

Solutia Inc.

300 Birmingham Highway Anniston, Alabama 36201 *Tel* 256-231-8447

September 21,1999

Mr. Wm. Gerald Hardy, Chief
Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Blvd
Montgomery, AL 36130-1463

Re:

Extension of North Side Cover Solutia Inc. Anniston, AL Facility EPA ID No. ALD 004 019 048 SEP 1999

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LAND DIVISION

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Dear Mr. Hardy:

Solutia has recently purchased additional property on the north side of its facility in Anniston, Alabama. These newly acquired properties are all located on the north side of the Norfolk Southern railway tracks, east of the cover that was constructed as a Supplemental Interim Measure in the second half of 1998. The scope of that Interim Measure was described in a Work Plan that was approved by the Alabama Department of Environmental Management (ADEM) in a letter dated September 10, 1998. The final report on the construction of this and other Supplemental Interim Measures was submitted to ADEM on March 30, 1999.

Some of the newly purchased properties contain affected soils, as shown on the attached Figure 1. This Figure shows the extent of the existing cover constructed in 1998, together with the results of analyses of samples taken within the immediate project area. The new properties are primarily located between Parkwin and Clydesdale Avenues, south of West 10^{th} Street. However, some additional property was also purchased on the east side of Clydesdale Avenue, between the railroad tracks and 11^{th} Street.

The properties on the west side of Clydesdale Avenue all contain affected soils and, in order to contain these soils, we intend to extend the existing cover system to include these properties. The properties on the east side of the street are either paved, or do not contain affected soils. Consequently, a cover is not necessary in this area.

Since the proposed work is an extension of the existing cover, we intend to use the same design and construction details contained in the approved Supplemental Measures Work

Plan. Consequently, we assume that a new Work Plan will not be required and that this letter and the attached drawings will serve as an amendment to that Work Plan. With that assumption, the scope of the proposed additional work consists of the following activities:

- Prior to extending the cover, the 10 structures shown on Figure 2 will be demolished. As was done previously, each of the buildings will be inspected for asbestos and, if present, an asbestos abatement plan will be implemented. Air quality will be monitored in the immediate vicinity of each of the structures during demolition, and the demolition debris will be transported to a permitted landfill for disposal. Concrete floor slabs will be left in place, since they will be isolated by the cover to be placed over these properties.
- Following demolition, the existing soil cover will be extended to the approximate limits shown on Figure 3. It will consist of a geotextile fabric placed over the existing ground surface and covered by a minimum of 14 ins. of clean soil which will be hydroseeded to promote vegetative growth. In some limited areas shown on Figure 3, an asphalt cover will be constructed instead of the soil cover.
- The existing fence enclosing Solutia-owned property will be extended to include the additional properties on the west side of Clydesdale Avenue with a soil cover. Since the properties on the east side of the street are either paved with asphalt, or do not contain affected materials, fencing is not required in this area.
- An addendum to the Supplemental Interim Measures Report will be submitted to ADEM within 90 days of completion of the proposed construction.

We plan to begin demolition prior to the end of 1999 and intend to start construction of the cover extension in the Spring of 2000. Consequently, we look forward to receiving your approval of these plans in the near future.

Sincerely, Solutia Ine:

Alan G. Faust

Manager of Remedial Projects

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