

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #19
Connoco Phillips Completes Soil Excavation
American Agricultural Chemical Company
A4SN
Cayce, SC
Latitude: 33.9682066 Longitude: -81.0594463

To:
From: Chuck Berry, On-Scene Coordinator
Date: 3/19/2013
Reporting Period: February 3 - March 16, 2013

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 completed excavation of the West Ramp subgrade and surrounding areas. This completes all scheduled contaminated soil excavation at the site. URS currently has one area with amended soil remaining to ship out during the next shift. Once removed, the area storing the soil will be backfilled, and all soil removal activities will be complete. URS excavated an estimated 5,680 tons during this reporting period. To date, a total of approximately 63,023 tons of soil have been excavated and treated with amendment.

- Disposal - To date, a total of 61,693 tons of soil have been shipped off as non-hazardous waste. Approximately 1,330 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.
- US Coast Guard Oversight - The USCG's Gulf Strike Team has provided project oversight on a bi-weekly basis for most of the removal action. The GST performed their last rotation at the site during this reporting period, and have demobilized from the site.

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 - All excavation is complete.
- Disposal - Three soil piles remain on site and will be shipped off site during the next reporting period.
- 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. West Ramp construction will begin within the next 3 weeks.
- Air Monitoring - URS will continue to sample and monitor for fugitive dusts up until the time the final truckload of contaminated soil is shipped off site.

2.2.1.2 Next Step

- URS will begin demobilization of all personnel and equipment.
- 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.
- URS will return to the site once the West Ramp is complete and perform grading and touch-up work on the site. This should complete all response activities.

2.2.2 Issues

The following issues have been presented at the Site:

- West Ramp Reconstruction - SEC has been contracted by COP to rebuild the West Ramp to their own specifications. Site activities will be on hiatus until this is completed. SEC will submit a timeline during a site walk-through with EPA and COP's Project Coordinator in mid-March.

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.