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March 10, 2026

Mr. George Skala IV, PG, PMP
Remedial Project Manager
United States Environmental Protection Agency, Region IV
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

**RE: February 2026 Progress Report
Anniston PCB Site (Docket No. 1:02-cv-0749-RDP)
Anniston, Alabama**

Dear Mr. Skala:

Please find attached the February 2026 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 February 1, 2026, through February 28, 2026. The report also describes upcoming developments anticipated for the months of March and April 2026.

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

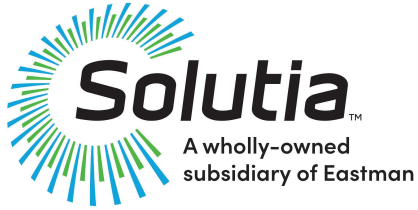
Sincerely,

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



FEBRUARY 2026 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

March 10, 2026

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Attachment C – OU-1/OU-2 Residential Removal Sampling Access

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 February 1, 2026, through February 28, 2026, 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 February 1, 2026, through

February 28, 2026, 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 February 1, 2026, through February 28, 2026, 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.

During this reporting period, P/S submitted correspondence to property owners and tenants currently included in the 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. During this reporting period, P/S requested access to eleven residential properties (Attachment A) and one special use property (Attachment B) to complete surface sampling in the footprint of former structures. Access was granted for surface sampling at the special use property. Additionally, P/S requested removal access for nine properties as part of the Interim IC Program (Attachment C).

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 11th Street Ditch

P/S will perform the next quarterly routine inspection in March 2026.

2.3 Operable Unit 4 (OU-4)

2.3.1 OU-4 Non-Residential Program

During this period, P/S was contacted by a contractor for the City of Oxford that is preparing to install a sewer main through a portion of OU-4. P/S are currently preparing a sampling plan to determine the extent of soil management that may be necessary for this project.

2.4 Special Studies

P/S initiated the process of obtaining access from property owners to install the tracking towers for the fish-tracking study.

2.5 Community Advisory Group

There was no CAG meeting scheduled for February. The next CAG meeting is scheduled for March 10, 2026 at 5:00PM CDT, and will be held in person at the Pell City Library located at 100 Bruce Ethridge Parkway in Pell City, Alabama.

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 5. 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 January 8, 2026, P/S completed the third quarterly baseline sampling of the interceptor wells at the four groundwater corrective/remedial action systems at OU-3 in accordance with the Optimization Work Plan. The validated groundwater data from this sampling event are presented in Table 6.

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 January 2026 quarterly groundwater sampling at the T-11 area are presented at Table 8.

5.0 WORK SCHEDULED

5.1 2003 PCD Anticipated Work Activities

During the months of March and April 2026, 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);
- 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;
- Perform 11th Street Ditch inspection and maintenance requirements in accordance with the approved schedule;
- Prepare and submit a sampling plan for the sewer main project in Oxford;
- Continue to implement the Special Studies Downstream of OU-4 in accordance with the Work Plan/Field Sampling Plan and QAPP;
- Prepare and submit a response to the EPA's comments on the Response to Comments matrix for the Special Studies Downstream of OU-4;
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold an in person regularly scheduled meeting on March 10, 2026.

5.2 OU-3 RD/RA CD Anticipated Work Activities

During the months of March and April 2026, the following work elements are anticipated:

- Continue to implement the OU-3 Optimization Work Plan; 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 March and April 2026, the following work elements are anticipated:

- Submit the 30% Remedial Design packages for OU-1/OU-2; 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

Notification of Change in EPA Remedial Project Manager	Received from EPA	December 22, 2025
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Reports

Operable Units -1/2 Reports

NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA	July 31, 2012
	Comments Received	May 16, 2013
	Revision Submitted	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
	Approval Pending	
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA	May 2, 2012
	Approval Pending	
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA	June 4, 2018
	Approval Pending	

Operable Unit - 4 Reports

All Operable Units Reports

January 2026 Progress Report	Submitted to EPA	February 10, 2026
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TABLE 2

INTERIM IC GROUP COUNTS ANNISTON PCB SITE

Anniston, Alabama

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

¹⁾ 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).

²⁾ 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.

³⁾ 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.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million

TABLE 3

OU-1 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

Residential Removal Action Program (Lead Site AOC Zone C and D) ⁽¹⁾

February 2026

No. of properties where access has been requested to surface sample	6
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	7
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
Total no. of properties with PCB surface results < 1 ppm	1214
Total no. of removal action properties completed by Solutia (as part of AOC and CD) ⁽²⁾⁽³⁾	371
Total no. of > 1 ppm PCBs removal action properties completed by EPA (confirmed)	8
Total no. of properties with PCB surface results ≥ 1 ppm	34
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

Special Use High Activity Residential Removal Action Program (Lead Site AOC Zone C and D)

February 2026

No. of properties where access has been requested to surface sample	1
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 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
Total no. of properties with PCB surface results < 1 ppm in High Activity Areas	24
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	9

Residential Removal Action Program (Lead Site AOC Zone A)

February 2026

No. of properties where access has been requested to surface sample	1
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	1
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
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	440
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	1
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	81

TABLE 3

OU-1 RESIDENTIAL PROGRAM SUMMARY

ANNISTON PCB SITE

Anniston, Alabama

Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)	2
Total no. of removal action properties Unsuitable for Removal	2

Residential Removal Action Program (Lead Site AOC Zone B) February 2026

No. of properties where access has been requested to surface sample	4
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	1
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
Total no. of properties with PCB surface results < 1 ppm sampled by Solutia and/or EPA	525
Total no. of properties with PCB surface results ≥ 1 ppm and Lead <400 ppm	1
Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead <400 ppm in High Activity Areas	0
Total no. of removal action properties completed by Solutia (as part of AOC and CD)	120
Total no. of removal action properties Unsuitable for Removal	3

Notes:

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

⁽²⁾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.

⁽³⁾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

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street ⁽²⁾	2820	3	C	Non-Responsive
1407 Glen Addie Avenue ⁽²⁾	765	24	C	Non-Responsive
716 Montrose Avenue ⁽²⁾	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) ⁽¹⁾	973	21	C	Owner Not Found

Notes:

⁽¹⁾ Portions of property are no longer unsuitable for removal.

⁽²⁾ Property requires additional removal action.

TABLE 5

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

Administrative Issues

Reports

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
OU-3 Construction Completion Report Third Addendum	Submitted to EPA	January 16, 2026
	Approval Pending	

Work Plans

TABLE 6

OU-3 GROUNDWATER OPTIMIZATION INITIAL BASELINE SAMPLING RESULTS
ANNISTON PCB SITE
Anniston, Alabama

LOCATION	IW-02	IW-05	IW-08	IW-10	IW-10	IW-11	IW-12	IW-13	IW-16	IW-17	IW-18	IW-19	IW-19	IW-20	IW-22	IW-23	IW-24	IW-25	IW-26	IW-27	IW-28	IW-29	
FIELD SAMPLE ID	IW-02	IW-05	IW-08	IW-10	Duplicate 2	IW-11	IW-12	IW-13	IW-16	IW-17	IW-18	IW-19	DUPLICATE 1	IW-20	IW-22	IW-23	IW-24	IW-25	IW-26	IW-27	IW-28	IW-29	
SAMPLE DATE	1/7/2026	1/8/2026	1/8/2026	1/8/2026	1/8/2026	1/7/2026	1/7/2026	1/7/2026	1/6/2026	1/6/2026	1/7/2026	1/7/2026	1/7/2026	1/7/2026	1/7/2026	1/6/2026	1/6/2026	1/7/2026	1/8/2026	1/6/2026	1/6/2026	1/6/2026	1/6/2026
QA TYPE	Original	Original	Original	Original	Field Duplicate	Original	Original	Original	Original	Original	Original	Original	Field Duplicate	Original	Original	Original	Original	Original	Original	Original	Original	Original	Original
NORTHING	1145271.926	1145611.76	1145764.36	1145709.985	1145709.985	1145644.222	1145566.113	1145529.733	1147359.729	1147321.328	1147284.009	1147246.109	1147246.109	1147216.856	1147403.35	1147303.9	1147269.88	1147121.03	1147567	1147567	1147213	1147185	
EASTING	650099.089	650319.729	650653.125	650528.278	650528.278	650392.379	650225.611	650083.909	649187.525	649123.033	649058.393	648991.944	648991.944	648942.425	649253.88	649089.55	649031.47	648792.11	649189	649159	650291	650301	
Parameter	Units																						
1,2,4-Trichlorobenzene	µg/L	1	1.1	<1	24 J	16 J	1.3	<1	<1	-	-	-	-	-	-	-	-	-	-	-	-	-	
Chlorobenzene	µg/L	<1	<1	<1	67	51	<1	<1	<1	<1	<1	3	4.2 J	1.9 J	28	<1	2.5	1.2	<1	<1	<1	-	
Trichloroethylene	µg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<1	<1	
1,2-Dichlorobenzene	µg/L	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	81	<10	<10	<10	<10	<10	<10	-	
1,4-Dichlorobenzene	µg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2,4,6-Trichlorophenol	µg/L	-	-	-	-	-	-	-	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	-	-	-	
4-Nitrophenol	µg/L	<10	12	<10	110	110	560 J	<10	<10	<10	<10	<10	<10	<10	5700 J	<10	<10	<10	61	<10	<10	-	
Indeno(1,2,3-cd)pyrene	µg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
o, o, o-Triethyl phosphorothioate	µg/L	<10	<10	<10	33 J	31	<10	<10	<10	<10	<10	50	130	140	75	<10	62	28	72	<10	<10	-	
Pentachlorophenol	µg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Aroclor 1016	µg/L	<0.5	<0.5	<0.5	9.8 J	16 J	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<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	220	220	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<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	<0.5	<0.5	<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	<0.5	<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	5	<0.5	<0.5	<0.5	23	4.7	1.5	<0.5	<0.5	<0.5	<0.5	<0.5	0.85	<0.5	<0.5	<0.5	13	6.7	15	
Aroclor 1254	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<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	<0.5	<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	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	
Total PCB, Aroclor specific	µg/L	<0.5	<0.5	5	230 J	236 J	<0.5	23	4.7	1.5	<0.5	<0.5	<0.5	<0.5	<0.5	0.85	<0.5	<0.5	<0.5	<0.5	13	6.7	15
Parathion	µg/L	<1	<1	<1	2.3	2.2	<1	<1	<1	<1	<1	<1	<1	<1	2.7	<1	<1	3	24	<1	<1	-	
Sulfotepp	µg/L	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<1.5	<5	<1.5	<1.5	<1.5	<4.2	<1.5	<1.5	-	
Beryllium	µg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<4	<4	
Cobalt	µg/L	<5	25	16	120	130	460	<5	<5	<5	<5	9.2	<5	<5	35	<5	44	21	5.2	<5	<5	-	
Manganese	µg/L	120	1300	280	8000	8100	22000	<10	20	200	1600	22000	27000	26000	6200	370	22000	8100	570	51	<10	190	
Mercury	µg/L	<0.2	2.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	0.48	

- Notes:
- Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A.
 - Metals concentrations are determined by USEPA Method 6010D and 7470A (mercury).
 - Pesticide concentrations are determined by USEPA Method 8141B.
 - Volatile organic compound concentrations are determined by USEPA Method 8260D.
 - Semi-volatile organic compound concentrations are determined by USEPA method 8270E.
- µg/L: micrograms per liter
J: Estimated concentration
PCB: polychlorinated biphenyl
- : not sampled

TABLE 7

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

Item	Relevant Section of CD/SOW	Timeline for Completion	Actual Completion	Approval
RD Schedule				
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 (response due March 12, 2026)		
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	--
Submit certificates of insurance naming USEPA as an additional insured	CD XI.41	15 days prior to commencing on-site Work		

TABLE 7

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

Item	Relevant Section of CD/SOW	Timeline for Completion	Actual Completion	Approval
Identify a Community Involvement Coordinator (if requested)	-	15 days following USEPA request		
RA Schedule				
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

**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-20260106	GW-U-DUP-20260106	T-11-F-20260106
SAMPLE DATE		1/6/2026	1/6/2026	1/6/2026
QA TYPE		Original	Duplicate	Original
NORTHING		1148974.57	1145611.8	1145764.4
EASTING		652936.85	650319.73	650653.13
Parameter	Units			
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
Total PCB, Aroclor specific	µg/L	ND	ND	ND
Monochlorobiphenyls	µg/L	ND	ND R	ND
Dichlorobiphenyls	µg/L	0.15 J	ND R	ND
Trichlorobiphenyls	µg/L	ND	ND	ND
Tetrachlorobiphenyls	µg/L	ND	ND	ND
Pentachlorobiphenyls	µg/L	ND	ND	ND
Hexachlorobiphenyls	µg/L	ND	ND	ND
Heptachlorobiphenyls	µg/L	ND	ND	ND
Octachlorobiphenyls	µg/L	ND	ND	ND
Nonachlorobiphenyls	µg/L	ND	ND	ND
Decachlorobiphenyls	µg/L	ND	ND	ND
Total PCB, Homolog specific	µg/L	0.15 J	ND R	ND

Notes:

1. Total PCB, Aroclor specific concentrations are determined by USEPA Method 8082A.
2. Total PCB, Homolog specific concentrations are determined by method 680.
3. Data were validated in accordance with the UFP-QAPP.

µg/L: micrograms per liter

J: Estimated concentration

ND: The analyte was analyzed for but was not detected at or above the reported sample quantitation limit.

R: The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

PCB: polychlorinated biphenyl

ATTACHMENT A
OU-1/OU-2 Residential Removal Properties Removal 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: A

2221 Walnut Ave

203693: 11-18-09-31-04-6-60, Eval. Area: -, EPA Zone: A

47963 > Owner [REDACTED] 2/20/2026 12

EPA Zone: B

1808 Cobb Ave

207570: 11-21-03-06-02-4-19, Eval. Area: -, EPA Zone: B

55680 > Owner [REDACTED] 2/20/2026 12

2820 Gurnee Ave

202946: 11-18-09-31-01-4-96, Eval. Area: -, EPA Zone: B

64069 > Owner [REDACTED] 2/20/2026 12

3200 Truman Ave

200770: 11-17-07-36-01-2-43, Eval. Area: -, EPA Zone: B

48950 > Owner [REDACTED] 2/20/2026 12

29 S Walnut Ave

3961: 11-21-03-07-04-4-16, Eval. Area: -, EPA Zone: B

38177 > Owner [REDACTED] 2/20/2026 12

EPA Zone: C

413 Chestnut Ave

3326: 11-21-03-07-04-1-24, Eval. Area: 04, EPA Zone: C

63849 > Owner [REDACTED] 2/20/2026 12

1203 Crawford Ave

1368: 11-22-01-01-04-4-37, Eval. Area: 19, EPA Zone: C

34160 > Owner [REDACTED] 2/20/2026 12

412 Front St

5130: 11-21-04-18-01-1-44, Eval. Area: 06, EPA Zone: C

63121 > Owner [REDACTED] 2/20/2026 12

701 Mulberry Ave

2663: 11-21-03-07-01-2-33, Eval. Area: 03, EPA Zone: C

31259 > Owner [REDACTED] 2/20/2026 12

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

1907 W 10th St

1983: 11-22-01-12-01-1-42, Eval. Area: 16, EPA Zone: D

64116 > Owner	██████████	2/20/2026	<input type="checkbox"/>		12
64177 > Tenant	██████████	2/20/2026	<input type="checkbox"/>		12

814 Montrose Ave

2283: 11-22-01-12-01-3-13, Eval. Area: 11, EPA Zone: D

63199 > Owner	████████████████████	2/20/2026	<input type="checkbox"/>		12
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ATTACHMENT B
OU-1/OU-2 Special Use Removal Properties Removal Sampling Access
Update

SPECIAL USE REMOVAL PROPERTIES SURFACE SAMPLING PROPERTIES ACCESS UPDATE

Anniston PCB Site
Consent Decree

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

Evaluation Area: 13

305 Embry St (formerly 0 Hwy 202)

3503: 11-22-01-12-03-1-88 (Includes Parcels 3504, 3554, 3695, 3730, 3732 & 3733 {formerly 0 Hwy 202}), Eval. Area:

37433 > Owner [REDACTED] 2/20/2026 2/21/2026 2/21/2026 --

Yes No NA

ATTACHMENT C
OU-1/OU-2 Residential Removal Properties Removal Sampling Access

OU-1/OU-2 RESIDENTIAL REMOVAL PROPERTIES REMOVAL SAMPLING ACCESS UPDATE

Anniston PCB Site
Consent Decree

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

EPA Zone: A

124 W 18th St

207123: 11-21-03-06-01-5-26, Eval. Area: -, EPA Zone: A

47913 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
	{Owner Previously Declined Access During Removal Initiation}				

EPA Zone: B

3002 Jefferson St

3410: 11-22-01-11-5-66, Eval. Area: -, EPA Zone: B

37284 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
	{Owner denied access 11/28/2007.}				

EPA Zone: C

621 Pine Ave

2820: 11-21-03-07-01-2-49, Eval. Area: 03, EPA Zone: C

64165 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
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1701 W 13th St

1061: 11-22-01-01-04-3-42 (formerly 1627 W 13th St), Eval. Area: 21, EPA Zone: C

33708 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
	{Access Previously Denied}				

Duncan Ave (11-22-01-01-04-2-77)

973: 11-22-01-01-04-2-77, Eval. Area: 21, EPA Zone: C

33572 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
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1407 Glen Addie Ave

765: 11-21-03-06-04-2-74, Eval. Area: 24, EPA Zone: C

30949 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
	{Denied dust sampling 9/03.}				

EPA Zone: D

716 Montrose Ave

2500: 11-22-01-12-01-3-64, Eval. Area: 11, EPA Zone: D

64105 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>		12
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OU-1/OU-2 RESIDENTIAL REMOVAL PROPERTIES REMOVAL SAMPLING ACCESS UPDATE

Anniston PCB Site
Consent Decree

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

EPA Zone: D

916 McDaniel Ave

2254: 11-21-03-07-02-1-44 (Includes Parcel 2310), Eval. Area: 11, EPA Zone: D

31208 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>	12
{Owner Previously Declined Access During Removal Initiation}				

918 McDaniel Ave

2217: 11-21-03-07-02-1-43, Eval. Area: 11, EPA Zone: D

45505 > Owner	[REDACTED]	2/20/2026	<input type="checkbox"/>	12
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