

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #8
Initiation of Phase 2
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 3/26/2012
Reporting Period: February 26 - March 24, 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 implemented a phased approach to the removal. Phase 1 involved 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 March 23, 2012:

- **Soil Excavation** - During this reporting period approximately 1/2 acre of the CRG property was excavated to a minimum depth of 1 foot below ground surface. XRF was used to determine the need to excavate deeper. No area required excavation greater than 2 feet below ground surface. Soil from the CRG property was pre-sampled for disposal compliance and directly loaded for transport with no stabilizing treatment required. URS also excavated areas on the SEC property south of the west ramp along the access road. This material was staged on site and sampled to determine the need

for chemical stabilization prior to off-site disposal.

- Disposal - To date, a total of approximately 16,121 tons of soil have been excavated and 15,546 tons shipped off as non-hazardous waste. Approximately 575 tons are staged for removal pending disposal profile compliance analysis.
- Bridge Reconstruction - Contractors employed by SEC began rebuilding the east ramp. During this reporting period, approximately 90% of the material required has been laid down, and the rear concrete retaining wall has been poured.
- Air Monitoring - URS has initiated a site air monitoring program that involves periodic sampling of site dust for overall lead and arsenic. Four high-volume air samplers have been placed strategically around the site to monitor both on-site and fugitive dust emissions. URS is also performing real-time respirable dust monitoring during excavation and truck loading. 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.
- While clearing debris prior to excavation, a storage tank containing a viscous petroleum material believed to be a waterproofing asphalt was discovered. While moving it, a small hole in the tank allowed a limited amount (estimated at less than 5 gallons) of product to seep onto the ground. URS placed the tank and impacted soil within a plastic containment until disposal arrangements can be made. The material is not free-flowing, and there was never any threat to navigable waters resulting from the spill.

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:

- Soil Excavation - URS will continue to excavate along the southern roadway. Utility contractors will be called out to locate a city sewer and city water supply line within the excavation area. URS will also coordinate with SEC on removal of debris and operating equipment from SEC's lay-down yard. URS plans to begin excavation there during their next rotation.
- Disposal - URS will continue to stage, sample, and treat as needed.
- Bridge Reconstruction - During the next reporting period, it is expected that CR Jackson will complete building the elevated foundation and URS's concrete contractor will begin pouring the roadbed.

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. URS has incorporated areas to the west of 12th Street as a backfill storage area. This will allow for the contaminated soil to be treated within the 'hot zone' and eliminate the possibility of migrating contamination on the site.
- 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.