



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR
DIRECTOR

July 16, 1998

FOB JAMES, JR.
GOVERNOR

**CERTIFIED MAIL # Z 233 165 078
RETURN RECEIPT REQUESTED**

Mr. Alan G. Faust
Manager of Remedial Projects
Solutia Inc.
300 Birmingham Highway
Anniston, Alabama 36201

Facsimiles: (334)
Administration: 271-7950
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Education/Outreach: 213-4399

Re: Review of July 2, 1998 *Soil Excavation/Placement Letter (Amendment to Supplemental Interim Measures Plan for North Side)*
Solutia Inc.
Anniston Facility
USEPA I.D. No. ALD 004 019 048

Dear Mr. Faust:

The Alabama Department of Environmental Management (ADEM) has reviewed Solutia's July 2, 1998 letter regarding removal and consolidation of certain off-site contaminated media. The Department understands that Solutia proposes to remove specific areas of shallow contaminated soil, including two parcels on the east side, two parcels on the north side, three parcels generally described as the Zinn and Pine Grove Areas, and three parcels on the west side. Only defined impacted areas are to be remediated (removed and consolidated on-site). The proposed remediation varies for each area, but generally includes removal of the top 4 to 12 inches of soil and replacement with an appropriate top soil. Two of the parcels involve right-of-ways along the west side of 1st Avenue. Other parcels are county owned, city owned, or privately owned residential or light industrial property.

The soil to be removed is reportedly considered pre-Toxic Substances Control Act (TSCA) material and furthermore is contaminated with PCBs at levels significantly less than 50 mg/kg. Please note that PCB levels for soil are to be reported on a dry weight basis. For the data submitted, please confirm that the data are dry weight basis and ensure that in the future, PCB analytical work is conducted on this basis.

The Department understands that Solutia intends, as stated, to return the properties to their original pre-contamination state. As a field verification, Solutia intends to use immunoassay techniques to a 5 ppm screening level. The Department also recommends post-removal sampling (according to definitive and approved gas chromatograph methods conducted by a contract laboratory) to determine the actual PCB levels remaining in-place. In the absence of risk assessment data, the Department believes it is appropriate to establish the no further action cleanup level at the EPA reference value of 1 ppm, which is also used for Superfund cleanups.



Mr. Alan G. Faust

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Upon response to this letter, the Department will review and consider approval of the proposed plan. The Department understands that Solutia intends to conduct this work as part of the Supplemental Interim Measures for the North Side and/or as part of the interim measures slated for Bethel Church. Either approach may, upon approval, be acceptable to the Department; however, the Interim Measures report should document final placement of consolidated material. In addition, ADEM reminds Solutia that the recently submitted Interim Measures Report (and Design Drawings) excludes Bethel Church. As such, an Interim Measures Report addendum will need to be submitted upon completion of the activities at the church. For the previously proposed interim measures (either at Bethel Church or the North Side), please confirm that the cover requirements for the consolidation areas will not require a change to the previously submitted workplans.

Please submit a response to the above comments within 30 days of receipt of this letter. If you have any questions concerning this matter, please contact Mr. Jim Grassiano of the Hazardous Waste Branch at 334-270-5628.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wm. Gerald Hardy".

Wm. Gerald Hardy, Chief
Hazardous Waste Branch
Land Division

WGH/JG/sem:L:LF7-13-98

cc: Kent Williams/EPA Region 4

File: TSD/Solutia/Calhoun County

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MANAGER OF REDMEDIAL PROJECTS
SOLUTIONS INC
300 BIRMINGHAM HIGHWAY
ANNISTON ALABAMA 36201

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