

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #10
Completion of Phase 2
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 5/25/2012
Reporting Period: April 22, 2012 - May 19, 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. Phase 1 involved removal of the east ramp. During Phase 2, the east ramp was reconstructed while areas outside the ramps were 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 May 19, 2012:

- **Soil Excavation** - URS completed excavation and backfill of the discolored soil are around the dog kennels near SECs main office. A average depth of 1.5 feet of material was excavated using XRF to guide the removal. URS also rebuilt the dog kennels. The dogs are expected to be relocated from the boarding kennels where they have been housed for the last 2 weeks. URS is considering this to be the end of Phase 2 activities. While some small portion of work in Phase 2 are left unfinished, they are contiguous to the west ramp, and will, thus, be taken care of during Phase 3. URS excavated an

estimated total of 1,600 tons during this reporting period.

- Disposal - To date, a total of approximately 20,202 tons of soil have been excavated and 19,859 tons shipped off as non-hazardous waste. Approximately 300 tons are staged for removal pending disposal profile compliance analysis. URS also shipped off a load of tires and rubber conveyor belts uncovered during excavation activities.
- Ramp Reconstruction - SEC transferred the Jersey barriers from the west ramp to the east ramp. SEC is currently using both sides of the ramp. The reopening of the east ramp is allowing URS to begin work on Phase 3 of the removal action after the Memorial Day holiday.
- 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. Due to increasing site dryness, URS has remobilized a water truck to provide for dust suppression during the expected dry summer.

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 Phase 3 of the removal action, the removal of the west ramp and associated impacted areas.
- Disposal - URS will continue to stage, sample, and treat as needed.
- Air Monitoring - URS will continue to sample and monitor for fugitive dusts. The summer forecast calls for a dry season, and the OSC has expressed concern about off-site migration.

2.2.1.2 Next Step

- URS will move the unfinished areas of Phase 2 into the workplan for Phase 3. URS will not mobilize to the site during the week of May 21-25, and will remobilize after the Memorial Day holiday on the 29th.

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

USCG GST

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.