



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 7, 2019

Ms. E. Gayle Macolly
Manager Remedial Projects
Solutia Inc.
702 Clydesdale Avenue
Anniston, Alabama 36201

Re: Remedial Investigation Report for Operable Unit 4
Anniston PCB Site, Anniston, Alabama

EPA CERLA ID # ALD000400123
EPA RCRA ID # ALD004019048

The U.S. Environmental Protection Agency has reviewed the Remedial Investigation (RI) Report for Operable Unit 4 (OU4) of the Anniston PCB Site (Site) dated September 2019. This document addresses the EPA's comments on the document, and it is approved with the following comments:

- The response provided to EPA comment 42 applies to similar discussions in the RI including page ES-2, Section 2.9, Section 2.9.7, Section 8.3.2, and Section 9.3.5:
"Based on these observations within the OU-4 portions of Choccolocco Creek and Snow Creek, habitat quality and the ecology have been impacted by human activities, including urbanization, agriculture, silviculture, grazing, and industrial pollution. The potential sources of pollution include a wide range of industries located within, upstream, and upwind of OU-4 that may have contributed contaminants, including PCBs, mercury, PCDD/DFs, and multiple metals other than mercury, to OU-4. Despite the impacts associated with human activities, including industrial pollution, there are portions of OU-4 that have valuable aquatic and riparian habitat; nevertheless, the presence of valuable habitat does not mean that contaminants have had no effect on the habitat."
- The bullets provided below clarify relative to the disposition of PCB-containing soils associated with the infrastructure improvement, interim measure and final corrective measure projects described in Sections 3.2, 3.3 and 3.4 of the RI, respectively:
 - All soil excavated under the infrastructure improvement projects, interim measures, and the Highway 21 Bridge at Choccolocco Creek final RCRA Corrective Action with PCB concentrations greater than 50 mg/kg was disposed of offsite at a TSCA approved facility;
 - All soil excavated under the infrastructure improvement projects, interim measures, and the Highway 21 Bridge at Choccolocco Creek final RCRA Corrective Action with PCB concentrations between 1 mg/kg and 50 mg/kg was either placed under an engineered cover/structure or was disposed of at a licensed solid waste landfill;

- The Choccolocco Creek Wastewater Treatment Plant Excavated Soil Pile project was conducted as a RCRA final corrective measure. Soil with PCB concentrations greater than 50 mg/kg and soil with PCB concentrations between 1 mg/kg and 50 mg/kg were placed in the pile after a construction project at the waste water treatment plant. The soil in the pile was not shipped to a TSCA approved facility or a licensed solid waste landfill, but was contained beneath an engineered cap; and
 - Except for the Highway 21 Bridge at Choccolocco Creek and the Choccolocco Creek Wastewater Treatment Plant Excavated Soil Pile project which are final RCRA Corrective Actions, the interim measure projects and residual contamination near the infrastructure improvement projects will be evaluated to determine if additional action is needed in the Feasibility Study.
- In Section 9.3.2 Sediment and Section 9.3.3 Surface Water, there is an emphasis on previous interim, removal and corrective actions being effective at reducing the concentration of PCBs associated with particulates entering the backwater area via surface water flow.” The EPA agrees that previous actions taken upstream have reduced ongoing releases of PCBs over time. However, the concentrations being transported in surface water do not meet ambient water quality criteria for PCBs and the sediment PCB concentrations in the backwater area are currently associated with human health (through fish consumption) and ecological risk.

There is no need to revise and resubmit the document. If you have any questions or concerns, please contact me at (404) 562-8935.

Sincerely,

A handwritten signature in blue ink, reading "Pamela J. Langston Scully". The signature is fluid and cursive, with the first name "Pamela" being the most prominent.

Pamela J. Langston Scully, P.E.
Remedial Project Manager
Superfund Restoration and Construction Section

cc: Chip Crockett, ADEM
Tom Dahl, SM District Court
Miranda Leopoldo, FWS
Karen Marlowe, FWS
Barry Tew, GSA
Christopher Blankenship, DCNR
Bertrand Thomas, WAF
David Reddick, CAG
Seth Newton, GSA
Minch Minchin, Clerk District Court