

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
MILLARD REFRIGERATED NH3 RELEASE - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
PROGRESS
MILLARD REFRIGERATED NH3 RELEASE

Theodore, AL
Latitude: 30.5316790 Longitude: -88.1030570

To:
From: Dean Ullock, On Scene Coordinator
Date: 8/27/2010
Reporting Period: 08/26/2010 thru 08/27/2010

1. Introduction

1.1 Background

Site Number:	B4B9	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	USCG	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/23/2010	Start Date:	8/23/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

At approximately 0910 CDT on 8/23/2010, an estimated 250 to 600 gallons of ammonia was released from the Millard Refrigerated facility. The vapor plume escaped the facility and was confirmed at other local facilities located across the Theodore Ship Channel near the mouth of the channel that leads to Mobile Bay. USCG GST (PO HAWES) and EPAOSC Ullock initially responded to the Millard facility to provide technical assistance, oversight, air monitoring, and to the USCG-FOSC-R. Approximately 104 persons sought medical attention and/or were hospitalized, including 5 in ICU. Approximately 65 persons affected by the ammonia cloud were BP-related contractors associated with the DWH oil spill. The Fire Department cleared the scene late Monday afternoon/early evening.

1.1.2.1 Location

7730 Deer River Road, Theodore, Mobile County, Mobile, Alabama 36582

1.1.2.2 Description of Threat

The refrigeration facility had been evacuated and several reports had been filed of off-site impacts where people experienced difficulty breathing as the vapor plume of ammonia traveled southeastward towards the mouth of the Theodore Ship Channel, over the Resolve marine facility (aka DWH Decon Staging Area) and towards Mobile Bay.

Ammonia has a NIOSH REL TWA of 25 ppm (18 mg/m³), an OSHA PEL TWA of 50 ppm (35 mg/m³), and an IDLH of 300 ppm. Exposure to high levels of ammonia in air may be irritating to skin, eyes, throat, and lungs and cause coughing and burns. Lung damage and death may occur after exposure to very high concentrations of ammonia. Some people with asthma may be more sensitive to breathing ammonia than others. Swallowing concentrated solutions of ammonia can cause burns in mouth, throat, and stomach. Splashing ammonia into eyes can cause burns and even blindness.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

OSC Ullock has assumed the lead FOSC role and as prescribed by the NCP, the US EPA is the lead Federal Agency as of 08/25/10 @ 1700 hrs. EPA OSC and the USCG GST IH continue to provide direct technical assistance to the RP, and it's clean-up contractors (SRS, USES and CTEH). The NH₃ release is secured , however much of the remaining released Ammonia remains frozen and sequestered within a 24000 sq. ft. freezer with a current internal temperature of 0 to 10 degrees F. The clean up phase will be complex and prolonged, involving the use and application of CO₂ to stabilize and neutralize the NH₃. USCG GST and EPA OSC Ullock will continue to provide technical expertise and oversight assistance to RP.

2.1.2 Response Actions to Date

Response actions to date include the finalization of all applicable response plans (ie. air monitoring, communication/coordination plan, site health and safety plan). The continued application of CO₂ has proven effective with reducing the dangerous NH₃ atmosphere within the affected freezer #5 and associated works spaces within. While these operations are ongoing, Millard is coordinating through their corporate management and their legal department what the final disposition of their poultry product will be, whether that is landfill or incineration. This decision is critical to safety and near term operations. Millard has been requested to provide a decision to US EPA during this reporting period.

The RP has been cooperative and has secured proper remediation contractors to stabilize the ammonia, and to continue to conduct comprehensive air monitoring. The DWH Unified Command (Mobile) continues to be briefed on a daily basis.

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

The PRP has been identified, Region IV EPCRA has been notified, and a US EPA Site Attorney has been assigned to this incident.

2.1.4 Progress Metrics

<><><><>

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
NH ₃ contaminated poultry and cellulose packaging material and wooden pallets		TBD	TBD	TBD	TBD

2.2 Planning Section

2.2.1 Anticipated Activities

Millard is expected to determine what the final disposition of their poultry will be so that near term operations can be planned for and arranged.

2.2.1.1 Planned Response Activities

Continue with application of CO2 into freezer #5 to neutralize and stabilize NH3. Continue with comprehensive air monitoring of the Millard facility and the Resolve marine facility (DWH Vessel Decon) area.

2.2.1.2 Next Steps

Continue with daily situational awareness updates and monitoring of operations.

2.2.2 Issues

High Visibility given the DWH Vessel Decon operation proximity.

2.3 Logistics Section

All logistics continue to be arranged by the RP.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Lt. Commander Kenneth Pounds of the USCG-GST has been assigned as EPA OSC's lead Safety Officer.

2.6 Liaison Officer

DWH Unified Command Chief Petty Officer-Robert Cox has been identified as the liaison officer between the DWH UC and this incident.

2.7 Information Officer

N/A

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

On the afternoon of 8/25/2010 at approximately 1700 hrs., EPA OSC Ullock assumed responsibility as lead-OSC. Under the NCP, US EPA is the lead Federal Agency for the duration of the response and will continue to oversee all ongoing removal activities.

3.2 Cooperating Agencies

OSHA

USDA

ADEM

USCG-Sector Mobile

USCG-Gulf Strike Team

CDC/ATSDR

Mobile County Dept. of Public Health

Chemical Safety Board

4. Personnel On Site

1 ea. EPA OSC

1ea. START

1ea. USCG IH (PM)

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

Please refer to the EPAOSC.net website for more information related to this incident.

6.2 Reporting Schedule

TBD

7. Situational Reference Materials

N/A