

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #15  
West Ramp Sub-Grade Excavation Continues  
American Agricultural Chemical Company  
A4SN  
Cayce, SC  
Latitude: 33.9682066 Longitude: -81.0594463

**To:**  
**From:** Chuck Berry, On-Scene Coordinator  
**Date:** 11/15/2012  
**Reporting Period:** September 30 - October 27, 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 October 27, 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. URS began backfilling areas cleared by in situ XRF analysis or that have reached the agreed-upon maximum depth as indicated in the approved workplan. In some areas, URS has exceeded the 3-foot depths in order to remove additional contamination down to a 5-foot depth. Additionally, URS completed reconstruction of the concrete

pad in the lay-down yard and the retaining wall in the sand containment area. URS excavated an estimated 3,873 tons during this reporting period. To date, a total of approximately 43,771 tons of soil have been excavated.

- Disposal - To date, a total of approximately 41,851 tons of soil have been shipped off as non-hazardous waste. Approximately 1,920 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.
- 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's subcontractor performed Phase 2 of the pilot test during this reporting period. No data has yet been collected to determine the efficacy of the process. Additional data will be collected during the next reporting period.

### 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 by mid-January 2013, with grading and final closure expected by March 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

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.