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**AUG 26 91**

**BUREAU OF SOLID-HAZARDOUS  
WASTE MANAGEMENT**

21 August 1991

Director, Waste Management Division  
Attn: Moss-American Site  
Remedial Project Manager (5HS-11)  
U.S. Environmental Protection Agency  
230 S. Dearborn Street  
Chicago, IL 60604

Subject: Monthly Progress Report for July 1991  
Moss-American Site, Milwaukee, Wisconsin

Gentlemen:

Roy F. Weston, Inc. (WESTON) has prepared this monthly progress report on behalf of the settling defendant for the Moss-American Superfund site, Kerr-McGee Chemical Corporation (KMCC). WESTON has been retained by KMCC to implement the predesign work of the Consent Decree.

This monthly progress report has been prepared to document progress achieved by KMCC during July. This progress report is provided in advance of the effective date of the Consent Decree. As of this date, KMCC understands that the Consent Decree has not yet been lodged. KMCC signed the Consent Decree in July 1991.

Progress During July 1991

The following summary of progress is presented for this reporting period in advance of the lodging of the Consent Decree:

- KMCC and WESTON conducted an initial meeting with U.S. EPA on 3 July to discuss planned 1991 predesign activities. A draft Interim Predesign Work Plan for 1991 Activities was presented to U.S. EPA for initial review and a follow-up meeting was scheduled. This work plan included a target milestone schedule of activities for achieving field work in 1991.
- An 8 July 1991 follow-up meeting was conducted between U.S. EPA, KMCC, and WESTON to discuss the Agency's initial comments on the draft Interim Predesign Work Plan. The Wisconsin Department of Natural Resources (WDNR) representative participated in this meeting via teleconference. A pre-QAPP meeting was then scheduled.



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- KMCC/WESTON formally submitted a draft Interim Predesign Work Plan for 1991 Activities to U.S. EPA and WDNR on 15 July 1991. This draft incorporated initial comments received from the agencies on 8 July 1991.
- A pre-QAPP meeting was conducted on 15 July 1991 between U.S. EPA and WESTON. The content of the QAPP as it relates to planned implementation of Predesign Task 2 was discussed.
- KMCC and WESTON continued work on developing the Interim QAPP, Field Sampling Plan, and Health and Safety Plan for planned submittal to U.S. EPA and WDNR in mid-August.
- New aerial photography for the facility properties was conducted in early May 1991. Compilation of aerial photographs and planning field survey tasks continued throughout July.
- KMCC is awaiting action by the Milwaukee County Board in mid-September on an agreement presented by KMCC. The agreement covers access to the facility and certain in-kind services which support implementation of the Consent Decree.

The predesign work outlined above has been conducted in advance of lodging of the Consent Decree, and has been conducted in good faith to expedite certain key predesign activities during the 1991 field investigation season. Therefore, scheduled activities and milestones presented in the Interim Work Plan should not be subject to any of the stipulated penalty clauses contained in the Consent Decree.

#### Activities Anticipated During August

KMCC and WESTON anticipate the following predesign activities during August 1991:

- Submittal of Interim QAPP, Field Sampling Plan, and Site Health and Safety Plan for 1991 activities.

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- Receive written comments and/or approval of Interim Predesign Work Plan for 1991 activities. Incorporate any written comments and resubmit Work Plan to Agency.
- Mobilize survey crew for off-facility surveying in obtaining data for topographic map preparation. Complete preparation of facility aerial photographs.
- Continue pursuit of access agreements.
- Continue planning and preparation work in anticipation of implementing certain 1991 field activities, as outlined in the Interim Work Plan.

In the event further clarification of this progress report is required, please contact the undersigned at (708) 918-4114.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in cursive script that reads "Gary Deigan".

Gary J. Deigan  
Senior Project Manager

A handwritten signature in cursive script that reads "Kurt Stimpson" followed by a circled number "4".

Kurt S. Stimpson  
Project Director

GJD/slr

cc: Mr. Mark Krippel, Project Manager  
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