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October 12, 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: September 2026 Progress Report
Anniston PCB Site (Docket No. 1:02-cv-0749-CLM)
Anniston, Alabama

Dear Mr. Skala:

Please find attached the September 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 September 1, 2026, through September 30, 2026. The report also describes upcoming developments anticipated for the months of October and November 2026.

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

Sincerely,

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

Attachments

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

SEPTEMBER 2026 PROGRESS REPORT

ANNISTON PCB SITE

(DOCKET NO. 1:02-cv-0749-CLM)

ANNISTON, ALABAMA

USEPA I.D. No. ALD 004 019 048

Submitted For:

Solutia Inc. and Pharmacia LLC
702 Clydesdale Avenue
Anniston, Alabama 36201

October 12, 2026

EXECUTIVE SUMMARY

During September 2026, P/S began construction support for the Oxford Water Works and Sewer Board sanitary sewer upgrade project on September 2. For the City of Oxford Parks and Recreation Department Softball Field Resurfacing Project, P/S submitted the Sampling Plan on September 21, received EPA approval on September 24, and began field sampling on September 29. P/S also completed upgrades to OU-3 carbon treatment system No. 3 and the SWMU 1 well controls. P/S submitted the OU-1/OU-2 Residential and Nonresidential Soil Pre-Final (95%) Remedial Design on September 25.

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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-CLM). 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, 2026, through September 30, 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-CLM). 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, 2026,

through September 30, 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-CLM). 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, 2026, through September 30, 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 eight residential properties in the Residential Removal Properties Program where access has not been granted and one special use property where removal access has been granted and depth sampling is pending. One residential property has granted access, and a removal action is scheduled. The properties are summarized in Table 3. A description of each residential property's status is presented in Table 4 and special use property in Table 5.

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

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 2026.

2.3 Operable Unit 4 (OU-4)

2.3.1 OU-4 Non-Residential Program

On September 2, 2026, P/S began providing construction support for the Oxford Water Works and Sewer Board sanitary sewer upgrade project. The portion of the project requiring construction support is expected to be completed in October 2026.

On September 21, 2026, P/S submitted a Sampling Plan for the City of Oxford Parks and Recreation Department Softball Field Resurfacing Project. EPA approved the sampling plan on September 24, 2026. The sampling began on September 29, 2026, and is expected to be completed in October 2026.

On September 30, 2026, P/S held a conference call with the EPA and the Special Master to the Court to discuss the sampling plan and the existing data that will be used to develop a construction support workplan.

2.4 Special Studies

P/S continued the fish-tracking study for the Special Studies Downstream of OU-4.

2.5 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 22, 2026, the West Anniston Foundation held a community education forum with members of the community to discuss the cleanup of the Anniston PCB Site. The TA provided a presentation on risk assessment, specifically as it relates to OU-4.

2.6 Community Advisory Group

A CAG meeting was held on September 8, 2026, via teleconference. There were three members of the CAG and four members of the public from outside the site OUs in attendance at the meeting. The meeting was open to the public to allow residents to observe the working session and to comment or ask questions. Topics discussed at the CAG meeting included:

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

The next CAG meeting is scheduled for November 10, 2026, at the Bynum Community Center.

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

P/S completed upgrades of carbon treatment system (CTS) #3 and the SWMU 1 well controls to address system operational issues 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 September 25, 2026, P/S submitted the Pre-Final (95%) Remedial Design for Residential and Nonresidential Soil. EPA approval is pending.

5.0 WORK SCHEDULED

5.1 2003 PCD Anticipated Work Activities

During the months of October and November 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 surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Prepare and submit Addendum No. 11 to the NTC Removal Action Completion Report for Residential Properties to document residential activities during 2025;
- 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;
- Provide construction support for the sewer main project in Oxford;
- Prepare and submit the construction completion report for the sewer main project in Oxford;
- Perform field sampling for the City of Oxford Parks and Recreation Department Softball Field Resurfacing Project;
- Continue to implement the Special Studies Downstream of OU-4 in accordance with the Work Plan/Field Sampling Plan and QAPP;
- 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 10, 2026, at the Bynum Community Center.

5.2 OU-3 RD/RA CD Anticipated Work Activities

During the months of October and November 2026, the following work elements are anticipated:

- Begin construction of CTS #4; 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 2026, the following work elements are anticipated:

- Submit the Sediment and Creek Banks Pre-Final (90%/95%) Remedial Design by October 9, 2026;
- Submit the T-11 Area Pre-Final (90%/95%) Remedial Design by October 19, 2026;
- P/S will collect the quarterly groundwater sample from T-11; 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

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		
August 2026 Progress Report	Submitted to EPA	September 10, 2026
Work Plans		
Oxford Parks and Recreation Department Softball Field Resurfacing Project Sampling Plan	Submitted to EPA	September 21, 2026
	EPA Approval Received	September 24, 2026

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	98	44	**457**
OU-4	12	6	0	**18**
Total	**327**	**104**	**44**	**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 then 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]	**September 2026**
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
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)	**September 2026**
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
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)[3]	**8**
Removal Action Completed, Additional Removal Action Required in the Footprint of a Former Structure	1

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

TABLE 3

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

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

PROPERTY STATUS FOR SPECIAL USE 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
305 Embry Street	3503	13	C	Removal Access Granted, Depth Sampling Pending

TABLE 6

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 ***Approval Pending***	January 16, 2026

Work Plans

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)	March 12, 2026	Comments Received: April 28, 2026, June 10, 2026 May 12, 2026; July 14 2026 May 21, 2026, July 23, 2026
Pre-Final (90%/95%) Design	SOW 3.5	150 days following USEPA comments on 30% Design (Residential and Nonresidential Soil due September 25, 2026; Sediment and Creek Banks due October 9, 2026; T-11 Area due October 19, 2026)	September 25, 2026 (Residential and Nonresidential Soil)	
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

Item	Relevant Section of CD/SOW	Timeline for Completion	Actual Completion	Approval
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		
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