

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #11  
Initiation of West Ramp Removal  
American Agricultural Chemical Company  
A4SN  
Cayce, SC  
Latitude: 33.9682066 Longitude: -81.0594463

**To:**  
**From:** Chuck Berry, On-Scene Coordinator  
**Date:** 6/26/2012  
**Reporting Period:** May 20 - June 23, 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 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 June 23, 2012:

- Soil Excavation - URS completed excavation of some remaining Phase 2 activities, namely a small area around the hopper bridge supports. A concrete pad was poured in this area at SEC's request. Excepting the West Ramp, only 1 area remains to be addressed. Remediation in this area will require removal of a large area of concrete and impact SEC's production and storage of new concrete block. URS will wait until the end of the project to address this area. On June 14, URS closed the West Ramp to all SEC traffic and began excavation of the ramp. URS excavated an estimated 2,220

tons during this reporting period. To date, a total of approximately 23,456 tons of soil have been excavated. URS backfilled and seeded the portion of the excavation which lies contiguous with the CRG property.

- Disposal - To date, a total of approximately 22,336 tons of soil have been shipped off as non-hazardous waste. Approximately 900 tons are staged for removal pending disposal profile compliance analysis.
- Dog Kennel - URS completed reconstruction of the dog kennel used by SEC's owner. The final product is larger than the original with augmented cleaning capabilities and additional covered areas. SEC's owner was very involved in the final as-built design and is pleased with the final product.
- 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.
- Asbestos Piping - An unused gas line owned by SCE&G lies As a favor to SEC, URS agreed to clear sediment out of a ditch which parallels the East Ramp, running just north of the ramp and off to the east. During the clearing, URS discovered an unmarked and unused gas line owned by SCE&G. The pipe is covered with asbestos, and URS scheduled SCE&G a time to come remove the pipe. Prior to removal, the OSC asked URS to verify that there is no contaminated soil in the area where SCE&G will be operating. If there is no contamination, SCE&G can remove the pipe with non-HAZWOPER-trained personnel. URS stood the removal crews down until positive verification of clean soil could be obtained.

### 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 - Continue excavation of the west ramp.
- Disposal - URS will continue to stage, sample, and treat as needed.
- Restoration - URS will restore all areas of the site, backfilling excavation, hydroseeding, and reconstructing infrastructure where it is needed. SEC has privately contracted with a construction company to rebuild the West Ramp.
- Air Monitoring - URS will continue to sample and monitor for fugitive dusts.
- Asbestos Pipe - URS will analyze the historical sampling data to make a positive determination on the possibility of impacted soil lying near the pipe. If the area is deemed to be absent impacted soil, the OSC, URS, and SCE&G will meet to discuss removal activities.

#### 2.2.1.2 Next Step

- URS will continue to focus on the West Ramp removal. Removal is expected to take 4 months. URS expects to be completed within the calendar year.

### 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. However, when rain does occur, it is usually heavy and flows across the hardpan into channels, causing erosion of the backfill.
- Asbestos Piping - URS is in the process of verifying that no contaminated soil exists along the pipe's path. Once confirmed, SCE&G will excavate the pipe with URS personnel using the XRF to continuously verify the non-contaminated status of the soil SCE&G is working in.

## 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.