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9 December 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 November 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 November 1997.

Progress During November 1997

Progress during this reporting period includes:

- On 5 November 1997, KMCC, WESTON, U.S. EPA, and WDNR attended a meeting in Milwaukee to continue discussions in developing a revised Statement of Work (SOW). Each party issued minutes and various documentation of the meeting, highlighting resolved and unresolved technical issues.
- On 12 November 1997, KMCC/WESTON issued additional information related to the derivation of NR 720 soil standards. We are awaiting U.S. EPA and WDNR concurrence with this transmittal.
- KMCC/WESTON have made contracting arrangements to have the site cleared of trees and brush in preparation for 1998 remediation work.
- KMCC/WESTON have proceeded with preparation of bid documents and technical specifications related to procurement of a thermal desorption contractor and implementation of a revised soil remedy.
- Per EPA's request, WESTON is preparing a revised ARARs matrix table for U.S. EPA review.





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U.S. EPA

-2-

9 December 1997

- KMCC/WESTON completed shutdown of the free-product recovery system for the season due to impending freezing temperatures. Approximately 7,200 gallons of a free product and water mixture were collected between May and October 1997. Transportation and disposal of this waste at a licensed RCRA treatment facility was completed during November.
- On 30 October 1997, U.S. EPA and WDNR issued comments on the 95% Remedial Design plans for the funnel and gate groundwater system. On 24 November, WESTON issued a revised funnel and gate configuration for preliminary U.S. EPA/WDNR review.

Activities Anticipated During December 1997

During December, 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. We anticipate and have requested a meeting with U.S. EPA, WDNR, and Counsel.
- KMCC/WESTON will transmit the ARARs analysis requested by U.S. EPA.
- KMCC/WESTON will address U.S. EPA/WDNR comments and additional issues raised on the 95% groundwater design, pending U.S. EPA/WDNR feedback on our 24 November 1997 related submittal.

Mr. Hart, please ensure that this report (and all progress reports) are entered into the administrative record for the site.

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



Mr. Russell D. Hart
U.S. EPA

-3-

9 December 1997

cc: Mr. A. Keith Watson
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