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

Dear Mr. Skala:

Please find attached the March 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 March 1, 2026, through March 31, 2026. The report also describes upcoming developments anticipated for the months of April and May 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. Pittman Macolly", is written over a light blue horizontal line.

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

Attachments

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



**MARCH 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**

April 10, 2026

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## **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 March 1, 2026, through March 31, 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 March 1, 2026, through

March 31, 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 March 1, 2026, through March 31, 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.

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. During this reporting period, there were no access activities.

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**

P/S performed the quarterly routine inspections as described in the 11<sup>th</sup> Street Operations and Maintenance Plan. No adverse findings were noted. P/S will perform the next quarterly routine inspection in June 2026.

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

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

There was no activity during this reporting period.

## **2.4 Special Studies**

P/S initiated the fish-tracking study for the Special Studies Downstream of OU-4. Validated data from the passive porewater and surface water samples collected in November 2025 are presented in Table 5. Validated data from the ex-situ porewater sediment samples collected in November 2025 are presented in Table 6.

## **2.5 Community Advisory Group**

A CAG meeting was held on March 10, 2026, at the Pell City Library located at 100 Bruce Ethridge Parkway in Pell City, Alabama. 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 May 12, 2026 via teleconference.

### **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 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.

#### **3.2 Remedial Action**

There was no activity during this reporting period.

#### **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 8. 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**

On March 12, 2026, P/S submitted the Preliminary (30%) Remedial Design (PRD) documents for OU-1/OU-2. The PDR documents included three components: Soil, Sediment and Creek Banks, and the T-11 Area. During this reporting period P/S also submitted Revision 2 of the OU-1/OU-2 RD/RA Health and Safety Plan and Revision 2 of the Unified Federal Policy – Quality Assurance Project Plan that are components of the PRD.

## **5.0 WORK SCHEDULED**

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

During the months of April and May 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;
- 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 a regularly scheduled meeting on May 12, 2026 via teleconference.

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

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

- Continue implementing the OU-3 Optimization Work Plan;
- Prepare and submit the 2025 Annual Groundwater Detection Monitoring and Corrective Action Effectiveness Report; 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 April and May 2026, the following work elements are anticipated:

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

**Operable Unit - 4 Reports**

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**All Operable Units Reports**

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February 2026 Progress Report	Submitted to EPA	March 10, 2026
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**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.

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) <sup>(1)</sup>** **March 2026**

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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	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>371</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed)</b>	<b>8</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

**Special Use High Activity Residential Removal Action Program (Lead Site AOC Zone C and D)** **March 2026**

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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 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>

**Residential Removal Action Program (Lead Site AOC Zone A)** **March 2026**

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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>March 2026</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

SPECIAL STUDIES DOWNSTREAM OF OU-4: PASSIVE POREWATER AND SURFACE WATER RESULTS  
ANNISTON PCB SITE  
Anniston, Alabama

LOCATION	PW-30I	SW-30I	PW-33I	SW-33I	PW-34I	SW-34I	PW-36I	PW-36I	SW-36I
FIELD SAMPLE ID	PW-30I-20251117	SW-30I-20251117	PW-33I-20251117	SW-33I-20251117	PW-34I-20251117	SW-34I-20251117	PW-36I-20251117	PW-DUP-01-20251117	SW-36I-20251117
SAMPLE DATE	11/17/2025	11/17/2025	11/17/2025	11/17/2025	11/17/2025	11/17/2025	11/17/2025	11/17/2025	11/17/2025
QA TYPE	Original	Original	Original	Original	Original	Original	Original	Field Duplicate	Original
NORTHING	1196561.127	1196532.824	1125294.271	1125169.074	1115099.606	1115024.358	1106407.361	1106407.361	1106315.769
EASTING	585548.1052	585497.6776	549401.6976	549421.7745	541243.1728	541238.0419	547958.1301	547958.1301	547940.9979
Parameter	Unit								
Aroclor 1016	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254	µg/L	0.00042 J	ND	ND	ND	ND	0.0013 J	0.0014 J	0.0014 J
Aroclor 1260	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1262	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1268	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>0.00042 J</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>	<b>0.0013 J</b>	<b>0.0014 J</b>	<b>0.0014 J</b>
Decachlorobiphenyl	µg/L	ND	ND	ND	ND	0.00000045 J	0.00000016 J	0.00000038 J	0.00000037 J
Dichlorobiphenyl	µg/L	ND	ND	ND	ND	ND	ND	0.00040 J	0.00077 J
Heptachlorobiphenyl	µg/L	0.000011 J	0.0000038 J	0.0000027 J	0.0000016 J	0.000017 J	0.000013 J	0.000049 J	0.000053 J
Hexachlorobiphenyl	µg/L	0.000030 J	0.000022 J	0.000012 J	0.0000086 J	0.000043 J	0.000032 J	0.00018 J	0.00021 J
Monochlorobiphenyl	µg/L	ND	ND	ND	ND	ND	ND	ND	0.00060 J
Nonachlorobiphenyl	µg/L	ND	ND	ND	ND	ND	ND	0.000014 J	0.000014 J
Octachlorobiphenyl	µg/L	0.000010 J	0.0000016 J	0.0000026 J	0.00000068 J	0.0000023 J	0.0000012 J	0.0000070 J	0.0000077 J
Pentachlorobiphenyl	µg/L	0.000055 J	0.000043 J	0.000023 J	0.000019 J	0.000073 J	0.000050 J	0.00038 J	0.00048 J
Tetrachlorobiphenyl	µg/L	0.000030 J	0.000037 J	0.000021 J	0.000019 J	0.000066 J	0.000031 J	0.00049 J	0.00061 J
Trichlorobiphenyl	µg/L	0.000014 J	0.000024 J	0.000023 J	0.0000099 J	0.000044 J	0.000017 J	0.00034 J	0.00045 J
<b>Total PCB, Homolog specific</b>	<b>µg/L</b>	<b>0.00014 J</b>	<b>0.00013 J</b>	<b>0.000082 J</b>	<b>0.000058 J</b>	<b>0.00024 J</b>	<b>0.00014 J</b>	<b>0.0018 J</b>	<b>0.0032 J</b>
PCB Congener #105	µg/L	0.0000016 J	0.0000014 J	0.00000055 J	0.00000036 J	0.0000022 J	0.0000013 J	0.0000094	0.000011
PCB Congener #114	µg/L	ND	ND	ND	ND	ND	0.00000021 J	0.00000042 J	0.00000082
PCB Congener #118	µg/L	0.0000074	0.0000055 J	0.0000036	0.0000029 J	0.0000090	0.0000068	0.000033	0.000038
PCB Congener #123	µg/L	ND	ND	ND	ND	ND	ND	0.00000081 J	0.00000089
PCB Congener #126	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
PCB Congener #156 + 157	µg/L	ND	ND	ND	0.00000070 J	0.00000068	0.00000030 J	0.0000022	0.0000028
PCB Congener #167	µg/L	0.00000015 J	0.00000023 J	ND	ND	0.00000020 J	0.00000011 J	0.00000051 J	0.00000088 J
PCB Congener #169	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
PCB Congener #189	µg/L	ND	ND	ND	ND	ND	ND	0.00000015 J	0.00000014 J
PCB Congener #77	µg/L	ND	0.00000054 J	ND	ND	0.00000035 J	ND	0.0000060	0.0000065
PCB Congener #81	µg/L	ND	ND	ND	ND	ND	ND	ND	ND
<b>Total PCB, Congener specific</b>	<b>µg/L</b>	<b>0.0000091 J</b>	<b>0.0000077 J</b>	<b>0.0000042 J</b>	<b>0.0000034 J</b>	<b>0.000012 J</b>	<b>0.0000088 J</b>	<b>0.000053 J</b>	<b>0.000061 J</b>

Notes:  
 1. Total PCB Aroclor specific concentrations are quantified by USEPA Method 8082A; Total PCB homolog specific concentrations are quantified by USEPA Method 680; Total dioxin-like PCB congener specific concentrations are quantified by USEPA Method 1668A.  
 µg/L: micrograms per liter  
 ND: non-detect result  
 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.  
 PCB: polychlorinated biphenyl  
 QA: quality assurance  
 USEPA: United States Environmental Protection Agency

TABLE 5

SPECIAL STUDIES DOWNSTREAM OF OU-4: PASSIVE POREWATER AND SURFACE WATER RESULTS  
ANNISTON PCB SITE  
Anniston, Alabama

LOCATION	SW-36I	PW-37I	SW-37I	PW-38I	SW-38I	PW-39I	SW-39I
FIELD SAMPLE ID	SW-DUP-01-20251117	PW-37I-20251118	SW-37I-20251118	PW-38I-20251118	SW-38I-20251118	PW-39I-20251118	SW-39I-20251118
SAMPLE DATE	11/17/2025	11/18/2025	11/18/2025	11/18/2025	11/18/2025	11/18/2025	11/18/2025
QA TYPE	Field Duplicate	Original	Original	Original	Original	Original	Original
NORTHING	1106315.769	1099283.801	1099197.454	1097310.712	1097293.14	1077777.775	1077721.604
EASTING	547940.9979	535604.6589	535567.0252	520422.5828	520369.0651	511875.3511	511806.9021
Parameter	Unit						
Aroclor 1016	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1221	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1232	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1242	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1248	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1254	µg/L	0.0015 J	0.0018 J	ND	ND	0.0012 J	ND
Aroclor 1260	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1262	µg/L	ND	ND	ND	ND	ND	ND
Aroclor 1268	µg/L	ND	ND	ND	ND	ND	ND
<b>Total PCB, Aroclor specific</b>	<b>µg/L</b>	<b>0.0015 J</b>	<b>0.0018 J</b>	<b>ND</b>	<b>ND</b>	<b>0.0012 J</b>	<b>ND</b>
Decachlorobiphenyl	µg/L	0.00000037 J	0.00000012 J	0.00000011 J	ND	0.000000043 J	ND
Dichlorobiphenyl	µg/L	0.00039 J	ND	ND	ND	ND	0.00058 J
Heptachlorobiphenyl	µg/L	0.000058 J	0.000018 J	0.000029 J	0.000031 J	0.000011 J	0.000020 J
Hexachlorobiphenyl	µg/L	0.00017 J	0.000069 J	0.000100 J	0.00012 J	0.000045 J	0.000086 J
Monochlorobiphenyl	µg/L	ND	ND	ND	ND	ND	ND
Nonachlorobiphenyl	µg/L	ND	ND	ND	ND	ND	ND
Octachlorobiphenyl	µg/L	0.000010 J	0.0000017 J	0.0000044 J	0.0000054 J	0.0000013 J	0.0000023 J
Pentachlorobiphenyl	µg/L	0.00034 J	0.00019 J	0.00025 J	0.00021 J	0.00013 J	0.00030 J
Tetrachlorobiphenyl	µg/L	0.00036 J	0.00024 J	0.00031 J	0.00027 J	0.00021 J	0.00051 J
Trichlorobiphenyl	µg/L	0.00018 J	0.00021 J	0.00013 J	0.00012 J	0.00011 J	0.00070 J
<b>Total PCB, Homolog specific</b>	<b>µg/L</b>	<b>0.0015 J</b>	<b>0.00072 J</b>	<b>0.00082 J</b>	<b>0.00076 J</b>	<b>0.00050 J</b>	<b>0.0022 J</b>
PCB Congener #105	µg/L	0.0000097	0.0000039 J	0.0000060	0.0000079 J	0.0000026 J	0.0000055
PCB Congener #114	µg/L	ND	ND	0.00000072 J	ND	ND	ND
PCB Congener #118	µg/L	0.000033	0.000016	0.000022	0.000026 J	0.000011 J	0.000021
PCB Congener #123	µg/L	0.0000010 J	ND	ND	ND	ND	0.00000067
PCB Congener #126	µg/L	ND	ND	ND	ND	ND	ND
PCB Congener #156 + 157	µg/L	0.0000026 J	0.00000097 J	0.0000012 J	0.0000021 J	0.00000047 J	0.00000070 J
PCB Congener #167	µg/L	0.00000072 J	0.00000017 J	0.00000021 J	ND	ND	0.00000031 J
PCB Congener #169	µg/L	ND	ND	ND	ND	ND	ND
PCB Congener #189	µg/L	ND	ND	ND	ND	ND	ND
PCB Congener #77	µg/L	0.0000034	ND	0.0000022 J	ND	0.00000095 J	ND
PCB Congener #81	µg/L	ND	ND	ND	ND	ND	ND
<b>Total PCB, Congener specific</b>	<b>µg/L</b>	<b>0.000051 J</b>	<b>0.000021 J</b>	<b>0.000032 J</b>	<b>0.000036 J</b>	<b>0.000015 J</b>	<b>0.000028 J</b>

TABLE 6

SPECIAL STUDIES DOWNSTREAM OF OU4: EX-SITU POREWATER SEDIMENT RESULTS  
ANNISTON PCB SITE  
Anniston, Alabama

LOCATION		SED-30E	SED-33E	SED-34E	SED-34E	SED-36E	SED-37E	SED-38E	SED-39E
FIELD SAMPLE ID		SED-30E-20251119	SED-33E-20251119	SED-34E-20251119	SED-DUP-01-20251119	SED-36E-20251119	SED-37E-20251118	SED-38E-20251118	SED-39E-20251119
SAMPLE DATE		11/19/2025	11/19/2025	11/19/2025	11/19/2025	11/19/2025	11/18/2025	11/18/2025	11/19/2025
QA TYPE		Original	Original	Original	Field Duplicate	Original	Original	Original	Original
NORTHING		1196016.024	1127953.062	1119406.193	1119406.193	1104218.421	1097242.165	1095855.903	1074427.808
EASTING		585739.4059	547540.6337	540076.9439	540076.9439	545957.6528	534513.816	521710.0795	511577.4488
DEPTH (MIN-MAX) (FT BGS)		0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5
Parameter	Unit								
Total organic carbon	mg/kg	19,000	9,800	8,700	7,500	9,700	13,000	7,600	7,600
Aroclor 1016	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	µg/kg	5.9 J	4.7 J	ND	4.0 J	9.3 J	6.6 J	6.1 J	4.5 J
Aroclor 1262	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1268	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
<b>Total PCB, Aroclor specific</b>	<b>µg/kg</b>	<b>5.9 J</b>	<b>4.7 J</b>	<b>ND</b>	<b>4.0 J</b>	<b>9.3 J</b>	<b>6.6 J</b>	<b>6.1 J</b>	<b>4.5 J</b>
Decachlorobiphenyl	µg/kg	0.17 J+	0.094 J+	0.041 J	0.081 J	0.36	0.25	0.18	0.081
Dichlorobiphenyl	µg/kg	0.16 J	0.089 J	0.080 J	0.089 J	1.9	4.8	1.0 J	0.34 J
Heptachlorobiphenyl	µg/kg	2.5 J	0.96 J	0.70 J	1.0 J	4.7 J	6.0 J	2.6 J	0.99 J
Hexachlorobiphenyl	µg/kg	4.1 J	1.7 J	1.4 J	2.0 J	8.5 J	13 J	5.2 J	2.0 J
Monochlorobiphenyl	µg/kg	0.021 J	0.020 J	0.022 J	0.012 J	0.39	0.40	0.14	0.052 J
Nonachlorobiphenyl	µg/kg	0.20	0.092 J	0.066 J	0.10 J	0.65	0.51	0.32	0.12 J
Octachlorobiphenyl	µg/kg	0.74	0.32 J	0.19 J	0.30 J	1.7 J	1.8	0.92	0.34 J
Pentachlorobiphenyl	µg/kg	4.1 J	1.7 J	1.6 J	2.2 J	9.9 J	19 J	6.1 J	2.5 J
Tetrachlorobiphenyl	µg/kg	1.7 J	0.83 J	0.79 J	0.90 J	7.5 J	17 J	4.3 J	1.8 J
Trichlorobiphenyl	µg/kg	0.56 J	0.30 J	0.28 J	0.29 J	4.1 J	14 J	2.3 J	0.90 J
<b>Total PCB, Homolog specific</b>	<b>µg/kg</b>	<b>14 J+</b>	<b>6.1 J+</b>	<b>5.1 J</b>	<b>7.0 J</b>	<b>40 J</b>	<b>75 J</b>	<b>23 J</b>	<b>9.1 J</b>
PCB Congener #105	µg/kg	0.16	0.096	0.092	0.12	0.51	0.85	0.30	0.12
PCB Congener #114	µg/kg	0.0089 J	0.0052 J	0.0044	0.0051 J	0.025	0.049	0.012 J	0.0073 J
PCB Congener #118	µg/kg	0.59	0.27	0.25	0.33	1.3	2.1	0.78	0.33
PCB Congener #123	µg/kg	0.0077	0.0052	0.0042 J	0.0055	0.029	0.035 J	0.018	0.0067
PCB Congener #126	µg/kg	0.0047	ND	ND	ND	ND	ND	ND	ND
PCB Congener #156	µg/kg	0.081	0.038	0.030	0.044	0.21	0.28	0.11	0.042
PCB Congener #157	µg/kg	0.081	0.038	0.030	0.044	0.21	0.28	0.11	0.042
PCB Congener #167	µg/kg	0.029	0.014	0.0093 J	0.017	0.065	0.095	0.038	0.015
PCB Congener #169	µg/kg	ND	ND	ND	ND	ND	ND	ND	ND
PCB Congener #189	µg/kg	0.013	0.0047	0.0039	0.0054	0.017 J	0.027	0.013	0.0041
PCB Congener #77	µg/kg	0.039	0.023	0.020	0.023	0.15	0.21	0.085	0.033
PCB Congener #81	µg/kg	ND	0.0067 J	ND	ND	ND	ND	ND	ND
<b>Total PCB, Congener Specific</b>	<b>µg/kg</b>	<b>1.0 J</b>	<b>0.50 J</b>	<b>0.44 J</b>	<b>0.59 J</b>	<b>2.5 J</b>	<b>3.9 J</b>	<b>1.5 J</b>	<b>0.59 J</b>

Notes:

1. Total PCB Aroclor specific concentrations are determined by USEPA Method 8082A; Total PCB homolog specific concentrations are quantified by USEPA Method 680; Total dioxin-like PCB Congener specific concentrations are quantified by USEPA Method 1668A; Total Organic Carbon concentrations are quantified by Lloyd Kahn.

2. Provided northing and easting represent the centroid of the ten individual locations sampled to form the composite sample.

ft bgs: feet below ground surface

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.

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

mg/kg: milligrams per kilogram

µg/kg: micrograms per kilogram

max: maximum

min: minimum

ND: non-detect result

PCB: polychlorinated biphenyl

QA: quality assurance

USEPA: United States Environmental Protection Agency

**TABLE 7**

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

**Administrative Issues**

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**Reports**

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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
	<b>Approval Pending</b>	

**Work Plans**

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**TABLE 8**

**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 (response due March 12, 2026)	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	--

**TABLE 8**

**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