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6 March 1992

Director, Waste Management Division
Remedial Project Manager (HSRW-6J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Work Order No.: 2687-07-01

Attention: Moss-American Site

Subject: Monthly Progress Report for February 1992
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 February.

Progress During February 1992

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

- WESTON and KMCC submitted a revised Draft Quality Assurance Project Plan/Field Sampling Plan (QAPP/FSP) to U.S. EPA and WDNR on 28 February 1992. This transmittal pertains to the Predesign Task 2 background CPAH determinations and included a summary of responses made to Agency review comments.
- WESTON and KMCC have initiated work on an analytical method performance study. This study has been designed to further validate the use of the selected monitor (SIM) GC/MS method for determining background concentrations of CPAHs in soil and sediment under Predesign Task 2. Data and findings obtained from this study will be incorporated into the final QAPP/FSP for this predesign task. This method performance study is anticipated to be completed during March.
- WESTON and KMCC completed transmittal of site aerial photographs and topographic maps to U.S. EPA and WDNR. These deliverables were prepared as outlined in the Interim Predesign Work Plan.



- WESTON and KMCC continued progress in preparing the overall Predesign Work Plan.
- Under Predesign Task 16, WESTON and KMCC finalized a contract agreement with IT Corporation to conduct bench-scale treatability studies of the biological treatment system. A project kick-off meeting was conducted between WESTON, KMCC, and IT Corp. representatives on 14 February 1992. WESTON and KMCC also made progress in developing a final work scope and tentatively selecting a contractor for the soil washing treatability study. Contract negotiations are currently in progress and are expected to be completed during March.

Problems Encountered/Issues to be Resolved

KMCC and their attorney, Covington & Burling, have continued to pursue access to Moss-American site properties which are not owned by KMCC. In so doing, an interim access agreement has been obtained for the Chicago and North Western Transportation Company (CNW) for predesign activities that are not significantly intrusive. Further agreements for more intrusive predesign investigative activities are pending.

KMCC and Covington & Burling have made attempts to obtain access arrangements for predesign and RD/RA activities with the County of Milwaukee (County). Recent requests for access to the County properties have been denied (refer to attached letter from County of Milwaukee Parks Department dated 10 February 1991). These site access denials by the County during February have impacted our planned progress. Specifically, WESTON has been unable to access the site to review potential background sampling locations, collect groundwater level and river staff gauge readings, or receive authorization to install a river flow gauge within the Little Menomonee River.

Continued access denials and/or restrictions by the County will have impact to our planned interim and overall Predesign Work Plan implementation schedules.

KMCC and their attorney, Covington & Burling, are continuing efforts toward reaching a settlement with the County. Covington & Burling has notified U.S. EPA and U.S. Department of Justice attorneys that their assistance in obtaining access may be required.

Activities Anticipated During March 1992

KMCC and WESTON anticipate conducting the following predesign phase activities during March 1992. Those planned activities which require access to County of Milwaukee



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properties of the site are also delineated. In the event access agreements cannot be reached, these activities will be postponed.

- Complete method performance study on low detection limit analytical method for use in determining background CPAH concentrations (Predesign Task 2). Prepare revisions to QAPP/FSP based on data/findings from this study.
- Continue progress on implementation of those predesign tasks outlined in the approved Interim Predesign Work Plan (County property access required).
- Continue progress in preparing the overall Predesign Work Plan required by the Consent Decree.

Figure 1 presents a projected three-month schedule of anticipated predesign activities. This projected schedule assumes access restrictions to county property will be resolved during March.

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

Very truly yours,

ROY F. WESTON, INC.

Gary J. Deigan
Senior Project Manager

Kurt S. Stimpson
Project Director

GJD:KSS:amp
Enclosure

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Figure 1

**Projected Three-Month Predesign Activities Planning Schedule
Moss-American Site
Milwaukee, Wisconsin**

March 1992	April 1992	May 1992
Submit Draft Bioslurry Bench Treatability Test Plan to Agency.	Submit Final Interim QAPP/FSP to Agency.	Receive QAPP/FSP approval.
Continue overall Work Plan development.	Submit Final Bioslurry Bench Treatability Test Plan to Agency.	Prepare overall project QAPP.
Receive second round Agency comments on QAPP/FSP.	Prep/mobilize to collect site soils for treatability work.*	Receive Agency approval of Bench Treatability Test Plan.
Submit background sampling locations to U.S. EPA/WDNR.*	Characterize site soils for treatability work.*	Initiate Bioslurry Benchscale Treatability Study.
Conduct field water level readings in wells and river*	Submit Draft Soil Washing Treatability Test Plan	Submit Final Soil Washing Treatability Test Plan to Agency.
	28 - Final due date for overall Predesign Work Plan submittal to Agency.	Select final background sampling locations with Agency.

*Pending access agreement to County/CNW properties.