

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Bennett Landfill Fire - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #20  
Temporary Demobilization Due to Weather  
Bennett Landfill Fire  
B44Y  
Chester, SC  
Latitude: 34.7874300 Longitude: -81.4502500

**To:**  
**From:** Matthew Huyser, OSC  
**Date:** 10/2/2015  
**Reporting Period:** 9/25/2015 - 10/2/2015

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B44Y	<b>Contract Number:</b>	EP-S4-07-02
<b>D.O. Number:</b>	0134	<b>Action Memo Date:</b>	4/30/2015
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	5/26/2015	<b>Start Date:</b>	5/26/2015
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	SCN000402727	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	1100014	<b>State Notification:</b>	11/2/2014
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time-critical removal action.

#### 1.1.2 Site Description

The Bennett Landfill Fire Site is a former construction debris and nonhazardous industrial waste landfill (defined by state regulations as a Class II landfill) that was additionally permitted to accept certain types of asbestos waste.

The landfill ceased accepting waste in 2014. On November 2, 2014, the landfill was found to be on fire and was believed to have been extinguished by November 7th. Due to increasing smoke concentrations in January 2015, SCDHEC requested that the EPA conduct a Removal Site Evaluation (RSE). EPA signed an Action Memorandum on April 30, 2015 to conduct a Time-Critical Removal Evaluation and mobilized to the Site to begin removal activities on May 26.

Additional information for this section is available in POLREP #4 from 6/5/2015.

##### 1.1.2.1 Location

The Site is located at 4399 Pinkney Road, Chester, Chester County, South Carolina. The geographic coordinates of the Site are 34.7874300 degrees north and 81.4502500 degrees west.

Additional information for this section is available in POLREP #4 from 6/5/2015.

##### 1.1.2.2 Description of Threat

The fire at the Bennett Industrial Landfill is actively releasing chemical compounds into the air, including benzene and formaldehyde, which are measured near the fire at concentrations exceeding industrial RMLs for air and concentrations within the surrounding community that are greater than three times the residential RSL. Conditions at the Site, if not addressed, will continue to deteriorate over time and resulting in increasing quantities of exposed asbestos which are susceptible to transport by wind and other weather conditions to the nearby population.

Additional information for this section is available in POLREP #4 from 6/5/2015.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Additional information for this section is available in POLREP #4 from 6/5/2015.

## 2. Current Activities

## 2.1 Operations Section

### 2.1.1 Narrative

From September 24 to September 29, nearly 5 inches of rain fell at the Site. Due to wet conditions, work was unable to continue on September 25, 26, and 28. Weather forecasts anticipated rain throughout the remaining week. On-Scene Coordinator Huyser demobilized ERRS and START from the Site with two ERRS crewmembers remaining for maintenance and observations.

Sporadic rain continued throughout the week and on October 2, ERRS reported that the Site remained saturated and was unable to dry between rain events due to persistent cloud cover.

The National Weather Service issued a flood watch on October 2 which will continue throughout the weekend. Due to weather interactions relating to Hurricane Joaquin, heavy rain is anticipated during the weekend "with potentially historic and life threatening flash flooding possible". Rainfall of 3"-4" per day is possible October 2, 3, and 4.

Crews will remain demobilized until ground conditions improve. Once crews return to the Site, completion of final soil caps and ground cover installation will take approximately 2-3 weeks but may take longer due to stormwater damage.

### 2.1.2 Response Actions to Date

- May 25-29: ERRS mobilization, site preparation (access roads, entrance, trailer, work zones)
- June 1-2: Grading and wetting burned area
- June 3: First record of no morning smoke observed
- June 3-5: Continue grading and wetting burned area. Moved cover soils from borrow area to burned area
- June 5-26: Continue grading and covering operations.
- June 16: Exhausted stockpile of cover soil at top center of Site
- June 26 Initial cover soil installation completed.
- June 29 Initial six inches of clay cap begun. Completed on July 3rd.
- July 2nd Three additional gas monitoring wells installed to monitor landfill carbon monoxide and temperatures near former burn area.
- July 13-17: Began removal of trees and topsoil from West Ridge Borrow Zone
- July 14: Exhausted Old Yard Stockpile at the south side of the Site
- July 14-17: Begin installation of second 6" clay layer on burn area
- July 20-22: Complete second 6" clay lift on burn area
- July 22: Conducted compaction testing by PSI Inc - 30 of 34 grids passed
- July 23: Begin installation of third clay layer on landfill face area
- July 28: Complete excavation of 3 vertical feet of sediment from detention pond
- July 29: Consultation with Clemson University Extension Office for Soil quality and vegetation
- July 27-31: Continue installation of third clay layer on landfilled face area reaching 90% completion
- Aug 6: Conducted round 2 of compaction testing, 27 of 28 grids passed.
- Aug 14: Completed fourth and final clay layer on the face area
- Aug 12: Begin removal of Knoll Borrow Zone
- Aug 12: Begin initial cover installation on Asbestos Cell
- Aug 17 Initial cover of Asbestos Cell completed
- Aug 29 Final cover of Asbestos Cell completed
- Aug 25 Begin installation of topsoil on former burn area
- Aug 29 Begin installation of vegetative cover on former burn area
- Aug 29 Complete stormwater protection measures on detention pond.
- Aug 31 Begin grading northeast debris cell
- Sep 17 Complete initial 12-inch soil layer on northeast debris cell
- Sep 18 Complete construction of dams above retention pond and in west stormwater channel
- Sep 25 Clay capping of North Debris Cell 50% complete
- Sep 28 Temporary demobilization due to weather and ground conditions

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

Information for this section is available in POLREP #4 from 6/5/2015.

### 2.1.4 Progress Metrics

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Start Date</b>	<b>Treatment</b>	<b>Est. % Complete</b>
Burning Area	Debris	Approx 3.0 acres	6/1/2015	Cover	18" of cover soils completed on 6/26. Initial clay cap completed 7/3. Final clay cap completed 8/14. (topsoil and vegetation remains)
Asbestos Cell	Debris	Approx 19,500 CY	n/a	Regrade & Cover	Initial cover completed 8/17/15. Final clay cap completed 8/29/2015. (vegetation remains)

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## 2.2 Planning Section

### 2.2.1 Anticipated Activities

The first priority of the removal action will be to address the burning debris pile by installing a soil cover. Isolation of the burning material and reduction of oxygen supply will significantly reduce emissions from the smoldering fire. The second priority of the removal action will be to address the eroding asbestos disposal cell by re-grading and covering the area.

Air sampling and monitoring activities will be conducted on-site for worker health and safety and continued site investigation purposes. Air monitoring for respirable particulate matter (PM2.5) will continue off-site outside the fenceline and in downtown Lockhart, SC for the duration of the action.

Soil for cover and encapsulation will be obtained from on-site sources to the greatest extent possible. The disturbed areas of the Site will be secured with vegetation to provide a stable erosion-resistant surface. Total project time has been updated to approximately 4.5 months.

#### 2.2.1.1 Planned Response Activities

- Isolation of burning material by removal and relocation of available fuel path and installation of earthen cover; **(ONGOING)**
- Isolation of designated asbestos disposal cell through the installation of earthen cover; **(COMPLETE)**
- Re-grading waste materials and native soils for purpose of cover installation; **(COMPLETE)**
- Installation of temporary measures to prevent off-site migration of dust or contaminants as removal operations are conducted; and, **(ONGOING)**
- Continue sampling and monitoring, as needed, for site safety purposes and to further delineate or identify contaminants. **(ONGOING)**

#### 2.2.1.2 Next Steps

1. Complete initial and final clay cover on landfill top, then vegetate
2. Complete topsoil installation on landfill face, then vegetate and install flow interruption devices
3. Vegetate asbestos cell
4. Repair channel dams with riprap
5. Vegetate all remaining exposed areas
6. Water until vegetation established

## 2.3 Logistics Section

Crews will remain demobilized until ground conditions improve. Once crews return to the Site, completion of final soil caps and ground cover installation will take approximately 2-3 weeks but may take longer due to stormwater damage.

Any equipment will be demobilized when no longer needed.

## 2.4 Finance Section

No information available at this time.

## 2.5 Other Command Staff

OSC Matthew Huyser  
OSC Perry Gaughan

## 3. Participating Entities

SCDHEC continues to provide technical assistance and information regularly

South Carolina Forestry Commission has inspected the Site and confirmed that no unacceptable forest fire hazard is present.

Chester County EMA and Union County EMA will provide technical assistance and information, as needed

Clemson Chester County Extension Office will provide technical assistance for soil amendment and seeding needs regarding final cover and vegetation

## 4. Personnel On Site

EPA (not on site this week)  
SCDHEC (varies)  
County EMA (varies)  
ERRS (2 for week of October 2)  
START (not on site this week)

## 5. Definition of Terms

µg/m<sup>3</sup>      Micrograms per cubic meter (= 0.001 mg/m<sup>3</sup>)  
AEGL      Acute Exposure Guideline Levels

AQI	Air Quality Index
C	Celsius
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
Conc	Concentration
ConcHR	Hourly (HR) average value recorded by an EBAM instrument
ConcRT	Real time (RT) concentration recorded by an EBAM instrument based on a rolling four-minute average
DHEC	South Carolina Department of Health and Environmental Control
EMA	Emergency Management Agency
EPA	U.S. Environmental Protection Agency
ERRS	Emergency and Rapid Response Services
mg/kg	Milligram per kilogram (= 1 ppm)
mg/L	Milligram per liter
mg/m <sup>3</sup>	Milligram per cubic meter (= 1000 µg/m <sup>3</sup> )
NAAQS	National Ambient Air Quality Standard (primary and secondary NAAQS for PM <sub>2.5</sub> 24-hour average is 35 µg/m <sup>3</sup> )
NPL	National Priorities List
OAQPS	EPA Office of Air Quality Planning and Standards
OSC	On-Scene Coordinator
PM <sub>2.5</sub>	Airborne particulate matter with particle diameters below 2.5 microns
ppb	Part per billion (cannot be used to describe a mass per volume unit such as µg/m <sup>3</sup> )
ppm	Part per million (cannot be used to describe a mass per volume unit such as mg/m <sup>3</sup> )
RML	Removal Management Level
RSL	Regional Screening Level
SCDHEC	South Carolina Department of Health and Environmental Control
START	Superfund Technical Assessment and Response Team
TWA	Time-weighted average

### 5.1 Regional Screening Levels (RSL) and Removal Management Levels (RML)

Regional Screening Levels (RSL) are conservative risk-based screening values developed by the U.S. EPA to help identify contaminants of potential concern. Contaminants that exceeded a RSL in at least one sample are then screened against industrial air Removal Management Levels (RML) that were calculated for this evaluation. RMLs are risk-based screening values developed by the U.S. EPA to determine whether sample concentrations are sufficiently elevated that they may warrant a removal action. Exceedance of a RML by itself does not require a removal action, nor does it imply that adverse health effects will occur.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

Site updates will be provided to the "[Bulletins](#)" section of [epaosc.org/bennettlandfill](http://epaosc.org/bennettlandfill)

Documents, reports, and videos for public release will be posted to the "[Documents](#)" section of [epaosc.org/bennettlandfill](http://epaosc.org/bennettlandfill)

### 6.2 Reporting Schedule

New POLREPS will be issued weekly on Fridays for the duration of on-site activities.

Daily photos of site conditions and progress are being posted to the "[Images](#)" section of [epaosc.org/bennettlandfill](http://epaosc.org/bennettlandfill). These photos are collected from the same general locations each day.

## 7. Situational Reference Materials

No pertinent information to report at this time.