Solutia

FROM (NAME, LOCATION, PHONE) Robert L. Cheever – 1760 -- 1641

DATE: July 19, 1999 cc:

SUBJECT: RFI Status Update

REFERENCE: Queeny CAP

TO:		
	Bob Auer	1760
	Kevin Cahill	G3NO
	Stephanie Geiselmann	1740
	Jim Hart	1740
	Brad Young	1760
	Jim Zeuner	1760

Attached is a copy of the latest RCRA Facility Investigation (RFI) status update that is being mailed to the members of the Solutia—Soulard Community Advisory Panel. We presented to the CAP, in April, a review of almost 10 years of investigation and we told them we would provide quarterly updates of our continuing progress. This is the first update since our April meeting and we will continue to provide these, as long as the CAP is interested.

Bob

Bob

DSW 137867

QUARTERLY UPDATE
RCRA FACILITY INVESTIGATION
JOHN F. QUEENY PLANT

July 12, 1999

Site Description

Solutia's Queeny plant is located in St. Louis, Missouri on a 56-acre site approximately 500 feet from the Mississippi River. The site lies within a major transportation corridor provided by the Mississippi River, numerous interstate highways, and a large railroad center. Various commercial properties, including a major rail yard to the east, parking lots, and vacant land border the property. The nearest residential property is approximately three blocks west of the facility.

The Queeny Plant has been manufacturing various chemical products since 1901. Current product types include industrial chemicals, polymer modifiers, and rubber chemicals.

The RCRA Facility Investigation is being undertaken as a requirement of a Resource Conservation and Recovery Act Part B Permit, issued to the site in November 1989.

Background

On July 17, 1997 the U.S. Environmental Protection Agency issued a Notice of Deficiency (NOD) to Monsanto Company (now Solutia, Inc.). This NOD stated that investigative reports that had been submitted with a RCRA Part B permit did not contain adequate information to support corrective action decisions at the Queeny plant.

On September 4, 1997, a meeting was held between representatives of Solutia, O'Brien & Gere, USEPA, and MDNR to discuss Solutia's response to the NOD comments. During that meeting Solutia presented an outline of activities undertaken to reduce waste and control potential sources, and proposed an action plan to address USEPA's concerns.

This action plan included taking all data that had been collected at the site to date and placing it in a single database. From this database, data "gaps" would be identified. A work plan would then be developed and submitted to the USEPA presenting activities to be undertaken to fill these data gaps. After review by the USEPA and MDNR the Data Gap Work Plan would be implemented and the subsequent results would be reviewed with USEPA and MDNR with the preparation of the final RFI report. Risk based compliance objectives would be developed using the results of the data gap work, and a Corrective Measures Study would subsequently be performed following approval of the final RFI report.

DSW 137868

Status Update

Comments on the Data Gap Work Plan, which was submitted to USEPA on November 3, 1998, were received from USEPA on June 29, 1999. The nature of the comments suggest there is a substantial difference of opinion between Solutia and the USEPA regarding the amount and type of additional characterization required at the site to complete an evaluation of the risks to human health and the environment at the Queeny Plant, and begin development of a Corrective Measures Study which will determine what actions need to be taken to mitigate these risks. One meeting was held between USEPA and Solutia in late June to begin addressing these differences, and two additional meetings are scheduled at the end of July. Solutia is obligated to provide a revised Data Gap Work Plan to USEPA which addresses all comments by August 28, 1999.

Who To Contact

The parties involved in the RFI at the Queeny site are committed to completing the RFI safely, effectively, and in manner that is protective of human health and the environment. We also want to make sure that the community is fully aware of activities occurring at the site. If you have any questions or concerns regarding remedial activities at the Queeny site, please contact any one of the individuals listed below:

- Craig Branchfield
  Project Manager
  Solutia, Inc.
  (314) 674-1729
- Bob Cheever
  ESH Coordinator
  Solutia, Inc.
  (314) 622-1641
- Jim Hart
  J.F. Queeny Plant Manager
  Solutia, Inc.
  (314) 621-4075
- Stephanie Doolan
  Correction Actions Officer
  USEPA, Region VII
  (913) 551-7719
- U.S. EPA Region VII
  Office of External Programs
  (913) 551-7003
- Richard Nussbaum
  Corrective Action Unit Chief
  Hazardous Waste Program
  Missouri Department of Natural Resources
  (573) 751-3176

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