

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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JAMES W. WARR
DIRECTORDON SIEGELMAN
GOVERNOR

December 15, 1999

**CERTIFIED MAIL # Z 385 766 596
RETURN RECEIPT REQUESTED**Mr. Craig Branchfield
Manager of Remedial Projects
Solutia, Inc.
702 Clydesdale Avenue
Anniston, Alabama 36201Re: **Revised Notice of Deficiency: Extension of North Side Cover**
Solutia Inc.
Anniston Facility
USEPA I.D. No. ALD 004 019 048Facsimiles: (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: 394-4325
Education/Outreach: 394-4383

Dear Mr. Branchfield:

On October 20, 1999, the Alabama Department of Environmental Management (ADEM or the Department) issued a Notice of Deficiency (NOD) related to Solutia's September 21, 1999 proposal for extension of the North Side Cover. Among other things, the NOD required that Solutia conduct removal activities for PCB contaminated soil in the subject area containing greater than 50 mg/kg PCBs. In addition, the NOD required that Solutia submit a Final Corrective Measures Workplan (CMS) within 60 days of receipt of the October 20, 1999 NOD. On November 2, 1999, Mr. Alan Faust of Solutia called Mr. Stephen Cobb of ADEM to contest these two aspects of the NOD. As a result of ADEM's further investigation, the subject NOD is being modified as outlined herein.

ADEM imposed the requirement for submittal of a Final CMS Workplan because the North Side IM Workplan had already been modified previously. As outlined in Comment No. 2 of the NOD issued by the Department on October 20, 1999, the Department believes that it remains inappropriate to continue to amend the previously approved IM workplan without establishing a deadline for submittal of a Final CMS Workplan. As a result, the Department requests that Solutia submit a milestone schedule indicating a date for submittal of the CMS Workplan. The submittal date for the workplan should be established as 60 calendar days from approval of the RFI Report for the north side areas (including the extended north side areas). The Department's Comment No. 2 is now considered revised to implement this requirement.

Regarding the requirement to conduct removal actions for TSCA-regulated material, the Department is rescinding this requirement (i.e., Comment No. 3) from the October 20, 1999 NOD. In place of Comment No. 3, the Department is now adding the following comment:

Birmingham
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]Decatur
2708 6th Avenue, SE, Suite B
Decatur, Alabama 35603-1508
(256) 353-1713
(256) 340-9359 [Fax]Mobile
2204 Perimeter Road
Mobile, Alabama 36615-1131
(334) 450-3400
(334) 479-2593 [Fax]Mobile - Coastal
4171 Commanders Drive
Mobile, Alabama 36615-1421
(334) 432-6533
(334) 432-6598 [Fax]

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Mr. Craig Branchfiel
December 15, 1999
Page 2

Revised Comment No. 3: *Solutia's Interim Measures proposal implies that either a soil or asphalt cover will be installed over contaminated soil areas with PCB levels exceeding 50 g/kg. Several areas that Solutia proposes to cover are contaminated with PCBs at levels exceeding 500 mg/kg, and one location reportedly contains PCBs at 2810 mg/kg.*

For the more highly contaminated areas throughout the facility and on the North Side properties where interim measures have previously been completed, Solutia installed a 40-mil HDPE geomembrane liner in addition to geotextile fabric and 14 inches of clean soil cover. It appears that Solutia should undertake a similar action to address the more highly contaminated areas throughout the extended North Side.

The Department understands that the previously completed interim measures included a multi-media liner over drainage ditches and newly constructed impoundment areas. While the extended North Side areas do not have a defined drainage ditch or impoundment, the Department believes that Solutia should evaluate erosion characteristics of elevated PCB-contaminated areas and develop a revised proposal to include a multi-media cover over selected areas with elevated contamination levels.

The Department notes that all other comments from the October 20, 1999 NOD remain in effect. ADEM requests that Solutia submit responses to the comments presented herein in addition to the original comments unaltered by this letter. Solutia should also submit a revised IM Workplan fully addressing all 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.

If you have any questions concerning this matter, please contact Mr. Jim Grassiano of the Hazardous Waste Branch at 334-270-5628.

Sincerely,



Wm. Gerald Hardy, Chief
Land Division

WGH/JWG/sep:L:NODRev12-13-99

cc:

Craig Brown/USEPA Region 4
Wes Hardegree/USEPA Region 4

File: Solutia, Calhoun County/ALD 004 019 048/Hazardous Waste/Correspondence/1999

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3. Article Addressed to:

MR CRAIG BRANCHFIELD
MANAGER OF REMEDIAL PROJECTS
SOLUTIA INC
702 CLYDESDALE AVENUE
ANNISTON ALABAMA 36201

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Z 385 766 596

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