



ROY F. WESTON, INC.
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7 April 1992

Ms. Betty Lavis
Remedial Project Manager (HSRW-6J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Via Certified Mail

Work Order No.: 2687-07-01

Attention: Moss-American Site

Subject: Monthly Progress Report for March 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 March.

Progress During March 1992

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

- WESTON and KMCC continued progress in preparation of the Draft Predesign Work Plan. The Draft Predesign Work Plan is required to be submitted to U.S. EPA and WDNR on 28 April 1992.
- WESTON and KMCC submitted proposed background soil and sediment sampling locations to U.S. EPA and WDNR on 30 March 1992. This submittal is a follow-up to the QAPP/FSP submittal for Predesign Task 2.
- In a letter dated 12 March 1992, WESTON and KMCC received comments from U.S. EPA and WDNR on the 3 December 1991 Final Interim Work Plan. WESTON is preparing a follow-up letter to address these comments.
- The following progress is reported for predesign tasks being implemented under the Final Interim Predesign Work Plan:
 - Predesign Task 2 - WESTON completed the analytical method performance study on the low detection limit SIM GC/MS method. Findings from this study will be incorporated into the final QAPP/FSP.



Ms. Betty Lavis

-2-

7 April 1992

- Predesign Task 8 - WESTON is proceeding in contacting residents identified in our groundwater survey technical memorandum to confirm the use or abandonment of their groundwater well.
- Predesign Task 10 - WESTON has made continued progress in defining the hydrology and hydraulics of the existing Little Menomonee River and its floodplain. WESTON received Wisconsin Department of Transportation (WDOT) approval for installation of a river flow gage on the bridge structure of Brown Deer Road. WESTON is now preparing an application to WDNR for a permit to install the flow gage.
- Predesign Task 16 - WESTON and IT Corporation completed a Draft Bench Scale Treatability Test Plan for the bioslurry technology. The draft is currently being reviewed and finalized for an April submittal to U.S. EPA and WDNR. WESTON is finalizing contract conditions and work scope with Bergmann USA for conducting bench-scale treatability testing of the soil washing technology.

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 currently being negotiated.

Requests for access to the County of Milwaukee (County) properties have been denied. These site access denials by the County 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 impacts on our planned interim and overall Predesign Work Plan implementation schedules.

KMCC and their attorney, Covington & Burling, have informed U.S. EPA of the need for assistance in obtaining access to County properties.



Ms. Betty Lavis

-3-

7 April 1992

Activities Anticipated During March 1992

KMCC and WESTON anticipate conducting the following predesign phase activities during April 1992. Further predesign activities that require access to County of Milwaukee properties have been postponed.

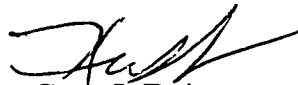
- Submit the Draft Predesign Work Plan to U.S. EPA and WDNR for review.
- Submit a Draft Bench-Scale Treatability Testing Plan for the bioslurry technology to U.S. EPA and WDNR for review.
- Receive the U.S. EPA and WDNR review comments on the 28 February 1992 QAPP/FSP submittal. Prepare revisions to the QAPP/FSP in response to these comments and incorporate the findings of the analytical method performance study.
- Submit response to Agency comments on the Final Interim Predesign Work Plan.


Figure 1 presents a projected three-month schedule of anticipated predesign activities.

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



Ms. Betty Lavis

-4-

7 April 1992

cc: Mr. Mark Krippel, Project Manager
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Bureau of Solid and Hazardous Waste Management
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Ms. Betty Lavis

-5-

7 April 1992

cc: Mr. Jim Schmidt (2 copies)
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Figure 1

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

April 1992	May 1992	June 1992
Submit Draft Bioslurry Bench Treatability Test Plan to Agency.	Submit Final Interim QAPP/FSP to Agency.	Receive Interim QAPP/FSP approval.
Receive second round Agency comments on QAPP/FSP.	Prepare/submit overall project QAPP to U.S. EPA/WDNR.	Submit Final Bioslurry Bench Treatability Test Plan to Agency.
28 - Final due date for overall Predesign Work Plan submittal to Agency.	Receive Agency comments on Bench Treatability Test Plan.	Prep/mobilize to collect site soils for treatability work.*
	Submit Draft Soil Washing Treatability Test Plan.	Characterize site soils for treatability work.*
	Select final background sampling locations with Agency.*	Submit Final Soil Washing Treatability Test Plan to Agency.
		Receive Agency comments on Draft Predesign Work Plan.

* Denotes activities requiring site access.