

September 18, 2002

Solutia Inc.
702 Clydesdale Avenue
Anniston, Alabama 36201-5328

Tel 256-231-8400

Mr. Wm. Gerald Hardy, Chief Land Division Alabama Department Of Environmental Management 1400 Coliseum Boulevard Montgomery, Alabama 36110

Re: Oxford Lake Softball Complex Parking Lot - Interim Measures Report

Solutia Inc.

Anniston, Alabama

USEPA ID ALD 004 019 048

Dear Mr. Hardy:

Please find enclosed three (3) copies of the *Interim Measures Report* for the Oxford Lake Softball Complex Parking Lot describing the actions completed pursuant to the April 24, 2001 *Removal Action Work Plan for the Stockpiled Soil at the Oxford Lake Softball Complex* (Work Plan). The interim measures were completed in accordance with the Work Plan with the following exceptions:

- The proposed 12-inch base course of aggregate for the multi-layer asphalt cover did not compact sufficiently to support the asphalt cap; therefore, an additional course consisting of 14 inches of 3-inch aggregate overlain by 4 inches of crushed aggregate was placed over the original aggregate base course and compacted prior to installation of the two-layer asphalt cover.
- The French drain around the parking lot perimeter was modified to include a 4-inch perforated polyvinyl chloride (PCV) drainpipe within the 8 inches of gravel to facilitate drainage, and was subsequently paved after the vegetation on the soil cover was well established.
- The walkway between the parking lot and the softball fields was paved to facilitate handicap access and eliminate maintenance of the gravel.

Should you have any questions regarding this enclosure, please call me at (256) 231-8404.

Sincerely,

Craig R. Branchfield

Manager, Remedial Projects

PARKING LOT MULTI-LAYER COVER INTERIM MEASURES REPORT

Oxford Lake Softball Complex Anniston, Alabama

September 18, 2002

Prepared for:

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

1400 Coliseum Boulevard Montgomery, Alabama 36110

Prepared by:

ROUX ASSOCIATES, INC.

1222 Forest Parkway, Suite 190 West Deptford, New Jersey 08066



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FIGURES

- 1. Site Location Map
- 2. As-Built Parking Lot

APPENDICES

- A. Genesis Project, Inc. Sampling Report November 16, 2001
- B. Example Inspection Log

1.0 INTRODUCTION

This Interim Measures Report has been prepared pursuant to the requirements of Condition III.F.3.b of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA) Post Closure and Corrective Action Permit for the Solutia Inc. (Solutia) Facility (the facility) located in Anniston, Alabama (RCRA Permit # ALD 004 019 048). It summarizes the details of the interim measures that were completed at the Oxford Lake Softball Complex (the Complex), specifically, the construction of the new parking lot adjacent to the ball fields during the period of June to October 2001.

These measures were proposed by Solutia to contain soil excavated from the adjacent softball fields. The details of the Interim Measures were provided in a Removal Action Work Plan for the Stockpiled Soil at the Oxford Lake Softball Complex (Work Plan) that was submitted to the Alabama Department of Environmental Management (ADEM) and United States Environmental Protection Agency (USEPA) on April 24, 2001. The Interim Measures were completed in accordance with the April 24, 2001 Work Plan. Solutia maintains the documentation of the project at its Anniston, AL facility.

The Complex is a city-owned community recreational area located in Oxford, Alabama (Figure 1). There are two areas at the Complex: an athletic field area in the eastern portion (approximately 9 acres) and an open area located in the western portion adjacent to Snow Creek (approximately 16 acres). The athletic area consists of four fenced softball fields.

Information obtained during Solutia's Phase I Off-Site Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) indicated that there was a potential for polychlorinated biphenyls (PCBs) to have been deposited in the Snow Creek flood plain at the Complex. Solutia previously excavated soil from the softball fields and replaced it with clean fill. The excavated soils were stockpiled in the adjacent open area. The interim measures proposed for this area included permanently containing the stockpiled soil with a multi-layer cover consisting of asphalt finished as a parking lot and landscaped soil.

2.0 INTERIM MEASURES

This section describes the interim measures completed at the Parking Lot. Figure 2 shows the As-Built Plan of the Parking Lot.

2.1 Stockpiled Soil Regrading

Prior to implementing the removal action, Solutia submitted a request to ADEM to include the proposed construction activities under its existing National Pollutant Discharge Elimination System (NPDES) General Permit ALG610000 (ALR105784) previously obtained for the ball field excavation work. In correspondence dated May 25, 2001, ADEM approved the extension of the above-referenced permit to cover the proposed construction activities. Solutia met all the permit requirements throughout the construction program.

Where necessary, the existing ground surface located within the footprint of the proposed parking lot area was cleared of vegetation and debris. The vegetation was cut at ground surface. The stockpiled soil was then consolidated in the area of the planned parking lot. The upper two inches of the native soil beneath the geotextile on which the soil was stockpiled was excavated to ensure that the stockpiled soil was removed. The Work Plan specified that excavated soil containing greater than 50 milligrams per kilogram (mg/kg) total PCBs would be disposed off site. Based on the results of the RFI sampling, no soils within the footprint of the parking lot contained more than 50 mg/kg total PCBs. Soils excavated from the adjoining ball fields that contained greater than 50 mg/kg total PCBs were segregated and disposed off site at the TSCA-approved Chemical Waste Management landfill in Emmelle, Alabama at the time of excavation and were not stockpiled in the open area.

In addition, soil samples were collected from the areas of excavation planned for the construction of the footbridge and the apron at the entrance form Recreation Drive. Genesis Project, Inc. collected soil samples on three occasions and screened them for total PCBs. Soil samples were also submitted to STL Savannah Laboratories for confirmation analysis of PCBs. The analytical results indicated that all PCB concentrations were less than 50 mg/kg. A copy of the analytical report and laboratory data sheets is included in Appendix A. Therefore, no soils from the parking lot area or the stockpile were disposed off site and the soil excavated for the footings of the footbridge were consolidated with the parking lot.

The stockpiled soil was re-graded to an elevation approximately 3 feet above then existing grade. The soil was sloped along the flanks of the planned parking lot to meet the existing grade. To the north, the soil was graded for installation of an access road from Recreation Drive.

2.2 Soil Cover

A multi-layer soil cover was constructed in those areas that will not be used for vehicular traffic in accordance with the specifications detailed in the Work Plan. The soil cover included non-woven geotextile placed over the stockpiled soil and covered with a minimum 12 inches of soil covered with grass sod. The minimum 12-inch compacted layer of soil was placed to grades that maintained the pre-construction surface-water runoff directions. The extent of the multi-layer soil cover is shown on Figure 2.

2.3 Multi-Layer Asphalt Cover

The multi-layer asphalt cover was constructed of non-woven geotextile fabric placed over the stockpiled soil as a base marker layer and covered with 12 inches of crushed aggregate base course. Following placement of the non-woven geotextile layer, the aggregate was compacted with a smooth drum roller. The 12-inch base course, however, did not sufficiently compact to support the asphalt cap; therefore, an additional course consisting of 14 inches of 3-inch aggregate overlain by 4 inches of crushed aggregate was placed over the original base course and compacted. APAC-Alabama Inc. subsequently installed a two-layer asphalt cover consisting of a 2-inch base course overlain by a 1-inch surface course.

2.4 French Drain System

A gravel-filled French drain was installed around the perimeter of the asphalt cover to re-direct surface runoff to prevent erosion of the soil cover until the vegetation was established and to facilitate drainage of the gravel aggregate under the asphalt cover. The drain is two-feet wide by approximately 8 inches deep. A 4-inch diameter perforated PVC drainpipe was installed in the gravel to facilitate drainage. The base of the drain is covered with non-woven geotextile. Beneath the geotextile is the soil cover. The French drain around the perimeter of the parking lot is connected to drainage ways that convey the surface runoff beyond the base of the soil cover. The drainage discharges onto native soil at the existing grade beyond the soil cover limits. The

location of the French drain system is shown on Figure 2. Following construction, routine inspections of the soil cover confirmed that the vegetation on the soil cover was well established and that the French drain system was no longer necessary to control runoff. As the gravel of the French drain was often a hindrance to mowing the grass and to minimize future maintenance, Solutia paved the surface of the French drain in August 2002. The paving consisted of a 2-inch base course overlain by a 1-inch surface course and seamed with the asphalt cover. The piping was left in place to facilitate drainage of the gravel sub-base beneath the asphalt cover. Figure 2 shows the extent of the multi-layer asphalt cover and French drain.

2.5 Public Access Ways

An access road was constructed connecting the parking lot to Recreation Drive. A culvert was installed in the drainage channel along Recreation Drive to facilitate stormwater conveyance beneath the access road. The access road was constructed with non-woven geotextile fabric placed over the multi-layer soil cover. An 8-inch layer of crushed aggregate was placed over the geotextile. The access road was completed with 3 inches of asphalt. The location of the access road is shown on Figure 2.

A pedestrian walkway and footbridge were constructed to provide access to the softball fields from the parking lot. The walkway was constructed of 4 inches of crushed gravel placed over the multi-layer soil cover. The footbridge is constructed of pressure-treated lumber. The locations of the walkway and footbridge are shown on Figure 2. The walkway was paved in August 2002 to facilitate handicap access and to eliminate maintenance of the gravel. The paving consisted of a 2-inch base course overlain by a 1-inch surface course.

3.0 INSPECTION AND MAINTENANCE

3.1 Responsibilities

A representative of Solutia will inspect the site at the frequencies described below. The City of Oxford will perform the routine activities that may include mowing the grass, fertilizing the vegetated areas, and periodic re-surfacing of the asphalt cover. Solutia will perform non-routine repairs.

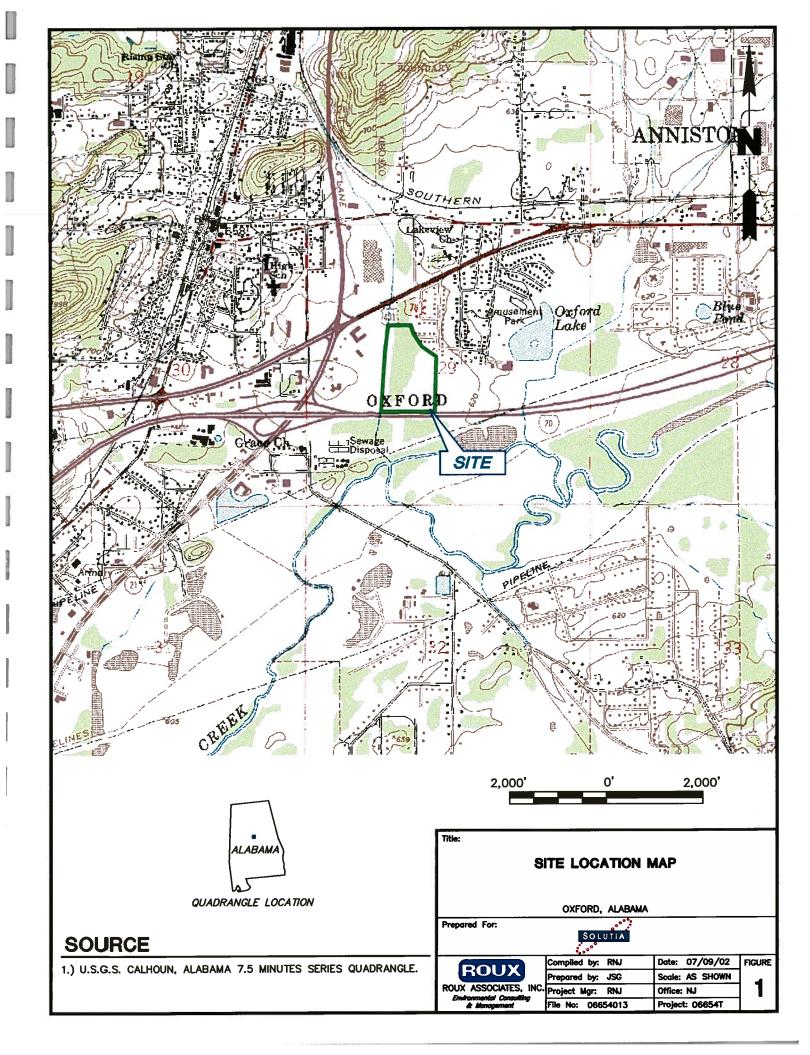
3.2 Inspections

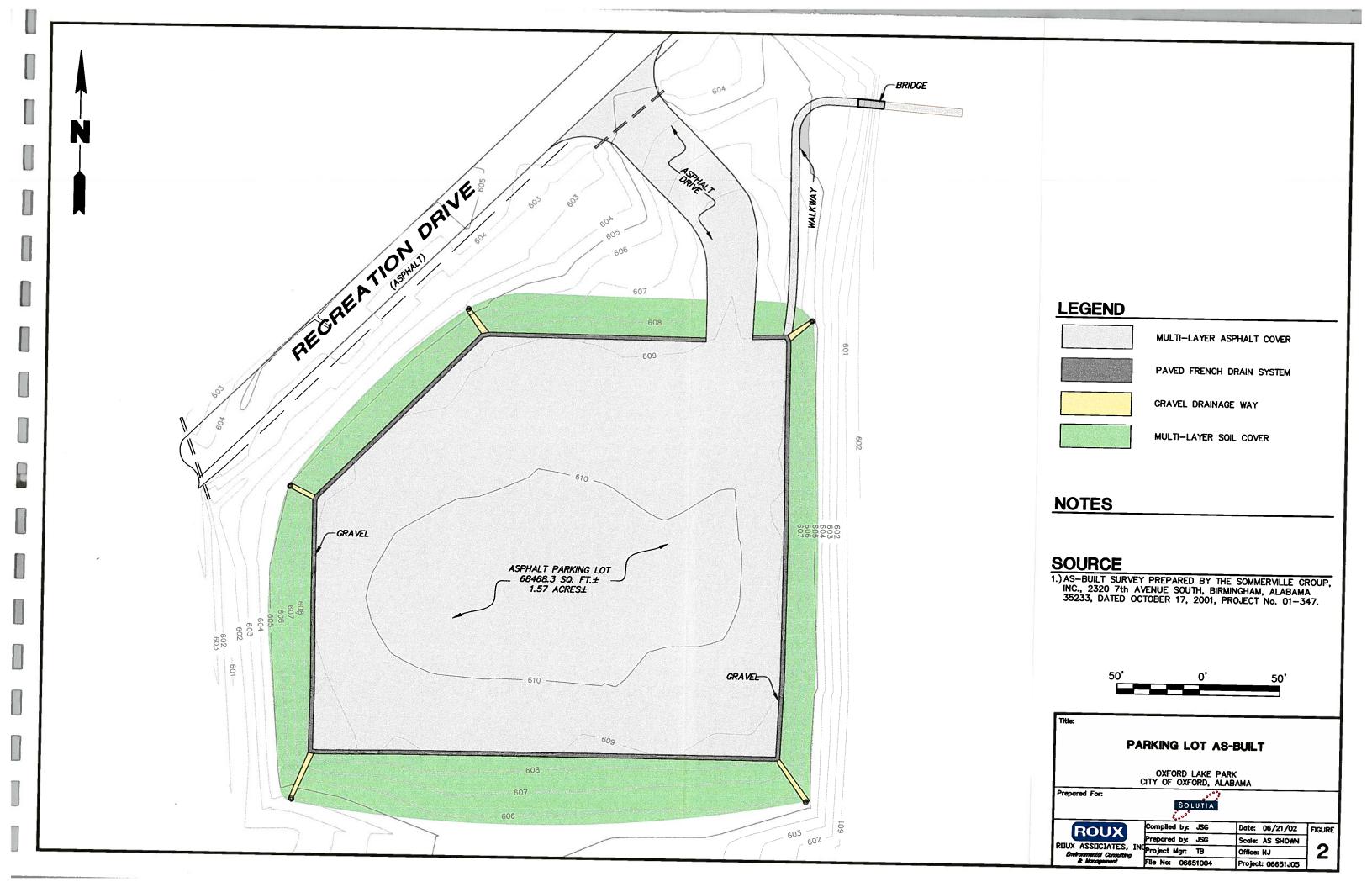
The asphalt and soil multi-layer covers will be inspected semi-annually and following significant storm events (defined as greater than 3 inches in 24 hours) for indications of integrity compromise such as excessive settlement, erosion, cracking and exposed soil. The downgradient drainage and culverts will be inspected for signs of debris accumulation and obstructions. Maintenance activities performed on a regular basis, such as mowing the grass, will not be noted on the inspection logs as these activities are considered ongoing events.

The inspections will be documented on an inspection log and maintained at the Solutia plant. The log will include the date and time of the inspection, the name of the inspector and notes on the general observations noting in particular items that need repair or maintaining. The inspection logs will be maintained at the Solutia site. An example inspection log is included as Appendix B.

3.3 Repairs and Maintenance

Within two weeks of the inspection, the inspector will notify the City of Oxford of routine repairs or Solutia of non-routine repairs. The inspection log will identify the action items, the responsible entity, the date of notification to the City of Oxford or the Solutia work order request, and the date the action item was completed.





APPENDIX A

GENESIS PROJECT, INC. SAMPLING REPORT - NOVEMBER 16, 2001

Memo

To: Craig Branchfield, Solutia

From: Michael Price, Genesis Project, Inc.

CC: Jerry Hopper, Solutia

Tim Joness, Maverick Construction Management

Date: November 16, 2001

Re: Oxford Lakes Softball Complex Parking Lot Soil Sampling, Oxford, AL

During August and September 2001, Genesis Project, Inc. completed three soil sampling events involved with the construction of a parking lot at the Oxford Lakes Softball Complex. These sampling events were conducted to characterize soils within known areas of PCB contamination for soil management purposes. Prior to each sampling event both the boundaries of the area of excavation and scope of work were discussed with Mr. Tim Joness of Maverick Construction.

Sampling Procedures

Sampling Event 1. (August 22, 2001)

The first sampling event was conducted prior to the construction of a pedestrian bridge leading from the new parking lot to the softball complex. Four soil samples (OLBR-1 through OLBR-4) were collected at the proposed bridge footing locations. Each soil sample was collected at a depth of 0-12" using a stainless steel hand auger and thoroughly mixed in a stainless steel bowl with a stainless steel spoon before being placed into a certified clean sample jar. All sample locations are depicted in Figure 1.

Sampling Event 2. (September 10, 2001)

The second sampling event involved the assessment of excavated material during the installation of the pedestrian bridge footings. Aliquots were collected from the excavated material every five minutes over the duration of the excavation and combined to form one composite soil sample (OLFBEX-1). Each aliquot was collected using a stainless steel spoon and thoroughly mixed in a stainless steel bowl before being placed into a certified clean sample jar. The area of excavation is depicted in Figure 2.

Sampling Event 3. (September 20, 2001)

The third sampling event was completed during the construction of the parking lot entrance along Recreation Drive. Aliquots were collected from the excavated material and combined to

form one composite sample (DWEX-1). Each aliquot was collected using a stainless steel spoon and thoroughly mixed in a stainless steel bowl before being placed into a certified clean sample jar. The area of excavation is depicted on Figure 2.

Soil Sample Analyses

Following the completion of each sampling event, all soil samples were field screened for PCBs greater than or equal to 1 ppm and greater than or equal to 50 ppm by USEPA Method 4020. All soil samples screened greater than 1ppm but less than 50 ppm. Soil samples collected during sampling events 2 and 3 were submitted to Severn Trent Laboratories in Savannah, GA for PCB analysis by USEPA Method 8082. The laboratory results, which were summed for all aroclors to give a total PCB concentration for each sample, are presented along with the field screening data in Table 1. The laboratory results confirmed the screening results. Based on the results, the soils from these excavations were incorporated into the parking lot construction. All laboratory analytical reports are presented in Attachment 1.

Table 1. Analytical and Field Screening Results for Soil Samples Collected During the Construction of the Parking Lot at Oxford Lakes Softball Complex, Oxford, Alabama.

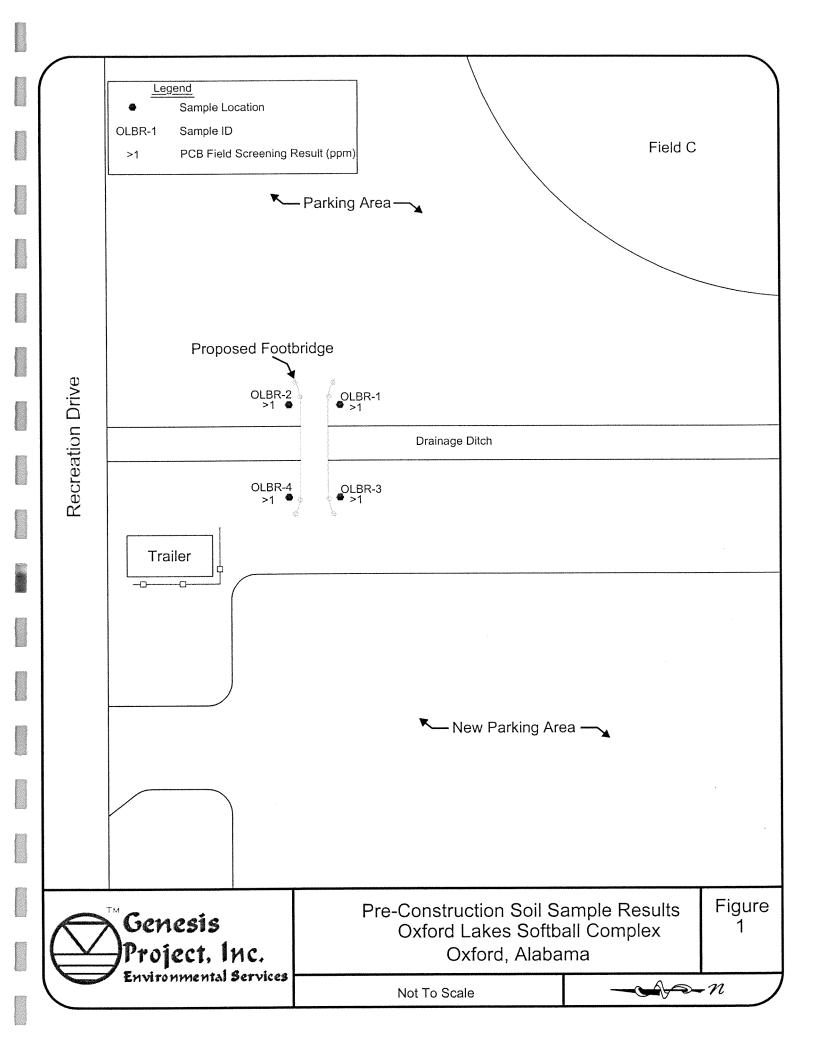
						Polychlorina	ted Biphenyl	Polychlorinated Biphenyls (mg/kg dw)			
Date	Screening	Dry				USE	USEPA Method 8082	1082			
Sampled	Results	Weight %	Aroclor	Aroclor	Aroclor	Aroclor	Aroclor Aroclor Aroclor	Aroclor	Aroclor	Aroclor	Total
			1016	1221	1232	1242	1248	1254	1260	1268	PCBs
08/22/01	۲۷										
08/22/01	7										
08/22/01	7										
08/22/01	>1										
09/10/01	>1	84	<0.20	<0.40	<0.20	<0.20	1.4	2.9	3.5	0.61	8.4
09/20/01	<u>×</u>	92	<0.18	<0.36	<0.18	<0.18	0.46	2.7	2.2	0.50	5.9

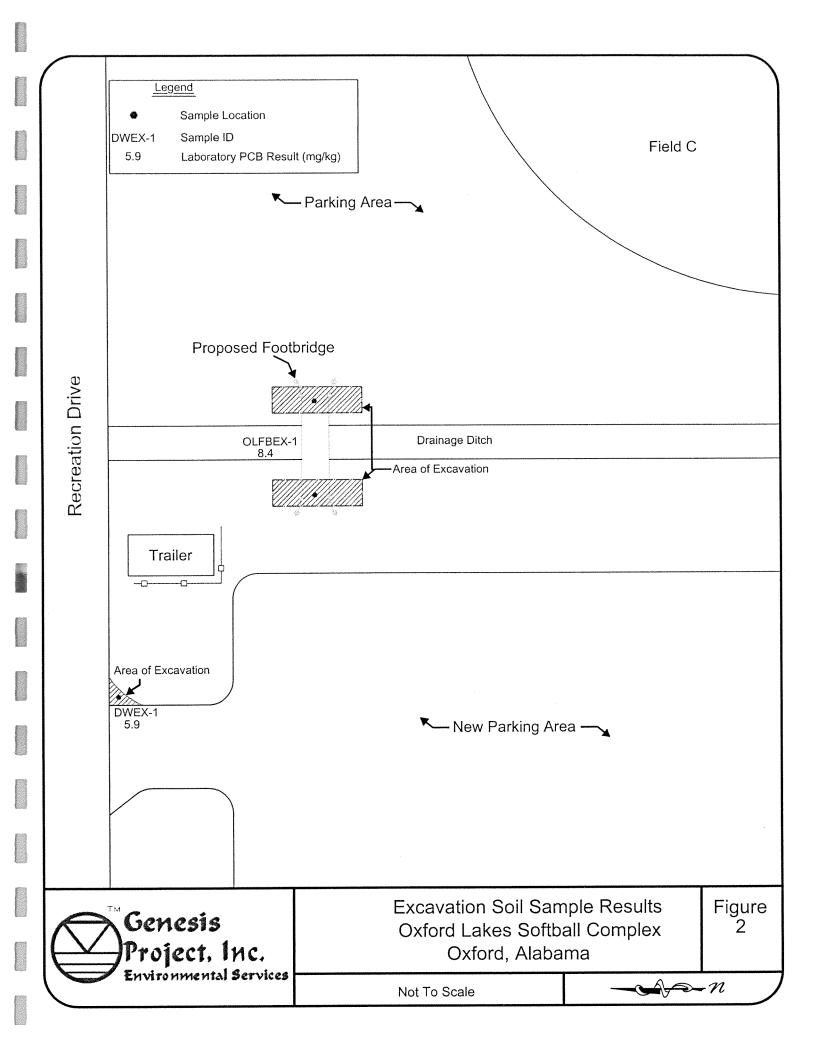
FOOTNOTES:

mg/kg dw - milligrams per kilogram dry weight

- Analyte was not detected at or above the indicated concentration

BDL - below detection limit





ATTACHMENT 1 Laboratory Reports



STL Savannah

LOG NO: S1-16012 Received: 17 SEP 01 Reported: 25 SEP 01

Mr. Mike Price Genesis Project, Inc. 1258 Concord Road Smyrna, GA 30080

Batch ID

Percent Solids

Client PO. No.: 4503213403

84

Requisition: V#203708 Contract No.: S7219 Project: OXFORD LAKES Sampled By: Client Code: 085710927

Page 1

REPORT OF RESULTS

SAMPLE DESCRIPTION	, SOLID OR SEMISOLID SAMPLES	DATE/ TIME SAMPLED
		09-12-01/07:35
	160	117-1
12) 1016, ug/kg dw 1221, ug/kg dw 1232, ug/kg dw 1242, ug/kg dw 1248, ug/kg dw 1254, ug/kg dw 1260, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw		<200 <400 <200 <200 1400 2900P 3500 610 75 % 355 % 5 19.01
		0919P
	OLFBEX-1 (COMP)	SAMPLE DESCRIPTION , SOLID OR SEMISOLID SAMPLES OLFBEX-1 (COMP) 160 121 1016, ug/kg dw 1221, ug/kg dw 1232, ug/kg dw 1242, ug/kg dw 1242, ug/kg dw 1254, ug/kg dw 1260, ug/kg dw 1260, ug/kg dw 1260, ug/kg dw 1260, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw 1268, ug/kg dw 1269, ug/kg dw 1269, ug/kg dw 1269, ug/kg dw 1269, ug/kg dw



STL Savannah

LOG NO: S1-16012 Received: 17 SEP 01 Reported: 25 SEP 01

Mr. Mike Price Genesis Project, Inc. 1258 Concord Road Smyrna, GA 30080

Client PO. No.: 4503213403

Requisition: V#203708 Contract No.: S7219 Project: OXFORD LAKES Sampled By: Client

mpled By: Client Code: 085710927

Page 2

REPORT OF RESULTS

DATE/

LOG NO	SAMPLE DESCRIP	TION , QC REPORT	FOR SOLID/S	SEMISOLID T	IME SAMPLED	
16012-2 16012-3 16012-4 16012-5 16012-6	Method Blank Lab Control St LCS Accuracy C LCS - 093 Cust True Value - 0		7			
PARAMETER		16012-2	16012-3	16012-4	16012-5	16012-6
PCB's (808		<33		34-138 %		** ** **
Arocioi-1	.221, ug/kg dw	<67			* * *	
Arocioi-1	232, ug/kg dw	<33				
Arocior-1	242, ug/kg dw	<33				
	1248, ug/kg dw	<33			1200	1500
Arocior-1	1240, ug/kg dw	<33			1900P	3100
Aroclor-	1254, ug/kg dw	<33	85 %	39-138 😵	1800	2000
	1260, ug/kg dw	<33			1100	1500
	1268, ug/kg dw	76 %	82 %	30-150 %	. 76 %	
Surrogate		82 %	82 %	30-150 %	124 %	
Surrogat		1	1		1	1
Dilution			09.19.01		09.19.01	09.19.01
Prep Dat			09.21.01		09.21.01	09.21.01
Analysis Batch ID		09197	0919P	- m -	0919P	0919P



STL Savannah

LOG NO: S1-16012 Received: 17 SEP 01 Reported: 25 SEP 01

Mr. Mike Price Genesis Project, Inc. 1258 Concord Road Smyrna, GA 30080

Client PO. No.: 4503213403

Requisition: V#203708 Contract No.: S7219 Project: OXFORD LAKES Sampled By: Client Code: 085710927

Page 3

REPORT OF RESULTS

DATE/

LOG NO	SAMPLE DESCRIPTION , QC REP	ORT FOR	SOLID/SEM	ISOLID TIM	SAMPLED	
16012-2 16012-3 16012-4 16012-5 16012-6	Method Blank Lab Control Standard % Reco LCS Accuracy Control Limit LCS - 093 Custom True Value - 093 Custom	overy (%R)				
PARAMETER	16012	2-2	16012-3	16012-4	16012-5	16012-6

These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report.

SW-846, Test Methods for Evaluating Solid Waste, Third Edition, September 1986, and Updates I, II, IIA, IIB, and III.

P = Identification of target analytes using GC methodology is based on retention time. Although two dissimilar GC columns confirmed the presence of the target analyte in the sample, relative percent difference is >40 %. Thus, viewer discretion should be employed during data review and interpretation of results for this target compound.

Michelle Owens, Project Manager

Final Page Of Report

Serial Number 042669

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ORIGINAL - RETURN TO LABORATORY WITH SAMPLE(S)



STL Savannah

LOG NO: S1-17310A Received: 09 NOV 01 Reported: 14 NOV 01

Mr. Mike Price Genesis Project, Inc. 1258 Concord Road Smyrna, GA 30080

Client PO. No.: 4503213403

Requisition: V#203708 Contract No.: S7219 Project: OXFORD LAKES Sampled By: Client

Code: 122511114

REPORT OF RESULTS

Page 1

LOG NO SAMPLE DESCRIPTION , SOLID OR	
17310A-1 DWEX-1	09-20-01/11:45
PARAMETER	17310A-1
PCB's (8082)	
Aroclor-1016, ug/kg dw	<180
Aroclor-1221, ug/kg dw	<360
Aroclor-1232, ug/kg dw	<180
Aroclor-1242, ug/kg dw	<180
Aroclor-1248, ug/kg dw	460
Aroclor-1254, ug/kg dw	2700
Aroclor-1260, ug/kg dw	2200
Aroclor 1268, ug/kg dw	500
Surrogate - TCX	61 %
Surrogate - DCB	383 %
Dilution Factor	5
Prep Date	11.09.01
Analysis Date	11.12.01
Batch ID	1109P
Percent Solids	92



STL Savannah

LOG NO: S1-17310A Received: 09 NOV 01 Reported: 14 NOV 01

Mr. Mike Price Genesis Project, Inc. 1258 Concord Road Smyrna, GA 30080

Client PO. No.: 4503213403

Requisition: V#203708 Contract No.: S7219 Project: OXFORD LAKES Sampled By: Client

Code: 122511114

REPORT OF RESULTS

Page 2

LOG NO SAMPLE DESCRIPTION	• •	FOR SOLID/S	-	IME SAMPLED	
17310A-2 Method Blank 17310A-3 Lab Control Standa 17310A-4 LCS Accuracy Contr 17310A-5 LCS - 093 Custom 17310A-6 True Value - 093 C	ol Limit (%R)				
PARAMETER	17310A-2	17310A-3	17310A-4	17310A-5	17310A-6
PCB's (8082) Aroclor-1016, ug/kg dw Aroclor-1221, ug/kg dw Aroclor-1232, ug/kg dw Aroclor-1242, ug/kg dw Aroclor-1248, ug/kg dw Aroclor-1254, ug/kg dw	<33 <67 <33 <33 <33 <33	88 % 	34-138 %	 1800 4300	1500 3100
Aroclor-1260, ug/kg dw Aroclor 1268, ug/kg dw Surrogate - TCX Surrogate - DCB Dilution Factor Prep Date Analysis Date	<33 <33 76 % 112 %	65 % 118 % 1	30-150 % 30-150 %	170 % 1 11.09.01	11.12.01
Batch ID					

These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL Project Manager who signed this test report.

Michelle Owens, Project Manager

Final Page Of Report

Serial Number 023918

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PROJECT REFERENCE	PROJECT NO.	PROJECT LOCATION (STATE)	MATRIX			REQUIRE	REQUIRED ANALYSIS			PAGE (or /
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2 Common Services and Comm											

ORIGINAL - RETURN TO LABORATORY WITH SAMPLE(S)

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OXFORD LAKE PARKING LOT

INSPECTOR:

DATE:

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Comments/Notes Completion Date Work Order No. Date Contact Information Department Name Routine (Y/N) Action Item