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9 April 1996

Mr. Russell D. Hart Remedial Project Manager (HSRW-6J) U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, IL 60604

Work Order No. 02687-007-002

Re:

Monthly Progress Report for March 1996

Moss-American Site, Milwaukee, Wisconsin

Dear Mr. Hart:

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 during March 1996.

Progress During March 1996

During this period, KMCC/WESTON continued work on providing additional information as requested in U.S. EPA's 30 January 1996 letter. This letter requested additional cost evaluation of sediment removal techniques and a technical response to issues raised by WDNR regarding maximum probable background (MPB) determinations in river tributary sediments. On 18 March 1996, U.S. EPA issued a letter requesting additional cost comparisons related to the sampling/analysis program that may be necessary during river remediation. Due to the magnitude of these requests, KMCC/WESTON has proposed to respond in several submittals during March and April 1996. The first of these submittals was sent out on 13 March 1996. On 28 March 1996, KMCC/WESTON toured the Little Menomonee River to assist us in formulating U.S. EPA/WDNR's requested cost estimates. An analysis of comparative costs for various sediment removal techniques will be submitted to U.S. EPA and WNDR on or about 10 April 1996, as requested. Under separate cover, KMCC/WESTON will prepare additional information in response to issues raised by WDNR on background levels of CPAHs in the tributary sediment.

On 14 March 1996, U.S. EPA issued a letter to KMCC requesting some "housekeeping" measures on drummed investigative wastes staged at the site by KMCC and U.S. EPA's contractors, and for installation of additional fencing around former "wood-treating areas" of the site. KMCC will comply with this request and conduct this work upon remobilization to the site this spring. Prior to fence installation, we will submit a fence plan for U.S. EPA review and approval that enhances site security.

Not done



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On 21 February 1996, KMCC's Counsel issued a letter to the U.S. EPA Region V Deputy Administrator, Mr. David Ullrich, expressing concerns with WDNR's lead role in the river remedy management team and inconsistencies with the Consent Decree. In response, Mr. Ullrich issued a 19 March 1996 letter to KMCC's Counsel.

Activities Anticipated During April 1996

During April, KMCC/WESTON anticipate the following activities:

- KMCC/WESTON will transmit the information requested by the U.S. EPA/WDNR river "management team."
- KMCC/WESTON will participate in a planned tour of the Little Menomonee River with management and staff of U.S. EPA and WDNR.
- KMCC/WESTON will submit a plan for installing additional security fencing at the site, for U.S. EPA review and approval.

Should further clarification of this progress report be required, please contact the undersigned at (847) 918-4000.

Very truly yours,

ROY F. WESTON, INC.

Gary J. Deigan

Principal Project Manager

Kurt S. Stimpson/see

Kurt S. Stimpson Project Director

GJD:KSS/slr



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cc: Mr. A. Keith Watson
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Regional Counsel Attn: Moss-American Site Coordinator (5CS) U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, IL 60604

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