

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #12
West Ramp Excavation Continues
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To: Matt Taylor, USEPA R4 ERRB

From: Chuck Berry, On-Scene Coordinator

Date: 7/25/2012

Reporting Period: June 24, 2012 - July 21, 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 June 23, 2012:

- Soil Excavation - During this reporting period, URS focused exclusively on excavation of the West Ramp. URS excavated an estimated 4,614 tons during this reporting period. To date, a total of approximately 27,986 tons of soil have been excavated. URS reseeded the portion of the excavation which lies contiguous with the CRG property that had suffered erosion due to heavy rains.
- Disposal - To date, a total of approximately 25,351 tons of soil have been shipped off as non-

hazardous waste. Approximately 2,635 tons are staged for removal pending disposal profile compliance analysis.

- **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 next to the East Ramp outside of the excavation. 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. URS and the OSC performed some exploratory borehole sampling along the pipeline route, and found very low levels of lead and arsenic in the soil near the pipe. Based on this and earlier sampling performed by URS, the OSC has determined that the pipeline lies outside the area of concern and is not part of the site. URS will provide personnel to monitor the progress of the excavation and collect periodic XRF readings of the soil to ensure USE&G does not uncover soil with lead and/or arsenic levels requiring removal.

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** - The OSC has determined that the pipe lies outside the area of concern and is not part of the site. URS will monitor the excavation to determine if soils requiring removal are uncovered. SCE&G will schedule excavation in the future.

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. During this reporting period, the site has experienced frequent afternoon thunderstorms, which shut the site down due to lightning. It has, however, kept dust down and eliminated the need for active dust suppression.
- **Asbestos Piping** - The OSC has determined that the pipe lies outside the area of concern and is not part of the site. URS will monitor the excavation to determine if soils requiring removal are uncovered. SCE&G will schedule excavation in the future.
- **Nearby Fire** - On June 29, a fire at the Worldwide Plastics Recycling Center, which is on the other side of the CRG property, impacted the site with smoke, causing URS to demobe from the site. Additionally, increased vehicle traffic using the site access road to access Monkey Creek to monitor the runoff caused safety issues. URS shut the site down for the weekend until the fire was suppressed Saturday afternoon.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

			Total To		%
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	Budgeted	Date	Remaining	Remaining
Extramural Costs				
START	\$100,000.00	\$96,000.00	\$4,000.00	4.00%
USGST	\$58,000.00	\$15,000.00	\$43,000.00	74.14%
Intramural Costs				
Total Site Costs	\$158,000.00	\$111,000.00	\$47,000.00	29.75%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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.