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9 December 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 November 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 November 2005.

Progress During November 2005

Progress during this reporting period includes:

- As a result of unusually warm weather in November, Tronox continued snake fence inspections and snake relocations until 13 November. WDNR Bureau of Endangered Resources concurred with the decision to end inspection and relocation efforts.
- In a letter to Tronox dated 14 November, EPA provided approval of the scope of work covering Reach 4a (Leon Terrace to Mill Road) remediation and sediment sampling in the uppermost 2000 ft of Reach 4.
- In a WDNR letter dated 29 November, Tronox received an Incidental Take Authorization addressing Butler's garter snake in Reach 4a. This followed email communications with Andy Galvin (WDNR) on 23 November which indicated that Authorization would be issued as soon as all appropriate signatures were obtained within WDNR.
- Mobilization for remediation of Reach 4a was initiated on 28 November.
- Sediment sampling in Reach 4 was initiated on 29 November.



Mr. Russell D. Hart U.S. EPA -2-

9 December 2005

Activities Anticipated During December 2005

During December Tronox anticipate the following activities:

- Sediment sampling in the uppermost 2000 ft of Reach 4 will be completed in the first half of December.
- Remediation of Reach 4a is anticipated to be completed in December, weather permitting.
- The Q4 groundwater sampling event will be conducted during the week of 12 December.
- 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

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TPG/jlw



Mr. Russell D. Hart U.S. EPA

-3-

9 December 2005

cc: Mr. A. Keith Watson
Tronox LLC
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Regional Counsel
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