

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #25
Rain delays and Thanksgiving break
Bennett Landfill Fire
B44Y
Chester, SC
Latitude: 34.7874300 Longitude: -81.4502500

To: James Webster, USEPA R4 ERRB
Paul Lee, DHEC
Ken Taylor, SCDHEC

From: Matthew Huyser, OSC

Date: 12/3/2015

Reporting Period: 11/14/2015 - 12/4/2015

1. Introduction

1.1 Background

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

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

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Work activities at the Site resumed on November 16 and continued until November 18. During this period the final clay layer was completed on the top of the landfill and was then seeded, fertilized, and covered with straw.

Caution signs which conform to NESHAP 40 CFR §61.154(b)(1)(i)-(iii) were purchased and are being installed around the perimeter of the asbestos disposal cell. Although §61.154 is intended for *active* waste disposal sites, there are no visible emissions to the outside air according to §61.154(a), and a natural barrier adequately deters access according to §61.154(b), the caution signs were deemed necessary for what will become an inactive disposal Site. The signs will serve as an informative safety measure for both trespassers and inspectors or future investigators since no active monitoring or maintenance by the owner/operator is anticipated.

Diversion barriers were constructed along the north road to move rainwater which had not passed over or through disposal areas down the north slope of the Site. Although it is desirable to capture all rainwater within the detention pond, the capabilities of the pond will become inundated prematurely without some reduction in storm water volume. There is no indication of disposal on the north slope aside from large trees and concrete debris, the slope is heavily vegetated, there remains a silt fence at the toe of the slope from the original construction, and there is a small floodplain containing dense conifers between the toe of the slope and the creek along the north side of the Site property.

Rainfall on November 18 and 19 necessitated early demobilization for the Thanksgiving Holiday break. The intensity of the rainfall was significant and would not have dried until November 22 or 23, leaving just one or one-half workday before the holiday demobilization. One ERRS crewmember was allowed to remain on-site during the break for both Site security and to conduct minor maintenance activities.

ERRS returned to the Site on November 29; however, an unanticipated rainfall event followed by a second the next day prevented work activities through December 2. Work at the Site resumed on December 3 and focused on construction of a diversion berm along the silt pile at the south toe of the landfill face. Completion of this berm is anticipated by the end of December 4 and will be the final construction activity of the project. On December 2-4, seed, fertilizer, and straw were installed on all exposed soil surfaces where no further work, construction, or equipment access is needed.

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
- Oct 07 ERRS contractors removed after significant rain event and flooding in South Carolina
- Oct 17 60 percent of landfill face covered with topsoil, seeded and fertilized.
- Oct 19 Landfill face covered with topsoil
- Oct 22 Landfill face covered with seed, fertilizer, straw matting, and erosion control devices

- Oct 21 Berm at top of landfill face completed to redirect storm water from top
- Nov 2-12 Temporary demobilization due to weather and ground conditions
- Nov 18 Landfill top soil cap completed
- Nov 18 Landfill top covered with seed, fertilizer, and straw
- Dec 4 Complete diversion berm on silt slope under southwest toe of Landfill face

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

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Start Date</i>	<i>Treatment</i>	<i>Est. % Complete</i>
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 completed 10/19. Erosion Control completed 10/22.
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 installed 9/23.

2.2 Planning Section

2.2.1 Anticipated Activities

The first priority of the removal action has been 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 has been to address the eroding asbestos disposal cell by re-grading and covering the area.

Air sampling and monitoring activities have been completed.

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 7 months due to continued interruption of rain events.

2.2.1.1 Planned Response Activities

- Isolation of burning material by removal and relocation of available fuel path and installation of earthen cover; **(COMPLETE)**
- 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. **(COMPLETE)**

2.2.1.2 Next Steps

1. Repair channel dams with riprap
2. Vegetate all remaining exposed areas

2.3 Logistics Section

Any equipment or personnel will be demobilized when no longer needed.

2.4 Finance Section

2.4.1 Narrative

A ceiling increase action memorandum was signed on April 30, 2015. Funding was approved for EPA's ERRS and START contractors which have been mobilized to the Site. A ceiling reallocation memorandum to file was issued on July 29.

A ceiling increase, 12-month exemption, and \$2 million exemption action memorandum was signed on September 10. Additional funding will ensure completion of all activities and establishment of adequate vegetation.

Due to an excessive amount of rain, causing significant delays in work activities and damage to exposed soils on the Site, an additional ceiling increase is being considered to accommodate two to three additional work weeks.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$2,046,198.10	\$1,840,299.10	\$205,899.00	10.06%
TAT/START	\$252,100.00	\$231,000.00	\$21,100.00	8.37%
Intramural Costs				
Total Site Costs	\$2,298,298.10	\$2,071,299.10	\$226,999.00	9.88%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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 (1)
SCDHEC (varies)
County EMA (varies)
ERRS (8)
START (0)

5. Definition of Terms

µg/m³ Micrograms per cubic meter (= 0.001 mg/m³)
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/m³ Milligram per cubic meter (= 1000 µg/m³)
NAAQS National Ambient Air Quality Standard (primary and secondary NAAQS for PM_{2.5} 24-hour average is 35 µg/m³)
NPL National Priorities List
OAQPS EPA Office of Air Quality Planning and Standards
OSC On-Scene Coordinator
PM_{2.5} 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/m³)
ppm Part per million (cannot be used to describe a mass per volume unit such as mg/m³)
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

Documents, reports, and videos for public release will be posted to the "[Documents](#)" section of 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. These photos are collected from the same general locations each day.

7. Situational Reference Materials

No pertinent information to report at this time.

POLREP #25 Last Updated 12/8/2015