

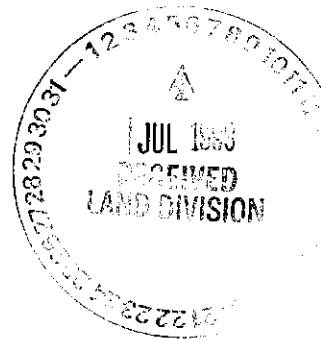


Applied Chemistry, Creative Solutions

Solutia Inc.
300 Birmingham Highway
Anniston, Alabama 36201
Tel 205-231-8447

July 2, 1998

Mr. Wm. Gerald Hardy
Chief, Hazardous Waste Branch – Land Division
Alabama Department of Environmental Management
1751 Cong. W. L. Dickinson Drive
Montgomery, Alabama 36109-2608



Re: Soil Excavation/Placement
Solutia Anniston Facility

Dear Mr. Hardy:

This letter is submitted as previously discussed with Mr. James Grassiano (ADEM) and seeks written approval for the consolidation of certain excavated soils (from certain off-site residential and commercial properties) beneath the cover planned for the remediation near the site of the former Bethel Missionary Baptist Church or the cover proposed for the Northside Interim Measures project.

During the soil sampling for polychlorinated biphenyls (PCBs) conducted under Consent Order 96-054-CHW Solutia Inc. and its contractors identified some residential and commercial properties having small areas of impacted surface soils at PCB concentrations well below 50 ppm (and generally less than 15 ppm). At the time of reporting the results to the property owners, we made commitments to these property owners or trustees to remediate the impacted areas. We propose therefore to excavate and remove the impacted surface soils and restore the properties to their original state. The areas from which we propose to remove soils are shown on the attached list. PCB removal will be verified by the immunoassay technique using a 5 ppm screening level consistent with prior characterization.

These soils in these areas are pre-Toxic Substances Control Act (TSCA) materials associated with historic operations at the facility prior to 1972 and contain less than 50 ppm PCBs. This plan is consistent with prior activities approved by the U.S EPA Region IV in August 1997 letter. (attached) The excavated soils would be placed as fill material

Formerly the chemical businesses of Monsanto Company

under the textile liner and soil layers planned for either the Bethel remediation along the east side of Boynton Avenue or the Northside closure project.

The proposed soil consolidation activities will be carried out as an integral part of the construction activities to be undertaken this summer on the North side and at the site of the former Bethel Church. Consequently, we propose that the consolidation activities be included with these Interim Measures as an amendment to the Supplemental Interim Measures Work Plan currently being reviewed by ADEM.

Should you have any questions regarding our request, please contact me at 256-231-8404.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alan G. Faust". The signature is fluid and cursive, with the first name "Alan" being more prominent.

Alan G. Faust
Manager, Remedial Projects

cc: Mr. Stuart Perry - EPA Region IV (Toxic Substances Section)
Atlanta Federal Center, 100 Alabama Street, S. W.
Atlanta, GA 30303-3104

Mr. James Grassiano - ADEM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

RECEIVED
8-15-97

PROJECT DCC

ID No. A-1.2-081297-1

AUG 12 1997

4APT-TS

Mr. Alan G. Faust
Remedial Projects Manager
Monsanto
The Chemical Group
300 Birmingham Highway
Anniston, Alabama 36201

SUBJ: Soil Consolidation
Monsanto Anniston Facility

Dear Mr. Faust: *ATTN*

This is in response to your letter dated June 9, 1997, requesting U.S. Environmental Protection Agency review and written approval of a proposal to place some excavated soils that were obtained from the drainage ditch along Highway 202 into Monsanto's south landfill. The soil and sediments from this drainage ditch are pre-Toxic Substance Control Act (TSCA) materials generated from historic operations at the facility prior to 1972, and contain less than 50 parts per million of Polychlorinated Biphenyls (PCB). This project is part of a larger effort to upgrade the cover on the closed south landfill, and was discussed in a telephone conversation on June 6, 1997, with Stuart Perry of my staff. Mr. Perry gave his verbal approval of the project on that date.

We have reviewed the information that was submitted, and concur with the proposal to place the soil in the south landfill as part of upgrading the cover on the south landfill since the soil is considered to be pre-TSCA.

If you have any questions regarding this response, please contact Stuart Perry of my staff at (404) 562-8980.

Sincerely

Alfreda F. Freeman
Chief
Toxic Substances Section

RESIDENTIAL/COMMERCIAL SOIL REMOVAL
Anniston, AL

Soils having low concentration of PCBs from the following locations will be removed and consolidated by Solutia Inc. as part of the Supplemental Interim Measures Work Plan currently under review by ADEM.

Property	Owner	Highest PCB Conc.	Approx. Impacted Area	Proposed Remediation
East Side				
Prospective lease property (901 Clydesdale Ave.) - SW section and near east security fence	Solutia Inc.	12.9 ppm 12.4 ppm	1,000 sq ft 450 sq ft	Remove soils to 12" depth w/ topsoil fill as needed
Car Care Wash and Exhaust Pro Muffler (705 Clydesdale Ave.) - east side of building	John L. Blair	8.0 - 9.5 ppm	150 sq ft	Remove ~6'x25' strip to 6"-12" depth w/ topsoil fill & sod
North Side				
Merita Bakery Thrift Store (931 Clydesdale Ave) - directly east of south end of building	James Patterson Pace, Jr.	7.1 ppm	400 sq ft	Scrap 20'x20' area to 4"-6" depth w/ topsoil fill & re-sod
Choo-Choo Dinner (903 Clydesdale Ave.) - along ditch berm to the west of building	James Patterson Pace, Jr.	14.6 ppm	120 sq ft	Scrap 6'x20' section on ditch berm to 4"-6" depth w/ topsoil fill & seed
Zinn and Pine Grove Areas				
Rental house (721 Zinn Pkwy Dr) - directly north of rear driveway	Raymond Traylor	10.5 ppm	96 sq ft	Remove 6'x16' strip to 4"-6" depth w/ topsoil fill & re-sod
Anniston Transportation Center (1215 W. 10 th St.) - along drainage ditch at PineGrove Rd.	City of Anniston, AL	21.9 ppm	150 sq ft	Remove ~10'x15' section to 6" depth w/ topsoil fill and seed
First Missionary Baptist Church (1100 Pine Grove Rd.) - south side of south parking area	Rev. Orell E. Webb	8.1 - 12.4 ppm	3,100 sq ft	Remove 60'x52' area to 6"-12" depth; fill and compact w/ topsoil fill and seed
West Side				
West side right-of-way along 1 st Avenue (Jefferson St. to Calhoun St.)	Calhoun County	8.5 - 17.7 ppm	1,350 sq ft	5'x270' ROW strip
West side right-of-way along 1 st Ave. (north of Calhoun St. to)	Calhoun County	12.6 - 17.5 ppm	750 sq ft	5'x150' ROW strip
East side along 1 st Ave. (north of Line St. to midway between Jefferson St. and Calhoun St.)	Solutia Inc. and Calhoun County	7 - 20 ppm	3,600 sq ft	8'x450' section between roadway and Solutia security fence

07/02/98