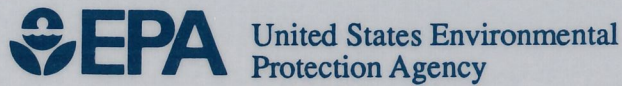


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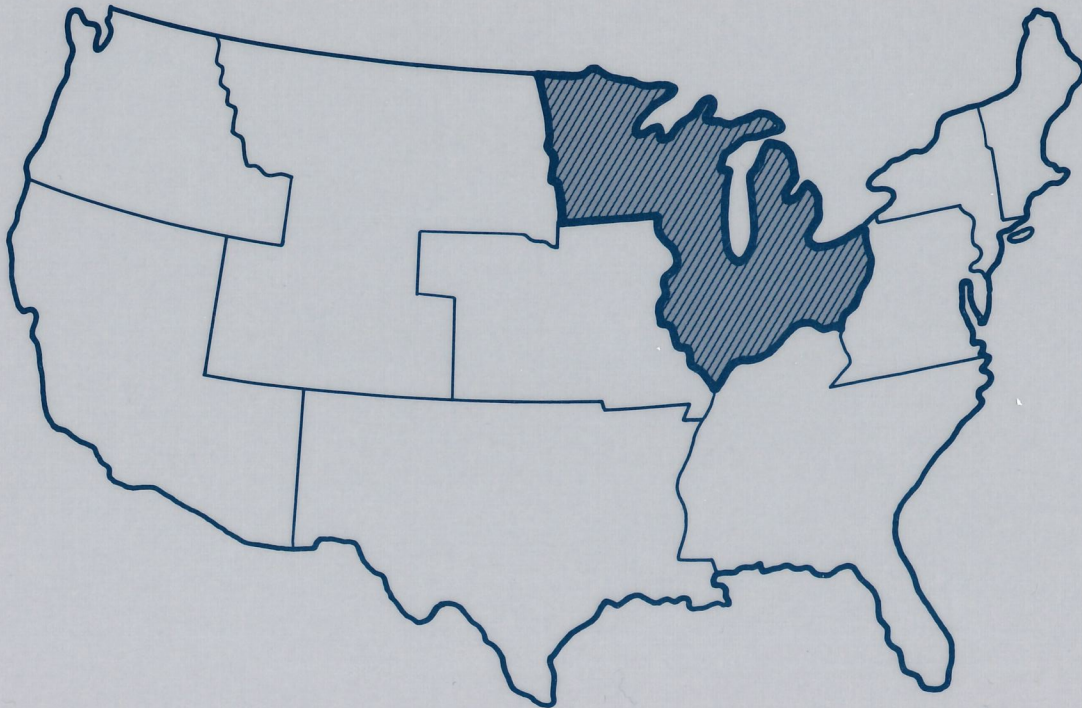
Remedial Activities at
Uncontrolled Hazardous
Waste Sites in
Region V



REVISED COMMUNITY RELATIONS PLAN

**Moss-American Site
Milwaukee, Wisconsin**

WA No. 46-5PM7 / Contract No. 68-W8-0040
November 1992



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Section 1 Introduction

A Community Relations Plan (CRP) for the Moss-American Superfund site in Milwaukee, Wisconsin, was published in 1986. This document is an addendum to the 1986 CRP. It was prepared for the U.S. Environmental Protection Agency (U.S. EPA), which is responsible for site investigations, cleanup measures, and community relations for the Moss-American site under the authority of the Federal Superfund Amendments and Reauthorization Act of 1986 (SARA). This addendum updates the site history and recommends specific activities that U.S. EPA will perform to inform the public and government officials and to encourage community involvement during the site cleanup. It also discusses the public's current project concerns and ways to address those concerns. The scope of this CRP addendum applies to the predesign phase and remedial design/remedial action (RD/RA) phases, which will last more than six years. The new information presented is based primarily on discussions with local government officials and area residents in March 1992. For a complete history of the site, refer to the 1986 CRP.

Section 2 Site Description

Location and Site Features

The 88-acre Moss-American site is located in northwestern Milwaukee at the southeast corner of the intersection of Brown Deer and Granville Roads. The parcel is located between the Chicago and North Western and the Wisconsin and Southern railroad lines. Sixty-five acres of the site are owned by Milwaukee County and held as undeveloped park land. The remaining 23 acres are owned by the Chicago and North Western Railroad and used as an automobile loading and storage area. The Little Menomonee River enters the site through the northern boundary and leaves through the eastern boundary. The site is surrounded by sites used for various urban and rural purposes.

Site Background

The site history in the 1986 CRP begins with use of the site as a creosoting facility in 1921 and includes important site activities through 1985. At that point, U.S. EPA placed the site on its National Priorities List and requested that the Potentially Responsible Parties (PRPs) participate in the Superfund investigation at the site. The following paragraphs describe other activities since 1985.

The remedial investigation (RI), which determined the nature and extent of contamination on site and in the Little Menomonee River, began in 1987 and was completed in early 1990. On-site work conducted during the RI included soil, river sediment, surface water, and ground-water sampling. The results of the RI are described in the RI Report (January 1990).

The feasibility study (FS), completed in early 1990, identified and evaluated cleanup alternatives that would minimize or eliminate the health risks posed by site-related contamination. In May 1990, U.S. EPA selected a cleanup remedy for the site. The selected remedy, in the form of a recommendation, is described in the proposed plan fact sheet (May 1990). The public comment period on the proposed plan began in May and ended in early August.

In September 1990, U.S. EPA signed a record of decision (ROD) that described the final cleanup plan for the site. Public comments on the proposed plan and U.S. EPA's responses were included in the ROD. Under the ROD, the cleanup will consist of:

- Rerouting the Little Menomonee River

- Removing and biologically treating highly contaminated soil and river sediment using an on-site slurry bioreactor
- Covering the remaining sediments in the old riverbed with soil excavated from the new channel
- Covering the untreated soil and the treated material from the slurry bioreactor on site under a soil cover
- Collecting and treating contaminated ground water and discharge it to the sanitary sewer
- Treating the northeast landfill soil on site and dispose of it on site in a Resource Conservation and Recovery Act (RCRA)-compliant landfill

Following the signing of the ROD, U.S. EPA began negotiating with the PRPs. One PRP, Kerr-McGee Chemical Corporation, Inc., signed a legal document called a consent decree in July 1991. Under the consent decree, Kerr-McGee will lead in funding, developing and implementing the RD/RA for the site.

Site Contamination

Organic contaminants have been detected in the soil and ground water on the Moss-American site and in sediments of the Little Menomonee River. The areas of greatest contamination in the subsurface soil are the processing area and vicinity, the treated wood storage area, the northeast landfill, and the southeast landfill (see Site Map on page 2-3). Contaminated ground water was found near the processing area and the treated wood storage area. A contaminated plume, as wide as 400 feet, extends from the processing area to the river. The depth of ground-water contamination varied up to a maximum of 20 feet below the surface. Organic contaminants were detected in river sediments from Brown Deer Road to the confluence with the Menomonee River.

Status of Community Relations Activities

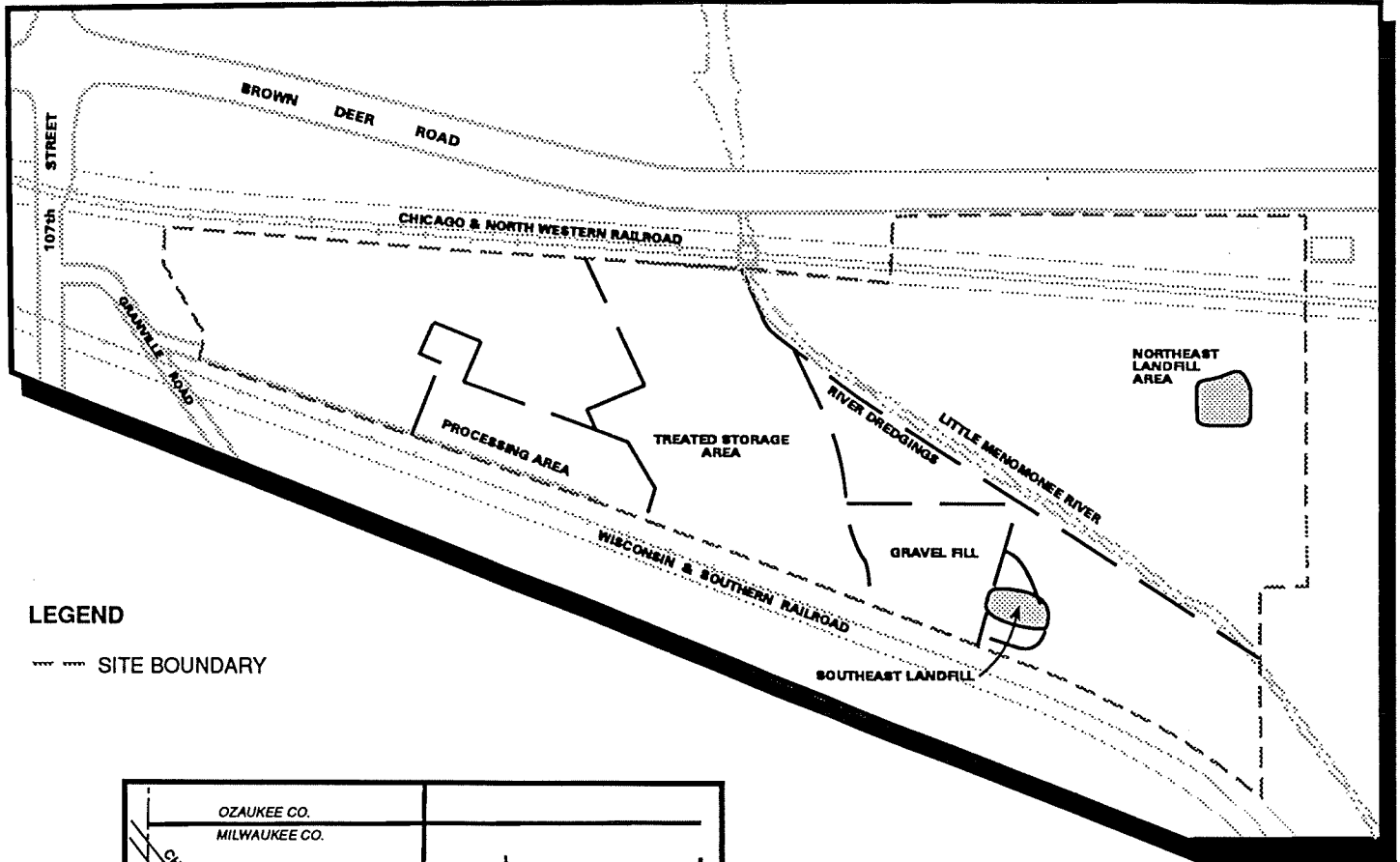
Community relations activities associated with the RI/FS phase have been completed. The activities consisted of press releases, public meetings, newspaper ads, and fact sheets that informed area residents about RI/FS activities.

Since the end of the RI/FS phase, U.S. EPA has focused on negotiating with the PRPs for cleanup of the site. There has been limited community relations activity during this period. A newspaper advertisement announcing the signing of the ROD was published in October 1990. Community interviews were conducted in March 1992 to gather information about current community concerns. The additional community relations activities planned for the site are discussed in Section 4.



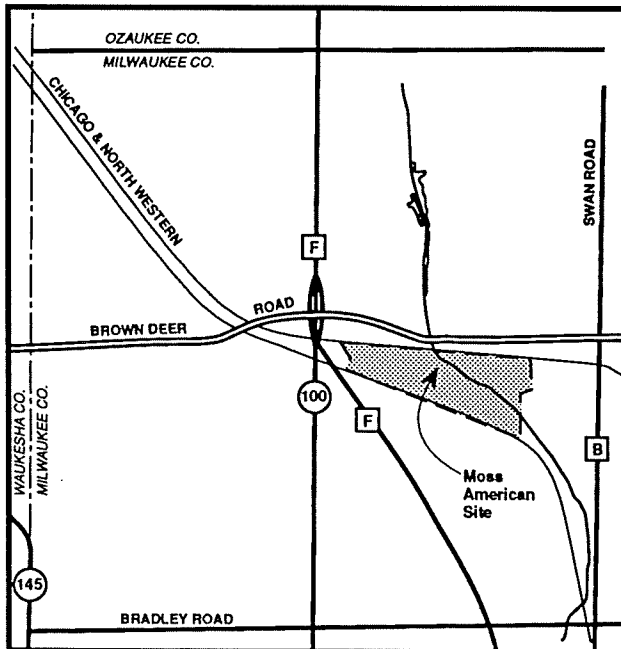
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APPROXIMATE
SCALE IN FEET



LEGEND

--- SITE BOUNDARY



Section 3 Community Background

History of Community Involvement

There has not been intense community interest in the Moss-American site. This may be because the site's contamination is not readily visible to the public and the public has not felt at risk from the contamination. When the site operated, it was somewhat isolated from surrounding uses, and the visible creosote contamination on site and in the river did not directly affect the public or was not perceived by the public as a problem. When the facility was demolished in 1978, the site took on a park-like appearance. Again, the on-site contamination and contamination in the river was not readily visible to the public.

Community Issues and Concerns

Interviews were conducted with local officials and area residents in Milwaukee on March 16 and 17, 1992, to determine how community concerns have changed. Community concerns as of 1986 can be found starting on page 14 of the original CRP. Current community concerns are described below.

Information Concerns

Several people were concerned that they did not receive site-related information regularly. The alderman for northwestern Milwaukee felt that the site mailing list could be more inclusive. He was concerned that all residents living along the river were not on the mailing list. The alderman also felt that people in the project area wanted to know the start and completion dates for the cleanup.

A resident and a school teacher believed that schools near the river should receive information about the health risks associated with contacting river water and river sediment. The school teacher indicated that high school students often frequent the river area near their school and have been seen in the water. Both individuals felt that information about the planned cleanup would also be beneficial to the schools.

City of Milwaukee officials wanted more information on progress during the design phase and the opportunity to have input into the design before it is finalized.

Selected Remedy Concerns

Nearly all of those interviewed had some concern or request about the selected remedy. A local high school teacher indicated that science classes use a portion of the river and asked whether that practice can continue. The teacher also requested that the new river bed be constructed as a river and not a drainage channel. A representative from an

environmental group indicated that the new river should look a like natural river habitat.

Most area residents interviewed were concerned about damaging the existing habitat during the cleanup. Many expressed concern about the loss of large trees and wetlands along the river. Several residents asked how the trees and other plants removed during construction would be replaced. A member of the Audubon Society volunteered to survey the proposed construction area to located rare and threatened and endangered species before construction starts. The Audubon Society also asked whether it would be possible to transplant some trees and other plants that would otherwise be destroyed during cleanup. They also requested that more desirable tree species be used to replace those destroyed (e.g., replacing a box elder with a birch). A resident requested that if trees are transplanted, they remain in the parkway. A representative from the County Parks Department indicated that the project area was being surveyed as part of a county-wide natural areas survey. He wanted to make the PRPs aware of the survey results to avoid damaging sensitive/high quality areas identified in the survey.

Several people expressed concern about the disruption to parkway facilities, such as walking and biking trails and ball fields, during the cleanup. These people indicated that the parkway facilities are heavily used and prolonged disruption of their use would be undesirable.

One resident believed the cost of the cleanup remedy was excessive and that a less expensive alternative should have been selected. Representatives of Milwaukee County, one of the PRPs, felt that the site did not pose a health threat and did not require the cleanup remedy selected by U.S. EPA. These representatives also felt that the selected remedy would be very damaging to the environment and unable to reduce health risks to U.S. EPA's desired levels.

Trucking Concerns

Several residents and City of Milwaukee officials were concerned about the trucking associated with the cleanup. One resident requested that trucks be prohibited from using Granville Road to reach the site. City of Milwaukee officials were concerned about transported soil spilling onto city streets. City officials indicated that a city ordinance requires trucks carrying soil to be covered. The city fire department (hazardous materials group) requested that it be informed of the hauling routes to the site and the hauling schedule.

Miscellaneous Concerns

The representative from the environmental organization was concerned about on-site erosion entering the river during cleanup. He also asked how the cleanup schedule coincided with efforts by the Wisconsin Department of Natural Resources to improve the river in its Priority Watershed Program.

The City of Milwaukee representatives were concerned about the effect of the cleanup

on the City's land bank property immediately southeast of the Moss site. The representatives also had several concerns about the PRPs. They wanted to know who will supervise the PRPs during construction. They also wanted to know whether the PRPs had developed a community safety plan and a plan for securing the site during cleanup.

The City representatives indicated that they would like to repair bridges over the river at Bradley and Granville Roads but have postponed work because of potential liability issues.

One resident recommended that local laborers be hired during the cleanup and "paid prevailing wages."

Section 4 **Proposed Community Relations Plan**

During the course of a Superfund project, community concerns may change or some may become of greater importance than others. The community interviews revealed a great concern about the environmental impacts of the proposed cleanup and the ability to make the new planned river a high quality natural area. Because this seemed to be the major concern of those interviewed, future community relations work should be particularly sensitive to this issue during the remainder of the landfill project.

U.S. EPA established its community relations goals for the RD/RA phases based on input received from the March 1992 community interviews. The community relations goal for the RD/RA phases is to maintain communication with interested parties and to encourage public involvement in various aspects of the cleanup.

U.S. EPA Presence and Contacts

Throughout the cleanup, the Remedial Project Manager (RPM) and the Community Relations Coordinator (CRC) will respond to telephone inquiries from those interested in the site. U.S. EPA's toll-free number and the project staff's direct numbers are listed in Appendix A and will be included on all community relations materials.

Media Relations

News releases will be issued to local media to provide site-related information. Display advertisements will be placed in Milwaukee newspapers announcing public meetings and RD/RA milestones. Releases will be prepared as needed during the course of the project and at the conclusion. The CRC and the RPM will be the key contacts for the news releases.

Information Repository

U.S. EPA has established an information repository at the Mill Road Public Library that contains project-related documents. The purpose of the repository is to enable public access to all site-related documents approved by U.S. EPA for public disclosure.

Fact Sheets and Updates

U.S. EPA produced a proposed plan fact sheet in May 1990 that evaluated and compared cleanup remedies considered for the site. It also described the recommended cleanup remedy for the site. The proposed plan fact sheet is available at the Mill Road Library. At least four more fact sheets and eleven project update reports will be prepared to update residents on the status of the design and cleanup activities at the site. Additional fact sheets and updates may be developed as needed.

Public Meetings/Availability Sessions

A public meeting was held in June 1990 to describe U.S. EPA's recommended cleanup plan to and invite residents to comment on the plan and other alternatives considered for the site. U.S. EPA may hold up to seven public meetings or informal availability sessions to describe the final design of the site's cleanup alternative and to update residents on the cleanup. The fact sheets and newspaper ads will be used to inform the public about the meetings and availability sessions.

Miscellaneous

U.S. EPA will consider other community relations activities during the site cleanup upon request.

Community Relations Program Schedule

Community relations program activities are timed to coincide with technical milestones during RD/RA. The following is a possible schedule of community relations activities.

Community Relations Activity	Schedule
Predesign Project Update	Fall 1992
Predesign Project Update (2)	Spring and Fall 1993
Predesign Project Update (2)	Spring and Fall 1994
Predesign Project Update (2)	Spring and Fall 1995
Predesign Public Meetings/Availability Sessions (3)	To be determined
Remedial Design Fact Sheet	To be determined
Remedial Design Update Report	To be determined
Remedial Design Public Meeting	To be determined
Remedial Action Fact Sheets/Availability Sessions (3)	To be determined
Remedial Action Update Reports (3)	To be determined
Remedial Action Public Meetings (3)	To be determined

Appendix A
List of Contacts

Federal Officials

Senator-Elect Russell Feingold
U.S. Senate
Washington, DC 20510
(202) 224-5323
or
7114 Donna Drive
Middleton, WI 53562
(414) 297-4451

Senator Herb Kohl
702 Hart Senate Office Building
Washington, DC 20510
(202) 224-1872
or
205 East Wisconsin Avenue
Milwaukee, WI 53202
(414) 297-3587

Rep. Jim Moody
1019 Longworth House Office Building
Washington, DC 20515
(202) 225-3571
or
135 West Wells, Room 618
Milwaukee, WI 53203
(414) 291-1331

Rep. F. James Sensenbrenner, Jr.
120 Bishops Way
Brookfield, WI 53005-6294
(414) 784-1111
or
2444 Rayburn House Office Building
Washington, DC 20515-4909
(202) 225-5101

State Officials

Senator Tom Barrett
Room 9 North
State Capitol
Madison, WI 53708
(608) 266-2512
or
2845 North 49th Street
Milwaukee, WI 53210
(414) 444-3535

Rep. Tom Seery
Room 23 North
State Capitol
Madison, WI 53708
(608) 267-7990
or
6300 North 101st Street
Milwaukee, WI 53225
(414) 461-9347

U.S. EPA Officials

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Community Relations Coordinator
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604
(313) 353-1325 or (800) 621-8431

Betty Lavis
Remedial Project Manager
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604
(312) 886-4784 or (800) 621-8431

and

Bonnie Eleder
Remedial Project Manager
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604
(312) 886-4855 or (800) 621-8431

State Agency Officials

Gary Edelstein
Project Manager
Wisconsin Dept. of Natural Resources
P.O. Box 7921
Madison, WI 53707

Kenneth Bro
State of Wisconsin
Dept. of Health and Social Services
Division of Health
P.O. Box 309
Madison, WI 53707

Jim Schmidt
Unit Leader
Southeast District Office
Wisconsin Dept. of Natural Resources
P.O. Box 12436
Milwaukee, WI 53212

Repository

Mill Road Library
6431 N. 76th Street
Milwaukee, WI

Media

Newspapers

Don Behm
Environmental Reporter
Milwaukee Journal
P.O. Box 661
Milwaukee, WI 53201-0661
(414) 224-2325
Fax 224-2047

Charles Heschmeyer
Business Journal
2025 North Summit Avenue
Milwaukee, WI 53202
(414) 278-7788
Fax 278-7028

Milwaukee Community Journal
3612 North Martin Luther King Drive
Milwaukee, WI 53212
(414) 265-5300
Fax 265-1536

Milwaukee Courier
2431 North Hopkins Street
Milwaukee, WI 53206
(414) 445-2031
Fax 449-4872

George Stanley
Milwaukee Sentinel
918 North 4th Street
Milwaukee, WI 53203
(414) 224-2248
Fax 224-2049

Radio

Chuck Quirmback
Milwaukee Public Radio
Milwaukee Center # 1060
111 East Kilbourn Avenue
Milwaukee, WI 53202
(414) 271-8686
Fax 271-4170

WEMP Radio
11800 West Grange Avenue
Hales Corners, WI 53130
(414) 529-1470
Fax 529-1999

WEZW Radio
735 West Wisconsin Avenue
Milwaukee, WI 53233
(414) 272-1040
Fax 272-0908

WISN Radio
P.O. Box 402
Milwaukee, WI 53201
(414) 342-1111
Fax 342-4734

WLUM Radio
Boyd Huppert
12800 West Bluemound Road
Elm Grove, WI 53122
(414) 771-1021
Fax 771-3036

WNOV Radio
3815 North Teutonia
Milwaukee, WI 53206
(414) 449-9668
Fax 449-9945

WQFM Radio
Barb Flemming
606 West Wisconsin Avenue
Milwaukee, WI 53203
(414) 276-2040
Fax 276-8406

Television

WISN-TV
759 North 19th Street
Milwaukee, WI 53201
(414) 342-8812
Fax 342-7505

WITI-TV
9001 North Green Bay Road
Brown Deer, WI 53209
(414) 355-6666
Fax 362-2141

WTMJ Radio
Tim Blotz
720 East Capitol Drive
Milwaukee, WI 53211
(414) 332-9611
Fax 223-5378

WUWM Radio
University of WI-Milwaukee
P.O. Box 413
Milwaukee, WI 53201
(414) 229-4664
Fax 229-5749

WYMS Radio
5225 North Vliet Street
Milwaukee, WI 53201
(414) 475-8890
Fax 475-8413

WMVS-TV
1015 North 6th Street
Milwaukee, WI 53203
(414) 271-1036
Fax 225-1895

WVTV-TV
Marlon McGee
P.O. Box 1818
Milwaukee, WI 53201
(414) 444-1848
Fax 874-1862