

**ADEM**

## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR  
DIRECTORDON SIEGELMAN  
GOVERNOR

October 20, 1999

**CERTIFIED MAIL #Z 422 412 503  
RETURN RECEIPT REQUESTED**Mr. Alan G. Faust  
Manager of Remedial Projects  
Solutia Inc.  
300 Birmingham Highway  
Anniston, Alabama 36201Facsimiles: (334)  
Administration: 271-7950  
General Counsel: 394-4332  
Air: 279-3044  
Land: 279-3050  
Water: 279-3051  
Groundwater: 270-5631  
Field Operations: 272-8131  
Laboratory: 277-6718  
Mining: 394-4326  
Education/Outreach: 394-4383**Re: Notice of Deficiency: Extension of North Side Cover**  
Solutia Inc.  
Anniston Facility  
USEPA I.D. No. ALD 004 019 048

Dear Mr. Faust:

The Alabama Department of Environmental Management's (ADEM's) Hazardous Waste Branch has reviewed Solutia's request to amend its Interim Measures (IM) Workplan for the North Side areas. The Department notes that the subject workplan was previously approved on September 10, 1998. In addition, the Department has also provided prior approval of the IM design and, upon completion of construction, provided approval of the resulting IM Report. This latest request for extension of the North Side cover is dated September 21, 1999.

Solutia is making this request because additional properties have been acquired on the north side that are contiguous with the parcel recently improved by interim measures. The nature and extent of contamination at these newly acquired properties are similar to the nature and extent of contamination at the other north side properties. In addition, it appears that the proposed IM activities may be readily incorporated into the existing north side design without changing form, fit, or function of the previous construction facilities. As a result, the Department agrees in principal with Solutia's proposal to amend the North Side IM Workplan. However, the Department has several comments that need to be resolved before ADEM can consider approval of the workplan and before Solutia may proceed with construction. These comments are presented below.

1. **Asphalt Cover:** Solutia states that in some limited areas shown in Figure 3, an asphalt cover will be constructed instead of using a soil cover. Is the use of an asphalt cover in certain areas in any way related to PCB levels in surface or subsurface soils? Please explain the basis of using an asphalt cover in the areas shown in Figure 3.



2. **Final Corrective Measures:** The Department notes that the workplan construction activities are proposed as interim measures. The workplan that Solutia desires to modify was first submitted to the Department in December 1997. The IM Workplan for the north side was modified once before to address several miscellaneous properties acquired on the north and east side of the facility. The September 21, 1999 request for extension of the north side cover represents the second modification to the North Side IM Workplan.

The Department believes that it is inappropriate to continue to modify the IM Workplan without establishing a firm deadline for development and submittal of a Final Corrective Measures System (CMS) Workplan for the North Side. According to Solutia's Post-Closure Permit, Solutia must submit the Final CMS Workplan within 60 calendar days from the date of notification by the Department that such a workplan is required. Hence, please submit the Final CMS Workplan within 60 days from the date of receipt of this letter. Solutia should acknowledge that it intends to meet this deadline in the response to comments to this Notice of Deficiency.

3. **Removal Action:** Solutia's Interim Measures proposal implies that either a soil or asphalt cover will be installed over soil with PCB levels exceeding 50 mg/Kg. Several areas proposed to be covered are contaminated with PCBs at levels exceeding 500 mg/Kg and one location reportedly contains PCBs at 2810 mg/Kg. The Department believes that the proposed Interim Measures are inappropriate in the absence of removal activities for the more highly contaminated areas. Solutia should submit a revised workplan that addresses removal of soils with PCBs exceeding 50 mg/Kg.
4. **Figure Discrepancies:** Note that certain sampling locations indicated by blue and green dots do not appear accurate. For instance, Figure 1 indicates that three of the sampling locations represent areas with PCBs less than the screening limit. On Figure 3, however, these same locations are shown as representing soil areas exceeding the screening limit. Please correct the discrepancies.
5. **Screening Value(s):** Please confirm the "screening limit(s)" referenced in the figures; i.e., are they all representative of 5 mg/Kg, 10 mg/Kg, or some other value. If more than one screening limit was used, please indicate so.

6. **Delineation of Covered Areas:** Please clarify whether or not one of the sampling areas located west of Clydesdale Avenue will be addressed by the interim measures. Specifically, this comment refers to the location with a reported PCB level of 26.3 mg/Kg. According to Figure 3, it does not appear that this area will be covered with either soil or asphalt. If this area is not addressed by the interim measures, Figure 3 should be modified accordingly and the basis for excluding this location should be presented to ADEM.
7. **Area East of Clydesdale Ave and Relation to 11<sup>th</sup> Street Ditch:** The two southern-most soil screening areas located on the east side of Clydesdale Avenue are reportedly going to be addressed by the proposed interim measures. While they will not be covered, they are shown on the associated figures and Solutia states that: "The properties on the east side are either paved, or do not contain affected soils. Consequently, a cover is not necessary in this area". However, ADEM notes that these two areas are located in an region that will reportedly undergo remediation in accordance with final measures for the 11<sup>th</sup> Street Ditch. The Department believes it is appropriate to address these areas under the pending final measures for the 11<sup>th</sup> Street Ditch. If they are no longer in the region designated for 11<sup>th</sup> Street Ditch remediation, please explain the basis of this change.

These two areas also should undergo further evaluation in accordance with the pending 11<sup>th</sup> Street Ditch sampling event. If this is not the case, additional sampling appears warranted to delineate contamination prior to developing a proposal for soil removal and/or remediation in this soil region. In any event, it does not appear appropriate to address the two aforementioned areas in this IM Workplan without further delineation of PCB levels and without soil removal activities.

8. **Area East of Clydesdale Ave:** Solutia states that it does not intend to complete interim measures on the east side of Clydesdale Avenue because these properties are either paved or do not contain affected soils. In reviewing the September 21, 1999 submittal, the majority of this area does appear to be impacted by PCB contamination above screening levels. Thus, Solutia's reasoning for excluding most of this area appears to be that the sediment sampling points indicated on Figure 1 are paved. However, the figure is unclear on this matter. Please confirm that the sediment sampling points are located in paved areas.

Note that Solutia will need to develop Final Corrective Measures for all contaminated areas, whether or not they are paved.

Mr. Allen G. Faust  
October 20, 1999  
Page 4

The Department requests that Solutia submit responses to the comments presented herein. Solutia should also submit a revised IM Workplan fully addressing the above comments. Please submit four copies of the *IM Workplan for Extension of North Side Cover and Responses to Comments* to ADEM within 30 days of receipt of this letter.

In addition, please submit the *Final CMS Workplan for North Side Areas* within 60 days from the date 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,



Stephen A. Cobb, Chief  
Hazardous Waste Branch  
Land Division

SAC/JWG/sep:L:/JWG/NOD10-99.doc

cc: Russ McLean/USEPA Region 4  
Wes Hardegree/USEPA Region 4

File: Solutia, Calhoun County/ALD 004019048/ /Hazardous Waste/Correspondence

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MR ALAN G. FAUST  
MANAGER OF REMEDIAL PROJECTS  
SOLUTIA INC  
300 BIRMINGHAM HIGHWAY  
ANNISTON ALABAMA 36201

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*James McFall*

PS Form 3811, December 1994

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