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10 October 2006

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.: 13741.003.001.0050
Tronox Work Order No.: 40-50-01-AKW-AH

Re: Monthly Progress Report for September 2006
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 September 2006.

Progress During September 2006

Progress during this reporting period includes:

- The Q2 groundwater monitoring report was submitted on 19 September.
- The Q3 groundwater monitoring event was conducted during the week of 18 September.
- On 27 September representatives of Tronox, U.S. EPA and WDNR met at U.S. EPA Region 5 Headquarters to discuss and resolve the path towards completing sediment sampling in Reaches 4 and 5. There was general agreement with the sampling and analysis approach proposed by Tronox. While all parties hope that the sampling could be completed by the end of December 2006, all parties also recognized that the QAPP approval process might present an obstacle to the desired schedule. Representatives of U.S. EPA and WDNR management committed their efforts to accelerating the process as much as practical.
- In a letter dated 19 September Tronox provided responses to comments in the Agencies letter of 10 July 2006 regarding groundwater issues. At our 27 September meeting with U.S. EPA, R. Hart indicated that all of the Agency comments contained in the 10 July 2006 letter had been adequately addressed by Tronox. As a result, the agreed upon modifications to the groundwater monitoring program will begin on a schedule appropriate for each individual task.





Mr. Russell D. Hart
U.S. EPA

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Activities Anticipated During October 2006

During October Tronox anticipates the following activities:

- U.S. EPA and WDNR will continue review of QAPP materials supplied by Tronox regarding the sediment sampling for Reaches 4 and 5.
- Tronox/Weston will select a contractor to complete the well installation/well abandonment task as part of the approved groundwater monitoring program modifications.

Should further clarification of this progress report be required, please contact me at (847) 918-4142 or Keith Watson at (405) 775-5475.

Very truly yours,

Weston Solutions, Inc.

A handwritten signature in black ink that reads "Thomas P. Graan".

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

TPG/tg



Mr. Russell D. Hart
U.S. EPA

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10 October 2005

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

Regional Counsel
Attn: Moss-American Site Coordinator (SCS)
U.S. Environmental Protection Agency
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