

Continued to work with Zumbro River Brand regarding potential vapor intrusion issues for the proposed area of renovation and completed the summary report for them. Collected quarterly groundwater elevation measurements. Processed drillers invoice for advancing the soil boring.

April

Prepared a soil gas sampling plan and submitted it to the MPCA for review and approval. Implemented the soil gas sampling plan and completed an indoor inspection for potential sources of indoor air contaminants.

May

Completed a soil gas sampling summary report and submitted it to the MPCA. Planned additional investigation of the interaction between the Straight River and groundwater on the site. Began to prepare a comprehensive site investigation report.

June

Met with the MPCA to discuss the site status and proposed activities. Installed continuous water level recorders in select monitoring wells and in the Straight River to record changes in groundwater elevations in response to changed in river stage. Continued to prepare the site investigation report. Processed MDH well maintenance permits for 8 site monitoring wells.

July

Removed the continuous water level recorders and began to process the data. Collected water elevation measurements from all site monitoring wells. Abandoned monitoring well MW-7 to allow Zumbro River Brand to remove an abandoned fuel oil tank. Completed the initial draft of the annual cost model update.

August

Continued to process data generated by the continuous water level recorders and prepare the site investigation report. Finalized the annual cost model update.

September

Conducted annual site-wide groundwater monitoring and collected water elevation measurements from the monitoring wells and river.

October

Received and tabulated the analytical results from the annual groundwater monitoring. Processed equipment and travel charges for the monitoring. Processed MDH well maintenance permits for 6 site monitoring wells.

November

Reviewed site data and evaluated potential need for additional investigation or potential remediation.

December

Continued to prepare the site investigation report. Processed laboratory invoices for the site-wide groundwater monitoring.

2008

Activities for the Owatonna MGP site focused on evaluating the data obtained in 2007 to examine the interaction between surface water and groundwater at the site and preparation of the remedial investigation report. Monthly activities for 2008 are summarized below:

January

Collected quarterly groundwater elevation measurements at the site.

February

Continued to prepare the remedial investigation report for the site.

March

Collected quarterly groundwater elevation measurements at the site and continued to prepare the remedial action report.

April

Continued to prepare the remedial investigation report for the site.

May

No activities completed during the month.

June

Processed the water level data collected with the continuous data recorders in 2007 and drafted a summary explanation of the variability in water levels and the interaction of between the river and the upper and lower aquifers. Continued to prepare the remedial investigation report for the site. Also reviewed and updated the text summary for the annual cost model update.

July

Continued to prepare the remedial investigation report for the site and began to revise the site cost model for the annual update.

August

Completed the pre-inflation cost model update and adjusted the cost model to account for inflation.

September

Continued to prepare the remedial investigation report for the site.

October

Continued to prepare the remedial investigation report for the site.

November

Continued to prepare the remedial investigation report for the site.

December

Continued to prepare the remedial investigation report for the site and processed 7 MDH monitoring well permit renewals.

2009

Activities for the Owatonna MGP site in 2009 consisted primarily of conducting a site-wide groundwater monitoring event and integrating the additional data in to the draft remedial investigation report. Monthly activities for 2009 are summarized below:

January

Continued to prepare a draft of the remedial investigation report. Processed MDH permit renewals for 12 site monitoring wells.

February

Had discussions with the MPCA regarding the site status and continued to prepare the remedial investigation report for the site.

March

No activities completed during the month.

April

Continued to prepare a draft of the remedial investigation report. Processed MDH permit renewals for 8 monitoring wells.

May

Continued to prepare a draft of the remedial investigation report.

June

Continued to prepare a draft of the remedial investigation report and scheduled a site-wide groundwater monitoring event for July 2009.

July

Conducted the site-wide groundwater monitoring event and submitted the samples for laboratory analysis.

August

Received and reviewed the analytical results for the site-wide groundwater monitoring and processed the travel and equipment costs for the sample collection. Completed the spatial data spreadsheet for the monitoring well and soil boring locations and submitted it to the MPCA.

September

Evaluated the results of the groundwater monitoring and tabulated the data for the remedial investigation report. Processed the laboratory invoice for analysis of the groundwater samples. Resurveyed the top of casing for the monitoring wells to correct for frost heaving noted on some of the wells. Processed remaining travel and equipment costs for the groundwater sampling event.

October

Continued to prepare the remedial investigation report for the site and processed 6 MDH monitoring well permit renewals.

November

Obtained a cost estimate to conduct a topographic and building survey of the site and immediately surrounding properties and continued to prepare the remedial investigation report for the site.

December

Coordinated field work for the site topographic survey and processed travel charges.

2010

Activities for the Owatonna MGP site in 2010 consisted primarily of continuing to prepare a comprehensive RI report for the site. The MPCA also requested that a vapor intrusion investigation be completed and incorporated in the RI report. Preliminary plans for the vapor intrusion investigation were developed. Monthly activities for 2010 are summarized below:

January

Continued to prepare a draft of the overall RI report. Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting. Renewed MDH well maintenance permits for 5 site monitoring wells.

February

Continued to prepare a draft of the remedial investigation report. Renewed MDH well maintenance permits for 7 site monitoring wells.

March

MWH received and reviewed the base map and electronic files of the site topographic survey, and incorporated the base map in to MWH's CAD system.

April

Continued to prepare a draft of the remedial investigation report.

May

Continued to prepare a draft of the remedial investigation report. Processed the surveyor's invoice for the site topographic survey.

June

Continued to prepare a draft of the remedial investigation report. Renewed MDH well maintenance permits for 8 site monitoring wells.

July

Contacted the MPCA to set up a meeting to discuss the status of the site and developed an agenda for the meeting.

August

Met with the MPCA to discuss the status of the site and future work needed. Began to prepare a work plan for conducting a vapor intrusion investigation.

September

Grouped soil and groundwater data by physical location and potential exposure pathway, calculated UCL concentrations, and entered the results in the MPCA RBSE spreadsheets to determine exposure risk levels. Renewed MDH well maintenance permits for 6 site monitoring wells.

October

Continued to prepare the remedial investigation report for the site.

November

Continued to prepare a vapor intrusion investigation work plan.

December

Continued to prepare a vapor intrusion investigation work plan. Finalized the RBSE evaluation. Renewed MDH well maintenance permits for 12 site monitoring wells.

2011

Activities for the Owatonna MGP site in 2011 consisted primarily of conducting a site-wide groundwater monitoring event and developing and implementing a vapor intrusion investigation. Monthly activities for 2011 are summarized below:

January

Completed the annual update of the project cost model and text summary for the basis for the SEC liability reporting.

February

Finalized the risk based screening evaluation spreadsheets and prepared an outline for the text summary.

March

Began to develop a soil vapor intrusion investigation work plan. Renewed MDH well maintenance permits for 8 site monitoring wells.

April

Completed the draft soil vapor screening investigation work plan and submitted it to IPL for review.

May

Completed the field work described in the soil vapor screening investigation work plan. Also installed and sampled two temporary monitoring wells.

June

Received and reviewed the results of the soil vapor screening samples and temporary monitoring well samples. Abandoned the two temporary monitoring wells. Processed invoices for installation of the temporary wells and laboratory analysis of the groundwater samples. Identified soil gas verification sample locations based on the results of the soil vapor intrusion screening investigation. Renewed MDH well maintenance permits for 8 site monitoring wells.

July

Conducted a site-wide groundwater monitoring event and collected soil gas verification samples. Received and reviewed the analytical results for the groundwater monitoring and soil gas verification samples. Processed the invoice for advancement of the probe holes for the soil gas verification sampling.

August

Tabulated and verified the analytical results for the groundwater and soil gas verification sampling. Processed laboratory invoices for analysis of the groundwater samples.

September

Processed laboratory invoices for analysis of the soil vapor screening and soil gas verification samples. Prepared figures with the sampling locations and summary of the results.

October

Conducted further review and comparison of the groundwater and soil gas verification results. Renewed MDH well maintenance permits for 6 site monitoring wells.

November

Continued to prepare a remedial investigation report. General project management and planning.

December

Continued to prepare a remedial investigation report. General project management and planning.

2012

Activities conducted for the Owatonna site during 2012 consisted primarily of developing and submitting a comprehensive Remedial Investigation Report. The report incorporated the results of the various phases of site investigation to define the extent of impacted soil, groundwater, and soil vapor, and presents the potential associated health risks. Monthly activities for 2012 are summarized below:

January

Completed the annual update of the project cost model and text summary for the SEC liability reporting. Renewed MDH well maintenance permits for 12 site monitoring wells.

February

Continued to prepare the remedial investigation report. Revised the annual site cost model to account for inflation.

March

Continued to prepare the remedial investigation report.

April

Continued to prepare the remedial investigation report. Renewed MDH well maintenance permits for 8 site monitoring wells.

May

Continued to prepare the remedial investigation report.

June

Continued to prepare the remedial investigation report.

July

Continued to prepare the remedial investigation report.

August

Had conversations with the site owner regarding expansion of their building. Abandoned monitoring well MW-4 in preparation of construction at the site. Continued to prepare the remedial investigation report.

September

Completed the draft remedial investigation report and conducted internal review.

October

Revised the remedial investigation report per internal comments. Renewed MDH well maintenance permits for 6 site monitoring wells.

November

Finalized the remedial investigation report and submitted it to the MPCA.

December

General project management and planning.

2013

During 2013 IPL received MPCA's approval of the Remedial Investigation Report for the Owatonna site on March 8, 2013. Based on the recommendations in the approved Remedial Investigation Report, a Response Action Work Plan was prepared and submitted it to the MPCA for review on June 10, 2013. MPCA's approval of the plan was received on July 16, 2013. In

accordance with the approved plan, replacement wells MW-4R and TW-22R were installed and monitoring wells MW-25 and MW-26 were abandoned. Implementation of the quarterly groundwater monitoring program outlined in the Response Action Work Plan began during the 4th quarter of 2013.

Monthly activities for 2013 are summarized below:

January

MDH well maintenance permits were renewed for 12 monitoring wells.

February

Revised the annual site cost model to account for inflation.

March

In March, approval of the Remedial Investigation Report was received from the MPCA. Based on the recommendations included in the report, a draft Response Action Plan was prepared.

April

The Response Action Plan was finalized and submitted to the MPCA for review, and MDH well maintenance permits were renewed for 8 monitoring wells.

May

In May, we had discussions with the MPCA about the use of an Affidavit for Real Property Contaminated with Hazardous Substances rather than an environmental covenant as the instrument for the proposed institutional controls. The Response Action Plan was revised accordingly and resubmitted to the MPCA. Other activities consisted of reviewing MPCA's proposed guidance for preparation of response action plans and comparing the requirements to the draft plan submitted to the MPCA.

June

Project management and planning.

July

Approval of the Response Action Plan was received from the MPCA. A meeting with site owners was held to discuss their plans for expansion of their facility and the potential need to abandon and relocate monitoring wells. Also, in accordance with the Response Action Plan, quotes for well abandonment and replacement well installation were obtained from qualified drillers.

August

Installation of two replacement monitoring wells and abandonment of two deep monitoring wells was completed during August. Travel and equipment charges for the activities were also processed.

September

September activities consisted primarily of beginning to develop an Affidavit for Real Property Contaminated with Hazardous Substances for the site and planning for the groundwater monitoring program.

October

The first quarterly groundwater monitoring event proposed in the Response Action Plan was scheduled for December and dedicated sampling supplies were ordered. MDH well maintenance permits were renewed for 6 monitoring wells.

November

General preparations for the quarterly groundwater monitoring event were completed.

December

The first quarterly groundwater monitoring event was completed and the samples were submitted for laboratory analysis. The analytical results were received and reviewed and the laboratory invoices for the sample analysis were processed.

Owatonna Site Environmental Investigation/Remediation Status

The site assessment is complete and the results have been summarized in a comprehensive remedial investigation and risk evaluation report submitted to the MPCA. Based on the findings of the remedial investigation, a Response Action Plan was prepared and approved by the MPCA. Activities to be completed include eight quarters of groundwater monitoring to demonstrate stable or declining contaminant concentrations in groundwater, abandonment of the two deep industrial water supply wells at the site, and preparation of institutional controls to restrict potential exposures to residual impacts.

FAIRMONT MGP SITE

History:

From approximately 1927 until 1939, gas was manufactured at the site using a carbureted water gas process. The MGP property was originally occupied by a gas plant building, an above-ground relief gas holder, gas storage tanks, oil storage tanks, tar storage tanks, purifiers, an oxide platform, and a tar separator. The eastern portion of the MGP property was sold in 1961.

In 1985, D.B. McDonald Research Associates performed an investigation at the site to summarize historical data. The investigation included sampling water supplies for the City of Fairmont and a water supply well installed at the site. Traces of toluene were detected in the onsite water supply well. This investigation included drilling and sampling of onsite soil borings. PAHs and BTEX were detected in these soil samples.

In 1987, MPCA performed a Preliminary Assessment of the site. The site was assigned a medium priority for inspection with a low potential hazard to the environment because no groundwater or surface water contamination was documented.

In 1988, Tuthill, Inc., prepared a suggested prioritization of IES MGP sites. The Fairmont site was placed in the lowest priority group.

In 1991, MPCA performed a Screening Site Inspection which included the collection of 10 soil samples and 5 groundwater samples. Volatile organic compounds and PAHs were detected in soil samples. The Site Inspection Report indicated that no compounds attributable to gas plant operations were detected in groundwater sampled during the inspection.

In 1994, Black & Veatch conducted a Phase I Investigation of the Fairmont MGP site. This investigation involved collection of site historical data, contacting City officials, and an environmental database search.

In 1994, Black & Veatch performed a Phase II Investigation at the Fairmont MGP Site which included the collection of 15 subsurface soil samples, 17 surface soil samples, 2 source area samples, and 6 groundwater samples. Analytical data from this investigation showed that tar material was present within the former tar separator. A Risk Assessment based on detected contaminant concentrations indicated that both noncarcinogenic and carcinogenic risks are within acceptable ranges established by the USEPA. For a highly unlikely exposure scenario evaluation requested by MPCA, carcinogenic risk levels were slightly above acceptable levels.

In 1996, Black & Veatch performed Supplemental Phase II Investigation activities at the site in response to comments from MPCA. This investigation involved performing a groundwater receptor survey, an aerial photography search, retiree interviews, collection of additional subsurface soil samples from beneath the gas plant building foundation, and collection of surface soil samples from onsite and offsite locations. A storm sewer vapor migration evaluation was also performed.

In 1997, Black & Veatch performed a Response Action on the former tar separator and on an adjacent concrete structure. Material from within these structures was removed and transported offsite to a utility boiler where the material was thermally treated.

In 1999, a letter was sent to the MPCA inquiring about the status of the review of the Response Action Implementation Report that was submitted in January 1998.

In 2000, the contingency plan was revised and an additional well was installed in response to MPCA comments.

In 2001, semi-annual groundwater monitoring was conducted and the associated reports were submitted to the MPCA.

In 2002 a restrictive covenant was established with the MPCA for the site.

ROCHESTER MGP SITE

History:

Manufactured gas was produced on the site from 1888 until 1932. In May 1948, IPC sold the site to Peoples Natural Gas Company. The MGP at the site was most likely demolished in 1948-1949. The property was originally occupied by two tar wells, a coke fence and retaining wall, three oil storage tanks, railroad trestle, a main plant building, an auxiliary building, a coal shed, two purifiers, five coal gas benches, and a concrete tar and oil separator.

Sub-surface deposits of coal tar were discovered at the Rochester site. Remedial investigation activities were performed at the Rochester site from November 1989 through June 1994. In October, 1990, 1,853 tons of contaminated soil and 979 tons of contaminated oversized material were excavated from the west bank of the Zumbro river by the Army Corps of Engineers as part of a flood control project. A response action was implemented at the site from June 1994 through September 1995. Following various investigations, nearly 80,000 tons of contaminated soil were excavated. From September 1995 to June 1997, groundwater sampling was conducted to document the effectiveness of the site response action. The Minnesota Pollution Control Agency stated that the cleanup levels have been met and that the site no longer poses a threat to public health and the environment.

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 25th day of July, 2014, she filed the attached Response to Commission Additional Questions for Joint Petitioners on behalf of Interstate Power and Light Company and Minnesota Energy Resources Corporation with the E-Docket system and provided service as specified on the attached service list.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
this 25th Day of July, 2014.

/s/ Alice Jaworski
Notary Public, State of Minnesota

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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