

**Index to the Administrative Record
U.S. EPA Final Corrective Measures for
Solutia Inc. Located in Sauget, Illinois
ILD 000 802 702**

<u>Document Number</u>	<u>Date</u>	<u>Description/Author</u>
Solutia - 001	Various	“Notification of Hazardous Waste Activity” submitted by Monsanto Company on August 15, 1980, September 25, 1984, May 31, 1985, June 10, 1985, and August 8, 1986.
Solutia - 002	Various	“Hazardous Waste Permit Application, Part A” submitted by Monsanto Company on November 13, 1980, September 25, 1984, May 31, 1985, June 10, 1985, and August 8, 1986.
Solutia - 003	12/5/97	Illinois EPA Memorandum documenting the Resource Conservation and Recovery Act (RCRA) history at the Solutia facility and the facility Solid Waste Management Units needing attention.
Solutia - 004	12/9/97	“Summary of Ground-Water Quality Conditions” (Volumes I and II) report prepared by Roux Associates. Provides a history of groundwater contamination at and from the Solutia facility.
Solutia - 005	2/19/98	Letter from Illinois EPA to Solutia providing comments on the RCRA Closure Plan for the hazardous waste management units at the facility.
Solutia - 006	6/29/98	Memorandum of Understanding between City of East St. Louis and Illinois EPA regarding the use of a local groundwater or water well ordinance as an environmental institutional control (print-out from Illinois EPA website). Includes Ordinance #97-10066.

The Administrative Record for Solutia is available at these locations. Documents in bold only at U.S. EPA Record Center.

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<u>Document Number</u>	<u>Date</u>	<u>Description/Author</u>
Solutia - 007	8/98	“Foundation Report” prepared by Solutia providing an approach to Illinois EPA to address environmental contamination at the facility. (oversized pages at U.S. EPA only)
Solutia - 008	9/30/99	“1998 Evaluation of Ground-Water Quality Conditions at the W.G. Krummrich Plant” prepared by Roux Associates. Presents ground-water quality data from six new wells and selected existing wells.
Solutia - 009	10/27/99	Letter from U.S.EPA notifying Solutia that an evaluation and site inspection of the Solutia W.G. Krummrich plant will be conducted to determine corrective action requirements under RCRA authority.
Solutia - 010	11/8/99	E-mail from U.S. EPA to Solutia outlining the steps for controlling the migration of contaminated groundwater from the Solutia W.G. Krummrich plant.
Solutia - 011	11/19/99	E-mail from U.S. EPA to Solutia providing observations on the “Summary of Ground-Water Quality Conditions” and “1998 Evaluation of Ground-Water Quality Conditions at the W.G. Krummrich Plant” reports dated December 9, 1997, and September 30, 1999.

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Solutia - 012	11/23/99	U.S. EPA Memorandum providing notification of negotiations for a RCRA 3008(h) Corrective Action Consent Order at the Solutia facility.
Solutia - 013	12/99	U.S. EPA's Index to Administrative Record in support of a RCRA 3008(h) Corrective Action Consent Order for the Solutia facility.
Solutia - 014	12/1/99	U.S. EPA Memorandum documenting risks posed to human health and the environment from contaminated soil and groundwater at the Solutia facility.
Solutia - 015	12/10/99	U.S. EPA determination that the migration of contaminated groundwater at and from the Solutia facility is not under control.
Solutia - 016	12/17/99	“Response to IEPA Comments on the Status Report, Hazardous Waste Management Unit Closure” prepared by Radian International for Solutia. The response provides information on releases at six hazardous waste management units at the Solutia facility. (oversized pages at U.S. EPA only)
Solutia - 017	12/21/99	Letter from U.S. EPA to Solutia providing a draft RCRA 3008(h) Consent Order.
Solutia - 018	12/23/99	Letter from Roux Associates to U.S. EPA responding to U.S. EPA observations on ground-water quality conditions provided in the November 19, 1999, e-mail.

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Solutia - 019	2/18/00	U.S. EPA analysis of aerial photographs depicting historical operations at the Solutia W.G. Krummrich plant.
Solutia - 020	5/3/00	Letter from U.S. EPA to Solutia providing an executed copy of the Administrative Order of Consent, EPA Docket No. R8H-5-00-003 entered for the Solutia facility.
Solutia - 021	5/15/00	“Site Study” report prepared by Tetra Tech EMI for U.S. EPA. The report presents and interprets 30 aerial photographs of the Solutia W.G. Krummrich plant taken from 1937 to 1998.
Solutia - 022	5/18/00	Letter from U.S. EPA to Solutia providing a final Figure 1 delineating the Solutia facility boundary subject to corrective action and providing notification of the U.S. EPA Project Manager. (oversized figure at U.S. EPA only)
Solutia - 023	5/31/00	E-mails from U.S. EPA to Solutia providing electronic copies of the 30 historical aerial photos studied in the May 15, 2000 report.
Solutia - 024	5/31/00	E-mail from U.S. EPA to Solutia providing examples of areas of concern identified in the aerial photos.

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Solutia - 025	6/2/00	Internal U.S. EPA e-mail discussing work to be presented by Solutia in the RCRA Site Sampling Plan.
Solutia - 026	6/21/00	Draft "RCRA Site Sampling Plan" prepared by Solutia. The plan proposes sampling of groundwater, surface water, and sediment. (oversized pages at U.S. EPA only)
Solutia - 027	8/1/00	Letter from Solutia to U.S. EPA providing an update on efforts to obtain off-site access agreements for conducting investigations.
Solutia - 028	8/1/00	Draft "Description of Current Conditions" (Appendices 1 to 15) report prepared by Solutia.
Solutia - 029	8/4/00	E-mail from EPA to Solutia providing preliminary comments on a draft "Description of Current Conditions" report dated August 1, 2000.
Solutia - 030	8/7/00	Letter from Solutia to U.S. EPA submitting the "Surface Water Quality Assurance Project Plan" prepared by Menzie-Cura & Associates, Inc.
Solutia - 031	8/9/00	E-mail from U.S. EPA to Solutia providing information available from the U.S. Army Corps of Engineers (ACE) pertinent to the investigation of environmental conditions in the Mississippi River.

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Solutia - 032	8/18/00	U.S. EPA preliminary comments on the "Surface Water Quality Assurance Project Plan" submitted by Solutia on August 7, 2000.
Solutia - 033	8/25/00	E-mail from U.S. EPA to Solutia providing meeting notes and agreements made for investigating environmental conditions in the Mississippi River.
Solutia - 034	8/25/00	Letter from Solutia to U.S. EPA requesting a 45-day extension for submitting a cost estimate to provide financial assurance for completing corrective action activities.
Solutia - 035	8/30/00	E-mail from U.S. EPA to Solutia granting a time extension for submittal of the cost estimate for completing corrective action activities.
Solutia - 036	9/1/00	E-mail from U.S. EPA to U.S. ACE requesting historical information on the Mississippi River.
Solutia - 037	9/1/00	Draft "Description of Current Conditions" (Volumes II and III, Appendices 16 to 25) report prepared by Solutia.
Solutia - 038	9/8/00	Letter from Solutia to U.S. EPA providing a cost estimate for completing corrective action activities.

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Solutia - 039	9/14/00	Progress report for the first quarter of 2000. The progress report summarizes the work performed during the quarter, data collected, problems encountered, project schedule, and percent project completed.
Solutia - 040	9/26/00	E-mail from Solutia to U.S. EPA providing results of a reconnaissance survey in Mississippi River. The survey was performed to determine appropriate sampling locations for determining impacts from the discharge of contaminated groundwater.
Solutia - 041	9/27/00	Letter from Solutia to U.S. EPA providing a cost estimate for completion of corrective action activities.
Solutia - 042	10/3/00	“Field Oversight Summary” report for September 18 through 20, 2000, prepared by Tetra Tech EM Inc. for U.S. EPA. Field work includes reconnaissance survey along east bank of the Mississippi River.
Solutia - 043	10/18/00	“Sampling and Analysis Plan” prepared by Tetra Tech EM Inc. for U.S. EPA. Plan proposes to collect up to 25 sediment samples from the Mississippi River.
Solutia - 044	10/24/00	E-mail from U.S. EPA to Solutia regarding the use of peristaltic pumps for collecting water samples from the Mississippi River.
Solutia - 045	11/14/00	Letter from Solutia to U.S. EPA providing an update of access agreements for off-site investigations.

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Solutia - 046	11/20/00	Letter from Solutia to U.S. EPA submitting a revised "Surface Water Sampling Plan" for the Mississippi River. The plan was originally submitted with the "Description of Current Conditions" report.
Solutia - 047	12/4/00	"Field Oversight Summary" report for October 2000, prepared by Tetra Tech EM Inc. for U.S. EPA. Field work includes split sampling of sediment samples obtained by Solutia in the Mississippi River.
Solutia - 048	12/11/00	"Field Sampling Summary" report for October and November 2000, prepared by Tetra Tech EM Inc. for U.S. EPA. Field work includes split sampling of sediment samples obtained by Solutia in the Mississippi River.
Solutia - 049	12/13/00	Progress report for the second quarter of 2000. The progress report summarizes the work performed during the quarter, access agreements, data collected, problems encountered, project schedule, and percent project completed.
Solutia - 050	2/9/01	Letter from U.S. EPA to Solutia providing analytical results of sediment sampled in the Mississippi River from October 24 through November 3, 2000. Sediment results are compared to groundwater data, U.S. EPA Region 5 Ecological Data Quality levels, and Illinois EPA Water Quality Criteria.

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Solutia - 051	3/13/01	Progress report for the first quarter of 2001. The progress report summarizes the work performed during the quarter, access agreements, data collected, problems encountered, project schedule, and percent project completed.
Solutia - 052	4/23/01	Letter from Illinois EPA to Solutia providing a Notice of Violation regarding a significant spill of monochlorobenzene on January 7 and 8, 2001.
Solutia - 053	6/11/01	Letter from Solutia to U.S. EPA submitting the "Ecological Risk Assessment for WG Krummrich Plant" prepared by Menzie-Cura & Associates, Inc. The ecological risk assessment concludes that there is an unacceptable risk posed to the Mississippi River environment from the discharge of groundwater contaminants.
Solutia - 054	6/14/01	Progress report for the second quarter of 2001. The progress report summarizes the work performed during the quarter, problems encountered, project schedule, and percent project completed.
Solutia - 055	6/20/01	Solutia "Hydraulic Containment Study" and "Mass Containment Study" reports prepared by Groundwater Services, Inc. The reports evaluate methods for controlling the discharge of contaminated groundwater to the Mississippi River.

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Solutia - 056	7/30/01	Letter from U.S. EPA to Solutia providing comments on the "Hydraulic Containment Study" and Mass Containment Study" reports submitted by Solutia on June 20, 2001.
Solutia - 057	8/1/01	E-mail from U.S. EPA to Illinois EPA providing comments sent to Solutia on the remedial action plan to address the January 7 and 8, 2001 monochlorobenzene spill.
Solutia - 058	8/9/01	Letter from U.S. EPA to Solutia providing comments on the "Ecological Risk Assessment for WG Krummrich Plant" submitted on June 11, 2001.
Solutia - 059	9/14/01	Progress report for the third quarter of 2001. The progress report summarizes the work performed during the quarter, problems encountered, and percent project completed.
Solutia - 060	10/31/01	Letter from Solutia to U.S. EPA providing a follow-up on environmental issues discussed in an October 3, 2001 meeting, including coordination of site investigations and remediation between the CERCLA and RCRA programs of U.S. EPA.

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Solutia - 061	11/30/01	Letter from Solutia to U.S. EPA requesting a 90 day extension for demonstrating that the migration of contaminated groundwater is stabilized. Includes the "Discharge Control Study, Site R, W.G. Krummrich Plant" prepared by Groundwater Services, Inc. (November 29, 2001), and "Technical Specifications Groundwater Extraction Wells, Site R, Sauget, Illinois" prepared by Golder Associates (November 2001). (oversized pages at U.S. EPA only)
Solutia - 062	12/3/01	E-mail from U.S. EPA to Solutia requesting the status of the monochlorobenzene spill remedial action and the design to capture the groundwater contaminant plume discharging to the Mississippi River.
Solutia - 063	12/13/01	Progress report for the fourth quarter of 2001. The progress report summarizes the work performed during the quarter, problems encountered, and percent project completed.
Solutia - 064	12/17/01	Letter from U.S. EPA to Solutia replying to Solutia's October 31, 2001 letter, including coordination between the CERCLA and RCRA programs of U.S. EPA.
Solutia - 065	12/20/01	Letter from Solutia to U.S. EPA replying to U.S. EPA's December 17, 2001 letter, including coordination between the CERCLA and RCRA programs of U.S. EPA.

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Solutia - 066	12/27/01	Letter from U.S. EPA to Solutia granting Solutia's November 30, 2001, request for a 90 day time extension for demonstrating that the migration of contaminated groundwater is stabilized. Includes U.S. EPA comments on the "Discharge Control Study, Site R, W.G. Krummrich Plant" and "Technical Specifications Groundwater Extraction Wells, Site R, Sauget, Illinois" submitted on November 30, 2001.
Solutia - 067	1/10/02	Letter from Solutia to U.S. EPA replying to U.S. EPA's December 27, 2001, letter granting a time extension and providing technical comments.
Solutia - 068	1/28/02	Letter from Solutia to U.S. EPA submitting the "Groundwater Discharge Control System, W.G. Krummrich, Sauget, Illinois, Design Basis and Design Response to Comments".
Solutia - 069	2/8/02	E-mail from Solutia to U.S. EPA revising the remediation action plan for monochlorobenzene recovery in response to U.S. EPA's December 3, 2001 e-mail.
Solutia - 070	2/8/02	Letter from Solutia to U.S. EPA providing an update on efforts to stabilize the migration of contaminated groundwater to the Mississippi River.

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Solutia - 071	3/1/02	Letter from Solutia to U.S. EPA providing an update on efforts to stabilize the migration of contaminated groundwater to the Mississippi River and a request for a time extension to September 31, 2002, for stabilizing the migration of contaminated groundwater.
Solutia - 072	3/20/02	Letter from U.S. EPA to Solutia responding to Solutia's "Groundwater Discharge Control System, W.G. Krummrich, Sauget, Illinois, Design Basis and Design Response to Comments" submitted on January 28, 2002.
Solutia - 073	3/20/02	Letter from U.S. EPA to Solutia responding to Solutia's update and request for time extension of March 1, 2002.
Solutia - 074	3/25/02	Letter from Solutia to U.S. EPA responding to U.S. EPA's letter of March 20, 2002.
Solutia - 075	3/27/02	Letter from U.S. EPA to Solutia responding to Solutia's letters of March 1 and 25, 2002.

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Solutia - 076	4/1/02	Letter from Solutia submitting the “Focused Feasibility Study, Volume 1, Interim Groundwater Remedy, Sauget Area 2 Sites O, Q, R, and S” and “Focused Feasibility Study, Volume 2, Design Basis and Design, Sauget Area 2 Sites O, Q, R, and S” to the U.S. EPA CERCLA program. Both studies were updated on June 13, 2002. The studies address the discharge of contaminated groundwater to the Mississippi River downgradient of the Sauget Area 2 Sites and provide a design for an interim groundwater remedy. (CD only in Cahokia)
Solutia - 077	4/5/02	Letter from U.S. EPA to Solutia requesting a revised cost estimate that includes costs associated with the groundwater remedial alternative, and an update of off-site access agreements.
Solutia - 078	4/5/02	Letter from Solutia to U.S. EPA requesting an eight-month time extension to stabilize the migration of contaminated groundwater to the Mississippi River.
Solutia - 079	4/10/02	Progress report for the first quarter of 2002. The progress report summarizes the work performed during the quarter, problems encountered, data collected, and project schedule.
Solutia - 080	5/5/02	Letter from Solutia to U.S. EPA responding to U.S. EPA’s April 5, 2002 letter requesting a revised cost estimate.

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Solutia - 081	7/6/02	Progress report for the second quarter of 2002. The progress report summarizes the work performed during the quarter, problems encountered, data collected, and project schedule.
Solutia - 082	8/13/02	List of areas of concern prepared by U.S. EPA for Solutia to investigate.
Solutia - 083	8/14/02	General sampling approach prepared by U.S. EPA for Solutia to assess human health risks.
Solutia - 084	9/20/02	Letter report prepared for Solutia by Groundwater Services, Inc. that evaluates groundwater data to predict contaminant concentrations at the Mississippi River. (oversized pages at U.S. EPA only)
Solutia - 085	9/23/02	E-mail from U.S. EPA to Solutia regarding the use of OSHA monitoring to address air investigations.
Solutia - 086	9/30/02	CERCLA Administrative Order issued to Solutia to perform a remedial design for an Interim Groundwater Remedy to address groundwater contaminants discharging to the Mississippi River.
Solutia - 087	10/14/02	Progress report for the third quarter of 2002. The progress report summarizes the work performed during the quarter and problems encountered.

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Solutia - 088	10/16/02	U.S. EPA documentation that the migration of contaminated groundwater at and from the Solutia facility is not under control, and U.S. EPA documentation that current human exposures at the Solutia facility are not under control.
Solutia - 089	10/29/02	Letter from Solutia to U.S. EPA providing a Conceptual Site Model for the Solutia facility.
Solutia - 090	11/18/02	E-mail from U.S. EPA to Solutia providing comments on the Conceptual Site Model submitted on October 29, 2002.
Solutia - 091	11/26/02	Submittal of the Solutia Field Sampling Plan, Quality Assurance Project Plan, and Health and Safety Plan for the "RCRA Environmental Indicator for Current Human Exposure (CA-725), W.G. Krummrich Plant, Sauget, Illinois" prepared by URS Corporation.
Solutia - 092	12/12/02	Letter from TRC Environmental Corporation submitting the "RCRA CA-725 Environmental Indicators - Human Exposures Air Quality Field Sampling Plan" for the Solutia facility.
Solutia - 093	12/13/02	U.S. EPA comments on the Solutia Field Sampling Plan and Quality Assurance Project Plan submitted on November 26, 2002.

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Solutia - 094	12/17/02	Submittal of the Environmental Indicator Report "CA 750 Migration of Contaminated Groundwater Under Control, W.G. Krummrich Plant, Sauget, IL" prepared by URS Corporation.
Solutia - 095	1/13/03	Progress report for the fourth quarter of 2002. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 096	1/13/03	Letter from Solutia to U.S. EPA regarding the "CA 750 Migration of Contaminated Groundwater Under Control, W.G. Krummrich Plant, Sauget, IL" report submitted on December 17, 2002.
Solutia - 097	1/16/03	Letter from U.S. EPA to Solutia providing comments on the "CA 750 Migration of Contaminated Groundwater Under Control, W.G. Krummrich Plant, Sauget, IL" submitted on December 17, 2002.
Solutia - 098	2/4/03	Letter from U.S. EPA to Solutia responding to Solutia's May 5, 2002 letter. A revised cost estimate is requested to assure completion of corrective action activities.
Solutia - 099	2/4/03	Letter from Solutia to U.S. EPA proposing sampling of indoor air at enclosed buildings without a positive pressure ventilation system.

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Solutia - 100	2/4/03	E-mail from U.S. EPA to Solutia providing comments on the "RCRA CA-725 Environmental Indicators - Human Exposures Air Quality Field Sampling Plan" submitted on December 12, 2002.
Solutia - 101	2/21/03	Letter from URS Corporation to U.S. EPA submitting a proposed soil sampling location plan for the Corrective Measures Study for the Solutia facility. (oversized pages at U.S. EPA only)
Solutia - 102	2/25/03	Letter from Solutia to U.S. EPA amending the "RCRA CA-725 Environmental Indicators - Human Exposures Air Quality Field Sampling Plan" submitted on December 12, 2002, including methodology and analyte list for air sampling.
Solutia - 103	2/28/03	U.S. EPA notes from a February 27, 2003, meeting with Solutia discussing the proposed soil sampling location plan submitted on February 21, 2003.
Solutia - 104	3/13/03	U.S. EPA comments on revisions to the "RCRA CA-725 Environmental Indicators - Human Exposures Air Quality Field Sampling Plan" submitted on February 25, 2003.
Solutia - 105	3/28/03	E-mail from TRC Solutions to U.S. EPA providing a revised sampling protocol for air sampling.

The Administrative Record for Solutia is available at these locations. Documents in bold only at U.S. EPA Record Center.

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Solutia - 106	3/28/03	E-mails between TRC Solutions and U.S. EPA regarding weather for indoor air sampling.
Solutia - 107	4/11/03	Progress report for the first quarter of 2003. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 108	4/23/03	Letter from Solutia to U.S. EPA submitting a revised detailed cost estimate (\$1,117,000) to complete corrective action activities in response to U.S. EPA's February 4, 2003 letter.
Solutia - 109	4/28/03	E-mail from U.S. EPA to Solutia providing background information on groundwater quality to use in addressing the requirement to control the migration of contaminated groundwater.
Solutia - 110	5/1/03	"Field Oversight Report" for March 2003, prepared by Booz Allen Hamilton for U.S. EPA. Field work includes Phase I soil sampling at the Solutia facility.
Solutia - 111	5/2/03	E-mail from U.S. EPA to Solutia providing comments on the "Implementation of Slurry Wall Construction" plan submitted on April 24, 2003, to the CERCLA program of U.S. EPA to address the discharge of contaminated groundwater to the Mississippi River.

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Solutia - 112	5/2/03	U.S. EPA letter to Solutia approving with conditions, the revised cost estimate to complete corrective action activities submitted on April 23, 2003.
Solutia - 113	5/29/03	E-mail from U.S. EPA to Solutia providing results of an Illinois EPA file review of the Route 3 Drum Site and comments on the site investigations.
Solutia - 114	6/13/03	E-mail from Solutia to U.S. EPA providing an update of the historical operations of the Route 3 drum site.
Solutia - 115	7/3/03	Letter from Solutia to the CERCLA program of U.S. EPA submitting the “Amended Focused Feasibility Study, Interim Groundwater Remedy Sauget Area 2 Sites O, Q, R, and S”. Includes groundwater data in the area of discharge to the Mississippi River.
Solutia - 116	7/3/03	Letter from Solutia to the CERCLA program of U.S. EPA submitting the “Groundwater Migration Control System Sauget Area 2 Superfund Site Remedial Design/Remedial Action Workplan”, “Volume 1, Final Design Submittal”, and “Volume 2, Construction Quality Assurance Plan” prepared by URS Corporation. These plans address the interim remedy to be constructed to eliminate the discharge of contaminated groundwater to the Mississippi River.

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Solutia - 117	7/10/03	E-mails between U.S. EPA and Solutia regarding the startup and construction schedule for the slurry wall and treatment of contaminated groundwater at the American Bottoms POTW.
Solutia - 118	7/10/03	Progress report for the second quarter of 2003. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 119	7/31/03	Letter from Solutia to the CERCLA program of U.S. EPA submitting the “Groundwater Treatment Contingency Plan for the Sauget Area 2 Groundwater Migration Control System” prepared by The Advent Group, Inc. The plan provides options for treating contaminated groundwater in case the American Bottoms POTW can not accept extracted groundwater.
Solutia - 120	8/5/03	Letter from Solutia to U.S. EPA providing the “Results of RCRA CA-725 Environmental Indicators Air Quality Sampling” report. The report is found in Volume III, Attachment D of the August 14, 2003 submittal (see Solutia - 123).
Solutia - 121	8/14/03	Letter from Solutia to U.S. EPA submitting the “CA 725 Human Exposures Under Control, Volumes I, II, and III” report prepared by URS Corporation. (only Volume I in Cahokia)

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Solutia - 122	8/18/03	Letter from U.S. EPA to Solutia requesting a meeting to discuss the insufficient pumping rate of three groundwater recovery wells to prevent the migration of contaminated groundwater into the Mississippi River.
Solutia - 123	8/03	“Draft Baseline Ecological Risk Assessment, Sauget Area 2 Sites, Volumes 1 and 2” prepared by AMEC for the Sauget Area 2 Sites Committee. Includes sediment and surface water sampling data, and sediment toxicity testing from the Mississippi River.
Solutia - 124	8/31/03	“Human Health Risk Assessment, Sauget Area 2 Sites, Volumes 1 and 2” prepared by ENSR Corporation for the CERCLA program of U.S. EPA. Includes an assessment of risk posed by contaminated sediment, surface water, and fish in the Mississippi River.
Solutia - 125	9/11/03	Letter from Solutia to U.S. EPA submitting the human health and ecological risk assessments prepared for the Sauget Area 2 Sites (see Solutia - 123 and - 124).
Solutia - 126	9/12/03	Letter from Solutia to U.S. EPA providing notification of a new project manager.
Solutia - 127	9/30/03	Letter from Solutia to U.S. EPA providing plume boundary maps to be included in the Environmental Indicator Report submitted on December 17, 2002. (oversized pages at U.S. EPA only)

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Solutia - 128	10/3/03	E-mail from the U.S. EPA to Solutia providing comments on the "Results of RCRA CA-725 Environmental Indicators Air Quality Sampling" report submitted on August 5, 2003.
Solutia - 129	10/13/03	Letter from Solutia to U.S. EPA providing a map showing where additional gravel will be placed to protect workers from potentially impacted surface soil. Provides supplemental information for the CA 725 Current Human Exposures Under Control report submitted on August 14, 2003.
Solutia - 130	10/15/03	Progress report for the third quarter of 2003. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 131	10/15/03	Letter from Solutia to the CERCLA program of U.S. EPA submitting the "Project Health and Safety Plan", "Construction and Quality Control Plan", "Hydraulic Barrier Plan", and "Stormwater Pollution Prevention Plan" prepared by Inquip Associates, Inc. The plans are for the Solutia groundwater migration control system to be installed to prevent contaminated groundwater from discharging to the Mississippi River. (oversized pages at U.S. EPA only)
Solutia - 132	10/22/03	E-mail from U.S. EPA to Solutia acknowledging new pumping rates for the groundwater migration control system.

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Solutia - 133	10/23/03	E-mail from U.S. EPA to Solutia noting an Environmental Indicators Report to demonstrate that the groundwater migration control system has eliminated the migration of contaminated groundwater into the Mississippi River.
Solutia - 134	10/28/03	E-mail from U.S. EPA to Solutia noting the new pumping rate (1,800 gpm) for the groundwater migration control system. U.S. EPA requests a new CA 750 Environmental Indicator Report and provides an outline of the data to be included in the report.
Solutia - 135	10/31/03	E-mail from U.S. EPA to Solutia providing a response to particle tracking analysis performed for the CA 750 Environmental Indicator Report.
Solutia - 136	11/5/03	Letter from U.S. EPA to Solutia outlining the potential for DNAPL to be present at the Solutia facility and the presence of a bedrock trough in the area. U.S. EPA requests investigations to fully delineate the extent of DNAPL and the bedrock trough.
Solutia - 137	11/06/03	E-mail from U.S. EPA to Solutia requesting the status of the placement of additional gravel detailed in Solutia's October 13, 2003 letter.
Solutia - 138	11/6/03	E-mail from Solutia notifying U.S. EPA that additional gravel placement commenced and will be completed in three weeks.

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Solutia - 139	11/13/03	Letter from Solutia to the CERCLA program of U.S. EPA submitting the “Treatability Study Report Sauget Area 2 Interim Groundwater Remedy” prepared by The Advent Group, Inc. The report evaluates possible treatment methods for contaminated groundwater recovered by the groundwater migration control system.
Solutia - 140	11/24/03	E-mail from U.S. EPA to Solutia providing a review of the CA 725 Human Exposures Under Control report submitted on August 14, 2003. The review concludes that contaminated groundwater and ambient air could pose a significant risk to human health through the inhalation pathway.
Solutia - 141	12/10/03	Letter from Solutia to U.S. EPA submitting the “Gravel Addition Implementation and Confirmation Summary Report” prepared by URS Corporation. The report confirms the placement of a minimum of 12 inches of gravel to control human exposures to contaminated surface soil.
Solutia - 142	12/11/03	Letter from Solutia to U.S. EPA submitting the “Results of RCRA CA-725 Environmental Indicators Air Quality Sampling” report. The letter includes responses to U.S. EPA comments from October 3, 2003. The report supplements the CA 725 Human Exposures Under Control report submitted on August 14, 2003.

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Solutia - 143	12/16/03	E-mail from Solutia to U.S. EPA providing worker exposure estimates in the vicinity of soil vapor sampling points.
Solutia - 144	1/9/04	E-mail from U.S. EPA to Solutia providing a list of monitoring wells where DNAPL might be a concern.
Solutia - 145	1/15//04	Progress report for the fourth quarter of 2003. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 146	1/20/04	E-mail from U.S. EPA to Solutia noting that a proper hydraulic gradient was not met for the groundwater migration control system at the Mississippi River.
Solutia - 147	1/30/04	Letter from the Sauget Area 2 Sites Group to the CERCLA program of U.S. EPA submitting the “Remedial Investigation/Feasibility Study Report, Volumes I to V” prepared by URS Corporation. The RI/FS Report provides groundwater data downgradient of the Solutia W.G Krummrich plant and sample results from the Mississippi River.
Solutia - 148	2/16/04	E-mail from Solutia to U.S. EPA providing results of early-February groundwater level data for piezometers monitoring the effectiveness of the groundwater migration control system. The data was submitted in response to U.S. EPA’s January 20, 2004 e-mail.

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Solutia - 149	2/18/04	Letter from Solutia to U.S. EPA submitting the "DNAPL Characterization and Site Corrective Measures Study Workplan" prepared by Groundwater Services, Inc. The workplan includes a Quality Assurance Project Plan, and the scope of work for investigating DNAPL and proposing corrective measures at the Solutia W.G. Krummrich plant.
Solutia - 150	2/24/04	E-mail from Solutia to U.S. EPA providing results of late-February groundwater level data for piezometers monitoring the effectiveness of the groundwater migration control system. The data was submitted in response to U.S. EPA's January 20, 2004, e-mail.
Solutia - 151	2/25/04	Letter from Solutia to U.S. EPA providing notification of a new project manager.
Solutia - 152	3/1/04	E-mail from U.S. EPA to Solutia providing comments on the "DNAPL Characterization and Site Corrective Measures Study Workplan" submitted on February 18, 2004.
Solutia - 153	3/9/04	Transmittal letter from Solutia to U.S. EPA that presents and discusses data and figures demonstrating that the groundwater migration control system is pumping at sufficient rates to control the discharge of contaminated groundwater to the Mississippi River. (oversized figures at U.S. EPA only)

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Solutia - 154	3/9/04	Letter from U.S. EPA to Solutia providing Notice of Dispute. U.S. EPA concludes in the notice that Solutia has not adequately demonstrated that contaminated groundwater migration is stabilized and that current human exposures are under control.
Solutia - 155	3/16/04	E-mail from Solutia to U.S. EPA notifying that the pumping rates for the groundwater migration control system were back to normal. The discharge of collected contaminated groundwater had been temporarily restricted at the American Bottoms POTW.
Solutia - 156	3/26/04	Letter from Solutia to U.S. EPA requesting a time extension for submitting the Corrective Measures Study.
Solutia - 157	3/30/04	Letter from U.S. EPA to Solutia providing agreements made at a March 17 and 18, 2004, meeting regarding the Notice of Dispute invoked by U.S. EPA on March 9, 2004.
Solutia - 158	4/19/04	Letter from Solutia to U.S. EPA submitting the "CA750 Groundwater Migration Under Control Addendum" as agreed to at the March 17 and 18, 2004 meeting.
Solutia - 159	4/19/04	Letter from Solutia to U.S. EPA providing responses to questions on human exposure scenarios raised at the March 17 and 18, 2004 meeting.

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Solutia - 160	5/3/04	Letter from Solutia to U.S. EPA requesting a time extension to August 27, 2004, for submitting the Corrective Measures Study.
Solutia - 161	5/4/04	Letter from U.S. EPA to Solutia agreeing to a time extension to August 27, 2004, for submitting the Final Corrective Measures Proposal.
Solutia - 162	5/18/04	Letter from U.S. EPA to Solutia providing Notice of Formal Dispute. U.S. EPA concludes that contaminated groundwater is currently being adequately controlled by the groundwater migration control system. However the migration of contaminated groundwater was not controlled during certain time periods.
Solutia - 163	5/26/04	U.S. EPA's "CA725 Documentation of Environmental Indicator Determination". The documentation verifies that current human exposures are under control at the Solutia facility.
Solutia - 164	5/26/04	U.S. EPA's "CA750 Documentation of Environmental Indicator Determination". The documentation verifies that the migration of contaminated groundwater at and from the Solutia facility is under control.
Solutia - 165	6/2/04	Letter from Solutia to U.S. EPA requesting a conference to resolve the May 18, 2004, Notice of Formal Dispute.

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Solutia - 166	6/8/04	E-mail from U.S. EPA to Solutia confirming a June 21, 2004, meeting to resolve the Notice of Formal Dispute.
Solutia - 167	6/18/04	Letter from Solutia submitting the “Groundwater Migration, Impact and Control Assessment”. The assessment presents Solutia’s position regarding the May 18, 2004, Notice of Formal Dispute.
Solutia - 168	7/15/04	Progress report for the second quarter of 2004. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 169	7/19/04	Letter from U.S. EPA to Solutia responding to the “Groundwater Migration, Impact and Control Assessment” submitted by Solutia on June 18, 2004. U.S. EPA partially concurs with Solutia’s position.
Solutia - 170	8/9/04	Letter from Solutia to U.S. EPA requesting a meeting to formally resolve the remaining issues in dispute detailed in U.S. EPA’s July 19, 2004 letter.
Solutia - 171	8/20/04	E-mail from U.S. EPA to Solutia confirming a September 23, 2004, meeting regarding the formal dispute and extension of the negotiation period for resolving the dispute.

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Solutia - 172	8/27/04	Letter from Solutia to U.S. EPA submitting the "RCRA Corrective Measures Study (CMS), Volumes I to III". The CMS provides the results of environmental investigations and proposes final corrective measures. (CD only in Cahokia)
Solutia - 173	9/9/04	Letter from Solutia to U.S. EPA submitting the "RCRA Corrective Measures Study (CMS), CMS Addendum I". The CMS Addendum I provides soil boring logs. (CD only in Cahokia)
Solutia - 174	9/10/04	E-mail from U.S. EPA to Solutia requesting supplemental information to complete a review of the CMS.
Solutia - 175	9/22/04	Letter from Solutia to U.S. EPA providing additional information to consider in the formal dispute initiated by U.S. EPA on May 18, 2004.
Solutia - 176	9/23/04	Solutia hand-outs presented at a meeting to resolve the formal dispute.
Solutia - 177	10/13/04	Progress report for the third quarter of 2004. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 178	10/13/04	Letter from Solutia counsel to U.S. EPA providing additional written information for resolution of the formal dispute initiated by U.S. EPA on May 18, 2004.

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Solutia - 179	10/18/04	Letter from Solutia to U.S. EPA submitting the "RCRA Corrective measures Study (CMS), CMS Addendum II". The addendum addresses U.S. EPA's request for additional information to complete a review of the CMS. (CD only in Cahokia)
Solutia - 180	11/9/04	Letter from Solutia to U.S. EPA submitting the "Status Report for the Sauget Area 2 Groundwater Migration Control System". The report documents the completion of the slurry trench excavation and backfilling, and monitoring program.
Solutia - 181	11/18/04	Letter from U.S. EPA to Solutia providing comments on the "RCRA Corrective Measures Study (CMS), Volumes I to III" and "CMS Addendums I and II" submitted on August 27, September 9, and October 18, 2004. The letter also requests supplemental information.
Solutia - 182	12/3/04	Letter from U.S. EPA to Solutia providing comments on the plume stability monitoring plan submitted on April 19, 2004, as part of the "CA750 Groundwater Migration Under Control Addendum".
Solutia - 183	1/10/05	Progress report for the fourth quarter of 2004. The progress report summarizes the work performed during the quarter and problems encountered.

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Solutia - 184	1/14/05	U.S. EPA memo evaluating Solutia's November 2002 Mississippi River sediment data.
Solutia - 185	1/27/05	U.S. EPA memo detailing results from the DNAPL characterization and remediation study.
Solutia - 186	2/9/05	Letter from Solutia to U.S. EPA submitting the "RCRA Corrective Measures Study (CMS), Response to Comments". The response to comments partially addresses U.S. EPA comments on the CMS from November 18, 2004. (CD only in Cahokia)
Solutia - 187	2/23/05	TerraTherm presentation for the February 23, 2005 meeting. The presentation discusses the use of in-situ thermal desorption (ISTD) for treatment of PCBs and chlorobenzenes at contaminated sites nationwide.
Solutia - 188	3/17/05	E-mail from U.S. EPA to Solutia discussing the use of ISTD technology at the Solutia facility.
Solutia - 189	3/18/05	E-mail from U.S. EPA to Solutia providing TSCA input on the use of ISTD at the Solutia facility.
Solutia - 190	3/21/05	E-mail from U.S. EPA to Solutia providing a revised version of the March 18, 2005 e-mail.
Solutia - 191	3/23/05	E-mail from Solutia to U.S. EPA discussing the need for source treatment at the Solutia facility.

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Solutia - 192	3/28/05	Letter from TerraTherm to U.S. EPA responding to questions on ISTD technology.
Solutia - 193	4/1/05	Letter from Solutia to U.S. EPA submitting the "Sauget Area 2 Groundwater Migration Control System Interim Operating Period 1 Tech Memo". The Tech Memo provides information to support a request to modify the method of performance monitoring for the groundwater migration control system. (CD only in Cahokia)
Solutia - 194	4/8/05	Progress report for the first quarter of 2005. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 195	5/2/05	E-mail from U.S. EPA to U.S. ACE that discusses a potential sampling program in the Mississippi River and requests a meeting to share information.
Solutia - 196	5/4/05	Letter from U.S. EPA to Solutia responding to Solutia's "RCRA Corrective Measures Study (CMS) Response to Comments" submitted on February 9, 2005.

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Solutia - 197	5/27/05	Letter from Solutia to U.S. EPA responding to comments on the CMS provided by U.S. EPA on May 4, 2005. The letter also submits the "In-Situ Thermal Desorption Work Plan" and the "Enhanced Aerobic Bioremediation Work Plan" for the mass removal treatability study at the Former PCB Manufacturing Area and the Former Chlorobenzene Process Area. (CD only in Cahokia)
Solutia - 198	6/23/05	Letter from U.S. EPA to Solutia responding to Solutia's response to comments on the CMS submitted on May 27, 2005. The letter also provides comments on the "In-Situ Thermal Desorption Work Plan" and the "Enhanced Aerobic Bioremediation Work Plan" submitted on May 27, 2005.
Solutia - 199	6/29/05	E-mail from Solutia to U.S. EPA responding to U.S. EPA comments on the "In-Situ Thermal Desorption Work Plan" and the "Enhanced Aerobic Bioremediation Work Plan" provided on June 23, 2005.
Solutia - 200	7/5/05	Letter from Solutia to U.S. EPA submitting the "Supplemental Soil and Groundwater Sampling Plan". The plan proposes additional sampling at the Solutia facility to address data gaps in the CMS. (CD only in Cahokia)

The Administrative Record for Solutia is available at these locations. Documents in bold only at U.S. EPA Record Center.

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Solutia - 201	7/8/05	Progress report for the second quarter of 2005. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 202	7/13/05	E-mail from U.S. EPA to Solutia discussing the construction of the monitoring wells to be used to monitor the stability of the groundwater contaminant plume.
Solutia - 203	7/21/05	Letter from U.S. EPA to U.S. ACE requesting a permit to conduct sediment sampling in the Mississippi River. (oversized figures at U.S. EPA only)
Solutia - 204	8/3/05	Memorandum of Understanding between Village of Sauget and Illinois EPA regarding the use of a local groundwater or water well ordinance as an environmental institutional control (print-out from Illinois EPA website). Includes Ordinance #99-5, as amended by Ordinance #05-03.
Solutia - 205	8/16/05	E-mails between U.S. EPA and Solutia discussing the construction of the monitoring wells to be used to monitor the stability of the groundwater contaminant plume.
Solutia - 206	9/13/05	E-mails between U.S. EPA and Solutia regarding completion of the in-situ thermal desorption (ISTD) and enhanced aerobic bioremediation (EABR) treatability tests.

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Solutia - 207	9/16/05	Letter from U.S. ACE to U.S. EPA granting a permit to conduct sediment sampling in the Mississippi River as requested on July 21, 2005.
Solutia - 208	9/16/05	Letter from Solutia to U.S. EPA submitting the "PCB Mobility and Migration Investigation" plan to investigate the Former PCB Manufacturing Area at the Solutia W.G. Krummrich plant. (oversized figures at U.S. EPA only)
Solutia - 209	9/16/05	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Plan". Twenty monitoring wells are proposed to monitor the contaminant plumes at and from the Solutia W.G. Krummrich facility. (CD only in Cahokia)
Solutia - 210	9/19/05	E-mail from U.S. EPA to Solutia discussing baseline soil samples for the ISTD treatability test.
Solutia - 211	9/21/05	E-mails between U.S. EPA and Solutia discussing the submittal of supplemental information for the CMS.
Solutia - 212	10/3/05	E-mail from U.S. EPA to Solutia providing comments on the "PCB Mobility and Migration Investigation Plan" submitted on September 16, 2005.

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Solutia - 213	10/6/05	“Revised Sampling and Analysis Plan for Sediment Sampling at Solutia W.G. Krummrich, Sauget, Illinois”, prepared by Booz Allen Hamilton for the U.S. EPA. (oversized figures at U.S. EPA only)
Solutia - 214	10/7/05	Letter from Solutia to U.S. EPA submitting the “RCRA Corrective Measures Study (CMS) Addendum III, Supplemental Soil and Groundwater Investigation”. The supplemental data was obtained in accordance with the “Supplemental Soil and Groundwater Sampling Plan” submitted on July 5, 2005, to address data gaps in the CMS. (CDs only in Cahokia)
Solutia - 215	10/11/05	Progress report for the third quarter of 2005. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 216	10/13/05	E-mails between Solutia and U.S. EPA regarding the installation of monitoring wells as described in the “Plume Stability and Monitoring Plan” submitted on September 16, 2005.
Solutia - 217	10/17/05	Letter from Solutia to U.S. EPA providing revisions to the “Plume Stability Monitoring Plan” submitted on September 16, 2005.

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Solutia - 218	10/19/05	E-mails between U.S. EPA and Solutia regarding comments on the "PCB Mobility and Migration Investigation Plan" provided by U.S. EPA on October 3, 2005.
Solutia - 219	10/21/05	Letter from Solutia to U.S. EPA submitting a revised "PCB Mobility and Migration Investigation Work Plan". (oversized figures at U.S. EPA only)
Solutia - 220	10/25/05	E-mail from Solutia to U.S. EPA providing an update on the installation of the plume stability monitoring wells.
Solutia - 221	10/26/05	E-mails between Solutia and U.S. EPA regarding completion of the ISTD and EABR treatability tests.
Solutia - 222	10/26/05	E-mail from Solutia to U.S. EPA providing an update on the ISTD treatability tests.
Solutia - 223	11/1/05	E-mail from U.S. EPA to Solutia requesting information on the Route 3 Drum Site located at the Solutia facility.
Solutia - 224	12/19/05	Letter from Solutia to U.S. EPA providing notification of a new project manager.
Solutia - 225	1/6/06	Progress report for the fourth quarter of 2005. The progress report summarizes the work performed during the quarter and problems encountered.

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Solutia - 226	1/9/06	E-mail from U.S. EPA to Solutia discussing implementation of the "PCB Mobility and Migration Investigation Work Plan" submitted on October 21, 2005.
Solutia - 227	1/9/06	E-mail from Solutia to U.S. EPA providing Mississippi River surface water and sediment samples results from September 2005.
Solutia - 228	1/12/06	Letter from Solutia to U.S. EPA submitting the "Draft Extraction Well Step Test Tech Memo". The memo provides the results of hydraulic tests on the extraction wells for the groundwater migration control system. (CDs only in Cahokia)
Solutia - 229	2/28/06	Letter from Solutia to U.S. EPA submitting the "EABR Mass Removal Treatability Tests" report.
Solutia - 230	2/28/06	Letter from Solutia to U.S. EPA submitting the "In-Situ Thermal Desorption Mass Removal Treatability Tests" report.
Solutia - 231	3/17/06	E-mails between U.S. EPA and Solutia discussing the status of the EABR treatability tests, plume stability monitoring program, PCB mobility and migration work plan, and ISTD treatability tests.

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Solutia - 232	4/7/06	Progress report for the first quarter of 2006. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 233	4/10/06	Letter from Solutia to U.S. EPA responding to comments provided by U.S. EPA on the "Groundwater Migration Control System Operation and Maintenance Plan, Site R, Sauget, IL. (CD only in Cahokia)
Solutia - 234	4/10/06	E-mail from U.S. EPA to Solutia providing comments on the "EABR Mass Removal Treatability Tests" and "In-Situ Thermal Desorption Mass Removal Treatability Tests" submitted on February 28, 2006.
Solutia - 235	4/18/06	Letters from U.S. EPA to Solutia, U.S. ACE, and the Township of Prairie DuPont Levee and Sanitary District providing the results of sediment samples obtained from the Mississippi River in October 2005.
Solutia - 236	5/1/06	E-mails between U.S. EPA and Solutia discussing the potential sale of a portion of Lot F of the Solutia facility for the construction of an ethanol plant.
Solutia - 237	5/12/06	Letter from Solutia to U.S. EPA submitting the "PCB Mobility and Migration Phase II Investigation Report". The report delineates the boundary of PCB contamination in soil greater than 25 ppm at the Former PCB Manufacturing Area.

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Solutia - 238	5/12/06	Letter from Solutia to U.S. EPA submitting a "Technical Memorandum for Bulk Soil Sample Collection" to conduct mass removal treatability tests.
Solutia - 239	5/22/06	E-mail from U.S. EPA to Solutia providing comments on the "PCB Mobility and Migration Phase II Investigation Report" submitted on May 12, 2006.
Solutia - 240	5/24/06	Letter from Solutia to U.S. EPA responding to comments on the ISTD Treatability Test Report provided by U.S. EPA on April 10, 2006.
Solutia - 241	5/24/06	Letter from Solutia to U.S. EPA responding to comments on the EABR Treatability Test Report provided by U.S. EPA on April 10, 2006.
Solutia - 242	5/24/06	Letter from Solutia to U.S. EPA submitting the "EABR Treatability Test Report for the Saturated Shallow Hydrogeologic Unit".
Solutia - 243	5/26/06	E-mails between U.S. EPA and Solutia regarding the "PCB Mobility and Migration Phase II Investigation Report" submitted on May 12, 2006.
Solutia - 244	6/12/06	E-mail from Solutia to U.S. EPA regarding the location of the PCB mobility and migration monitoring wells.

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Solutia - 245	6/16/06	E-mail from Solutia to U.S. EPA regarding the sampling of the PCB mobility and migration monitoring wells.
Solutia - 246	6/21/06	E-mail from U.S. EPA to Solutia providing comments on the "EABR Treatability Test Report for the Saturated Shallow Hydrogeologic Unit" submitted on May 24, 2006.
Solutia - 247	6/30/06	Letter from Solutia to U.S. EPA submitting the "Phase I Site Investigation, PCB Mobility and Migration Investigation" report. (Complete report available on CD)
Solutia - 248	7/10/06	Progress report for the second quarter of 2006. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 249	7/11/06	E-mail from U.S. EPA to Solutia regarding a July 20, 2006, meeting to discuss interim corrective measures at the Former PCB Manufacturing and Former Chlorobenzene Process Areas.
Solutia - 250	7/21/06	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Program 1 st Quarter 2006 Data Report" prepared by Solutia. The report provides groundwater data for 11 wells monitoring the contaminant plume at and from the Solutia facility. (Complete report available on CD)

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Solutia - 251	7/25/06	Letter from Solutia to U.S. EPA notifying of the sale of a portion of Lot F at the Solutia facility.
Solutia - 252	7/26/06	E-mail from Solutia to U.S. EPA providing boring logs and well construction diagrams for monitoring wells installed at the Former PCB Manufacturing Area.
Solutia - 253	7/31/06	E-mail from U.S. EPA to Solutia providing comments on the "Phase I Site Investigation, PCB Mobility and Migration Investigation" report submitted on June 30, 2006.
Solutia - 254	8/10/06	Letter from Solutia to U.S. EPA responding to comments on the "EABR Treatability Test Report for the Saturated Shallow Hydrogeologic Unit" provided by U.S. EPA on June 21, 2006.
Solutia - 255	8/15/06	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Program Well Completion Report" prepared by URS Corporation. Twenty wells were installed to monitor the contaminant plume at and from the Solutia facility. (CD only in Cahokia)
Solutia - 256	8/18/06	E-mail from Solutia to U.S. EPA outlining the path forward for completing corrective measures at the Solutia facility.

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Solutia - 257	8/24/06	E-mail from U.S. EPA to Solutia responding to Solutia's August 18, 2006 e-mail. The e-mail provides a memo on the history of corrective measure activities at the Solutia facility and proposes to move forward with final corrective measures for the Solutia facility.
Solutia - 258	8/31/06	Letter from Solutia to U.S. EPA submitting the "Pilot-Scale EABR Treatability Test for the Former Chlorobenzene Process Area" prepared by Groundwater Services Inc.
Solutia - 259	9/7/06	E-mail from Solutia to U.S. EPA notifying that monitoring wells on Lot F will need to be relocated or abandoned due to construction of an ethanol plant.
Solutia - 260	10/9/06	E-mail from Solutia to U.S. EPA proposing the monitoring wells on Lot F that will be abandoned.
Solutia - 261	10/9/06	Progress report for the third quarter of 2006. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 262	10/20/06	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Program, 2nd Quarter 2006 Data Report" prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility.

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Solutia - 263	10/20/06	Letter from Solutia to U.S. EPA submitting the “PCB Mobility and Migration Investigation, 2nd Quarter 2006, Groundwater Data Report”. The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area.
Solutia - 264	10/31/06	E-mail from U.S. EPA to Solutia providing comments on the “Pilot-Scale EABR Treatability Test for the Former Chlorobenzene Process Area” submitted on August 31, 2006.
Solutia – 265	11/6/06	E-mail from Solutia to U.S. EPA providing a map of possible businesses to be developed at the Solutia facility.
Solutia - 266	11/27/06	E-mail from U.S. EPA to Solutia providing comments on the “Plume Stability Monitoring Program 2 nd Quarter 2006 Data Report” submitted on October 20, 2006.
Solutia - 267	12/15/06	Letter from Solutia to U.S. EPA providing an update on remediation efforts and possible redevelopment of the Solutia W.G. Krummrich plant.
Solutia - 268	1/5/07	Progress report for the fourth quarter of 2006. The progress report summarizes the work performed during the quarter and problems encountered.

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Solutia - 269	1/15/07	“Technology Selection Report” prepared by Booz Allen Hamilton for U.S. EPA. Evaluates and selects technologies for cleanup of contamination at and from the Solutia facility. (oversized tables available at EPA only)
Solutia - 270	1/19/07	Letter from Solutia to U.S. EPA submitting the “Plume Stability Monitoring Program, 3 rd Quarter 2006 Data Report” prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility. (CD only in Cahokia)
Solutia - 271	1/19/07	Letter from Solutia to U.S. EPA submitting the “PCB Mobility and Migration Investigation, 3 rd Quarter 2006, Groundwater Data Report”. The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area. (CD only in Cahokia)
Solutia - 272	2/6/07	Draft “TACO III Tier Human Health Risk Assessment for the W.G. Krummrich Facility” prepared by ENSR Corporation. The report presents the risks to workers from contamination at specific parcels at the Solutia facility. (Complete report available on CD only)
Solutia - 273	2/26/07	E-mail from Solutia to U.S. EPA providing a summary figure showing high risk areas at the Solutia facility.

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Solutia - 274	2/27/07	E-mail from U.S. EPA to Solutia discussing options for remediating the Former PCB Manufacturing Area.
Solutia - 275	2/26-28/07	E-mails between Solutia and U.S. EPA regarding the use of "risk-based disposal" under the TSCA program to address PCB contamination at the Former PCB Manufacturing Area.
Solutia - 276	3/1/07	E-mail from U.S. EPA to Solutia providing comments on the "Plume Stability Monitoring Program, 3 rd Quarter 2006 Data Report" and "PCB Mobility and Migration Investigation, 3 rd Quarter 2006, Groundwater Data Report" submitted on January 19, 2007.
Solutia - 277	3/5/07	E-mail from Solutia to U.S. EPA notifying of the need to replace two plume stability monitoring wells located off-site along the Mississippi River.
Solutia - 278	3/6/07	E-mail from Solutia to U.S. EPA providing a Tech Memo that analyzes the use of ISTD technology to remediate contamination at the Former PCB Manufacturing Area.
Solutia - 279	3/7/07	E-mail from Solutia to U.S. EPA discussing the use of an Area of Contamination for remediation at the Solutia facility.

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Solutia - 280	3/9/07	E-mail from Solutia to U.S. EPA providing a Tech Memo that analyzes the percent mass removal of PCB-contaminated soil to various depths at the Former PCB Manufacturing Area.
Solutia - 281	3/14/07	E-mails between Solutia and U.S. EPA discussing the replacement of two plume stability monitoring wells noted in the March 5, 2007, e-mail.
Solutia - 282	4/9/07	Progress report for the first quarter of 2007. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 283	4/10/07	U.S. EPA e-mail and memo analyzing potential PCB cleanup at the Solutia facility and disposal of 12,500 cubic yards of PCB-contaminated soil at the Sauget Area #1 Containment Cell.
Solutia - 284	5/14/07	E-mail from Solutia to U.S. EPA proposing locations for installing the two replacement wells discussed in the March 14, 2007, e-mail.
Solutia - 285	5/24/07	E-mail from Solutia to U.S. EPA providing a river sampling plan in response to U.S. EPA's March 1, 2007, comments on the plume stability monitoring program.

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Solutia - 286	5/24/07	Letter from Solutia to U.S. EPA submitting the “Plume Stability Monitoring Program, 4 th Quarter 2006 Data Report” prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility. (Complete report available on CD)
Solutia - 287	5/24/07	Letter from Solutia to U.S. EPA submitting the “PCB Mobility and Migration Investigation, 4 th Quarter 2006, Groundwater Data Report”. The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area. (Complete report available on CD)
Solutia - 288	5/25/07	E-mail from U.S. EPA to Solutia providing comments on Solutia’s proposed locations for two replacement wells submitted on May 14, 2007.
Solutia - 289	6/11/07	E-mail from Solutia to U.S. EPA discussing wells for monitoring the PCB plume.
Solutia - 290	6/28/07	Letter from U.S. EPA to Solutia responding to Solutia’s conceptual proposal (confidential) submitted on June 11, 2007, to remediate the facility.
Solutia - 291	7/6/07	E-mail from Solutia to U.S. EPA submitting a Tech Memo documenting the replacement of monitoring wells PSMW-15M and PSMW-15D used in the plume stability monitoring program.

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Solutia - 292	7/9/07	Progress report for the second quarter of 2007. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 293	7/31/07	Proposal from Solutia to U.S. EPA to designate an Area of Contamination for the Solutia facility that would allow the containment cell on Judith Lane in the Villages of Sauget and Cahokia to be used as a disposal site for up to 12,500 cubic yards of PCB-contaminated soil from the Solutia W.G. Krummrich plant.
Solutia - 294	8/14/07	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Program, 1 st Quarter 2007 Data Report" prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility. (Complete report available on CD)
Solutia - 295	8/14/07	Letter from Solutia to U.S. EPA submitting the "PCB Mobility and Migration Investigation, 1 st Quarter 2007, Groundwater Data Report". The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area. (Complete report available on CD)
Solutia - 296	9/10/07	Original transcript of September 6, 2007, public comments provided by Accurate Court Reporting, Inc.

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Solutia - 297	9/29/07	“Mississippi River Levee Issues in Illinois” discussing the risk of levee failure due to structural deficiencies.
Solutia - 298	10/5/07	Letter from Solutia to U.S. EPA providing comments on the Statement of Basis.
Solutia - 299	10/5/07	Letter from Illinois EPA, Permit Section to U.S. EPA providing comments on the Statement of Basis.
Solutia - 300	10/9/07	Letter from Illinois EPA, Federal Site Remediation Section to U.S. EPA providing comments on the Statement of Basis.
Solutia - 301	10/10/07	E-mail from Solutia to U.S. EPA providing preliminary schedule for completing major components of the remedy.
Solutia - 302	10/10/07	Progress report for the third quarter of 2007. The progress report summarizes the work performed during the quarter and problems encountered.
Solutia - 303	10/10/07	Letter from Solutia to U.S. EPA notifying of a change in the Solutia project manager.
Solutia - 304	11/2/07	E-mail from Robert Johnson, Johnson Consulting providing comments on the Statement of Basis.

The Administrative Record for Solutia is available at these locations. Documents in bold only at U.S. EPA Record Center.

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Solutia - 305	11/2/07	E-mail from Kathy Andria, American Bottom Conservancy providing comments on the Statement of Basis.
Solutia - 306	11/2/07	Letter from Solutia to U.S. EPA submitting the "PCB Mobility and Migration Investigation, 2 nd Quarter 2007, Groundwater Data Report". The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area. (Complete report available on CD)
Solutia - 307	11/5/07	Letter from Solutia to U.S. EPA submitting the "Plume Stability Monitoring Program, 2 nd Quarter 2007 Data Report" prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility. (Complete report available on CD)
Solutia - 308	11/23/07	E-mail from U.S. EPA to Solutia clarifying the work that is necessary to determine whether the groundwater contaminant plume that is discharging to the Mississippi River is stable.
Solutia - 309	11/26/07	E-mails between Solutia and U.S. EPA responding to the November 23, 2007, e-mail from U.S. EPA and the need to approve the human health risk assessment.

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Solutia - 310	11/28/07	E-mail from U.S. EPA to Solutia providing Illinois EPA comments on the Area of Contamination (AOC) proposed by Solutia.
Solutia - 311	12/05/07	E-mail from Solutia to U.S. EPA responding to U.S. EPA's November 28, 2007, e-mail regarding the AOC and requesting a meeting.
Solutia - 312	12/12/07	Letter from Solutia to U.S. EPA notifying of a change in the Solutia project manager.
Solutia - 313	12/27/07	E-mail from U.S. EPA to Solutia providing tabulated soil data for the Former PCB Manufacturing Area and disposal options discussed at the December 12, 2007, meeting.
Solutia - 314	1/4/08	E-mail from Illinois EPA to U.S. EPA providing notes from the December 12, 2007, meeting with Solutia.
Solutia - 315	1/4/08	Letter from Solutia to U.S. EPA submitting the "PCB Mobility and Migration Investigation, 3 rd Quarter 2007, Groundwater Data Report". The report provides groundwater data for eight monitoring wells located at the Former PCB Manufacturing Area. (Complete report available on CD)

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<u>Document Number</u>	<u>Date</u>	<u>Description/Author</u>
Solutia - 316	1/4/08	Letter from Solutia to U.S. EPA submitting the “Plume Stability Monitoring Program, 3 rd Quarter 2007 Data Report” prepared by URS Corporation. The report provides groundwater data for 20 wells monitoring the contaminant plume at and from the Solutia facility. (Complete report available on CD)
Solutia - 317	1/10/08	Progress report for the fourth quarter of 2007. The progress report summarizes the work performed during the quarter and problems encountered.

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