



Roy F. Weston, Inc.
Suite 400
3 Hawthorn Parkway
Vernon Hills, Illinois 60061-1450
847-918-4000 • Fax 847-918-4055

9 October 1997

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 September 1997
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 September 1997.

Progress During September 1997

Progress during this reporting period includes:

- On 11 August 1997, KMCC, WESTON, U.S. EPA, WDNR, and each party's legal counsel attended a meeting to discuss various site technical and legal issues. The meeting defined future near-term objectives of having each party participate in drafting an amended Statement of Work (SOW) reflecting revised remedy components. The SOW will then become the mechanism by which technical negotiations related to the revised remedy shall continue. A series of conference calls and meetings throughout the balance of 1997 are anticipated to attempt resolution of outstanding issues. On 5 September 1997, U.S. EPA issued an e-mail to WDNR and KMCC of conceptual revisions and ideas incorporated into the original SOW. On 26 September 1997, KMCC/WESTON issued an amended SOW prepared to reflect necessary remedy revisions proposed for the site. In a teleconference on 29 September 1997, U.S. EPA, WDNR, WESTON, and KMCC agreed to review the SOW transmittals and schedule two meetings in October to continue resolution of outstanding issues related to the revised remedy.
- On 11 September 1997, U.S. EPA issued a letter on the subject of certain ARARs issues related to the revised site remedy. Per EPA's letter request, WESTON is preparing a revised ARARs matrix table for U.S. EPA review. In a related matter, on 12 September 1997, WESTON issued a letter in response to WDNR's 20 August 1997 letter on state ARARs applicable to sediment management during the river





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remedy. On 16 September 1997, WDNR replied that continued discussions were necessary to resolve this ARARs issue.

- On 15 September 1997, KMCC/WESTON transmitted pre-final RD plans for the funnel and gate groundwater remedy to U.S. EPA/WDNR.
- KMCC/WESTON continued to operate the free-product recovery system (Phase I groundwater remediation) at the site.
- On 29 September 1997, KMCC/WESTON conducted a second teleconference with U.S. EPA and WDNR aimed at resolving the sediment removal standard of the Little Menomonee River remedy. Resolution was not achieved and continuing discussion is necessary.

Activities Anticipated During October 1997

During October, KMCC/WESTON anticipate the following activities:

- We will continue our attempts to work with U.S. EPA and WDNR toward resolution of issues related to developing a revised site remedy and modified SOW. To facilitate this, we anticipate an exchange of draft amended SOW language and two meetings (to be scheduled) during October.
- KMCC/WESTON will continue operation and maintenance of the Phase I groundwater remediation system.
- KMCC/WESTON will transmit the ARARs analysis requested by U.S. EPA.

Should further clarification of this progress report be required, please contact me at (847) 918-4114.

Very truly yours,

ROY F. WESTON, INC.

Gary J. Deigan
Principal Project Manager

GJD/slr



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U.S. EPA

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cc: Mr. A. Keith Watson
Kerr-McGee Chemical Corporation
Kerr-McGee Center
P.O. Box 25861
Oklahoma City, OK 73125

Mr. Richard Meserve
Covington & Burling
1201 Pennsylvania Avenue N.W.
P.O. Box 7566
Washington, D.C. 20044

Regional Counsel
Attn: Moss-American Site Coordinator (SCS)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044
Ref. D.J. #90-11-2-590

Section Chief (3 copies)
Environmental Response and Repair Section
Bureau of Solid and Hazardous Waste Management
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Mr. Jim Schmidt (2 copies)
Department of Natural Resources
Southeast District Office
P.O. Box 12436
Milwaukee, WI 53212