



JUNE 2011 PROGRESS REPORT
ANNISTON PCB SITE
(DOCKET NO. CV-02-PT-0749-E)
ANNISTON, ALABAMA

USEPA I.D. No. ALD 004 019 048

Submitted For:

Solutia Inc. and Pharmacia Corporation
702 Clydesdale Avenue
Anniston, Alabama 36201

July 8, 2011



July 8, 2011

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SENT VIA FEDERAL EXPRESS

Ms. Pamela J. Langston Scully, P.E.
Remedial Project Manager
United States Environmental Protection Agency
Anniston PCB Site Project Office
902 Noble Street
Anniston, AL 36201

**RE: June 2011 Progress Report
Anniston PCB Site (Docket No. CV-02-PT-0749-E)
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find enclosed eight (8) hard copies and ten (10) electronic copies of the June 2011 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia Corporation and the United States Environmental Protection Agency entered by the United States District Court for the Northern District of Alabama on August 4, 2003. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of June 1, 2011 through June 30, 2011. The report also describes upcoming developments anticipated for the months of July and August 2011.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Macolly", with a long, sweeping horizontal line extending to the right.

E. Gayle Macolly
Manager, Remedial Projects
Solutia Inc.

Attachments

cc: Mr. Jeffery W. Kitchens (ADEM)
Mr. G. Douglas Jones, Esq.
Mr. Thomas Dahl
Ms. Delores J. Simmons, Esq.

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1.0 INTRODUCTION

This monthly progress report has been prepared in accordance with the requirements of the Partial Consent Decree (CD) (Docket No. CV-02-PT-0749-E) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia Corporation (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003. The CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the CD, this report describes the work performed during the period of June 1 through June 30, 2011, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. This report also describes upcoming developments anticipated over the next two months, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

2.0 WORK PERFORMED DURING REPORTING PERIOD

2.1 General CD Activities

2.1.1 Administrative Submittals

A CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. The schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

2.1.2 General Activities

The Screening Level Ecological Risk Assessment (SLERA) for the residential and non-residential portions of Operable Unit (OU)-1/OU-2 of the Anniston PCB Site (dated December 23, 2005) was submitted to the EPA on January 9, 2006. The SLERA approval for OU-1/OU-2 is contingent upon results of the pending OU-4 Baseline Ecological Risk Assessment.

2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2) Residential Program

2.2.1 General

The residential program consists of residential work associated with the CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

On January 29, 2008, P/S submitted the NTC Removal Action Supplemental Sampling and Analysis Plan Addendum 3 to the EPA to incorporate the surface sampling of unsuitable properties. Verbal approval was received from the EPA in February 2008, and a formal approval is pending.

On October 27, 2008, P/S submitted the NTC Removal Action Amended Supplemental Sampling and Analysis Plan proposing, based on previous sampling results, that no additional sampling be required for residential properties not previously sampled in Zone B. On December 24, 2008, the EPA submitted comments on the NTC Removal Action Amended Supplemental Sampling and Analysis Plan. In March 2009, P/S prepared a draft response to these comments; however, the EPA deferred providing additional input pending completion of Foothills Community Partnership

(Foothills) sampling and removal activities in Zone B. On March 8, 2011, the EPA requested a revised version of the NTC Removal Action Amended Supplemental Sampling and Analysis Plan to include the additional Zone B data collected since October 2008. On April 26, 2011, P/S submitted the NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Revision 1.0. The EPA approval is pending.

P/S continue to work with the City of Anniston and Calhoun County to identify properties that have either been demolished or are scheduled for demolition. During the June 2011 reporting period, P/S received a list of additional properties from the City of Anniston that have recently been demolished or are scheduled for demolition. P/S have reviewed this information and determined one of these properties will need to be included in the active Residential Sampling Program.

On June 2, 2011, P/S convened a meeting with the EPA and the Special Master Tom Dahl to discuss the preparation of a work plan that details the Interim Institutional Controls (IC) Program for Residential properties. P/S is currently preparing the Interim IC Program for Residential properties for submittal to the EPA.

2.2.2 Residential Surface Sampling Program

2.2.2.1 Residential Sampling Access

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. There were no residential properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

2.2.2.2 Residential Sampling Activities

During this reporting period, P/S performed composite surficial soil sampling. The numbers of residential properties sampled are summarized in Table 2, and the addresses of these properties are presented in Table 3.

2.2.3 Residential Removal Properties Program

2.2.3.1 Residential Removal Access

Access activities include updating owner/tenant information and/or access request information and notifying the EPA of owner/tenant noncompliance with access requests. During this reporting period, there were several residential removal properties that had access activity performed by P/S and/or access acquisition by the EPA, which are presented in Attachment A for Zones A and B. Also during this reporting period there were notifications to the EPA for residential removal property owners and/or tenants who did not provide access within the guidelines provided in the AOC and CD which are presented in Attachment B. The access activities for this reporting period are summarized in Table 2.

Currently in Evaluation Areas 1 through 35, 18 residential properties and one Special Use property have surface composite samples with PCB results greater than or equal to 1 parts per million (ppm) that require a removal action. The description of each property's status is presented in Table 4.

Currently in Zone A, four residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 5.

Currently in Zone B, eight residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 6.

2.2.3.2 Residential Removal Activities

During this reporting period, P/S performed surface and depth sampling associated with residential removal properties in Evaluation Areas 1 through 35 and Zones A and B. A list of properties sampled during this reporting period are presented in Table 3.

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

On May 7, 2010, P/S submitted the SSSMA Interim Closure Report to the EPA. The EPA approval is pending.

2.3 OU-1/OU-2 Non-Residential Program

The Preliminary Site Characterization Summary Report for OU-1/OU-2 was submitted to the EPA on December 18, 2007. Approval from the EPA is pending, contingent upon approval of the additional groundwater investigation work described below.

A Supplemental Report on OU-1/OU-2 Non-Residential Groundwater Investigations was submitted to the EPA on March 24, 2009. The EPA approved the proposed additional investigation activities on December 3, 2009 that consisted of the installation and sampling of three new off-site groundwater monitoring wells. All work was completed during 2010, and the final report summarizing the field activities and analytical results for the OU-1/OU-2 Second Non-Residential Groundwater Investigation was submitted to the EPA on December 10, 2010. On May 16, 2011, P/S and the EPA met to discuss the results of the OU-1/OU-2 Second Non-Residential Groundwater Investigation and determine a path forward to resolve the remaining groundwater issues for OU-1/OU-2 and OU-4. Based on the discussions from this meeting, P/S agreed to review the available soil data from OU-1/OU-2 and OU-4, including areas where interim measures consisting of caps and/or covers have been installed, to identify representative locations for installing additional groundwater monitoring wells in OU-1/OU-2 and OU-4. P/S agreed to develop a work plan that includes this evaluation and a plan for installing any additional wells believed to be necessary to complete the Remedial Investigation/Feasibility Study. P/S anticipates submitting this work plan to the EPA for approval in July 2011.

2.4 11th Street Ditch

During this reporting period, P/S performed the quarterly routine inspections as described in the 11th Street Ditch Operations and Maintenance Plan. No adverse findings were noted. The next quarterly inspection is scheduled for the month of September.

2.5 Operable Unit 3 (OU-3)

The Operable Unit 3 Remedial Investigation (RI) Report, Revision 1.0 was submitted to the EPA on March 24, 2009, and the OU-3 Feasibility Study (FS) Report was submitted on May 8, 2009. The EPA provided several sets of comments on these reports, and multiple conference calls and meetings were held between the EPA and P/S to discuss and resolve outstanding issues related to EPA's comments. These issues were resolved during a meeting held between the EPA, P/S and the Technical Special Master on March 26, 2010. As a result of this meeting, the EPA issued its final set of comments on the RI and FS Reports, which was received by P/S on April 21, 2010. P/S responded to these comments and submitted the revised RI Report, Revision 2.0, to the EPA on May 20, 2010 and the revised FS Report, Revision 1.0, on June 21, 2010. Approval from the EPA is pending.

As part of the resolution process, P/S agreed to collect additional characterization/confirmation samples within OU-3 and perform a limited removal action near sample location SSRI-11 to address principal threat waste material identified in that area. Work plans for these activities were submitted by P/S to the EPA on April 6, 2010, and the EPA issued its approval of these work plans on April 7, 2010. This work was completed in April and May 2010, and P/S submitted a summary of these efforts in two RI addenda reports submitted on May 20, 2010 and May 28, 2010. Approval from the EPA is pending.

The EPA issued the Proposed Remedial Action Plan (PRAP) for OU-3 identifying the Preferred Remedial Alternatives for this operable unit dated August 2010. The EPA held a public meeting on Monday, September 13, 2010 to present the PRAP and accepted public comments through October 31, 2010. Issuance of a Record of Decision (ROD) by the EPA memorializing final cleanup requirements for OU-3 is pending.

On May 5, 2011, P/S submitted a Removal Action Work Plan for addressing elevated levels of PCBs within OU-3 prior to conducting a Facility improvement project. On May 10, 2011, the EPA submitted comments and questions on the work plan which were addressed in a letter to the EPA from P/S dated May 11, 2011. The EPA approved the work plan on June 2, 2011. During this reporting period, P/S completed the sampling portion of the Removal Action Work Plan. P/S will commence the Facility improvement project upon completion of the Removal Action. P/S

anticipates performing the Removal Action in July 2011. A report documenting the Removal Action and all sampling activities will be submitted to the EPA within 30 days of completion of the project.

2.6 Operable Unit 4 (OU-4)

Revision No. 2 of the Phase 2 Field Sampling Plan for Operable Unit 4 (OU-4 Phase 2 FSP) was submitted to the EPA for approval on April 28, 2010 including the final Sediment Toxicity Testing Plan. Final EPA approval of the OU-4 Phase 2 FSP was received on April 29, 2010. All of the field investigations identified in the OU-4 Phase 2 FSP with the exception of the sediment toxicity testing program have been implemented based on EPA's prior approval of Revisions Nos. 0 and 1 to the OU-4 Phase 2 FSP. With the exception of data that will be generated during the in-laboratory portion of the sediment toxicity testing program, all data for samples collected under the OU-4 Phase 2 FSP have been submitted to the EPA. Data for the sediment toxicity and bioaccumulation testing program are further described below.

Phase 1a of the sediment toxicity and bioaccumulation testing program conducted by the United States Geological Survey (USGS) and the United States Army Corps of Engineers (USACE) was completed in December 2010. Phase 1b of the sediment toxicity and bioaccumulation program began in mid-January 2011, and the Phase 1b bioaccumulation testing began in early February 2011. The laboratory portion of the Phase 1b sediment toxicity and bioaccumulation tests were completed in March 2011. The Phase 1b bioaccumulation tests were completed in late April 2011. All of the chemical characterization data for the sediment samples used during Phase 1a and Phase 1b of the sediment toxicity and bioaccumulation testing program have been reported with the exception of the PCB and lipid results for the *Lumbriculus* samples from the Phase 1b bioaccumulation testing. These samples have been analyzed and the results are currently being reviewed as part of the data validation process. The results will be provided to EPA once the data are validated. The sediment toxicity laboratories are projecting completion of a draft report presenting the sediment toxicity and bioaccumulation data in late September 2011.

The OU-4 Phase 3 FSP was submitted to the EPA on October 15, 2010 and approved by the EPA on February 23, 2011. The process of obtaining property access for the OU-4 Phase 3 FSP

floodplain soil sampling and evaluation of residential property use was initiated during the March 2011 reporting period and is ongoing.

2.7 Interim Measures

On September 29, 2010, P/S submitted a Scope of Work to the EPA describing proposed support activities for the Alabama Department of Transportation (ALDOT) Interstate 20 (I-20) Bridge Expansion Project over Snow Creek. The EPA approved the Work Plan on October 1, 2010. This work, which includes excavation and capping of areas affected by ALDOT's proposed bridge replacement and widening of I-20 over Snow Creek, began in early November 2010 and is expected to continue through 2013. On April 19, 2011, P/S submitted the Interstate 20 Bridge Expansion Support Work Plan Addendum No. 1 for the jack and bore installation of two casings beneath the I-20 bridge expansion area for the Oxford Water Works and Sewer Board. The EPA approved the work plan addendum on April 27, 2011. The pre-characterization sampling activities were completed and casing installation commenced during May 2011. Installation of both casings was completed on June 24, 2011. A report summarizing these activities will be submitted to the EPA within sixty days of completion.

On May 18, 2011, P/S submitted a work plan to assist the City of Anniston in their efforts to remove debris from a ditch adjacent to Snow Creek located near the intersection of 6th Street and Glen Addie Avenue. The EPA approved this work plan on May 23, 2011. P/S implemented this work plan during this reporting period. On June 30, 2011 P/S submitted a letter report documenting the field activities.

2.8 Technical Assistance Plan Grant (TAPG)

The Technical Advisor (TA), Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the Community Advisory Group (CAG) and the community. Mr. Thomas' reports are posted on the West Anniston Foundation's web site. Mr. Jerel Harris will be assisting Mr. Thomas in his role as Technical Advisor in the future.

On June 23, 2011 the West Anniston Foundation sponsored a community educational forum on the Anniston PCB Site with Ms. Gayle Macolly, Manager of Remedial Projects for Solutia, and

Ms. Pamela Scully, the USEPA Remedial Project Manager, present to answer questions from the community.

2.9 Community Advisory Group (CAG)

The CAG meeting for May was rescheduled and held on June 20, 2011. The meeting was open to the public to allow residents to observe the working session and comment or ask questions. Topics discussed by the CAG included:

- an update from the Institutional Controls Committee;
- an update from the Technical Advisor;
- an update from EPA; and
- an update from Solutia.

The next CAG meeting is scheduled for July 18, 2011.

2.10 Anniston Community Education Foundation (ACEF)

The ACEF continues to collaborate with community leaders, parents, educational foundations, religious entities, public schools and other civic organizations to assist in the process of improving the quality of education for children in the community.

3.0 WORK SCHEDULED

During the months of July and August 2011, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling activities according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site;
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties as access is provided (as necessary);
- Address action items identified by P/S, the EPA and/or the property owner/tenant for completed removal response properties (as necessary);
- Prepare residential removal packages for the 2011 Residential Removal Event;
- Prepare the OU-1/OU-2 Residential Completion Report;
- Prepare and submit the Interim IC Program for Residential properties;
- Perform CSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan;
- Perform SSSMA inspection and maintenance requirements in accordance with the approved SSSMA Operating and Closure Plan and the Interim Operations and Maintenance Plan;
- Prepare and submit a work plan for installing and monitoring additional groundwater wells for OU-1/OU-2 and OU-4;
- Implement the OU-3 Removal Action Work Plan for the Facility improvement project;
- Evaluate data generated under the sediment toxicity and bioaccumulation testing program;
- Perform chemical analysis of and data validation for tissue samples from the Phase 1b bioaccumulation testing program;
- Schedule a status update meeting with the EPA human health risk assessment team;
- Prepare a comprehensive COPC evaluation table for OU-1/OU-2 and OU-4.
- Collaborate with the EPA ecological risk assessment team on COPCs, exposure point concentrations (EPCs), exposure units (EUs), and bioaccumulation factors for the baseline ecological risk assessment (BERA);
- Conduct property access outreach activities and implement the floodplain soil sampling and residential structure evaluations in accordance with the OU-4 Phase 3 FSP;

- Perform support activities for the I-20 Bridge Expansion Project in accordance with the approved Interstate 20 Bridge Expansion Support Work Plan and Addendum;
- Prepare and submit a report summarizing the activities completed for the I-20 Bridge Expansion Support Work Plan Addendum;
- Respond to EPA comments, as necessary, on deliverables submitted to the EPA for approval;
- Continue to hold ACEF board meetings; and
- Continue regularly scheduled CAG meetings.

Tables

TABLE 1
PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Reports

Screening Level Ecological Risk Assessment (SLERA) for Operable Units 1, 2, and 3 of the Anniston PCB Site ⁽¹⁾	Submitted to EPA Partial Approval Granted	January 9, 2006 (dated December 23, 2005) November 8, 2007
Central Staging and Soil Management Area (Former Miller Property) Final Closure Report ⁽²⁾	Submitted to EPA Approval Pending	July 11, 2006
Temporary Staging and Loading Area Completion Report ⁽²⁾	Submitted to EPA Approval Pending	January 11, 2007
NTC Removal Action - South Staging and Soil Management Area Interim Closure Report	Submitted to EPA Approval Pending	May 7, 2010
Preliminary Site Characterization Summary Report for OU-1/OU-2 ⁽³⁾	Submitted to EPA Approval Pending	December 18, 2007
Report on OU-1/OU-2 Second Non-Residential Groundwater Investigation	Submitted to EPA Approval Pending	December 10, 2010
Remedial Investigation Addendum - Area A Removal Action, Remedial Investigation and Feasibility Study for Operable Unit-3	Submitted to EPA Approval Pending	May 20, 2010
Remedial Investigation Addendum - South Landfill Cap Assessment and West End Landfill Confirmation Sampling, Remedial Investigation and Feasibility Study for Operable Unit-3	Submitted to EPA Approval Pending	May 28, 2010
Report on Remedial Investigation for Operable Unit 3 Rev 2.0	Submitted to EPA Approval Pending	May 20, 2010
Operable Unit 3 Feasibility Study Report Rev 1.0	Submitted to EPA Approval Pending	June 21, 2010
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA Approval Pending	June 30, 2010
Sediment Sampling for Debris Removal from Ditch Adjacent to Snow Creek, Anniston PCB Site, Anniston, Alabama	Submitted to EPA	June 30, 2011
May 2010 Progress Report	Submitted to EPA	June 9, 2011

Work Plans

NTC Removal Action Supplemental Sampling and Analysis Plan Addendum 3	Submitted to EPA Approval Pending	January 29, 2008
NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Rev. 1.0	Submitted to EPA Approval Pending	April 26, 2011
Removal Action Work Plan for Addressing Elevated Levels of PCBs within Operable Unit 3 (Facility Improvement Project), Anniston PCB Site, Anniston, Alabama	Submitted to EPA Comments Received Responses Submitted to EPA Approval Received	May 5, 2011 May 10, 2011 May 11, 2011 June 2, 2011

Notes:

- ⁽¹⁾ The approval for OU-1/OU-2 is contingent upon the results of the OU-4 Baseline Ecological Risk Assessment.
⁽²⁾ The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-1/OU-2.
⁽³⁾ The approval is pending the completion of the Human Health Risk Assessment and the additional groundwater investigation.

TABLE 2

**RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE**

Anniston, Alabama

Residential Surface Sampling Program (Evaluation Areas 1-35)⁽¹⁾	June 2011
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	1
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results \geq 1 ppm	0
Total no. of properties with PCB surface results \geq 1 ppm ⁽²⁾	18
Total no. of properties with PCB surface results < 1 ppm	1229

Residential Removal Action Program (Evaluation Areas 1-35)⁽¹⁾	June 2011
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	8
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of removal action properties Unsuitable for Removal	26
Total no. of removal action properties completed by Solutia (as part of AOC and CD)⁽³⁾	366
Total no. of > 1 ppm PCBs removal action properties completed by EPA (confirmed)	7

Residential Surface Sampling Program (Special Use Properties - Evaluation Areas 1-35)	June 2011
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	0
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results \geq 1 ppm in High Activity Areas	0
Total no. of properties with PCB surface results \geq 1 ppm in High Activity Areas	1
Total no. of properties with PCB surface results < 1 ppm in High Activity Areas	24

Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)	June 2011
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, and/or confirmatory samples were collected	1
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	7

TABLE 2

**RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE
Anniston, Alabama**

Residential Removal Action Program (Lead Site AOC Zone A)	June 2011
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	1
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	1
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	440
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	4
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	76
Total no. of removal action properties Unsuitable for Removal	3
Residential Removal Action Program (Lead Site AOC Zone B)	June 2011
No. of properties where access has been requested for removal action activities	1
No. of properties where total access has been granted for removal action activities	2
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	2
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	525
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	8
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	108
Total no. of removal action properties Unsuitable for Removal	6

Notes:

⁽¹⁾ Evaluation Areas 1 through 34 also represents the Lead Site AOC Zones C and D.

⁽²⁾ Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

⁽³⁾ This total includes 3 Appendix 6 properties within Evaluations Areas 1-35 where removals were completed by Solutia.

TABLE 3
RESIDENTIAL PROPERTIES SAMPLED
ANNISTON PCB SITE
Anniston, Alabama

Evaluation Areas 1-35 Residential Surface Sampling Program

Parker Street (11-22-01-11-1-9)

Evaluation Areas 1-35 Residential Removal Action Program

1024 W 15th Street
1100 Hunter Street
1826 W 11th Street
2311 Jefferson Street
2405 Jefferson Street
909 Pipe Street
910 Pipe Street
923 Lehman Avenue

Evaluation Areas 1-35 Special Use Removal Action Program

W 10th Street (11-22-01-12-01-3-1)

Zone A Residential Removal Action Program

Marshall Street (11-22-01-11-6-3)

Zone B Residential Removal Action Program

2403 Wilmer Avenue
605 S Marshall Street

TABLE 4

**PROPERTY STATUS FOR PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS FOR SURFACE COMPOSITE
SAMPLES IN EVALUATION AREAS 1-35
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	EVALUATION AREA	GIS PARCEL ID	PROPERTY STATUS
Residential Program			
1024 W. 15th Street	22	609	Depth Data Pending
1010 Pipe Street	16	1853	Non-Responsive
918 McDaniel Avenue	11	2217	Non-Responsive
2414 W Jefferson Street	13	3395	Non-Responsive
807 Bancroft Avenue	34	2443	Non-Responsive
510 Legrande Street	13	3070	On Hold
Ashley Street (11-22-01-12-03-1-36)	13	3109	On Hold
631 Roxie Avenue	9	7717	Owner Declined Access During Removal Initiation
2106 W. 10th Street	15	2128	Owner Declined Removal Access
608 Zinn Pkwy Drive	11	2755	Owner Declined Removal Access
916 McDaniel Avenue	11	2254	Owner Declined Removal Access
1627 W. 13th Street	21	1061	Owner Declined Removal Access
1204 Ferron Street	18	1372	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) ⁽¹⁾	21	973	Owner Not Found
402 Hunter Street	31	3542	Owner Not Found
509 W. 13th Street	24	1136	Owner Not Found
716 Montrose Avenue ⁽²⁾	11	2500	Owner Not Found
1207 Crawford Avenue	19	1308	Removal Package Being Prepared
Special Use Program			
W. 10th Street (11-22-01-12-01-3-1)	11	2113	Depth Data Pending

Notes:

⁽¹⁾ Portions of property are no longer unsuitable for removal⁽²⁾ Property requires additional removal at the site of the former structure

TABLE 5

PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD
RESULTS FOR SURFACE COMPOSITE SAMPLES IN ZONE A
ANNISTON PCB SITE
Anniston, Alabama

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
Marshall Street (11-22-01-11-6-3)	2532	Depth Data Pending	Foothills Community Partnership
124 W. 18th Street	207123	Owner Declined Access During Removal Initiation	EPA
2331 W. 13th Street	1099	Owner Declined Removal Access	Foothills Community Partnership
0 Golden Springs Road	533058	Owner Declined Removal Access	Foothills Community Partnership

TABLE 6

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD
RESULTS FOR SURFACE COMPOSITE SAMPLES IN ZONE B
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
861 Old Coldwater Road	213610	Access Granted, Depth Sampling Pending	Foothills Community Partnership
2540 Wilmer Avenue	204152	Access Granted, Depth Sampling Pending	Foothills Community Partnership
605 S. Marshall Street	5039	Depth Data Pending	Foothills Community Partnership
2403 Wilmer Avenue	204126	Depth Data Pending	Foothills Community Partnership
318 Glen Addie Avenue	3567	Non-Responsive	Foothills Community Partnership
3002 Jefferson Street	3410	Owner Declined Removal Access	Foothills Community Partnership
511 Cheryl Drive	212735	Owner Declined Removal Access	Foothills Community Partnership
2705 Wilmer Avenue	204090	Removal Access In Progress	Foothills Community Partnership

Attachment A
Residential Removal Properties Access Update
Zones A and B

RESIDENTIAL REMOVAL PROPERTIES ACCESS UPDATE - ZONES A AND B

Anniston PCB Site
Consent Decree

Sampling Letter			Access Granted?	EPA Notified	Days Out
Sent	Signed For	Returned			

EPA Zone: A

Marshall St (11-22-01-11-6-3)

2532: 11-22-01-11-6-3, Eval. Area: -, EPA Zone: A

35933 > Owner	[REDACTED]	5/31/2011	5/31/2011	6/7/2011	<input checked="" type="checkbox"/>	--
	{Access obtained by EPA}					

EPA Zone: B

2540 Wilmer Ave

204152: 11-18-09-32-03-3-23, Eval. Area: -, EPA Zone: B

63388 > Owner	[REDACTED]	6/9/2011	6/9/2011	6/9/2011	<input checked="" type="checkbox"/>	--
63387 > Tenant	[REDACTED]	5/24/2011	6/9/2011	6/9/2011	<input checked="" type="checkbox"/>	--
	{Tenant waived dust sampling}					

861 Old Coldwater Rd

213610: 11-22-05-16-1-28, Eval. Area: -, EPA Zone: B

63385 > Owner	[REDACTED]	5/31/2011	5/31/2011	6/8/2011	<input checked="" type="checkbox"/>	--
	{Access obtained by EPA}					

Yes No NA

Attachment B

Removal Action – EPA Notification of Noncompliance

REMOVAL ACTION - EPA NOTIFICATION OF NONCOMPLIANCE

Anniston PCB Site
Consent Decree

509 W 13th St

1136: 11-21-03-06-04-5-17, Eval. Area: 24, EPA Zone: C

47329 > Owner



716 Montrose Ave

2500: 11-22-01-12-01-3-64, Eval. Area: 11, EPA Zone: D

46072 > Owner



Care of Katie Jackson

2705 Wilmer Ave

204090: 11-18-09-32-03-2-16, Eval. Area: -, EPA Zone: B

63379 > Owner



Care of Lester Avery