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December 23, 2015

Ms. Carolyn Bury - LU-9J
U.S. EPA Region 5
Corrective Action Section
77 West Jackson Boulevard
Chicago, IL 60604-3507

Re: Long-Term Monitoring Program
4th Quarter 2015 Data Report and Recommended Program Change
Solutia Inc., W. G. Krummrich Plant, Sauget, IL

Dear Ms. Bury:

Enclosed please find the Long-Term Monitoring Program 4th Quarter 2015 Data Report for Solutia Inc.'s W. G. Krummrich Plant, Sauget, IL. Supplemental piezometers GWE-1D, 2D, 3D, 5S, and 5M; and supplemental wells GWE-5D; ESL-MW-A, C1, and D1; and PM1M and PM1D are also included in this report. (4th quarter 2015 data reports for the Route 3 Drum Site, PCB, and Chlorobenzene Process Area groundwater monitoring programs will be submitted in January.)

Solutia is submitting the enclosed report earlier than the others in order to request US EPA's approval of the following program change recommendation before Solutia begins making arrangements in January for 1st quarter 2016 groundwater monitoring in February. This recommendation is pursuant to Solutia's attached September 29, 2014, letter about installation of supplemental wells PM1M and PM1D, which stated that we would: "Sample wells PM1M and PM1D, along with Supplemental Monitoring Program wells GWE-3D, 5D, 5M, and 5S and ESL-MW-D1, A, and C1, quarterly for one year ... after which Solutia will make a recommendation to US EPA regarding the Supplemental Monitoring Program." (At US EPA's request, that program was expanded to include wells GWE-1D and 2D per Solutia attached October 8, 2014, letter.) Wells PM1M and PM1D were installed in January 2015 and then sampled, along with the other supplemental wells, quarterly for one year in February, May, August, and November. The attached Mann-Kendall trend analyses summarize monitoring results for benzene and chlorobenzene for the following groups/transects of wells/piezometers (completed in the Deep (DHU), Medium (MHU), or Shallow (SHU) Hydrogeologic Units): PM1M and PM1D; ESL-MW-A, C1, and D1; GWE-1D, 2D, 3D, and 5D; and GWE-5M and 5S. These analyses show trends that are "decreasing," "stable," "no trend," or "not detect" except for chlorobenzene in GWE-2D ("increasing") and benzene in GWE-3D ("probably increasing"). Therefore, Solutia proposes to discontinue monitoring all of the supplemental wells except GWE-2D and 3D. Those and "original" Long-Term Monitoring Program wells BSA-MW-1S, 2D, 3D, 4D, and 5D and

CPA-MW-1D, 2D, 3D, 4D, and 5D will continue to be monitored quarterly throughout 2016, after which Solutia will submit its next triennial "Periodic Technical Review" in early 2017 with recommendations for changes to all monitoring programs.

Solutia looks forward to US EPA's prompt and favorable response to this recommendation. If you have any questions or comments, please contact me at (314) 674-3312 or gmrina@eastman.com

Sincerely,



Gerald M. Rinaldi
Manager, Remediation Services

Enclosure / Attachments

cc: Distribution List