U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Mike Davidson Enterprises LLC Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: **POLREP #2**
Progress Update
Mike Davidson Enterprises LLC Site

Camden Wyoming, DE
Latitude: 39.0446000 Longitude: -75.6954000

To:
From: Dominic Ventura, On Scene Coordinator
Date: 2/24/2014
Reporting Period: 02/21/2014 - 02/23/2014

1. Introduction

1.1 Background

Site Number:		**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	2/21/2014	**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Removal Action

1.1.2 Site Description

The Mike Davidson Enterprises LLC Site (Site) is located at 3051 Willow Grove Road in Camden Wyoming, Kent County, Delaware. The Site is a commercial industrial facility located in a rural residential area. The facility was a permitted solid waste handling facility at one time, but its permit was revoked in 2013. Large piles of various types of debris are located on the Site.

1.1.3 Removal Site Inspection Results

On February 15, 2014, the Delaware Department of Natural Resources and Environmental Control (DNREC) requested technical assistance from EPA regarding a response to a debris fire at the Site. DNREC reported that an ongoing fire was located within the interior of a debris pile which appeared to contain shredded construction and demolition debris, possibly from response activities related to Hurricane Sandy.

On February 16, 2014, OSC Towle met with State responder Bethard at the scene and observed the burning pile. DNREC response activities included dousing the burning debris with water and pulling down burning debris from the pile. The OSC concluded with DNREC that tactics to reduce the fire (and the associated emission) were proper, but that ultimate success may rely upon a more aggressive approach. The OSC noted that the debris pile contained various forms of plastic, rubber, metal, and other materials. The OSC noted an odor of hydrogen sulfide (i.e., like rotten eggs) and other sulfur and noxious odors in addition to the typical odor associated with a fire involving wood. The OSC could smell sulfur and hydrogen sulfide odors at the fenceline of the property. The subject property abuts properties which have residences. DNREC continued response operations over the next few days.

The most significant threats posed by the Site include: 1) potential contact via inhalation of hydrogen sulfide (a hazardous substance) and other noxious or toxic emissions, and 2) potential contact via inhalation of unknown compounds that would generate from the combustion or incomplete combustion of the debris.

On February 20, 2014, DNREC contacted the OSC and requested EPA assistance in response activities at the Site. The OSC issued Special Bulletin A, authorizing CERCLA funding in an amount not to exceed

$250,000 to initiate an emergency Removal Action to prevent further release of hazardous substances stemming from the burning debris pile located at the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Response Activities

February 21, 2014

-OSC Ventura met DNREC representatives on site to discuss the status of the debris fire and transitioning site operations from a DNREC led response action to an EPA Removal Action. The OSC was informed that the debris pile was still lightly smoking/steaming but that the pile was generating much less smoke/steam than on previous days. Hydrogen Sulfide could still be smelled on top of and down wind of the debris pile.

-ERRS arrived on site and were tasked with continuing to wet down burning debris and to aggressively remove burning debris from the pile in order to prevent the fire from spreading further. ERRS was able to utilize equipment already on site by transferring rental from DNREC's contractor. The transition of site operations was complete by the afternoon. ERRS continued to wet debris and remove debris from the pile for the remainder of the day. Debris was moved to an adjacent concrete pad and placed in small piles.

-START arrived on site and conducted air monitoring for hydrogen sulfide (H2S), oxygen (O2), carbon monoxide (CO), LEL and VOCs. No elevated concentrations were detected in either the burn area or downwind of the pile. A Hydrogen Sulfide smell was observed in several downwind locations. Air monitoring was canceled in the afternoon due to thunderstorms.

February 22, 2014

- ERRS installed silt fence intersecting the stream of water flowing away from the debris pile generated from fire fighting activities.

- An 8" water pipe was extended adjacent to the debris pile to allow further penetration into the debris pile.

- The OSC and State Rep Bethard observed that there no longer appeared to be smoke coming from the debris pile. Only a small amount of steam was apparent. A temperature gun was used to measure the temperature along the face of the excavated portion of the debris pile. The highest temperature detected was approximately 130 degrees Fahrenheit. It was agreed that the fire appeared to have been extinguished and that plan moving forward would be to plug up the excavated area with fine fill material and then grade the slope until stable. This will be done to cover the debris and reduce the source of oxygen. A layer of course material will be spread on top for erosion control. The material used to backfill and grade the slope will be taken from stockpiles located on site.

-ERRS began moving fill material and placing it in the excavated area of the debris pile. The bucket of the excavator was used to pack material in to the face of the excavated area of the pile.

- START conducted air monitoring. No elevated concentrations were noted in the excavation area or downwind of the debris pile. However, H2S was detected at elevated concentrations just above the surface (0-2") of the debris pile at two different locations. H2S was detected at 20 ppm by a small test pit that had been previously dug by DNREC and 190 ppm approximately 150 feet east/northeast of the test pit. An elevated level of VOCs (19 ppm) and LEL (12%) were also detected at this location. Elevated levels were not detected in the breathing zone possibly due to a steady wind.

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

The site is owned and was operated by Mike Davidson Enterprises LLC. The OSC met with the president of the company, Mike Davidson on February 20, 2013. Mr. Davidson stated that he does not have funds to pay for any response activities at the site. Mr. Davidson granted EPA and its contractors access to conduct response actions at the site related to extinguishing the debris fire.

2.2 Planning Section

2.2.1 Next Steps

- EPA will complete backfilling/grading of excavated debris pile.
- EPA will remain on site for at least 72 from when it was determined that the fire was extinguished to monitor and ensure that the action was effective and will the prepare to demobilize of site personnel and equipment.

2.2.2 Issues

-It is possible that the generation of H2S will continue by decomposing debris in the pile. Additionally, the OSC believes that the pile may pose a threat of additional future fires. Further assessment will be needed to determine whether additional action is required at the site.

2.3 Logistics Section

Nothing to report.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

Nothing to report.

3. Participating Entities

Nothing to report

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.