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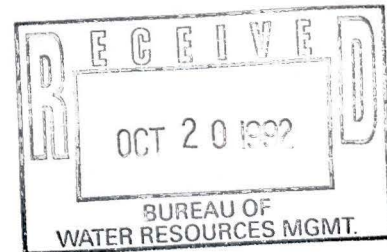
OCT 12 1992

BUREAU OF SOLID -  
9 October 1992  
HAZARDOUS WASTE

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

Via Certified Mail

Re: Monthly Progress Report for September 1992  
Moss-American Site, Milwaukee, Wisconsin



Dear Ms. Eleder:

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 September 1992

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

- On 1 September 1992, WESTON and KMCC received U.S. EPA approval of the Quality Assurance Project Plan (QAPP) for Predesign Task 2. WESTON and KMCC then compiled and issued the final version of this QAPP, including all U.S. EPA-approved revised pages, on 7 October 1992.
- Also on 1 September 1992, WESTON and KMCC issued revised pages to the Test Plan for the Bioslurry Treatability Study. These revised pages were prepared in response to U.S. EPA's review comments of 13 August 1992. U.S. EPA then issued approval of the Test Plan on 8 September 1992. All revised pages were then compiled into a final document, which was issued to U.S. EPA on 23 September 1992.
- On 9 September 1992, WESTON and KMCC received U.S. EPA review comments on the Test Plan for the Soil Washing Treatability Study. WESTON and KMCC are currently preparing draft responses to these review comments and will be scheduling a meeting with U.S. EPA during the coming weeks to discuss the comments and draft responses.



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- WESTON and KMCC continued to make progress on preparing responses/revisions to the Draft Predesign Phase QAPP review comments received from U.S. EPA on 20 August 1992. However, as this QAPP approval will not be required until next season's field activities, we have postponed its resubmittal until late October or early November, in order to focus on implementing key field predesign activities before the 31 October 1992 site access agreement with the County of Milwaukee expires.
- On 24 September 1992, WESTON, KMCC and U.S. EPA met to review the status of the project and to introduce Ms. Bonnie L. Eleder as the U.S. EPA's replacement for Project Manager Ms. Betty G. Lavis. The meeting discussions included a review of the status of project plans, near-term field activities, overall schedule, and site access issues.
- A number of predesign field investigative activities were conducted during this reporting period. The enclosed "Target Schedule of Near-Term Activities" depicts the completion status for these activities and also presents the anticipated completion date for outstanding activities.
- In letters dated 23 September 1992 from the U.S. Army Corps of Engineers, St. Paul District and 28 September 1992 from the Wisconsin DNR's Southeast District, KMCC and WESTON (as agent) were issued a permit to install a flow monitoring gage in the Little Menomonee River, north of Brown Deer Road.

#### Problems Encountered/Issues to be Resolved

In a letter dated 6 October 1992 from WESTON to U.S. EPA, WESTON and KMCC have requested that U.S. EPA pursue an extension to the access agreement with the County of Milwaukee, in order to allow selective brush clearing and mowing of the former wood preserving facility. This task is viewed as necessary to ensure safe and efficient site access during any subsequent field investigative tasks.

#### Activities Anticipated During October 1992

The enclosed near-term schedule depicts additional field activities anticipated to be completed during October 1992. In addition to these activities, KMCC and WESTON anticipate conducting the following predesign phase activities during October 1992:





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- Predesign Task 2 - WESTON will perform laboratory analysis of background soil and sediment samples.
- Predesign Tasks 3 and 5 - WESTON will complete the geophysical surveys of the northeast landfill and the former settling pond area of the former wood preserving facility.
- Predesign Task 6 - WESTON will conduct the monthly groundwater level readings in existing and newly installed wells on 13 October 1992
- Predesign Task 9 - WESTON will conduct a limited field review and meet with local informational sources to further compile and map aquatic and terrestrial resources along the subject stretch of the Little Menomonee River. WESTON will also gather information on socioeconomic, land use and cultural resources along this section of the river.
- Predesign Task 10 - WESTON will conduct additional field reviews and bridge crossing measurements of the Little Menomonee River. WESTON will also complete final planning and procurements for installing the flow monitoring gage in the Little Menomonee River. Installation of the gage will be conducted in late October or early November.
- Predesign Task 16 - WESTON and our subcontractor, IT Corporation will complete the initial laboratory characterization of the treatability study test samples, in accordance with the Test Plan. Upon confirmation that these samples meet the criteria for the treatability testing, they will be transported to the treatability study laboratories.
- KMCC, WESTON, and our subcontractor, Bergmann - USA will continue progress in preparing responses/revisions to U.S. EPA's review comments on the Test Plan for the Soil Washing Treatability Study.
- WESTON and KMCC will continue progress in preparing responses/revisions to the Draft Predesign Phase QAPP, as previously discussed.



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U.S. EPA

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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/lh  
Enclosure

cc: Mr. Mark Krippel, Project Manager  
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U.S. EPA

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Date: 9 October 1992  
Revision: 1



**Status of Project Plans  
Moss-American Site  
Milwaukee, Wisconsin**

Project Plan	Draft Submittal	U.S. EPA Review Comments	WESTON/KMCC Revisions Submittal Date	U.S. EPA Approval	Date of Final Plan
1. Interim Predesign Work Plan	15 July 1991	21 August 1991 12 March 1992	3 December 1991	25 June 1992*	3 December 1991
2. QAPP for Predesign Task 2 [Interim QAPP]	18 November 1991	24 December 1991 31 March 1992 15 April 1992 13 August 1992	28 February 1992 22 May 1992 28 August 1992	1 September 1992	6 October 1992
3. Predesign Work Plan	28 April 1992	15 June 1992	20 July 1992 3 August 1992	26 August 1992	9 October 1992
4. Predesign Phase QAPP	27 May 1992	20 August 1992	In progress - late October submittal		
5. Test Plan - Bioslurry	29 May 1992	3 August 1992 13 August 1992	1 September 1992	8 September 1992	23 September 1992
6. Test Plan - Soil Washing	7 August 1992	9 September 1992	In progress - late-October submittal		
7. Site Health and Safety Plan	15 August 1991	4 September 1991	25 October 1991	N/A	25 October 1991

N/A - Not applicable.

\* - Minor comments did not require document resubmittal.



**Target Schedule - Near-Term Activities  
Moss-American Site  
Milwaukee, Wisconsin**

Activity	Target Start Date	Target Completion Date	Completed (✓)
<b>Predesign Task 2 - Background Sampling and Analysis</b>			
1. U.S. EPA Interim QAPP comments	13 August	N/A	✓
2. Finalize background sampling locations	13 August	19 August	✓
3. WESTON/EPA-QAS conference call	20 August	20 August	✓
4. Submit interim QAPP revisions to U.S. EPA	N/A	26 August	✓
5. U.S. EPA Interim QAPP approval	26 August	7 September	✓
6. Field sampling of sediment and soils	28 September	6 October	✓
<b>Predesign Task 6 - Evaluate Groundwater East of LMR</b>			
1. Conduct monthly GW level readings	25 August	25 August	✓
2. Review access by drill rig to east side of river	25 August	25 August	✓
3. Procure drilling/well installation subcontractor	20 August	1 September	✓
4. Receive U.S. EPA approval of work plan for well installations	3 August	1 September	✓
5. Mobilize to field and install wells	14 September	24 September	✓
6. Conduct next round of GW level readings	15 September	15 September	✓
<b>Predesign Tasks 3 and 5 - Conduct Geophysics Subtasks Only</b>			
1. Review site conditions for geophysics surveys	25 August	25 August	✓
2. Conduct DC resistivity field survey in free-product zones	5 October	9 October	
3. Conduct AC resistivity field survey at northeast landfill and former process areas	5 October	9 October	
<b>Predesign Task 16 - Treatability Study Evaluations</b>			
1. Submit revised pages of Bioslurry Test Plan to U.S. EPA per 13 August meeting	28 August	N/A	✓
2. Receive U.S. EPA approval of treatability sampling plan (Appendix E of Test Plan)	28 August	9 September	✓
3. Mobilize to site to collect/process treatability test matrix	14 September	16 September	✓
4. Analyze treatability samples for CPAHs	16 September	22 September	✓
5. If necessary, conduct additional blending of test matrix and re-analyze for CPAHs	24 September	25 September	✓
6. Ship samples to treatability contractors	19 October	20 October	

**Target Schedule - Near-Term Activities  
Moss-American Site  
Milwaukee, Wisconsin  
(Continued)**

Activity	Target Start Date	Target Completion Date	Completed (✓)
<b>Pre-design Task 9 - Evaluate Alternate Alignments of LMR</b>			
1. Conduct follow-up field surveys of river corridor (Subtasks 4 and 5, p. 5-8 of Work Plan)	5 October	9 October	
<b>Pre-design Task 10 - Study River and Floodplain Hydraulics</b>			
1. Conduct follow-up field surveys to confirm findings to date	5 October	6 October	✓
2. Install flow monitoring gage in LMR.	26 October	31 October	
<b>Other:</b>			
Conduct selective brush clearing and mowing of former wood preserving facility.	1 November	15 November	



Moss American Groundwater Levels

Date	07/05/88				07/19/88			11/12/91	
Well No.	Riser Elevation	Surface Elevation	Depth to Water	GW Elevation	Depth to Water	GW Elevation	Depth to Water	GW Elevation	
MW-04S	732.91	731.13	5.04	727.87	5.03	727.88			
MW-04I	733.10	730.88	8.80	724.30	9.09	724.01			
MW-04D	732.49	731.15	16.25	716.24	17.15	715.34			
MW-05S	724.97	723.15	6.42	718.55	6.67	718.30			
MW-06S	725.50	722.71	7.15	718.35	8.09	717.41	4.31	721.19	
MW-07S	721.84	719.79	7.35	714.49	7.46	714.38	6.07	715.77	
MW-07I	721.66	720.06	5.82	715.84	6.68	714.98	---	---	
MW-08S	721.08	718.50	7.57	713.51	8.73	712.35	6.10	714.98	
MW-08I	721.73	718.60	7.79	713.94	7.92	713.81	4.28	717.45	
MW-09S	722.03	719.77	11.26	710.77	12.09	709.94	6.87	715.16	
MW-09I	721.44	719.50	9.72	711.72	10.50	710.94	5.34	716.10	
MW-10S	726.48	724.13	10.44	716.04	11.52	714.96	5.26	721.22	
MW-12S	719.87	717.74	8.21	711.66	8.35	711.52	4.71	715.16	
MW-14S	742.97	740.97	22.48	720.49	22.63	720.34	16.36	726.61	
MW-15S	750.53	749.39	DRY	DRY	DRY	DRY	---	---	
MW-20S	720.13	716.98	9.53	710.60	8.30	711.83	5.40	714.73	
Staff Gage	718.55						6.15	712.40	
	718.02								

Date	08/25/92				09/16/92		Oct. 92	
Well No.	Riser Elevation	Surface Elevation	Depth to Water	GW Elevation	Depth to Water	GW Elevation		
MW-04S	732.91	731.13	4.90	728.01	4.25	728.66		
MW-04I	733.10	730.88	8.03	725.07	6.98	726.12		
MW-04D	732.49	731.15	17.08	715.41	13.89	718.60		
MW-05S	724.97	723.15	5.59	719.38	4.81	720.16		
MW-06S	725.50	722.71	6.21	719.29	4.81	720.69		
MW-07S	721.84	719.79	7.10	714.74	6.23	715.61		
MW-07I	721.66	720.06	-	-	3.55	718.11		
MW-08S	721.08	718.60	6.99	714.09	6.29	714.79		
MW-08I	721.73	718.50	6.94	714.79	6.02	715.71		
MW-09S	722.03	719.77	11.11	710.92	10.57	711.46		
MW-09I	721.44	719.50	-	-	8.59	712.85		
MW-10S	726.48	724.13	11.48	715.00	11.86	714.62		
MW-12S	719.87	717.74	7.76	712.11	7.00	712.87		
MW-14S	742.97	740.97	22.58	720.39	23.20	719.77		
MW-15S	750.53	749.39	---	---	20.45	730.08		
MW-20S	720.13	716.98	6.77	713.36	6.30	713.83		
Staff Gage	718.55		---	---	---	---		
	718.02		4.15	713.87	4.13	713.89		