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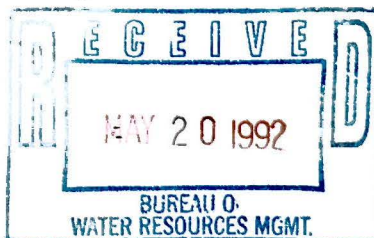
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BUREAU OF SOLID -
HAZARDOUS WASTE MANAGEMENT

8 May 1992



Via Certified Mail

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

Subject: Monthly Progress Report for April 1992
Moss-American Site, Milwaukee, Wisconsin

Dear Ms. Lavis:

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 April.

Progress During April 1992

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

- WESTON and KMCC completed the Draft Predesign Work Plan during this period. The Work Plan was delivered to U.S. EPA and WDNR on 28 April 1992.
- On 15 April 1992, WESTON and KMCC conducted a meeting with U.S. EPA while WDNR participated by teleconference. The discussions during this meeting included an overview of the forthcoming Draft Predesign Work Plan submittal, the approach to developing the predesign phase QAPP, and the schedule implications associated with the County of Milwaukee's denial of site access. U.S. EPA provided concurrence to WESTON and KMCC's assessment that the predesign work cannot proceed until site access is obtained, and that the schedule for U.S. EPA to obtain site access is uncertain at this point.
- On 15 April 1992, U.S. EPA transmitted Quality Assurance Section (QAS) review comments on the 28 February 1992 Draft Interim QAPP revisions. These comments were provided in addition to those received on 31 March 1992 from WDNR. WESTON and KMCC have proceeded to revise the Interim QAPP in response to the comments. The Interim QAPP is also being revised to incorporate the findings of the analytical method performance study completed by WESTON in late March.



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- The following progress is reported for predesign tasks being implemented under the Final Interim Predesign Work Plan:
 - Predesign Task 2 - WESTON and KMCC are awaiting U.S. EPA and WDNR comments on proposed background sampling locations transmitted on 30 March 1992. The QAPP for this task is being revised and finalized as described above.
 - Predesign Task 8 - WESTON has made attempts to contact the residents identified in our groundwater well survey by telephone during normal business hours. Most telephone contact has been unsuccessful. WESTON will attempt further telephone contacts during evenings and weekends in order to obtain the informational requirements for our area well survey.
 - Predesign Task 10 - WESTON has made continued progress in defining the hydrology and hydraulics of the existing Little Menomonee River and its floodplain. An updated computer model for evaluating the river re-routing alternatives during Predesign Task 9 has been substantially completed. WESTON is in the process of obtaining additional as-built drawings of bridge crossings and hydraulic structures in order to finalize this model.
 - Predesign Task 16 - WESTON, KMCC and IT Corporation are in the process of finalizing a Draft Bench-Scale Treatability Test Plan for submittal to U.S. EPA and WDNR. Technical exchanges during review of internal drafts of this Test Plan have been beneficial to the test protocol development; however, they have somewhat delayed our planned April transmittal of the Test Plan, as was reported in our last progress report.

Problems Encountered/Issues to be Resolved

Site access denials by the County of Milwaukee (County) have impacted KMCC's ability to perform any predesign work that requires access to the County properties. KMCC and their attorney have informed U.S. EPA of this issue. U.S. EPA will pursue the resolution of this issue.



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Activities Anticipated During May 1992

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

- Submit a Draft Predesign Phase QAPP and a Final Interim QAPP to U.S. EPA and WDNR for review and approval.
- Submit a Draft Bench-Scale Treatability Testing Plan for the bioslurry technology to U.S. EPA and WDNR for review.
- Submit response to Agency comments on the Final Interim Predesign Work Plan.
- Prepare a Draft Bench-Scale Treatability Testing Plan for the soil washing technology evaluation.

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) 918-4000.

Very truly yours,

ROY F. WESTON, INC.

Gary J. Deigan
Senior Project Manager

Kurt S. Stimpson
Project Director

GJD:KSS/slr
Enclosure



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cc: Mr. Mark Krippel, Project Manager
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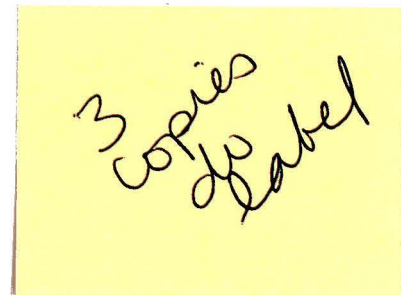
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cc: Mr. Jim Schmidt (2 copies)
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Southeast District Office
P.O. Box 12436
Milwaukee, WI 53212

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Figure 1

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

May 1992	June 1992	July 1992
Submit Final Interim QAPP/FSP to Agency.	Submit Draft Soil Washing Treatability Test Plan.	Receive Interim QAPP/FSP approval.
Submit Draft Bioslurry Bench Treatability Test Plan to Agency.	Receive Agency comments on Bench Bioslurry Treatability Test Plan.	Submit Final Bioslurry Bench Treatability Test Plan to Agency.
Prepare/submit overall project QAPP to U.S. EPA/WDNR.		Receive Agency comments on Draft Predesign Work Plan.
Submit response to Agency comments on Final Interim Work Plan.		Receive Agency comments on Draft Overall Project QAPP.