

\$250,000/\$50,000 Action Memorandum¹

SUBJECT: Action Memorandum for a Removal Action at the Pea Ridge Road Fire site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

FROM: Randy B Nattis, OSC
Emergency Response and Removal Branch

THRU: Matt Taylor, Chief
Emergency Response Section

TO: The File

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Pea Ridge Road Fire Site located in Canton, Cherokee County, Georgia pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

II. Site Information

A. Site Description

Site Name: Pea Ridge Road Fire
Superfund Site ID (SSID): B4G5
NRC Case Number: NRC#: 970033
CERCLIS Number: GAN000410668
Site Location: Pea Ridge Road, Canton, Cherokee County, Georgia
Lat/Long: 34.2703490, -84.4942690
Potentially Responsible Party (PRP): N/A
NPL Status: No
Removal Start Date: 14MAR11

B. Site Background

1. Removal Site Evaluation

At 1430, EPA OSC Subash Patel notified Tetra Tech START of a tire fire at 230 Pea Ridge Road, Canton, Cherokee County,

¹ Regional Administrators may redelegate to designated On-Scene Coordinators (OSCs) the authority to determine the need for emergency response and to approve and initiate removal actions costing up to \$250,000 where site conditions constitute an emergency and up to \$50,000 where site conditions do not constitute an emergency. OSCs must check their specific Regional delegations to determine the level to which they have been granted the programmatic authority to respond to a release or threatened release of a hazardous substance, pollutant, or contaminants. Some Regions may not have fully redelegated this programmatic authority to OSCs.

Georgia. OSC Randy Nattis tasked Tetra Tech START to mobilize to the site and supplied a copy of National Response Center Incident Report # 970033 describing details of the incident.

At approximately 1615 on 14MAR11, EPA On Scene Coordinator (OSC) Randy Nattis and Tetra Tech START arrived on-site. EPA and START were briefed by Chief Darrel Mitchell, Cherokee County Fire Emergency Services (FES) on details of the site and were implemented into the current ICS structure. The property was an old landfill and had been recently purchased by Mr. Arthur Kellogg. At the time of arrival, tires were on fire along the north perimeter of the landfill. Cherokee County FES personnel were spraying water on the burning tires and debris. Local residents were located to the south of the property.

EPA, Tetra Tech START, and Chief Mitchell conducted a visual inspection of the site perimeter. OSC Nattis and Tetra Tech START noted the runoff from fire suppression operations was flowing downhill north of the property into the Hickory Log Reservoir. There was no visible sheen in the runoff from the landfill. Smoke from the fire was migrating to the northwest into a wooded area. Cherokee County FES conducted a chemical classifier field test of the runoff and preliminary results were negative for field test including of pH, hydrocarbons, oxidizers, and chlorinated compounds.

EPA and Tetra Tech START conducted perimeter air monitoring using Multi-RAE and Area-RAE instrumentation. Air monitoring indicated no results above occupational action levels for the typical target compounds for a tire fire (Benzene, Carbon Monoxide, Hydrogen Sulfide, Sulfur Dioxide, PAHs (as particulates), and Lead (as particulates)). Perimeter air monitoring was continued during fire suppression operations.

The potential issues were runoff and air quality. OSC Nattis, working within the ISC structure, requested Chief Ranger Bobby Smith of the Georgia Forestry Service with the support of START to construct an underflow dam to prevent any oil by products from the burning tires to enter into the Hickory Log Reservoir.

Working with Chief Mitchell, the solution to minimizing the runoff problem, therefore reducing the potential impacts to Hickory Log Reservoir, the fuel within the fire needed to be pulled apart, reducing the heat and allowing the Fire Department to extinguish the fire.

2. Physical location and Site characteristics

An illegal dumping area containing tires, construction and demolition, carpets and many other unknowns about 2 acres in size and piled up to over 30 feet in places. The site is located in a residential neighborhood. The property is bounded by houses on either side (east and west side) and backs up to a forested area. The property sloped from South to North. Pea Ridge road is to the south and the forested area is to the north. The downward slope through the forested area to the north until it comes to Hickey Log Reservoir.

3. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant.

Fire due to unknown causes. The illegal dumping area contains 100's of tires, construction and demolition debris, wood, carpet, couches, and potentially unknown hazmat or other oil containers. The burning of tires can and will produce VOCs and certain gases such as Benzene, Carbon Monoxide, Hydrogen Sulfide, Sulfur Dioxide, PAHs (as particulates), and Lead (as particulates).

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

Air pollution is also produced by tire fires. Air emissions may include polycyclic aromatic hydrocarbons (PAHs), benzene, styrene, phenols, and butadiene. Tire fires also produce oil, which when left burning, will containment soil and nearby water ways.

B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

- ☐ ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☐ ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].

- ___ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ___ * Threat of fire or explosion [300.415(b)(2)(vi)].
- ___ * The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ___ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. Endangerment Determination under CERCLA Section 104: Pollutant or Contaminants

N/A

V. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation.

From the Start date to the date of this document, the weather has been seasonal with low temperature ranges of 40° to 50° F and high temperature ranges of 50° to 70° F. Rain has been heavy at times during most of the removal activities.

There has been media involvement for this Site.

2. Removal activities to date:

a. Federal Government/Private Party

EPA OSC Nattis mobilized ERRS contractor Environmental Restoration, Inc. (ER) to site. ER was tasked to bring a 300 series excavator as well as a john boat and hard and soft boom to defend against oil runoff into Hickey Log Reservoir. OSC Nattis and ER Coordinator Jake Jones conducted a walk-through inspection of the site perimeter. At 20:55, Chief Mitchell conducted a pre-operations safety briefing for all personnel. ER used an excavator to pull back sections of the landfill to determine the extent and depth of the fire. During this time, OSC Nattis and Tetra Tech START conducted perimeter air monitoring with the Multi-RAE air monitoring units. Chief Ranger Smith and Tetra Tech START visually inspected the runoff from the landfill during ER activities. There was no visible sheen in the runoff during landfill operations; however, the water appeared muddier than during previous observations.

At 2300, OSC Nattis and Chief Mitchell decided to cease operations for the night based on current site conditions and incoming rain. The fire at this time appeared to have been extinguished and all tires and superficial debris had been placed in a pile. All personnel were to meet back at the site at 10:00 on March 15, 2011.

b. State/local

EPA OSC coordinated with GA EPD via phone, but no personnel were on site during the site activities. Cherokee Country Fire Department was on site and provided fire fighting personnel, communications and EMT as needed. Cherokee County Police Department was on site and provided site control and security as needed. Georgia Forestry service was on site and provided a backhoe to create access through the forest and the ability to create an underflow dam.

3. Enforcement

N/A

B. Planned Removal Actions

1. Proposed action description

No EPA removal actions planned. The Site has been referred to GEPCD solid waste program

2. Contribution to remedial performance

N/A

3. ARARs

None

4. Project Schedule

The Emergency Response has been completed. No additional EPA actions required

C. Estimated Costs*

Contractor costs (ERRS/START staff, travel, equipment)	\$30,000
Other Extramural Costs (Strike Team, other Fed Agencies)	
Contingency costs (20% of subtotal)	\$6,000
Total Removal Project Ceiling	\$36,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

VI. Expected Change in the Situation Should Action Be Delayed or Not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VII. Outstanding Policy Issues

None

VIII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document; I am approving the proposed removal actions. The total project ceiling is \$36,000; this amount will be funded from the Regional removal allowance.

Randy B. Nattis,
Federal On-Scene Coordinator

Date