



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

September 10, 2021

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

Re: Remedial Design Work Plan
OU1/OU2 Portion of the Anniston PCB Site
Anniston, Alabama

EPA CERLA ID # ALD000400123
EPA RCRA ID# ALD004019048

The U.S. Environmental Protection Agency has reviewed the Remedial Design Work Plan (RDWP) for the Operable Unit (OU) 1/OU2 Portion of the Anniston PCB Site (Site) dated August 2021. The EPA is approving the RDWP. However, the specific requirements of the Pre-Design Investigation Work Plan (PDIWP), which is the next document to be submitted, may be different than what has been outlined in this RDWP. Additionally, the 2017 Record of Decision for OU1/OU2 documented that fate and transport of PCBs to residential properties followed three pathways that are not all identified in this workplan: air dispersion, the physical transport of contaminated fill material, and surface water transport. The air and contaminated fill pathways were investigated by sampling residential properties outside of the floodplain.

The EPA has no comments on the Health and Safety Plan (HASP) provided in Appendix A. As with the RDWP, the fate and transport section in the HASP is incorrectly limited to the surface water pathway. Please note that in Section 10.1.2 Emergency Contacts, Summoning Emergency Services, the numerical list on page 10-1 is confusing and appears to require calling 911 in item 1 and item 3. This list has been fixed in Appendix B.

The EPA reviewed and is approving the Emergency Response Plan in Appendix B. However, in Section 4.9 Emergency Response Actions and Reporting, the National Response Center should always be contacted at 1-800-424-8802 for emergencies and other sudden threats to public health, such as: oil and/or chemical spills, radiation emergencies, and biological discharges. The number is provided in Table 3-1 of this plan, but there is no specific requirement for the site safety officer or project manager to contact the center.

Based on the schedule in the OU1/OU2 Remedial Design/Remedial Action Consent Decree Statement of Work, entered by the court on March 26, 2021, Pharmacia Corp. and Solutia Inc. are required to submit the Pre-Design Investigation Work Plan, Field Sampling Plan, and Quality Assurance Project Plan no later than 60 days following this approval.

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, PE – GA
Remedial Project Manager
Superfund Restoration and Construction Section

cc: Metz Duites, ADEM
Tom Dahl, Special Master District Court
Bertrand Thomas, WAF
David Reddick, CAG
Andrew Toler, Clerk District Court