

# **Trafalgar Site Response Action Plan**

## **Preliminary Outline**

The underground fire on Trafalgar Road is a complex situation that requires a thorough and comprehensive solution. ADEQ's preferred action to respond to the Trafalgar site will use air curtain technology with excavation, separating of hazardous substances, and wood waste management. While ADEQ has not selected a contractor yet, the outline of the plan below will provide insight into ADEQ's preferred path forward.

After consulting with numerous technical advisors, ADEQ's preferred preliminary response action plan outlined below will eliminate or greatly reduce the need for 500,000 gallons of the treated community water supply daily. In addition, the number of dump trucks needed will drastically reduce because the wood waste will be consumed on-site using air curtain technology—lessening the impact on Trafalgar Road.

### **1. Fire Control**

The fire team will be comprised of certified fire personnel with extensive experience in firefighting and wildland fire containment on-site for the duration of the project. The goal is to have the fire contained within the first 30 days of excavation.

### **2. Excavation**

Excavators will be used to begin removing all materials from the site. The materials will be loaded into large articulated dump trucks that will haul waste materials to a staging and sorting area on the site. ADEQ would expect that excavation and sorting activities would be conducted only during daylight hours.

### **3. Sorting and Separating Waste Materials**

A second excavation team will work to separate waste materials into segregated staging areas depending on the types of waste encountered during the excavation process. This sorting process will be achieved using excavators, bulldozers, and shaker machines to separate organic waste from dirt and other wastes in order to achieve complete combustion using air curtain technology.

### **4. Wood Waste Management**

This method will allow the organic fuel sources (wood waste) feeding the fire to be eliminated while minimizing use of the community water supply. The wood waste management will be achieved through the use of air curtain technology. This proven technology reduces smoke and particulate matter being emitted into the ambient air by employing a horizontal curtain of air over the organic matter in the burn boxes. This method is often employed by municipalities during storm debris removal, and is in wide

use across the country. There may be up to five of these burn units in use at any given time, and the proposal includes a 24/7 operation in order to achieve the complete solution in a timely manner of approximately 180 days. The federal regulations provide for an exclusion from permitting requirements for the air curtain technology for up to the first 16 weeks of operation if an emergency or disaster has been declared. Thereafter, EPA must grant a waiver from permitting. EPA Region 6 has indicated they will support our efforts.

#### **5. Waste Materials Relocation**

Following the sorting process, other materials, including hazardous substances, encountered will be properly documented, containerized, and transported for permanent disposal to permitted landfill or to a recycling facility.

#### **6. Site Restoration**

The site will be regraded and restored with native trees, grass, or other vegetative material in order to promote natural regrowth of the area.

Due to the complex nature of this scope of work, safety is of the highest priority. Workers will be properly trained using established Occupational Safety and Health Administration (OSHA) HAZWOPER requirements. The work site and surrounding area will be continuously monitored for air emissions in order to protect workers and nearby residents. Respiratory protection and personal protective equipment will be available for workers and used as air monitoring dictates. Additionally, a CCTV system, outdoor lighting, 24/7 security, and the use of drones will aid in the overall security of the site and workers while the project progresses. This plan will adhere to the highest standards for safety and environmental stewardship in order to protect workers and the local community of Bella Vista.