

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #8
Site Update
Moody Landfill Fire
C4Q6
Moody, AL
Latitude: 33.6187920 Longitude: -86.5295290

To: James Webster, USEPA R4 ERRPPB
Grady Springer, ADEM
Stephen Cobb, ADEM

From: Subash Patel, OSC

Date: 3/10/2023

Reporting Period: 3/3/2023-3/10/2023

1. Introduction

1.1 Background

Site Number:	C4Q6	Contract Number:	
D.O. Number:		Action Memo Date:	2/13/2023
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/18/2023	Start Date:	1/18/2023
Demob Date:		Completion Date:	
CERCLIS ID:	ALN000420955	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response to a Landfill Fire

1.1.2 Site Description

The Site is former disposal area for vegetative debris with several piles of material in various states of management. The U.S. Environmental Protection Agency (EPA) and the Alabama Department of Environmental Management (ADEM) have documented the presence of construction debris, solid waste and tires within the landfill and as indicated by signs at the Site, the landfill also accepted asphalt waste. The Site was not constructed with a landfill liner or drainage controls. Layers of cover material have not consistently been installed as part of the Site operations and maintenance practices.

1.1.2.1 Location

The Site is surrounded by residential homes in all directions; a forest is located to the east. The Site drains north to an unnamed tributary and then 2,500 feet east to Big Black Creek.

1.1.2.2 Description of Threat

On January 4, 2023, ADEM requested assistance from the EPA to conduct air monitoring and air sampling at the Site. The fire at Moody Landfill has been burning since late November 2022. Residents near the fire have filed multiple complaints with the State and St. Clair County as well as with the National Response Center (NRC) regarding the smoke and potential health hazards.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 6, 2023, the EPA mobilized to the Site with equipment and personnel to conduct air monitoring and collect air samples at four stations in and around the Site. Two stations were located on the landfill property, and two were established in residential lots less than 200 yards downwind of the Site.

Analysis of the air samples indicated that four VOCs (1,3-Butadiene, Acetonitrile, Benzene and Trichloroethene) exceeded their respective EPA residential Removal Management Levels (RMLs) at the onsite sampling stations. Two VOCs (1,3-Butadiene and Benzene) exceeded their respective RMLs at a sampling station on a residential lot.

ADEM and St. Clair County have inspected the Site, conducted air monitoring, and implemented public outreach efforts. Local firefighting resources have responded with attempts to extinguish the fire that have

been unsuccessful. In November of 2022, the Alabama Forestry Commission cut a fire break around the perimeter of the Site to reduce the risk of ignition to adjacent parcels. Representatives from State and Local agencies attempted to work with the owner and operator of the landfill facility to compel firefighting efforts that were not successful. St. Claire County and the State of Alabama declared states of emergency on January 3 and 18, 2023, respectively. On January 17, 2023, ADEM and St. Clair County requested EPA assistance to address the continued off-site migration of hazardous substances.

On January 18, 2023, the EPA Federal On-Scene Coordinator (FOSC) determined that an emergency response removal action was warranted based on the EPA sample results. On January 23, 2023 and February 13, 2023, the EPA Region 4, Superfund and Emergency Management Division Director authorized continued response actions.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA mobilized its Emergency Rapid Response Services (ERRS) contractor and the Superfund Technical Assessment and Response Team (START) contractor.

Three air monitoring stations have been deployed in the community around the Site. Air monitoring units are operating 24 hours per day. Sensors include a DustTrak for particulate monitoring and MultiRAE Pro for gas monitoring. Data summary reports are being produced each day for a timeframe covering 6:00am on the previous day to 6:00am on the current day. On-Site worker safety monitoring is also conducted.

Initial efforts of firefighting with heavy equipment includes, compaction, cover and re-grading the Site for emissions control. Local dirt/fill is used to cover the landfill to reduce air infiltration; the lack of oxygen will eventually smother (i.e. suffocate) the fire.

2.1.2 Response Actions to Date

- ERRS has installed grass seeds and straw around the southern area of the landfill.
- At this time, there is no additional need for off-site soil. Any additional soil needed for covering/grading will be obtain within the site. The burrow pit will soon be re-graded and covered with seed and straw. If more soil is needed from the burrow pit, it will be available.
- Work on the Northern slope continues. There are a couple localized pockets where smoldering continues in the Northern slope.
- Approximately 2,599 loads of soil has been delivered from the burrow pit to the Site (approximately 12 cubic yards per load).
- OSC continues to talk with residents regarding their concerns. Residents are concerned about indoor air quality and any impacts regarding long-term health. OSC is working with EPA's risk assessors and ATSDR to address residents' concerns.
- START continues to maintain two air monitoring stations; one at site and one on a residential property adjacent to the landfill. Mobile air monitoring for VOCs and particulates around the landfill continues.
- START assisting with worker safety monitoring on-site.
- Due to wet weather, ERRS contractors will stand down Friday afternoon of March 10 and return to work on Monday morning of March 13.

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

EPA will continue to identify PRPs for the Site.

2.1.4 Progress Metrics

- Approximately 31,188 cubic yards of cover material have been received from the local borrow pit.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Continue final grading and covering of the landfill;
- Continue installation of surface water controls;
- Mitigate off-site impacts due to firefighting operations to the extent practicable;
- Conduct and maintain air quality monitoring and air sampling; and,
- Continue to implement outreach plan to notify the community of response activities and air quality conditions.

2.2.1.2 Next Steps

- Prepare for off-site disposal of a limited amount of solid waste to allow for application of cover

material.

2.2.2 Issues

Off-site air monitors have reported significant reductions of PM2.5 and VOC levels, with periodic spikes depending on weather and on-going fire mitigation.

On-site work continues with 24 hour monitoring of worker safety.

2.3 Logistics Section

ERRS will arrange for continued delivery of borrow material.

2.4 Finance Section

2.4.1 Narrative

An Additional Funding and Exemption Request Action Memorandum has been signed with a ceiling of \$3,623,456.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$2,204,316.00	\$1,478,316.00	\$726,000.00	32.94%
TAT/START	\$200,000.00	\$130,000.00	\$70,000.00	35.00%
EPA RRC	\$20,000.00	\$17,000.00	\$3,000.00	15.00%
REAC	\$80,000.00	\$75,000.00	\$5,000.00	6.25%
Intramural Costs				
Total Site Costs	\$2,504,316.00	\$1,700,316.00	\$804,000.00	32.10%

* 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

2.5.1 Safety Officer

START is assisting with air monitoring.

2.5.2 Community Liaison Officer

EPA has identified a Community Involvement Coordinator for the Site. Contact information has been listed on the public page for the Site at response.epa.gov.

2.5.3 Information Officer

EPA has identified a Public Information Officer for the Site. Contact information has been listed on the public page for the Site at response.epa.gov.

3. Participating Entities

Unified Command

EPA
ADEM
St. Claire County

4. Personnel On Site

EPA Region 4 - 1
EPA START - 1
EPA ERRS - 12
ADEM - 1
St. Claire County - 1

5. Definition of Terms

ADEM - Alabama Department of Environmental Management
CO - Carbon Monoxide
EPA - Environmental Protection Agency
ERRS - EPA's Emergency Rapid Response Services contractor
ERT - EPA's Environmental Response Team
FOSC - Federal On-Scene Coordinator (same as OSC)
OSC - On-Scene Coordinator (same as FOSC)

PAH - Poly-Aromatic Hydrocarbon
PM2.5 - Particulate matter smaller than 2.5 microns
PRP - Potentially Responsible Party
START - EPA's Superfund Technical Assessment and Response Team contractor
VIPER - EPA's response monitoring database (not an acronym)
VOC - Volatile Organic Compound

6. Additional sources of information

Information is being released to the public through the Site webpage at response.epa.gov/MoodyLandfillFire

7. Situational Reference Materials

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