

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #13
West Ramp Excavation nears Completion
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 9/4/2012
Reporting Period: July 22, 2012 - September 1, 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 continued excavation of the West Ramp. URS excavated an estimated 5,079 tons during this reporting period. To date, a total of approximately 35,161 tons of soil have been excavated. URS has removed the entire above-ground portion of the West Ramp removal area and is now removing the below-grade contamination. URS also met with SEC to discuss removal of soil from areas currently utilized by SEC's production line. Work will be performed to minimize impact to SEC's productivity. A small area of the access road leading into the

rear areas of the plant was removed and backfilled during this reporting period. The work was performed during SECs off-days and over the weekend.

- Disposal - To date, a total of approximately 32,832 tons of soil have been shipped off as non-hazardous waste. Approximately 2,329 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.
- 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.
- Groundwater Treatment - URS, at the request of SCDHEC, is injecting a treatment solution into the groundwater to bring the site into compliance with DHEC regulations. Although not part of the AOC with EPA, this activity is part of the overall site remediation. URS hired a subcontractor to perform a test run of the injection system during this reporting period. URS will collect groundwater samples later to determine the efficacy..

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. URS will also continue the removal of soil from areas currently utilized by SEC.
- 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 is expected to complete the West Ramp removal during the next shift. URS will then focus on removal of soils from SEC's production lines. Removal is expected to take 3 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.

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.