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10 September 2008

Mr. Ross del Rosario Remedial Project Manager (HSRW-6J) U.S. Environmental Protection Agency Region V 77 West Jackson Boulevard Chicago, IL 60604

WESTON Work Order No.: 13741.003.002.0030 Tronox Work Order No.: 40-50-01-AKW-AH

Re: Monthly Progress Report for August 2008 Moss-American Site, Milwaukee, Wisconsin

Dear Mr. del Rosario:

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 August 2008.

Progress During August 2008

Progress during this reporting period includes:

- On 1 August Tronox submitted a draft copy of the sediment CPAH data to be used to define the extent of sediment remediation in Reach 4/5.
- On 13 August Tronox submitted a final version of the CPAH data to the Agencies.
- A meeting at the WDNR Sturtevant office was held on 21 August to discuss the sediment CPAH results for the Area of Interest in Reach 4/5. Representatives of EPA, WDNR, and Tronox were present. Tronox presented its draft statistical analysis defining sediment exceeding 15 mg/kg CPAH. Tronox agreed to provide the Agencies with a Draft Remedial Work Plan for the Area of Interest by 1 November.
- On 22 August Tronox provided the Agencies with a narrative description containing the details of the statistical analyses discussed at our 21 August meeting.
- The Wetlands delineation and rare species survey report was completed in the Area of Interest in Reach 4/5. This information will be incorporated into the Remedial Work Plan for the Area of Interest.



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Mr. Ross del Rosario U.S. EPA

Activities Anticipated During September 2008

During September Tronox anticipates the following activities:

- The semi-annual groundwater monitoring event will occur during the week of 8 September.
- Work will continue with the Draft Remedial Work Plan.
- Tronox awaits Agency comments on the draft statistical analysis presented at our 21 August meeting.
- A draft report documenting the results of the 2008 sediment sampling will be submitted to the Agencies.

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.

Thomas P. Gram

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

TPG/jlw



Mr. Ross del Rosario U.S. EPA -3-

10 September 2008

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