

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #14
Completion of Excavations North of the West Ramp
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: 10/24/2012

Reporting Period: September 2, 2012 - September 29, 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 has removed the entire above-ground portion of the West Ramp and is now removing the below-grade contamination, taking some areas to 3 feet below grade. Additionally, URS cut out a section of the concrete pad in the block plant lay-down yard and excavated the soil beneath. The remaining area of the access road leading into the rear areas of the plant was also removed at this time and backfilled.

URS excavated an estimated 3,574 tons during this reporting period. To date, a total of approximately 39,288 tons of soil have been excavated. The concrete was repoured once the area was backfilled. This concludes all excavation activity north of the ramp.

- Disposal - To date, a total of approximately 37,458 tons of soil have been shipped off as non-hazardous waste. Approximately 1,830 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. At the OSC's request, URS collected a biased sample of the fugitive dust released during the soil amending process. Lead and Arsenic levels were shown to be 0.072% and 0.002%, respectively. Magnesium oxide was 22% of the total, indicating the vast majority of the dust generated is the amendment agent itself. These totals will be used to adjust the action levels for respiratory upgrades during mixing activities.
- 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 collected pH readings from the monitoring wells during this reporting period. PH readings were found to be highly variable, even within a short linear distance, although it is too soon to determine the efficacy of the process at this time.

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. Once the ramp is completely excavated, removal of the south access road and the current staging area will begin.
- 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 excavate the West Ramp as directed by XRF readings to as much as 3 feet below grade. Removal is expected to take 2 months. URS expects to complete excavation within the calendar year. Replacement of infrastructure and restoration may proceed into calendar year 2013.

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.
- 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

Estimated Costs *

	Budgeted	Total To 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.