



October 28, 2016

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: Baseline Ecological Risk Assessment for Operable Unit 4  
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB); Anniston, Alabama

Dear Ms. Langston Scully:

On behalf of Pharmacia LLC and Solutia Inc. (P/S), as parties to the Partial Consent Decree (PCD) for the Anniston Polychlorinated Biphenyl (PCB) Site (the Site), enclosed please find eight printed copies and eight electronic copies of the *Baseline Ecological Risk Assessment for Operable Unit 4* (OU-4 BERA). This OU-4 BERA is submitted in accordance with the PCD.

The OU-4 BERA was originally submitted to USEPA on August 14, 2015. P/S and USEPA met to discuss the OU-4 BERA in August 2015, December 2015, and February 2016, and a technical working group was convened to collaborate on critical questions of approach and data use. After this period of discussion, USEPA provided formal comments on the OU-4 BERA to P/S on June 30, 2016. Receipt of the comments triggered a 60-day resubmission timeframe under the terms of the PCD and the August 26, 2015 schedule letter approved by USEPA on September 2, 2015. Given the technical complexity associated with addressing many of USEPA's comments, P/S requested a 60-day extension for resubmission of the OU-4 BERA on June 30, 2016. USEPA approved the schedule extension on July 6, 2016, establishing the deadline for resubmittal as October 28, 2016. As discussed in the schedule extension request and approval letters dated June 30, 2016 and July 6, 2016, respectively, the schedule extension was developed through collaborative discussions between P/S, the USEPA, and Mr. Thomas Dahl, the Technical Special Master responsible for oversight of the Remedial Investigation/Feasibility Study (RI/FS) under the PCD.

This OU-4 BERA builds on the initial evaluation of potential ecological risks presented in the *Screening Level Ecological Risk Assessment for Operable Unit 4* (SLERA; Blasland, Bouck & Lee, Inc. [BBL] 2005) as well as the data needs identified in the *Data Summary Report for Operable Unit 4* (BBL 2005). This document also reflects the results of Site-specific ecological and biological data collection efforts described in the Phase 1, 2, and 3 Field Sampling Plans (BBL 2006, Arcadis 2010, and Arcadis 2010/2011, respectively) and the *Sediment Toxicity Testing Plan for Operable Unit 4* that was part of the Phase 2 Field Sampling Plan. This OU-4 BERA also incorporates direction provided by USEPA on specific technical aspects of the analyses.

Responses to USEPA's June 30, 2016 comments are attached to this cover letter to aid in the review of the revised OU-4 BERA.

We look forward to USEPA's approval of the OU-4 BERA and advancing to preparation of the Remedial Investigation Report for OU-4. Please contact me if you have any questions.

Sincerely,



E. Gayle Macolly  
Manager, Remedial Projects  
Solutia Inc.

Attachments

cc: Mr. Chip Crockett (ADEM)  
Mr. G. Douglas Jones, Esq. (Jones & Hawley, PC)  
Mr. Thomas Dahl (Dahl Environmental Services)