

Tom Wentland → Plymouth



Weston Solutions, Inc.  
Suite 500  
750 East Bunker Court  
Vernon Hills, IL 60061-1865  
847-918-4000 • Fax 847-918-4055  
www.westonsolutions.com

8 September 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 August 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 August 2005.

#### Progress During August 2005

Progress during this reporting period includes:

- On 9 August KMC met with EPA and WDNR to discuss the appropriate path forward for Reaches 4 and 5. As a result of this meeting the three parties agreed to 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 work with EPA and WDNR to develop a program to characterize CPAH content in Reach 4 and 5 sediments in the remainder of 2005, with the goal being to use this new information to begin design of Reach 4 and 5 remediation in 2006.
- KMC initiated and completed the field work necessary to support the design of river remediation between Leon Terrace and Mill Road. This included: wetlands delineation; Butler's garter snake habitat survey; threatened and endangered plant species survey; identification and location of large trees; and location of utilities and drainage culverts.





Mr. Russell D. Hart  
U.S. EPA

-2-

8 September 2000

- KMC initiated contacts with landowners in and adjacent to Reach 4 (Leon Terrace to Mill Road) in order to obtain any necessary access agreements.
- On 4 August KMC submitted the results of its Butler's garter snake survey (Reach 4, Leon Terrace to Mill Road) to WDNR's Bureau of Endangered Resources, with a request for an Incidental Take Authorization.
- Mowing and herbicide application to disturbed areas in Reaches 1, 2, and 3 were completed as part of the NRD agreement to attempt to control invasive plant species.
- As a result of the 9 August meeting with EPA and WDNR, KMC began the engineering tasks necessary to design the river remedy for Reach 4 (Leon Terrace to Mill Road).

#### Activities Anticipated During September 2005

During September KMC anticipate the following activities:

- KMC will meet with EPA and WDNR on 8 September to discuss the draft design for Reach 4 river remediation (Leon Terrace to Mill Road).
- After receiving input from EPA and WDNR, KMC will finalize the design for Reach 4 (Leon Terrace to Mill Road) and submit it to the Agencies for approval.
- KMC intends to complete contract negotiations with its construction contractor (North Star Environmental) to perform the river remediation (Leon Terrace to Mill Road).
- The Q3 groundwater monitoring event will be conducted during the week of 5 September.
- KMC will schedule a fall evaluation of the re-vegetation efforts covering Reaches 1, 2, and 3. In accordance with the NRD agreement for Reaches 1, 2, and 3, WDNR will be given the opportunity to participate in this evaluation.
- KMC will meet with the Agencies to finalize the Reach 4/5 sampling protocol.
- KMC awaits Agency comments on the recently submitted Request for Modifications to the Groundwater Monitoring Program.



Mr. Russell D. Hart  
U.S. EPA

-3-

8 September 2000

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.

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. 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

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



Mr. Russell D. Hart  
U.S. EPA

-4-

8 September 2000

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