

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, December 15, 2008

From: Terry Tanner

Subject: Interim Soil Removal Action - Playground
VCC Wando
2390 Baker Hospital Blvd., Charleston, SC
Latitude: 32.8371000
Longitude: -79.9700000

POLREP No.:	2	Site #:	A4WH
Reporting Period:	10/20/08 to 11/14/08	D.O. #:	
Start Date:	10/20/2008	Response Authority:	CERCLA
Mob Date:	10/20/2008	Response Type:	Emergency
Demob Date:	10/13/2008	NPL Status:	Non NPL
Completion Date:	11/14/2008	Incident Category:	Removal Action
CERCLIS ID #:	SCN000410243	Contract #	
RCRIS ID #:			

Site Description

The Site is the location of a complete fertilizer production plant. Fertilizer manufacturing began at the Site prior to 1884 and continued until 1924. A review of historical Sanborn maps provides the layout and components of the VCC Wando facility. The Site was used for acid production included an acid chamber structure, an ore shed, a nitre house, pyrite burners, sulfur burners, a sulfur shed, a bunk house, a nitrate of soda house, a chlorination building, a laboratory, a rock shed, a concentrating building, and rail sidings.

Plant operations were conducted along the Ashley River on the parcel currently occupied by the Osprey Place Apartment complex. Based on information gathered from land deeds, the combined area of the Site is approximately 74 acres; however, the former plant was located on approximately 11 acres along the Ashley River front. The property has since been subdivided and currently occupies 7 separate tax parcels

In April 2008 ExxonMobil's contractor conducted a Removal Site Evaluation and submitted the results to EPA. In August 2008, the RSE report was forwarded to the EPA Region 4 Emergency Response and Removal Branch (ERRB) for consideration using CERCLA removal authorities. In September 2008, ERRB completed a review of the site information and concluded that the site meets the criteria as set forth in 40 CFR 300.415 (b) (2) for a time-critical removal action.

EPA is currently negotiating an Administrative Order on Consent (AOC) with ExxonMobil to conduct a Removal Action at the Wando Site. The removal action will consist of additional site characterization activities followed by removal of the impacted soils at the Site which exceed Removal Action Levels.

ExxonMobil, in concurrence with EPA, determined that the contamination levels in the playground constituted immediate action. EPA agreed to allow ExxonMobil to conduct a voluntary removal action in the playground while the AOC was in negotiations. ExxonMobil's contractor, ARCADIS, has submitted an Interim Soil Removal Work Plan for EPA review and approval. The Plan outlines ExxonMobil's plan to assess and remove impacted soils in and around the apartment complex playground. The remainder of the site will be assessed after the effective date of the AOC.

On August 26, 2008, EPA and ExxonMobil met with representatives from the property owner and North Charleston Councilman Brown. Issues discussed were sampling results and planned removal activities. EPA, in conjunction with ExxonMobil and Osprey Place Apartment management, disseminated informational flyers to the residents of the apartment complex. Representatives from EPA and ExxonMobil's Contractor, ARCADIS, were available for two days to address resident's questions and concerns regarding the assessment and removal. During the two day period only two residents had general questions.

Current Activities

EPA is currently negotiating an Administrative Order on Consent (AOC) with ExxonMobil to conduct a Removal Action at the Wando Site. The removal action will consist of additional site characterization

activities followed by removal of the impacted soils at the Site which exceed Removal Action Levels.

ARCADIS mobilized to the site on September 29, 2008, to collect additional samples throughout the playground area to determine the extent of contamination. Sampling was completed on October 2, 2008, after 47 samples, from 15 different sampling locations were collected. The data was used to determine the extent of the interim removal action.

On October 20, 2008, ARCADIS mobilized to the site to begin excavation of the 0.2 acres of contaminated soils in the playground and adjoining grassy area. The excavation was advanced downward to the groundwater table (approx. 2 to 3 feet below land surface) or until a continuous debris layer was encountered. A total of 1,351 tons of contaminated soil and debris were transported off site to the Waste Management Oakridge Landfill in Dorchester, South Carolina for disposal. The excavation was completed on 10/29/2008 and was divided into two equal areas for composite confirmation sampling. The analytical results revealed concentrations below the established removal goals of 27 ppm arsenic and 400 ppm lead. Once confirmation sample data was reviewed, backfilling operations started immediately thereafter. Backfilling, grading, and placement of sod was completed on 11/14/2008.

Planned Removal Actions

Once ExxonMobil enters into an AOC with EPA, the remainder of the site will be assessed of contamination and a removal action work plan will be developed and submitted to EPA for comment and approval.

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