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10 March 2008

Mr. Ross Delrosario
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 February 2008
Moss-American Site, Milwaukee, Wisconsin

Dear Mr. Delrosario:

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 February 2008.

Progress During February 2008

Progress during this reporting period includes:

- Monthly groundwater treatment system maintenance was performed during the week of 25 February.
- Tronox received a proposal from U.S. EPA regarding two remedial alternatives for Reach 4/5.

Activities Anticipated During March 2008

During March Tronox anticipates the following activities:

- Tronox will review the remedial alternatives proposed by U.S. EPA for Reach 4/5 and provide a response to the Agencies.





Mr. Ross Delrosario
U.S. Environmental Protection Agency

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- Tronox will submit the 2007 Q3 groundwater monitoring report.
- Weather permitting, Tronox will perform the Q1 groundwater sampling during the week of 31 March. It is possible that this sampling may be pushed back into early April.

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 cursive script that reads "Thomas P. Graan".

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

TPG/jlw



Mr. Ross Delrosario
U.S. Environmental Protection Agency

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cc: Mr. A. Keith Watson
Tronox LLC
P.O. Box 268859
Oklahoma City, OK 73126-8859

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

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

Wentland, Thomas A - DNR

From: Ryan Murphy [rmurphy@tnainc.com]
Sent: Friday, February 22, 2008 2:32 PM
To: Wentland, Thomas A - DNR
Subject: Project ID 2130-12-00 and 2130-13-00 - Phase I Issues

Tom

T N & Associates, Inc. has been hired by the Milwaukee County Dept. of Transportation and Public works, in conjunction with WisDOT, to complete plans for the replacement of the bridge decks over the Little Menomonee River at W. Good Hope Road, just west of N. 91st Street (WisDOT Project IDs 2130-12-00 and 2130-13-00). As part of this project, a Phase 1 Hazardous Materials investigation will be completed. There is a Superfund site upstream from our project (Moss American – Kerr McGee, WDNR EPR 02-41-529585). The City of Milwaukee recently completed a Phase 1 report for a project just north of ours, over the Little Menomonee River at Granville Road. They used the following text in their report:

The Phase 1 identified only one hazardous material concern within, or adjacent to, the project limits: contaminated river sediments associated with the Moss American – Kerr McGee EPA Superfund site (WDNR ERP 02-41-529585) located approximately 2 miles upstream from Granville Road. The portion of the Little Menomonee containing Granville Road has been remediated per regulatory authority; however, residual contamination (carcinogenic polycyclic aromatic hydrocarbons [CPAHs]) remains in the streambed there. As a result, the river sediments excavated during construction will need to be managed as a solid waste. *RCRA HAZARDOUS?*

The contaminated sediment can be managed, and ultimately wasted, as upland project fill or directly disposed at a commercial landfill facility. The City plans to reuse as much of the sediment as fill within the project limits as possible. If geotechnically feasible, this is expected to be the most cost-effective option yet it will require WDNR concurrence. The Phase 1 presented limited sediment sample results from the remedial action completed near the existing bridge; however, it's likely that the WDNR will require additional characterization data for their concurrence of the upland reuse of the waste. The rest of the material will have to be dewatered and hauled to the nearest WDNR-licensed disposal facility. An appropriate waste characterization will be required by the landfill facility prior to their acceptance of the material.

I had some questions regarding this site:

1. Is it correct that remediation has been completed and no further investigation would be required for our project site?
2. Would text similar to that used by the City be sufficient for our Phase 1 report, or should additional information be included? The only excavation planned for our projects is along the stream banks under the structures to accommodate the placement of riprap.

Any information you could provide would be greatly appreciated.

Thank you.

Ryan P. Murphy, PE
 Transportation Project Engineer
 T N & Associates, Inc.
 Direct: 414-607-6765
rmurphy@tnainc.com

02/26/2008