

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #6
Removal of East Ramp Nears Completion
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 2/16/2012
Reporting Period: January 1, 2012 through January 28, 2012

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 January 28, 2012:

- Soil Excavation Progress - During this reporting period a total of 4,615 tons of soil were excavated with all of the excavated soil being amended with a chemical stabilizing agent. Only about 10-15% of the east ramp remains in place, with detail excavation around the newly installed bridge footer reinforcements still pending. To date, a total of approximately 12,200 tons of soil have been excavated from the east ramp. Of this amount, approximately 10,080 tons have been shipped off site. Due to increasing levels of lead in the raw excavated material, URS is adding 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.

- 1,920 tons of soil were removed from the site for disposal as nonhazardous waste.
- More exhaustive sampling of the discolored soil area near the SEC offices was performed. The findings will be added to the pending site sampling report and submitted to EPA for approval.
- 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 submit the site sampling results and the workplan for the west ramp and non-ramp areas of the site.
- COP's contractor will continue to sample and monitor dust.
- COP's contractor will use XRF to determine residual contamination in the treatment area. Any areas above the site action levels will be scraped until the soil screens above the action levels or 2 feet in depth is reached. As most areas of the ramp will be under several feet of backfill, COP is excavating merely to natural grade. However, areas near the edges and the toe will be under less cover. URS will screen these areas, and, if necessary, excavate to provide for a 2-foot protective barrier between ground level and any contamination left in place.
- START will demobilize from the site during the next reporting period.
- The US Coast Guard Gulf Strike Team will assist EPA with providing a Federal presence at the site beginning in the next reporting period.

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.
- Timing - The amount of time SECs construction contractor will require to rebuild the ramp is unknown. There may be significant delays while waiting for the contractor to perform. COP is preparing contingency plans to continue site operations.

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.