

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #9  
Continuation of Phase 2 Activities  
American Agricultural Chemical Company  
A4SN  
Cayce, SC  
Latitude: 33.9682066 Longitude: -81.0594463

**To:**  
**From:** Chuck Berry, On-Scene Coordinator  
**Date:** 5/3/2012  
**Reporting Period:** March 25 - April 21, 2012

## 1. Introduction

### 1.1 Background

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

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 April 21, 2012:

- Soil Excavation - URS continued to excavate areas near and within the active SEC plant operations. SEC only operates 4 days a week. URS used the 3 days downtime to excavate several areas around the production areas in order to minimize impacts to the business. Some areas requiring more delicate excavation (around pilings and utilities) were left for later so that these areas could all be done at once. URS excavated an estimated total of 1,960 tons during this reporting period.
- Disposal - To date, a total of approximately 18,284 tons of soil have been excavated and 17,243 tons

shipped off as non-hazardous waste. Approximately 1,041 tons are staged for removal pending disposal profile compliance analysis. URS also received landfill approval for disposal of oil-impacted soil, the empty asphalt tank, and pressure-treated lumber (utility poles).

- Ramp Reconstruction - Contractors employed by SEC have completed rebuilding of the east ramp. SEC will transfer the jersey barriers from the west ramp to the east ramp during the next reporting period. This will complete the ramp reconstruction activities.
- 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.

### **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 begin excavation of the dog kennel area near the SEC offices. URS will use XRF and visual determination to guide excavation.
- Disposal - URS will continue to stage, sample, and treat as needed.
- Ramp Reconstruction - During the next reporting period, the east ramp is expected to open.

#### **2.2.1.2 Next Step**

- COP will complete the "non-ramp" areas prior to initiation of west ramp excavation. After the dog kennel area is complete, several small areas near equipment and buildings will be excavated with small equipment. Once complete, initiation of Phase 3 and excavation of the west ramp will begin.

### **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.
- Weather - A drought is forecast for the area during the summer. Dust suppression will become a significant issue during the summer.

## **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.