

Jim Schmidt - SED



ROY F. WESTON, INC.
THREE HAWTHORN PARKWAY, SUITE 400
VERNON HILLS, ILLINOIS 60061
708-918-4000

10 October 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 September 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). This monthly progress report has been prepared to document progress achieved by KMCC during September.

Progress During August 1991

The following summary of progress is presented for this reporting period:

- KMCC, WESTON, and U.S. EPA conducted a meeting on 4 September, 1991 to review, discuss, and obtain clarifications of comments received from U.S. EPA on 21 August 1991 on the draft Interim Predesign Work Plan. Wisconsin DNR representatives participated in this meeting via teleconference. Many of the Agency review comments were resolved via discussion. However, much of the meeting discussion focused upon the approach to determining background concentrations of CPAHs in soil and sediment. After much discussion on this issue, it was decided that a follow-up meeting was necessary in the presence of WDNR representatives. This follow-up meeting was conducted on 26 September 1991 and is addressed in subsequent sections of this monthly progress report.
- Following the 4 September, 1991 meeting with U.S. EPA, WESTON issued a letter to U.S. EPA requesting partial approval of the Interim Predesign Work Plan, in order to allow continued progress in implementing the work plan. U.S. EPA responded to this request in a letter dated 25

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September 1991, by granting a partial and conditional work plan approval.

- In a letter dated 12 September 1991, WESTON and KMCC received a draft Title Search Report for the site, a bird census study report, and review comments on the Interim Site Health and Safety Plan submittal dated 16 August 1991. KMCC and WESTON are preparing revisions to the Interim Site Health and Safety Plan to address review comments received from the Agency.
- KMCC, WESTON and our surveying subcontractor, Kapur and Associates, Inc., continued to make progress in topographic map preparation by continuing ground survey work.
- KMCC and WESTON issued Requests for Qualifications (RFQs) for purposes of pre-screening vendors with apparent capabilities in soil washing and biotreatment system development. KMCC and WESTON subsequently prepared a draft Request for Proposal (RFP) for transmittal in early October to select vendors. The RFP scope of work has been developed to include initial bench-scale treatability studies for bioslurry and soil washing techniques for CPAH-contaminated soils (Predesign Task 16).
- KMCC, WESTON, U.S. EPA and WDNR conducted a follow-up meeting on 26 September 1991 to further present and discuss the technical approach to determining background CPAH in sediment and soil (Predesign Task 2). A summary of agreements and resolutions made during this meeting is presented as Attachment 1 of this progress report. WESTON and KMCC will now complete an interim Quality Assurance Project Plan (QAPP) and Field Sampling Plan (FSP) submittal which will further outline the approach to conducting these background determinations.
- WESTON initiated a method detection limit (MDL) study on a selected ion monitor mode (SIM) GC/MS laboratory method for determining low level concentrations of CPAHs in soils and sediments. The results of this study will be presented within the forthcoming Interim QAPP submittal.



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This study is being conducted as part of predesign Task 2.

- KMCC continued to pursue site access agreements with the County of Milwaukee and the Chicago and Northwestern Railroad Co.

KMCC and WESTON understand, based upon information provided by U.S. EPA, that lodging of the consent decree is not expected until late November. KMCC, however, continues to make progress on predesign work in advance of this lodging.

Activities Anticipated During October

KMCC and WESTON anticipate the following predesign activities will be conducted during October 1991:

- Begin implementation of Interim Work Plan activities including groundwater utilization survey (Predesign Task 8), initial study of river hydraulics (Predesign Task 10), soil washing and bioslurry, treatability studies (Predesign Task 16), and evaluation of groundwater treatment technologies (Predesign Task 20).
- Resubmit a final Interim Predesign Work Plan which incorporates responses to Agency review comments.
- Continue preparation of the Interim QAPP and FSP with anticipated transmittal to the Agency in late October or early November.
- Continue site topographic mapping activities.
- Submit a revised Site Health and Safety Plan incorporating Agency review comments.
- Complete the MDL study on the SIMS GC/MS low detection laboratory method.
- Complete the Interim QAPP and FSP for transmittal to the Agencies in late October or early November.



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

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in cursive script, appearing to read "Gary Deigan".

Gary J. Deigan
Senior Project Manager

A handwritten signature in cursive script, appearing to read "Kurt Stimpson".

Kurt S. Stimpson
Project Director

Attachment

GJD\KSS\lh

cc: Mr. Mark Krippel, Project Manager
Kerr-McGee Chemical Corporation
798 W. Factory St.
West Chicago, IL 60186

Mr. George B. Rice
Kerr-McGee Chemical Corporation
P.O. Box 25861
Oklahoma City, Oklahoma 73125

Mr. Richard Meserve
Covington & Burling
1201 Pennsylvania Avenue N.W.
P.O. Box 7566
Washington, D.C. 20044

Regional Counsel (1 copy)
Attn: Moss-American Site Coordinator (5CS)
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, IL 60604

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Assistant Attorney General (1 copy)
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044
Ref. D.J. #90-11-2-590

Section Chief (3 copies)
Environmental Response and Repair Section
Bureau of Solid and Hazardous Waste Management
Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Mr. Jim Schmidt (2 copies)
Department of Natural Resources
Southeast District Office
P.O. Box 12436
Milwaukee, WI 53212

Attachment 1

Summary of 26 September 1991 Meeting Resolutions for Background Determination of CPAHs in Sediments and Soils

Moss-American Site

Meeting attendees included:

B. Lavis, U.S. EPA	M. Krippel, KMCC
G. Edelstine, WDNR	K. Stimpson, WESTON
J. Schmidt, WDNR	G. Deigan, WESTON
W. Wawrzyn, WDNR	C. Lee, WESTON
	T. Graan, WESTON

Prior to the meeting, WESTON issued an informational overview of the planned technical approach to conducting sediment and soil background determinations (attached letter dated 23 September 1991). This document became the basis for WESTON's presentation of the technical approach, rationale, and protocols of the planned sampling program during the group meeting.

Following a period of information presentation, clarification, and discussion of technical issues associated with the sampling approach, a general concurrence with the sampling approach outlined in WESTON's 23 September 1991 letter was reached, with the understanding that the following Agency concerns will be addressed in the forthcoming Field Sampling Plan (FSP) submittal.

Sediment Sampling

1. Sediment upstream of the former facility will be sampled in the main channel of the Little Menomonee River, and not in upstream tributary locations.
2. Sampling of sediments within the river shall proceed to a depth where the "hardpan" layer is first encountered. This sediment sampling depth may be three to four feet or as little as six inches, depending on sampling location within the river. Sediment samples will be composited from the entire depth of the sediment core.
3. Professional judgement will be utilized in selecting sampling locations to avoid sampling obvious upstream point source discharges such as tank farm, major roads, and landfills.
4. Phase 2 sediment sampling will include collection of sediment samples in upstream tributaries of the subject reaches of the Little Menomonee River, in similar manner as described for Phase 1. The Agency recognizes the importance of collecting this data, however, has deferred any decision or agreement on

Attachment 1 (continued)

use of this data in an MPB determination or as a cleanup standard for downstream reaches of the Little Menomonee River.

Soil Sampling

1. WDNR will provide a listing of suggested background soil sampling locations which take into account topography, land use, soil characteristics, and vegetative cover (habitat). WESTON will evaluate these recommended locations with respect to habitats mapped by the National Wetlands Inventory studies available for the site and surrounding areas.
2. Background soil samples will be collected to a depth of 12 inches and then composited to a single sample for that location.
3. The FSP will present criteria for the field team's selection of background soil sampling locations. Again, professional judgement will be utilized in combination with these criteria to avoid sampling obvious point sources.

In conclusion, WESTON and KMCC will proceed in developing the Interim QAPP and FSP to be consistent with our 23 September letter and the agreements outlined above. In addition, WESTON looks forward to receipt of WDNR's recommended background soil sampling locations.