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November 9, 2011

Mr. Kenneth Bardo - LU-9J
U.S. EPA Region V
Corrective Action Section
77 West Jackson Boulevard
Chicago, IL 60604-3507

VIA FEDEX

Re: 100% Enhanced Aerobic Bioremediation System Design
Former Chlorobenzene Process Area
Solutia Inc., W. G. Krummrich Plant, Sauget, IL

Dear Mr. Bardo:

Enclosed please find the subject document regarding full-scale implementation of enhanced aerobic bioremediation (EABR) of the saturated zone in the Former Chlorobenzene Process Area (CPA) at Solutia Inc.'s W. G. Krummrich Plant, Sauget, IL. (A similar document for thermally enhanced soil vapor extraction (T-SVE) of the unsaturated zone is being submitted separately.)

The "Final Decision" dated February 26, 2008, for the W. G. Krummrich Plant requires in part that, in a "Construction Completion Report," "a registered professional engineer and the Solutia Project Manager shall certify that the remedy at the Former Chlorobenzene Process Area has been conducted in accordance with the U.S. EPA-approved final design and specifications, to the best of their knowledge …." The enclosed document and that for T-SVE are intended to be those "final designs and specifications" to serve as the basis for that certification for the Former Chlorobenzene Process Area.

Per the "Semiannual Progress Report" submitted on September 15, 2011, CPA remedy installation was projected to be completed, and remedy operation begun, in late January 2012 and a Construction Completion Report submitted in mid-March 2012. Those dates were based on proposals / estimates; fabrication / installation contracts have since been executed, and the above dates are now projected to be early March and mid-April, respectively, as reflected in the enclosed document. Well drilling and other field work is now under way; Solutia will advise US EPA of further schedule changes, if any, as soon as possible.

If you have any questions regarding this submittal, please contact me at (314) 674-3312 or gmrina@solutia.com

Sincerely,

Gerald M. Rinaldi
Manager, Remediation Services

Enclosure

cc: Distribution List

DISTRIBUTION LIST

100% Enhanced Aerobic Bioremediation System Design
Former Chlorobenzene Process Area
Solutia Inc., W. G. Krummrich Plant, Sauget, IL

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