

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #16
Continued Excavation of Western Areas
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: 12/17/2012

Reporting Period: October 28 - December 9, 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 December 5, 2012:

- **Soil Excavation** - During this reporting period, URS continued excavation of the West Ramp and surrounding areas. URS has removed the entire above-ground portion of the West Ramp and most of the the below-grade contamination, taking some areas to 5 feet below grade. Additionally, URS began excavating areas outside the ramp footprint, including the south access road. This is the last area of the site requiring excavation. 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. URS excavated an estimated 5,676 tons during this reporting period. To date, a total of approximately 50,305 tons of soil have been excavated.

- Disposal - To date, a total of approximately 48,305 tons of soil have been shipped off as non-hazardous waste. Approximately 2,000 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. Sampling results from Phase 1 and 2 indicated efficacy of the process. A subcontractor was employed to drill several hundred temporary injection wells in the area to the south of the West Ramp. In all, approximately 48,000 gallons of slurry was injected through these wells. Although the process is occurring simultaneously with the soil excavation, EPA is not providing oversight of the activity.
- Asbestos Piping Removal - SCE&G, the local power utility, arrived on site to remove an unused gas line that abutted the site. Although not inside the "Site" as defined by the OSC, the pipe was close enough to warrant having URS inspect the soil surrounding the pipe and assay it using XRF. No elevated lead or arsenic levels were found in the soil surrounding the site, and no further actions regarding the piping were deemed necessary under this removal action.

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 areas surrounding 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.

2.2.1.2 Next Step

- URS will continue to excavate the areas surrounding 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.
- No activity will occur at the site during the Winter holidays, from December 19, 2012, until January 7, 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.

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	\$35,000.00	\$23,000.00	39.66%

Intramural Costs				
Total Site Costs	\$158,000.00	\$131,000.00	\$27,000.00	17.09%

* 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.