

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #7
Completion of East Ramp Removal
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 2/28/2012
Reporting Period: January 29, 2012 - February 25, 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. Since the plant must remain in operation, at least one ramp leading to the bridge must remain open. COP is implementing a phased approach to the removal, with Phase 1 involving removal of the east ramp. During Phase 2, the east ramp will be reconstructed while areas outside the ramps are excavated. Phase 3 will conclude with the removal and reconstruction of the west ramp. 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 February 26, 2012:

- Soil Excavation Progress - During this reporting period a total of approximately 1,100 tons of soil were excavated with all of the excavated soil being amended with a chemical stabilizing agent. The east ramp is now completely removed. To date, a total of approximately 14,585 tons of soil have been shipped off site. All soil was sampled for disposal compliance prior to off-site shipping.
- Once the ramp was removed, URS used XRF to screen soil in the staging area. Areas showing lead and/or arsenic above the action levels were scraped until levels were shown to be below the action

levels. Additionally, URS screened areas that will be covered by less than 2 feet of backfill once the ramp is replaced. Soil above the site action levels in those areas was excavated until the readings were below the site action level or a full 2-feet below grade was excavated. It should be noted that areas which will be covered with more than two feet of fill once the ramp is reconstructed still report lead and arsenic levels higher than the site action levels. These areas will, however, be below as much as 15 feet of clean fill once the ramp is reconstructed.

- Once all the necessary soil was excavated, URS laid down a geotextile fabric, sand, and gravel to provide both a platform for reconstruction of the ramp as well as to provide a physical barrier to the contamination left in place beneath the ramp. This will allow for a non-HAZWOPPER-trained construction crew to perform the reconstruction at significant cost savings.
- In preparation of Phase 2 activities, URS removed trees and brush from parts of the OmniSource property. Additionally, power lines have been removed, natural gas lines shut off, the air monitoring station in the area relocated, and a generator brought in to replace the lost land line. OmniSource has removed its equipment from the area, and URS has marked the removal area.
- URS has initiated a site air monitoring program that involves 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.
- COP and URS submitted an amended sampling report on the non-east ramp areas of the site. EPA provided approval of this report on February 16. COP and URS also submitted the work plan for removal of the non-east ramp areas. EPA reviewed the work plan and approved it on February 27, 2012.

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:

- URS will begin direct loading of contaminated soil from the OmniSource property. This excavation will be performed to a maximum depth of 2-feet bgs or until attainment of the site cleanup goals is achieved. TCLP analysis of the soil indicated it is nonhazardous, and disposal approval was provided for this Phase separately.
- COP has contracted directly with SEC to rebuild the east ramp. SEC's contractor, CR Jackson, will mobilize the first week of March.

2.2.1.2 Next Step

- COP will continue to implement the approved work plan for the removal of the non-ramp areas while SEC rebuilds the east ramp. Site activities are dependent on the east ramp construction being completed in concert with the completion of the non-ramp areas.

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 SEC's 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.