

Weston Solutions, Inc. Suite 500 750 East Bunker Court Vernon Hills, IL 60061-1450 847-918-4000 • Fax 847-918-4055 www.westonsolutions.com

5 August 2005

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

WESTON Work Order No. 02687.007.007 KMC Work Order No. 40-50-01-AKW-V

Re: Monthly Progress Report for July 2005 Moss-American Site, Milwaukee, Wisconsin

Dear Mr. Hart:

Weston Solutions, Inc. (WESTON_®) has prepared this monthly progress report on behalf of the Settling Defendant for the Moss-American Superfund site, Kerr-McGee Chemical LLC (KMC). This monthly progress report has been prepared to document progress during July 2005.

Progress During July 2005

Progress during this reporting period includes:

- On 21 July KMC met with EPA management to discuss the appropriate path forward for Reaches 4 and 5. As a result of this meeting the two parties proposed the following path forward:
 - 1. KMC would initiate and attempt to complete a portion of Reach 4 river remediation (Leon Terrace to Mill Road) in the remainder of 2005.
 - 2. KMC would initiate a program to characterize CPAH content in Reach 4 and 5 sediments, with the goal being to use this new information to begin design of Reach 4 and 5 remediation in 2006.
 - 3. KMC/EPA will meet with WDNR to discuss the CPAH characterization program as soon as is practical.
- In a letter dated 28 July to WDNR, KMC relayed the results of its assessment of invasive species in disturbed areas in Reach 1. Mowing and herbicide application, as required by the Natural Resource Damage (NRD) agreement between KMC and WDNR, will be accomplished in early August.



Mr. Russell D. Hart U.S. EPA

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Activities Anticipated During August 2005

During August KMC anticipate the following activities:

- KMC will meet with WDNR on 9 August at WDNR Southeast Region headquarters to discuss sediment CPAH characterization for Reaches 4 and 5.
- Mowing and herbicide application to disturbed areas in Reaches 1, 2, and 3 will be completed as part of the NRD agreement to attempt to control invasive plant species.
- KMC will submit a report to the Agencies documenting the progress of re-vegetation in Reach 1.
- KMC awaits Agency comments on the recently submitted Request for Modifications to the Groundwater Monitoring Program.
- KMC will continue evaluation of WDNR's 28 March letter.
- KMC will continue evaluation EPA's 21 March letter and attachments, and provide a response.

Should further clarification of this progress report be required, please contact me at (847) 918-4142 or Keith Watson at (405) 270-3747.

Very truly yours,

Weston Solutions, Inc.

Komas P. Graan

Thomas P. Graan, Ph.D. Principal Project Manager

TPG/tg

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



Mr. Russell D. Hart U.S. EPA

> Mr. J.T. Smith Covington & Burling 1201 Pennsylvania Avenue N.W. P.O. Box 7566 Washington, D.C. 20044

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

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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) Technical Resources Section Bureau for Remediation and Redevelopment 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 5 August 2005