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October 10, 2025

Ms. Pamela J. Langston Scully, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

**RE: September 2025 Progress Report  
Anniston PCB Site (Docket No. 1:02-cv-0749-RDP)  
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find attached the September 2025 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003, the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013, and the Consent Decree for Remedial Design/Remedial Action for Operable Unit Nos. 1 and 2 between P/S and the EPA entered by the Court on March 26, 2021. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of September 1, 2025, through September 30, 2025. The report also describes upcoming developments anticipated for the months of October and November 2025.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Gayle Pittman Macolly".

E. Gayle Pittman Macolly  
Principal Remediation Manager, Major Projects  
Solutia Inc.

Attachments

cc: Mr. Austin Pierce (ADEM)  
Mr. Thomas Dahl



**SEPTEMBER 2025 PROGRESS REPORT**

**ANNISTON PCB SITE**

**(DOCKET NO. 1:02-cv-0749-RDP)**

**ANNISTON, ALABAMA**

USEPA I.D. No. ALD 004 019 048

Submitted For:

**Solutia Inc. and Pharmacia LLC**

**702 Clydesdale Avenue**

**Anniston, Alabama 36201**

October 10, 2025

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- Attachment A – Residential Removal Properties Surface Sampling Access Update

## **1.0 INTRODUCTION**

### **1.1 2003 Partial Consent Decree**

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-RDP). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for and defines the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site). Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of September 1, 2025, through September 30, 2025, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-RDP). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of September 1, 2025,

through September 30, 2025, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.2 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.3 2021 Operable Unit 1/Operable Unit 2 (OU-1/OU-2) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 1/Operable Unit 2 (OU-1/OU-2 RD/RA CD) between the EPA and P/S was entered by the Court on March 26, 2021 (Docket No. 1:02-cv-00749-RDP). The OU-1/OU-2 RD/RA CD provides for the implementation of the remedies selected for OU-1/OU-2 as described in the OU-1/OU-2 Record of Decision issued by Region 4 of the EPA on November 9, 2017. This includes remedial actions for soils, sediments, and groundwater at residential and non-residential properties outside of OU-3.

In accordance with the OU-1/OU-2 RD/RA CD Scope of Work (Appendix B Paragraph 5.1), Section 4.0 of this report describes the work performed for the OU-1/OU-2 RD/RA CD during the period of September 1, 2025, through September 30, 2025, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.3 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-1/OU-2 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

## **2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD**

### **2.1 General 2003 CD Activities**

#### **2.1.1 Administrative Submittals**

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

### **2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2)**

#### **2.2.1 Residential Removal Properties Program**

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

P/S continued to work with the local municipalities and property owners to implement the approved NTC Removal Action Interim Institutional Control Program for Residential Properties (Interim IC Program). Table 2 provides a summary of the number of properties in each IC group.

##### **2.2.1.1 Residential Removal Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. P/S obtained access to one property to complete surface sampling in the footprint of former structures (Attachment A).

There are nine residential properties in the Residential Removal Properties Program where access has not been granted. The properties are summarized in Table 3, and a description of each property's status is presented in Table 4.

##### **2.2.1.2 Residential Removal Activities**

P/S did not perform any surface or depth sampling.

### **2.2.2 OU-1/OU-2 Non-Residential Program**

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA). No adverse findings were noted during the inspections.

### **2.2.3 11<sup>th</sup> Street Ditch**

During this reporting period, P/S performed the quarterly routine inspections as described in the 11th Street Operations and Maintenance Plan. No adverse findings were noted. P/S will perform the next quarterly routine inspection in December 2025.

## **2.3 Operable Unit 4 (OU-4)**

### **2.3.1 General**

On August 14, 2025, P/S received comments from the EPA on the Work Plan/Field Sampling Plan and Quality Assurance Project Plan for Special Studies Downstream of OU-4. On August 20, 2025, P/S, the EPA and the Special Master to the Court held a conference call to review and discuss EPA's comments. P/S submitted a revised Work Plan/Field Sampling Plan, a Response to Comments (RTC) matrix, and Quality Assurance Project Plan for Special Studies Downstream of OU-4 on September 24, 2025.

### **2.3.2 OU-4 Residential Program**

P/S did not perform any surface or depth sampling. A removal action was completed at 48460 AL Hwy 21 S (Parcel ID 600117). Residential properties are summarized in Table 5.

### **2.3.3 OU-4 Non-Residential Program**

There was no activity during this reporting period.

## **2.4 Technical Assistance Plan Grant**

The Technical Advisor (TA), Mr. Bertrand Thomas, P.G., reviews Site-related documents and conveys information from these documents to the CAG and the community.

On September 16, 2025, the West Anniston Foundation held a community education forum with members of the community to discuss the Second Five-Year Review Report for the Anniston PCB Site that was issued by the EPA on August 15, 2025. The meeting was facilitated by the TA.

## **2.5 Community Advisory Group**

A CAG meeting was held on September 9, 2025. The meeting was open to the public to allow residents to observe the working session and comment or ask questions. Topics discussed at the CAG meeting included:

- An update from the Technical Advisor;
- an update from the EPA; and
- an update from P/S.

The next CAG meeting is scheduled for November 11, 2025.

### **3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

#### **3.1 General OU-3 RD/RA CD Activities**

##### **3.1.1 Administrative Submittals**

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 6. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

#### **3.2 Remedial Action**

On August 13, 2025, P/S completed the initial baseline sampling of the interceptor wells at the four groundwater corrective action systems at OU-3 in accordance with the Optimization Work Plan for Groundwater Corrective/Remedial Action Systems and Monitoring Programs (Optimization Work Plan). The validated groundwater data from this sampling event are presented in Table 8.

#### **4.0 OU-1/OU-2 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

##### **4.1 General OU-1/OU-2 RD/RA CD Activities**

###### **4.1.1 Administrative Submittals**

A CD submittal schedule for the OU-1/OU-2 RD/RA CD that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 7. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

###### **4.1.2 OU-1/OU-2 Non-Residential Program**

The validated data from the August 2025 quarterly groundwater sampling at the T-11 area are presented in Table 9.

## **5.0 WORK SCHEDULED**

### **5.1 2003 PCD Anticipated Work Activities**

During the months of October and November 2025, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling and removal activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Initiate the annual field surveys in accordance with the Interim IC Program;
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Prepare and submit an APCO Fiber Optic Project Construction Completion Report;
- Initiate the Special Studies Downstream of OU-4 in accordance with the Work Plan/Field Sampling Plan and Quality Assurance Project Plan;
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold a regularly scheduled meeting on November 18, 2025.

### **5.2 OU-3 RD/RA CD Anticipated Work Activities**

During the months of October and November 2025, the following work elements are anticipated:

- Continue to implement the OU-3 Optimization Work Plan;
- Hold a meeting with ADEM and EPA on October 15, 2025, to discuss the results of the Optimization Work Plan initial baseline sampling; and
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval.

### **5.3 OU-1/OU-2 RD/RA CD Anticipated Work Activities**

During the months of October and November 2025, the following work elements are anticipated:

- Prepare and submit a work plan outlining the adaptive site management approach to the remedial activities at the T-11 area by November 8, 2025;
- Prepare and submit the Predesign Investigation Evaluation Report; and
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval.

## **TABLES**

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

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**Reports**

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**Operable Units -1/2 Reports**

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NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA	July 31, 2012
	<b>Comments Received</b>	May 16, 2013
	<b>Revision Submitted</b>	November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA	July 14, 2017
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 3	Submitted to EPA	June 4, 2018
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 4	Submitted to EPA	June 26, 2019
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 5	Submitted to EPA	April 24, 2020
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 6	Submitted to EPA	June 9, 2021
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 7	Submitted to EPA	June 30, 2022
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 8	Submitted to EPA	June 30, 2023
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 9	Submitted to EPA	July 11, 2024
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 10	Submitted to EPA	May 9, 2025
	<b>Approval Pending</b>	
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA	May 2, 2012
	<b>Approval Pending</b>	
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA	June 4, 2018
	<b>Approval Pending</b>	
West 11th Street Sewer Line Repair Construction Completion Report - City of Anniston Water Works and Sewer Board	Submitted to EPA	June 12, 2018
	<b>Approval Pending</b>	
Snow Street Drainage Improvement Project Completion Report Closure Report - Addendum No. 1	Submitted to EPA	July 10, 2019
	<b>Approval Pending</b>	

**Operable Unit - 4 Reports**

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OU-4 Sediment Stability Technical Memorandum	Submitted to EPA	June 30, 2010
	<b>Approval Pending</b>	
Former Holiday Inn Redevelopment Project Completion Report <sup>(1)</sup>	Submitted to EPA	November 20, 2013
	<b>Approval Pending</b>	
Anniston Regional Airport Fence Installation Project Completion Report <sup>(1)</sup>	Submitted to EPA	July 23, 2014
	<b>Approval Pending</b>	

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Operable Unit - 4 Reports (continued)**

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Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 5, 2014

**All Operable Units Reports**

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August 2025 Progress Report	Submitted to EPA	September 10, 2025
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**Work Plans**

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Work Plan/Field Sampling Plan for Special Studies for Areas Located Downstream of OU-4	Submitted to EPA <b>EPA Comments Received</b> <b>Revision Submitted</b>	June 27, 2025 August 14, 2025 September 24, 2025
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Notes:

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<sup>(1)</sup> The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.

**TABLE 2**

**INTERIM IC GROUP COUNTS**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Area</b>	<b>IC Group 2<sup>1</sup></b>	<b>IC Group 3<sup>2</sup></b>	<b>IC Group 4<sup>3</sup></b>	<b>Total</b>
OU-1/2	315	99	43	<b>457</b>
OU-4	12	6	0	<b>18</b>
<b>Total</b>	<b>327</b>	<b>105</b>	<b>43</b>	<b>475</b>

<sup>1)</sup> IC Group 2 includes properties where residual PCB-containing soil may remain on the property but such presence has not been confirmed (e.g., PCBs beneath structures or driveways).

<sup>2)</sup> IC Group 3 includes properties where PCB levels in the surficial soil are less than 1 ppm, but are between 1 and 10 ppm at 12 inches or more below the existing ground surface. IC Group 3 properties may also include improvements (e.g., houses, driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed.

<sup>3)</sup> IC Group 4 includes properties where PCB levels in the surficial soil are greater than 1 ppm and have not been remediated (due to access issues or unsuitable areas). IC Group 4 properties may also include improvements (e.g., houses or driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed, and/or the property may contain PCBs between 1 and 10 ppm at 12 inches or more below the existing ground surface.

<sup>4)</sup> A removal action has been completed at 48460 AL Hwy 21 S (Parcel ID 600117). The property has been reassigned to IC Group 3.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million

**TABLE 3**

**OU-1 RESIDENTIAL PROGRAM SUMMARY  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Residential Removal Action Program (Lead Site AOC Zone C and D) <sup>(1)</sup></b>	<b>September 2025</b>
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	1
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>	<b>1214</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD) <sup>(2)(3)</sup></b>	<b>370</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed)</b>	<b>7</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm</b>	<b>34</b>
Properties with PCB surface results ≥ 1 ppm; Access Pending or Removal In Progress	4
Removal Action Completed, Additional Removal Action Required in the Footprint of a Former Structure	3
Removal Action Completed, Additional Removal Action Required in area Unsuitable for Removal	9
Removal Action Required in area Unsuitable for Removal	18
<b>Special Use High Activity Residential Removal Action Program (Lead Site AOC Zone C and D)</b>	<b>September 2025</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or demo samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm in High Activity Areas</b>	<b>24</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>9</b>
<b>Residential Removal Action Program (Lead Site AOC Zone A)</b>	<b>September 2025</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>440</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>81</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>	<b>2</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>2</b>

**TABLE 3**

**OU-1 RESIDENTIAL PROGRAM SUMMARY  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Residential Removal Action Program (Lead Site AOC Zone B)</b>	<b>September 2025</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>525</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>120</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>3</b>

Notes:

<sup>(1)</sup>Lead Site AOC Zones C and D represents Evaluation Areas 1-34. Properties in Evaluation Area 35 have been moved to OU-4.

<sup>(2)</sup> This total includes 3 Appendix 6 properties within Lead Site AOC Zones C and D where removals were completed by Solutia and two properties that were inadvertently removed with the adjacent residential properties.

<sup>(3)</sup> This total does not include properties where removal actions were completed but additional removals are required in the footprint of a former structure or in a heavily overgrown/wooded area.

**TABLE 4**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>ADDRESS</b>	<b>GIS PARCEL ID</b>	<b>EVALUATION AREA</b>	<b>EPA Zone</b>	<b>PROPERTY STATUS</b>
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street <sup>(2)</sup>	2820	3	C	Non-Responsive
1407 Glen Addie Avenue <sup>(2)</sup>	765	24	C	Non-Responsive
716 Montrose Avenue <sup>(2)</sup>	2500	11	D	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
Duncan Avenue (11-22-01-01-04-2-77) <sup>(1)</sup>	973	21	C	Owner Not Found

Notes:

<sup>(1)</sup> Portions of property are no longer unsuitable for removal.

<sup>(2)</sup> Property requires additional removal action.

**TABLE 5**

**OU-4 RESIDENTIAL PROGRAM SUMMARY**

**ANNISTON PCB SITE**

*Anniston, Alabama*

<b>Residential Removal Action Program</b>	<b>September 2025</b>
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	1
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>	<b>39</b>
<b>Total no. of properties with PCB surface results <math>\geq</math> 1 ppm <sup>1</sup></b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia</b>	<b>20</b>

Notes:

<sup>1)</sup> A removal action has been completed at 48460 AL Hwy 21 S (Parcel ID 600117).

**TABLE 6**

**OU-3 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

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Second Five-Year Review Report for the Anniston PCB Site	Issued by EPA	August 15, 2025
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**Reports**

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OU-3 Construction Completion Report	Submitted to EPA	January 22, 2018
OU-3 Construction Completion Report Addendum	Submitted to EPA	July 27, 2018
OU-3 Construction Completion Report Second Addendum	Submitted to EPA	June 30, 2021
	<b>Approval Pending</b>	
OU-3 Operations and Maintenance Plan for Remedial/Corrective Action Projects	Submitted to EPA	August 7, 2018
	<b>Revision Submitted</b>	August 31, 2021
	<b>Approval Pending</b>	

**Work Plans**

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OU-3 Institutional Control Implementation and Assurance Plan: Rev 2.0	Submitted to EPA	September 30, 2021
	<b>Approval Pending</b>	
Revised Optimization Work Plan for Groundwater Corrective/Remedial Action Systems and Monitoring Programs	Submitted to EPA	August 26, 2025
	<b>Approval Pending</b>	

**TABLE 7**

**OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Item</b>	<b>Relevant Section of CD/SOW</b>	<b>Timeline for Completion</b>	<b>Actual Completion</b>	<b>Approval</b>
<b>RD Schedule</b>				
Identify the Supervising Contractor	CD VI.9	10 days after Effective Date	April 5, 2021	April 16, 2021
Financial Assurance Mechanism	CD IX.27	Within 10 days after Effective Date	April 12, 2021	May 24, 2021
Financial Assurance Documentation	CD IX.27	30 days following USEPA approval of financial assurance method (June 23, 2021)	June 18, 2021	--
Submit Draft RDWP, HASP, and ERP	SOW 3.1	Within 60 days following receipt of USEPA's Authorization to Proceed regarding the Supervising Contractor (June 15, 2021)	June 15, 2021	--
Submit Revised RDWP, HASP, and ERP	SOW 3.1	Within 30 days following receipt of USEPA's Comments on the Draft RDWP, HASP and ERP (July 20, 2021)	August 19, 2021	September 10, 2021
Submit PDIWP and QAPP	SOW 3.3(a)	60 days following USEPA approval of RDWP	November 9, 2021	--
Submit Revised PDIWP and QAPP	SOW 3.3(a)	60 days following receipt of USEPA comments.  Comments Received January 7, 2022 (response due March 8 2022)	March 7, 2022	--
Submit Revised PDIWP and QAPP	SOW 3.3(a)	60 days following receipt of USEPA comments.  Comments Received May 3, 2022 (response due July 5, 2022)	June 9, 2022	July 5, 2022
Preliminary (30%) Design	SOW 3.3(a), 3.4	120 days following USEPA approval of PDI Report		
Pre-Final (90%/95%) Design	SOW 3.5	150 days following USEPA comments on 30% Design		
Final (100%) Design	SOW 3.6	60 days following USEPA comments on 95% Design		
Draft Notice to Successors-In-Title	CD VIII.23.a	15 days after Effective Date	April 12, 2021	June 2, 2021
Record Notice to Successors-In-Title	CD VIII.23.a	Within 10 days after USEPA approval of draft notice	June 3, 2021	--
Certified Copies of Notices to Successors-In-Title	CD VIII.23.a	Within 10 days after recording notices	June 9, 2021	--

**TABLE 7**

**OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Item</b>	<b>Relevant Section of CD/SOW</b>	<b>Timeline for Completion</b>	<b>Actual Completion</b>	<b>Approval</b>
Submit certificates of insurance naming USEPA as an additional insured	CD XI.41	15 days prior to commencing on-site Work		
Identify a Community Involvement Coordinator (if requested)	-	15 days following USEPA request		
<b>RA Schedule</b>				
Award RA Contract	-	120 days after USEPA Notice of Authorization to Proceed with RA		
Submit RAWP	SOW 4.1	Submit with Award of RA Contract		
Designate IQAT	SOW 4.2	-		
Pre-Construction Conference	SOW 4.3(a)	Within 30 days after approval of RAWP		
Start of Construction	-	Within 60 days after approval of RAWP		
Completion of Construction	SOW 4.6(b)	as described in approved RAWP		
Pre-Final Inspection	SOW 4.6(b)	Within 14 days following completion of construction		
Pre-Final Inspection Report	SOW 4.6(d)	Within 14 days following completion of Pre-Final Inspection		
Final Inspection	SOW 4.7	Within 14 days following completion of work identified in Pre-Final Inspection Report		
RA Report	SOW 4.6(d)	60 days following final inspection		
Monitoring Report	SOW 4.7(b)	to be determined		
Work Completion Report	SOW 4.9(b)	to be determined		
Periodic Review of Support Plan	SOW 4.8	for Five-Year Reviews, triggered by start of first RA on 6/8/2015		

**Notes:**

Effective date is March 26, 2021.

--: not applicable

CD: consent decree

ERP: emergency response plan

HASP: health and safety plan

IQAT: independent quality assurance team

PDI: predesign investigation

PDIWP: predesign investigation work plan

QAPP: quality assurance project plan

RA: remedial action

RAWP: remedial action work plan

RD: remedial design

RDWP: remedial design work plan

SOW: statement of work

USEPA: United States Environmental Protection Agency

TABLE 8

**GROUNDWATER OPTIMIZATION INITIAL BASELINE SAMPLING RESULTS**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

LOCATION	IW-02	IW-05	IW-06	IW-07	IW-08	IW-10	IW-11	IW-12	IW-13	IW-13	
FIELD SAMPLE ID	IW-02	IW-05	IW-06	IW-07	IW-08	IW-10	IW-11	IW-12	IW-13	Duplicate-1	
SAMPLE DATE	7/29/2025	7/29/2025	8/13/2025	7/30/2025	7/30/2025	7/30/2025	7/29/2025	7/29/2025	7/29/2025	7/29/2025	
QA TYPE	Original	Original	Original	Original	Original	Original	Original	Original	Original	Field Duplicate	
NORTHING	1145271.926	1145611.76	1145677.548	1145799.004	1145764.36	1145709.985	1145644.222	1145566.113	1145529.733	1145529.733	
EASTING	650099.089	650319.729	650459.106	650734.1	650653.125	650528.278	650392.379	650225.611	650083.909	650083.909	
Parameter	Units										
1,2,4-Trichlorobenzene	µg/L	3.2	<1	<1	52	<1	2.5	1.3	<1	8.3	5.9
Chlorobenzene	µg/L	<1	<1	<1	3	<1	1.7	<1	<1	<1	<1
Trichloroethylene	µg/L	-	-	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	µg/L	<10	<10	<10	47	<10	<10	<10	<10	<10	<10
1,4-Dichlorobenzene	µg/L	<10	<10	<10	33	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	µg/L	-	-	-	-	-	-	-	-	-	-
4-Nitrophenol	µg/L	<10	<10	<10	<10	<10	<10	400 J	<10	<10	<10
Indeno(1,2,3-cd)pyrene	µg/L	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2
o, o, o-Triethyl phosphorothioate	µg/L	<10	<10	<10	23	<10	<10	<10	<10	<10	<10
Pentachlorophenol	µg/L	-	-	<1	-	-	-	-	-	-	-
Aroclor 1016	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1221	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	11	<0.5	<0.5	<0.5	<0.5
Aroclor 1232	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1242	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1248	µg/L	<0.5	<0.5	<0.5	2.8	3	4.1	<0.5	13	7.5	7.1
Aroclor 1254	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1260	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1268	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>2.8</b>	<b>3</b>	<b>15</b>	<b>&lt;0.5</b>	<b>13</b>	<b>7.5</b>	<b>7.1</b>
Parathion	µg/L	<1	<1	<1	4.7	<1	3.6	<1	<1	<1	<1
Sulfotepp	µg/L	<2	<2	<2	<2	<2	<2	<2	<2	<2	<2
Beryllium	µg/L	-	-	-	-	-	-	-	-	-	-
Cobalt	µg/L	<5	7.6	<5	40	<5	23	570	<5	<5	<5
Manganese	µg/L	260	580	31	9,600	250	1,500	25,000	78	240	240
Mercury	µg/L	<0.2	1.6	<0.2	<0.2	<0.2	<0.2	0.46	0.23	<0.2	<0.2

Notes:

1. Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A.

- : not sampled

µg/L: micrograms per liter

J: Estimated concentration

PCB: polychlorinated biphenyl

QA: quality assurance

TABLE 8

**GROUNDWATER OPTIMIZATION INITIAL BASELINE SAMPLING RESULTS**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

LOCATION	IW-16	IW-17	IW-18	IW-19	IW-20	IW-22	IW-23	IW-24	IW-25	
FIELD SAMPLE ID	IW-16	IW-17	IW-18	IW-19	IW-20	IW-22	IW-23	IW-24	IW-25	
SAMPLE DATE	7/30/2025	7/31/2025	7/31/2025	7/31/2025	7/30/2025	7/30/2025	7/30/2025	7/30/2025	7/30/2025	
QA TYPE	Original	Original	Original	Original	Original	Original	Original	Original	Original	
NORTHING	1147359.729	1147321.328	1147284.009	1147246.109	1147216.856	1147403.35	1147303.9	1147269.88	1147121.03	
EASTING	649187.525	649123.033	649058.393	648991.944	648942.425	649253.88	649089.55	649031.47	648792.11	
Parameter	Units									
1,2,4-Trichlorobenzene	µg/L	-	-	-	-	-	-	-	-	-
Chlorobenzene	µg/L	<1	<1	11	1.1	2.6	<1	9.1	2.6	<1
Trichloroethylene	µg/L	-	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10
1,4-Dichlorobenzene	µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10
4-Nitrophenol	µg/L	<10	<10	<10	<10	26	<10	<10	<10	120
Indeno(1,2,3-cd)pyrene	µg/L	-	-	-	-	-	-	-	-	-
o, o, o-Triethyl phosphorothioate	µg/L	<10	14	150	290	<10	<10	130	73	170
Pentachlorophenol	µg/L	<1	<1	<1	<1	<1	<1	<1	<1	<1
Aroclor 1016	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1221	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1232	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1242	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1248	µg/L	1.5	<0.5	<0.5	<0.5	<0.5	0.61	<0.5	<0.5	<0.5
Aroclor 1254	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1260	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1268	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>1.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>0.61</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>	<b>&lt;0.5</b>
Parathion	µg/L	<1	2.2	9.8	9.7 J	<1	<1	<1	<1	40
Sulfotepp	µg/L	<2	<2	<5 J	<2.5 J	<2	<2	<2	<2	<2
Beryllium	µg/L	-	-	-	-	-	-	-	-	-
Cobalt	µg/L	<5	<5	140	<5	<5	<5	47	11	6.4
Manganese	µg/L	150	3,400	31,000	17,000	810	210	43,000	10,000	630
Mercury	µg/L	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2

## Notes:

1. Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A.

- : not sampled

µg/L: micrograms per liter

J: Estimated concentration

PCB: polychlorinated biphenyl

QA: quality assurance

TABLE 8

**GROUNDWATER OPTIMIZATION INITIAL BASELINE SAMPLING RESULTS**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

LOCATION	DW-01	IW-26	IW-27	IW-27	IW-28	IW-29
FIELD SAMPLE ID	DW-01	IW-26	IW-27	Duplicate-2	IW-28	IW-29
SAMPLE DATE	7/31/2025	7/30/2025	7/30/2025	7/30/2025	7/30/2025	7/30/2025
QA TYPE	Original	Original	Original	Field Duplicate	Original	Original
NORTHING	1147158.05	1147567	1147567	1147567	1147213	1147185
EASTING	648895.868	649189	649159	649159	650291	650301
Parameter	Units					
1,2,4-Trichlorobenzene	µg/L	-	-	-	-	-
Chlorobenzene	µg/L	1.1	<1	<1	<1	-
Trichloroethylene	µg/L	-	-	-	-	<1
1,2-Dichlorobenzene	µg/L	<10	<10	<10	<10	-
1,4-Dichlorobenzene	µg/L	<10	<10	<10	<10	-
2,4,6-Trichlorophenol	µg/L	<10	-	-	-	-
4-Nitrophenol	µg/L	<10	<10	<10	<10	-
Indeno(1,2,3-cd)pyrene	µg/L	-	-	-	-	-
o, o, o-Triethyl phosphorothioate	µg/L	630	<10	<10	<10	-
Pentachlorophenol	µg/L	<1	-	-	-	-
Aroclor 1016	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1221	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1232	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1242	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1248	µg/L	<0.5	4.2	5.2	4	7.9
Aroclor 1254	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1260	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
Aroclor 1268	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>&lt;0.5</b>	<b>4.2</b>	<b>5.2</b>	<b>4</b>	<b>7.9</b>
Parathion	µg/L	2.3	<1	<1	<1	-
Sulfotepp	µg/L	<2	<2	<2	<2	-
Beryllium	µg/L	-	-	-	-	<4
Cobalt	µg/L	<5	<5	<5	<5	-
Manganese	µg/L	1,100	15	<10	<10	110
Mercury	µg/L	<0.2	<0.2	<0.2	<0.2	<0.2

## Notes:

1. Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A.

- : not sampled

µg/L: micrograms per liter

J: Estimated concentration

PCB: polychlorinated biphenyl

QA: quality assurance

**TABLE 9**

**OU-1/OU-2 GROUNDWATER RESULTS: T-11  
ANNISTON PCB SITE  
Anniston, Alabama**

LOCATION		T-11	T-11	T-11
FIELD SAMPLE ID		T-11-U-20250813	GW-U-Dup-20250813	T-11-F-20250813
SAMPLE DATE		8/13/2025	8/13/2025	8/13/2025
QA TYPE		Original	Field Duplicate	Original
NORTHING		1148974.57	1148974.57	1148974.57
EASTING		652936.85	652936.85	652936.85
Parameter	Unit			
Aroclor 1016	µg/L	ND	ND	ND
Aroclor 1221	µg/L	ND	ND	ND
Aroclor 1232	µg/L	ND	ND	ND
Aroclor 1242	µg/L	ND	ND	ND
Aroclor 1248	µg/L	ND	ND	ND
Aroclor 1254	µg/L	ND	ND	ND
Aroclor 1260	µg/L	ND	ND	ND
Aroclor 1268	µg/L	ND	ND	ND
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
Monochlorobiphenyl	µg/L	ND	ND	ND
Dichlorobiphenyl	µg/L	0.3 J	0.2 J	ND
Trichlorobiphenyl	µg/L	0.13	0.11	ND
Tetrachlorobiphenyl	µg/L	ND	ND	ND
Pentachlorobiphenyl	µg/L	ND	ND	ND
Hexachlorobiphenyl	µg/L	ND	ND	ND
Heptachlorobiphenyl	µg/L	ND	ND	ND
Octachlorobiphenyl	µg/L	ND	ND	ND
Nonachlorobiphenyl	µg/L	ND	ND	ND
Decachlorobiphenyl	µg/L	ND	ND	ND
<b>Total PCB, Homolog specific</b>	<b>µg/L</b>	<b>0.43 J</b>	<b>0.31 J</b>	<b>ND</b>

Notes:

1. Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A; Total PCB Homolog specific concentrations are determined by USEPA Method 680.

µg/L: micrograms per liter

F: filtered sample

J: The analyte was positively identified; however, the associated numerical value is estimated due to bias of associated quality control or calibration data or attributable to matrix interference.

ND: non-detect result

PCB: polychlorinated biphenyl

QA: quality assurance

U: unfiltered sample

USEPA: United States Environmental Protection Agency

**ATTACHMENT A**  
**Residential Removal Properties Surface Sampling Access Update**

# RESIDENTIAL REMOVAL PROPERTIES SURFACE SAMPLING ACCESS UPDATE

Anniston PCB Site  
Consent Decree

Sampling Letter			Access Granted?	EPA Notified	Days Out
Sent	Signed For	Returned			

## EPA Zone: D

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926 McDaniel Ave

2129: 11-21-03-07-02-1-40 (Includes Parcel 2110), Eval. Area: 11, EPA Zone: D

64179 > Owner



8/25/2025 9/2/2025 9/2/2025



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