



August 9, 2017

SENT VIA FEDERAL EXPRESS

Ms. Pamela J. Langston Scully, P.E.
Remedial Project Manager
United States Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

**RE: July 2017 Progress Report
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find enclosed five (5) hard copies and five (5) electronic copies of the July 2017 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003 and the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of July 1, 2017 through July 31, 2017. The report also describes upcoming developments anticipated for the months of August and September 2017.

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 Harris".

E. Gayle Macolly Harris
Manager, Remedial Projects
Solutia Inc.

Attachments

cc: Mr. Chip Crockett (ADEM)
Mr. G. Douglas Jones, Esq.
Mr. Thomas Dahl



JULY 2017 PROGRESS REPORT

ANNISTON PCB SITE

(DOCKET NO. 1:02-cv-0749-KOB)

ANNISTON, ALABAMA

USEPA I.D. No. ALD 004 019 048

Submitted For:

Solutia Inc. and Pharmacia LLC

702 Clydesdale Avenue

Anniston, Alabama 36201

August 9, 2017

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1.0 INTRODUCTION

1.1 2003 Partial Consent Decree

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 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 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 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 2003 CD, Section 2.0 of this report describes the work performed during the period of July 1, 2017 through July 31, 2017, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of July 1, 2017 through

July 31, 2017, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.2 of this report describes the upcoming developments anticipated over the next two months for the work that will be required by the OU-3 RD/RA CD including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD

2.1 General 2003 CD Activities

2.1.1 Administrative Submittals

A 2003 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. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

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 2003 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 July 14, 2017, P/S submitted Addendum Number 2 of the NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site (NTC Completion Report, Addendum No. 2) detailing the work completed in 2016. EPA approval is pending.

During this reporting period, P/S continued to work with the local municipalities and property owners to implement the approved NTC Removal Action Interim Institutional Control Program for Residential Properties (Interim IC Program).

2.2.2 Residential Removal Properties Program

2.2.2.1 Residential Removal Access

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. During this reporting period, there were no access activities.

Currently there are 15 residential properties in the Residential Removal Properties Program where access has not been granted. The properties are summarized in Table 2, and a description of each property's status is presented in Table 3.

2.2.2.2 Residential Removal Activities

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in Evaluation Areas 1-35 and Zones A and B.

During this reporting period, P/S' residential removal contractor Allen Hall Excavating completed a removal action at 114 Monsanto Road in Evaluation Areas 1-35.

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

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

There was no activity during this reporting period.

2.4 11th Street Ditch

P/S will perform the next quarterly routine inspections as described in the 11th Street Ditch Operations and Maintenance Plan in the month of September 2017.

2.5 Operable Unit 4 (OU-4)

Currently there is one residential property in the OU-4 Residential Removal Properties Program where access has not been granted. The property's status is presented in Table 4.

P/S submitted the revised OU-4 Baseline Ecological Risk Assessment (BERA) on October 28, 2016. On May 15 and 16, 2017, P/S, the EPA and the Technical Special Master for the Court met to discuss the EPA's draft comments to the OU-4 BERA. As a result of this meeting, the EPA proposed preparing an Addendum to the OU-4 BERA to facilitate final approval of the OU-4 BERA and further the Remedial Investigation (RI) process. On June 16, 2017, the EPA

forwarded a draft outline of the OU-4 BERA Addendum which they estimate will be complete in mid-August for review. On June 26, 2017, P/S transmitted the information the EPA requested during the May meeting to assist in preparing the OU-4 BERA Addendum.

P/S are currently working with the Anniston Water Works and Sewer Board (AWWSB) to identify support work associated with a capital improvement project at the Choccolocco Creek Waste Water Treatment Plant (CCWWTP). P/S submitted a soil sampling plan on May 8, 2017 to the EPA. On May 12, 2017, the EPA provided comments on the proposed sampling plan. P/S submitted a revised sampling plan on June 30, 2017. P/S and the EPA met on July 18, 2017 to discuss the sampling plan in more detail. On July 19, 2017, the EPA approved the sampling plan based on clarifications that are documented in the approval letter. P/S initiated the soil sampling on July 25, 2017. The sampling is expected to continue through the month of August. P/S will prepare a summary report for submittal to the EPA once all data are received and validated.

Support work for the City of Oxford Maintenance Building Construction Project commenced on March 21, 2017 and was completed on April 27, 2017. P/S submitted a construction completion report on June 22, 2017, and a revised construction completion report on June 29, 2017 to address minor editorial errors. On July 20, 2017, the EPA approved the Maintenance Building Construction Project Completion Report.

2.6 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.

On September 12, 2017, the West Anniston Foundation will hold a community education forum with members of the community to discuss the cleanup of the Anniston PCB Site. The meeting will be facilitated by the TA.

2.7 Community Advisory Group (CAG)

A regularly scheduled CAG meeting was held on July 18, 2017. The meeting was open to the public to allow residents to observe the working session and comment or ask questions. Topics discussed at the CAG meeting included:

- an update from the EPA;
- an update from Solutia;
- an update from the Technical Advisor; and
- an update from the CAG Board President.

The next CAG meeting is scheduled for September 19, 2017.

3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD

3.1 General OU-3 RD/RA CD Activities

3.1.1 Administrative Submittals

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 5.

The EPA, P/S and the Court appointed Technical Special Master met on October 31, 2016 to discuss the proposed design modification to address the seep and evaluate potential additional data requirements. On February 28, 2017, P/S submitted the OU-3 Data Collection Work Plan (Seep Area) to address the source of the seep area observed at the South Landfill. On April 5, 2017, the EPA submitted comments on the OU-3 Data Collection Work Plan. P/S met with the EPA on May 17, 2017 to discuss the comments on the OU-3 Data Collection Work Plan. As a result of the meeting, P/S are currently preparing a new work plan to evaluate the source of the seep. Additionally, P/S are evaluating the permits that may be required pending a final decision on the path forward to address the seep.

3.2 Remedial Action

Work continued on the OU-3 RA Cover Systems Project and Groundwater Systems Project throughout the month of July. The following items were performed by the RA Contractor during this reporting period:

- Prepared for the seep intercept trench installation.

4.0 WORK SCHEDULED

4.1 2003 CD Work Activities

During the months of August and September 2017, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Address action items identified by P/S, the EPA and/or the property owner/tenant for completed removal response properties (as necessary);
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11th Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Continue to implement the soil sampling plan for the capital improvement project at the CCWWTP and prepare a summary report;
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval;
- The Technical Advisor will host a Community Education Forum on September 12, 2017; and
- The CAG will hold a regularly scheduled meeting on September 19, 2017.

4.2 OU-3 RD/RA CD Work Activities

During the months of August and September 2017, the following work elements are anticipated:

- Prepare a new work plan to evaluate the source of the seep at the PCB cells;
- Conveyance pipe design and installation for CTS #3 and the Seep Area; and
- Begin installation of the seep intercept trench.

TABLES

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

Administrative Issues

Reports

Central Staging and Soil Management Area (Former Miller Property) Final Closure Report ⁽¹⁾	Submitted to EPA Approval Pending	July 11, 2006
Temporary Staging and Loading Area Completion Report ⁽¹⁾	Submitted to EPA Approval Pending	January 11, 2007
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA Approval Pending	May 2, 2012
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA Comments Received Revision Submitted	July 31, 2012 May 16, 2013 November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA Approval Pending	July 14, 2017
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 6	Submitted to EPA Approval Pending	May 30, 2017
Snow Street Drainage Improvement Project Completion Report	Submitted to EPA Approval Pending	April 13, 2017
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA Approval Pending	June 30, 2010
Baseline Ecological Risk Assessment for OU-4	Submitted to EPA Comments Received Revision Submitted Approval Pending	August 14, 2015 June 30, 2016 October 28, 2016
Former Holiday Inn Redevelopment Project Completion Report ⁽²⁾	Submitted to EPA Approval Pending	November 20, 2013
Miracle Field Construction Completion Report ⁽²⁾	Submitted to EPA Approval Pending	June 19, 2014
Anniston Regional Airport Fence Installation Project Completion Report ⁽²⁾	Submitted to EPA Approval Pending	July 23, 2014
Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report ⁽²⁾	Submitted to EPA Approval Pending	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report ⁽²⁾	Submitted to EPA Approval Pending	November 5, 2014
Maintenance Building Construction Project Completion Report ⁽²⁾	Submitted to EPA Revision Submitted Approval Received	June 22, 2017 June 29, 2017 July 20, 2017
June 2017 Progress Report	Submitted to EPA	July 7, 2017

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

Work Plans

Alternative Removal Action Workplan For the 510 LeGrande Street and 0 and 505 Ashley Street Properties	Submitted to EPA Approval Pending	July 3, 2013
Anniston Water Works and Sewer Board Dewatering Facility Project Sampling Plan	Submitted to EPA Comments Received Revision Submitted Approval Received	May 8, 2017 May 12, 2017 June 30, 2017 July 19, 2017

Notes:

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- ⁽¹⁾ The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-1/OU-2.
⁽²⁾ The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.

TABLE 2

**OU-1 RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE
Anniston, Alabama**

Residential Removal Action Program (Evaluation Areas 1-35) ⁽¹⁾	July 2017
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
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 surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	1
No. of properties where removal actions are in progress	0
Total no. of properties with PCB surface results < 1 ppm	1231
Total no. of properties with PCB surface results ≥ 1 ppm ⁽²⁾⁽³⁾	12
Total no. of removal action properties Unsuitable for Removal	21
Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)	11
Total no. of removal action properties completed by Solutia (as part of AOC and CD) ⁽³⁾⁽⁴⁾	372
Total no. of > 1 ppm PCBs removal action properties completed by EPA (confirmed)	8
<hr/>	
Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)	July 2017
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 demo samples were collected	0
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 properties with PCB surface results < 1 ppm in High Activity Areas	24
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	9
<hr/>	
Residential Removal Action Program (Lead Site AOC Zone A)	July 2017
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 where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
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	2
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)	80
Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)	2
Total no. of removal action properties Unsuitable for Removal	2

TABLE 2
OU-1 RESIDENTIAL PROGRAM SUMMARY
ANNISTON PCB SITE
Anniston, Alabama

Residential Removal Action Program (Lead Site AOC Zone B)	July 2017
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 where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
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	1
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)	119
Total no. of removal action properties Unsuitable for Removal	4

Notes:

⁽¹⁾ Evaluation Areas 1-34 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 three properties where removals have previously been completed, but additional removals are required in the footprint of former structures.

⁽⁴⁾ This total includes 3 Appendix 6 properties within Evaluations Areas 1-35 where removals were completed by Solutia.

TABLE 3

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D
ANNISTON PCB SITE
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
1010 Pipe Street	1853	16	D	Non-Responsive
807 Bancroft Avenue	2443	34	D	Non-Responsive
918 McDaniel Avenue	2217	11	D	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
2106 W. 10th Street	2128	15	D	Owner Declined Removal Access
0 Golden Springs Road	533058	-	A	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
1204 Ferron Street	1372	18	C	Owner Not Found
509 W. 13th Street	1136	24	C	Owner Not Found
716 Montrose Avenue ⁽²⁾	2500	11	D	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) ⁽¹⁾	973	21	C	Owner Not Found
621 Pine Street ⁽²⁾	2820	3	C	Owner Not Found
1407 Glen Addie Avenue ⁽²⁾	765	24	C	Owner Not Found

Notes:

⁽¹⁾ Portions of property are no longer unsuitable for removal

⁽²⁾ Property requires additional removal at the site of the former structure

TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS
FOR SURFACE COMPOSITE SAMPLES IN OU-4
ANNISTON PCB SITE
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

TABLE 5
OU-3 CONSENT DECREE SUBMITTAL SCHEDULE
ANNISTON PCB SITE
Anniston, Alabama

Administrative Issues

Request to Connect to City of Anniston Sewer System	Submitted to AWWSB Approval Pending	May 12, 2016
OU-3 Data Collection Work Plan (Seep Area)	Submitted to EPA Comments Received	February 28, 2017 April 5, 2017
