

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Agricultural Chemical Company - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #5
Interim Progress Update
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 1/4/2012
Reporting Period: 11/24/11 - 12/31/11

1. Introduction

1.1 Background

Site Number:	A4SN	Contract Number:	
D.O. Number:		Action Memo Date:	3/14/2011
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	9/26/2011
Demob Date:		Completion Date:	
CERCLIS ID:	SCN000407801	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

For background information including Site Description, Location and Description of Threat, please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

ConnocoPhillips (COP) is currently conducting a removal action at the American Agriculture Site to remove lead-and arsenic-containing soil that was deposited during operation of a superphosphate fertilizer plant on the property during the early half of the 20th century. The property has been subdivided since the closure of the plant, and a concrete company, Southeastern Concrete Products Company (SEC), is currently operating on the northern end of the site. Additionally, the southern end of the site is occupied by a metals recycling facility, currently OmniSource but formerly the Carolinas Recycling Group (CRG).

When the concrete plant was built, an elevated causeway bridge was constructed so SEC's aggregate trucks could dump directly into the hoppers. Construction of this causeway bridge involved constructing two approach ramps. These ramps were constructed using locally-available fill, which happened to be waste from the old lead-acid chambers that was dumped on site. Currently, COP is conducting Phase I of the removal, which involves removing the eastern ramp. Only one ramp at a time can be removed to allow SEC continued access to its raw materials. COP has hired URS as their removal contractor.

2.1.2 Response Actions to Date

The following activities took place at the site during the reporting period ending December 31, 2011:

- **Soil Excavation Progress** - During this reporting period a total of 2,007 cubic yards (cy) of soil were excavated with 1,661 cy being amended with a chemical stabilizing agent. An estimated 150 linear feet of ramp and a depth ranging from 6-10 feet below the original top of the ramp was removed. To date, approximately 6,300 cy of soil have been excavated from the east ramp which has a total length of 400 ft. Of this amount, approximately 3,577 cy have been treated with chemical stabilizer. Due to increasing levels of lead in the raw excavated material, URS will add the stabilizing agent to all excavated material instead of initially sampling to determine need. All soil will still be sampled for disposal compliance prior to off-site shipping.

- 2,610 tons of soil were removed from the site for disposal as nonhazardous waste.
- The sampling results from an area of discolored soil near the SEC offices were received from the laboratory, and preliminary results show that there is a need for further, more exhaustive investigation of the soil in this area. EPA and URS met with Southeastern Concrete and discussed the findings.
- The crane machinery used to support the hopper bridge's foundation while COP's contractors excavated around it was removed from the site.
- URS has initiated a site air monitoring program that involved periodic sampling of site dust for overall lead and arsenic content as well as respirable dust monitoring during site activity such as excavation and truck loading. To date no contaminants have been found in any on- or off-site air monitoring. There have been some particulates monitored coming from the normal operations of the concrete company, but URS has yet to find any contaminant levels which would require an upgrade in respiratory protection or notification of SEC or CRG of possible off-site migration.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

ConocoPhillips Company has been identified as PRP and entered into an Administrative Order on Consent March 14, 2011.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- COP's contractor will continue to excavate the east ramp of the hopper bridge.
- COP's contractor will continue to treat and load soil for off-site disposal.
- COP's contractor will perform an expanded investigation into discolored soil near the SEC offices.
- COP's contractor will continue to sample and monitor dust.

2.2.1.2 Next Steps

COP has contracted directly with SEC to rebuild the east ramp. While rebuilding activities are underway, URS will initiate Phase 2, excavating contaminated material near the SEC building and on the CRG property. Once the ramp is rebuilt, the removal can move to Phase 3 with excavation of the west ramp. Any additional areas identified will be addressed on an as-needed basis.

2.2.2 Issues

The following issues have been presented at the Site:

- Limited space - due to the site lying between two active businesses and the volume of soil that is expected to be excavated, there is little operational area in which to stockpile.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

COP
USEPA
SCDHEC

3.2 Cooperating Agencies

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

