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9 November 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
Tronox Work Order No.: 40-50-01-AKW-V

Re: Monthly Progress Report for October 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, Tronox LLC (Tronox), formerly Kerr-McGee Chemical LLC. This monthly progress report has been prepared to document progress during October 2005.

Progress During October 2005

Progress during this reporting period includes:

- On 4 October Tronox participated in a conference call with WDNR representatives to discuss status and schedule of WDNR's review of the Draft Field Sampling Plan. At this meeting WDNR committed to providing review comments in the week of 10 October. KMC committed to installing snake fences at Reach 4 (Leon Terrace to Mill Road) by 6 October
- The annual evaluation of the re-vegetation efforts covering Reaches 1, 2, and 3 was completed in October.
- Snake fence inspections and snake relocations continued through the end of October.
- After a series of teleconference calls in October concerning sediment sampling for Reaches 4 and 5, Tronox proposed a revised plan to decrease the scope of sampling to a level that would address many Agency concerns and still allow the field work to be completed in 2005. The components of the agreement are as follows:
 - Tronox will implement a program of sediment characterization to cover 2000 ft downstream from Leon Terrace in Reach 4. This sampling will be used to characterize the sediment for remedy design.





Mr. Russell D. Hart
U.S. EPA

-2-

9 November 2005

- Tronox will implement a limited source characterization for CPAHs in sediment. This work is performed consistent with EPA requirements on other projects, but is being performed "at risk" by Tronox since the laboratory and methods are not currently contained in an Agency-approved QAPP for this site. This work is being performed as a demonstration study to illustrate analytical methods and data analyses that may prove useful for this project.
- The results of the two sediment investigations described above will be submitted to the Agencies in February 2006, and used to design additional sediment investigations of the remainder of Reaches 4 and 5.
- Contingent upon our receipt of agency approval of the revised plans, Tronox will implement the remediation of Reach 4 (Leon Terrace to Mill Road).

Activities Anticipated During November 2005

During November Tronox anticipate the following activities:

- Pending issuance of the incidental takings permit for Butler's garter snake, Tronox intends to initiate remediation of Reach 4 (Leon Terrace to Mill Road) on 28 November.
- Tronox intends to initiate limited Reach 4 sediment sampling on 28 November.
- As a result of unseasonably warm weather in November, Tronox will continue snake fence inspections and snake relocations.
- Tronox will prepare a report documenting revegetation efforts in Reaches 1, 2, and 3.
- Tronox awaits Agency comments on the recently submitted Request for Modifications to the Groundwater Monitoring Program.

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/jlw



Mr. Russell D. Hart
U.S. EPA

-3-

9 November 2005

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