

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #18  
Excavation Nearing Completion  
American Agricultural Chemical Company  
A4SN  
Cayce, SC  
Latitude: 33.9682066 Longitude: -81.0594463

**To:**  
**From:** Chuck Berry, On-Scene Coordinator  
**Date:** 2/26/2013  
**Reporting Period:** January 6 - February 2, 2013

## 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 December 5, 2012:

- **Soil Excavation** - During this reporting period, URS continued excavation of the West Ramp subgrade 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. URS continues to excavate areas outside the ramp footprint, including the south access road. This is the last area of the site requiring excavation. In order to access areas occupied by the soil amendment tanks, URS has taken the tanks down and is receiving amendment shipments in Super

Sacks, stockpiling them outside the excavation area. Additionally, URS will begin to mix amendment and soil inside the excavation pits in order to prevent cross-contaminating already remediated sections of the site. URS is 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 1-foot depths in order to remove additional contamination down to a maximum of 5-feet. URS excavated an estimated 3,209 tons during this reporting period. To date, a total of approximately 55,779 tons of soil have been excavated.

- **Disposal** - To date, a total of approximately 53,679 tons of soil have been shipped off as non-hazardous waste. Approximately 2,100 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 agreement 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 334 temporary injection wells in the area to the south of the West Ramp. A total of 334,000 gallons of treatment solution have been injected into the shallow aquifer. Although the process is occurring simultaneously with the soil excavation, EPA is not providing oversight of the activity.

### 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 5 feet below grade. Excavation is expected to be completed in early March.
- The property owner, SEC, has been contracted by COP to rebuild their own ramp. Coordination with SEC is occurring so that restoration can commence as soon as possible.

### 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 will begin mixing soil inside the excavation pits in order to eliminate cross-contamination onto already remediated sections of the property.
- Rain has hampered productivity in the past few weeks, and may impact the expected completion date.

## 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.