U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
VCC Mobile - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #2**
Progress Report
VCC Mobile
B4C1
Prichard, AL
Latitude: 30.7297070 Longitude: -88.0736217

To: Matt Taylor, EPA

From: Terry Tanner, On Scene Coordinator
Date: 3/24/2015
Reporting Period: 12/11/14 to 3/23/15

1. Introduction

1.1 Background

Site Number:	B4C1	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/9/2014
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	11/3/2014	**Start Date:**	11/3/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Site Description

The Virginia-Carolina Chemical Company Mobile Site (the Site) is located in Prichard, Mobile County, Alabama. The Site is a former fertilizer production plant which occupied approximately 24 acres and was operated by the Virginia-Carolina Chemical (VCC) Company. Fertilizer manufacturing began at the Site prior to 1895 and continued until 1961.

VCC acquired the Mobile fertilizer plant from Mobile Phosphate Company between 1895 and 1904 and operated the plant until declaring bankruptcy in 1924. VCC of Richmond, Virginia, emerged from the bankruptcy as a new company and continued to operate the fertilizer plant until 1961. VCC merged into Socony Mobil Oil Company, Inc., in 1963 and the company changed names in 1966 to Mobil Oil Corporation. In 1999, Exxon Corporation merged with Mobil Oil Corporation. ExxonMobil Oil Corporation is the corporate successor to this VCC site.

1.2 Site Location

Most of the former VCC property was located within the current I-165 corridor and the original plant structures no longer exist. The I-165 corridor consists of an elevated six-lane freeway deck with frontage roads on both the northeast and southwest sides of the interstate. Structures associated with the former plant include a fertilizer mixing and storing area, acid chambers with associated burners/furnaces, a sulfur heap, a bag house, a boiler room, an oil house, a potash storage building, an ammonia tank house, and several electrical transformers.

1.1.2.2 Description of Threat

Former phosphate production plants have historically produced waste products containing arsenic and lead. In May 2010, ExxonMobil's contractor (ARCADIS) conducted a Removal Site Evaluation (RSE) at the VCC Mobile Site to assess the environmental impact associated with this former VCC plant. A total of 98 soil samples were collected from 32 soil boring locations across the Site. Samples were collected from 0.0 to 0.5 feet below ground surface (bgs), 0.5 to 2 feet bgs, and 2 to 4 feet bgs. Four surface water samples and four sediment samples were also collected from the drainage ditch that traverses the Site. All samples were analyzed for arsenic and lead and the results compared to Site Specific Screening Levels (SSSL) for arsenic (27 ppm) and lead (800 ppm). The SSSLs have been used as remediation endpoints at other former VCC fertilizer sites and meet EPA's Removal Management Levels for arsenic (240 ppm) and lead (800 ppm) for an industrial exposure scenario. Analytical results demonstrated that 15 of the soil samples exceeded the SSSL for arsenic (27 ppm) and that 5 of the soil samples exceeded the SSSL for lead (800 ppm). The maximum arsenic and lead concentrations detected in the soil samples were 294 ppm and 8,350 ppm,

respectively. The depth of impacted soil varied from 0.0 to 4 feet bgs across the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

Initial soil excavations began in November using a soft dig technique via air knife and vac truck. This soft dig technique was performed in areas surrounding utilities and subsurface anomalies identified by ground penetrating radar. Once these soft digs were completed the soil excavation commenced via trackhoe. Excavated soil is staged onsite and sampled for TCLP values prior to transportation and disposal at the Chastang Landfill in Mt Vernon, Al. To date approximately 16,594 cubic yards of soil have been excavated and transported to the landfill for disposal.

Air monitoring is being performed for dust, arsenic and lead at three locations surrounding the periphery of the site. Action levels for air are set at 0.150 mg/m3 (dust), 0.005 mg/m3 (arsenic), and 0.03 mg/m3 (lead) and have been monitored since the beginning of the soil excavation activities in early December 2014. Air monitoring results show that arsenic and lead levels in the air remain below the action levels of 0.005 mg/m3 and 0.030 mg/m3, respectively, since the beginning of the soil excavation activities. Particulate (dust) levels did exceed the action level of 0.150 mg/m3 on December 4, 2014. Corrective measures including the application of water by water truck reduced the dust particulates below the action levels. Work resumed at the site with no further dust problems.

A Public meeting was held on Sept 22, 2014, prior to the start of the removal action. The first fact sheet was distributed by mail to residents prior to this public meeting. A second fact sheet was mailed on February 2015 to update the residents about the status of the removal action. Additional public relation activities included a site visit from the Mayor of Prichard on February 25, 2015.

2.1.2 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

ExxonMobil has entered into an Administrative Order on Consent on May 16, 2014, for performing this removal action.

2.1.3 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Arsenic/lead	Soil	16,594 cubic yards			Chastang Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Approximately 90% of the arsenic/lead contaminated soils have been excavated to date. The removal action has an estimated completion date by late April.

2.2.1.2 Next Steps

2.2.2 Issues

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

No information available at this time.

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.