

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
REEF Environmental - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Initiation of the Response
REEF Environmental

Sylacauga, AL
Latitude: 33.1888040 Longitude: -86.2640480

To:
From: Tim Neal, OSC
Date: 10/3/2012
Reporting Period: 10/2/2012

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date:
Response Authority: CERCLA	Response Type: Emergency
Response Lead: EPA	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date: 10/2/2012	Start Date: 10/2/2012
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

The Reef LLC facility in Sylacauga, Alabama was a centralized waste treatment facility. The facility planned on accepting waste water and oily waste from other industries for treatment and discharge to the Sylacauga waste water treatment plant. Shortly after the first waste deliveries began, reports indicate that numerous odor complaints were received by the local and state government. Within the past few years, the facility has filed for bankruptcy. The State has taken various actions and had limited success in getting the wastes at the Site to be properly disposed. On October 1, 2012, after receiving information that totes were being removed from the facility and numerous odor complaints, Alabama Department of Environmental Management (ADEM) personnel investigated the Site. ADEM personnel could not make entry into the facility but did observe an oily sheen in a stream near the facility as well as a large bulge in the tarp covering the Biological Treatment Basin at the facility. Later in the day on October 1, ADEM requested assistance from the Environmental Protection Agency to assess the Site and to assist with implementation of emergency stabilization measures. On the morning of October 2, 2012, OSCs Francendese and Harper were mobilized from Birmingham, Alabama to meet with ADEM and assess the situation. Upon initial assessment, OSC Francendese secured the Site and ceased removal of on-site totes by private party contractors. In addition, he verbally notified the PRPs of potential hazards which included the accumulation of hazardous substances (including hydrogen sulfide) under the tarps/liners covering the basins. While the PRP provided verbal access, he indicated that he was not able to perform the necessary stabilization actions required by EPA. OSC Francendese requested the dispatch of the on call responder. EPA OSC Neal was dispatched to the scene. Assessment activities continued throughout the day and evening of October 2, 2012.

1.1.2.1 Location

71 Twin Street, Sylacauga, AL

1.1.2.2 Description of Threat

A release of the hazardous substances hydrogen sulfide and organic vapors including BTEX compounds is actively releasing from the facility into the atmosphere. The abandoned facility has several priority issues that will be addressed under a phased approach. The first phase of the emergency response action is primarily addressing the trapped gases that exist under the 3 million gallon biological reactor tarp/liner. An additional basin called the equalization basin exists that also holds approximately 3 million gallons. The trapped gases total approximately 175,000 cubic feet and evidence indicates elevated levels of volatile organics and hydrogen sulfide. This facility exists within 1000 feet of a residential neighborhood.

Additional threats exist in the form of an oily sheen release to the nearby creek as well as abandoned

hazardous substances onsite.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The initial assessment identified the trapped gases under the tarp/liner as well as the oily sheen being released to the creek. The rotten egg odor was later identified to be both elevated volatile organics and hydrogen sulfide. Subsequent site walkthru identified abandoned hazardous substances at the facility both on the facility grounds proper and within the lab.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

10/2/2012

EPA OSCs (Lead OSC Neal and supporting OSCs, Francendese, Harper and Ball) mobilized to assess the site and assume the lead OSC role. START and ERRS were also mobilized.

An Initial exclusion zone established at the fence line.

OSCs conducted initial Level B entry to collect air monitor data. MultiRae, TVA 1000 photoionization detector and flame ionization detector (PID/FID) Electronic Personnel Dosimeter (EPD), HCN monotox sensor and CH4 monitor were used to assess ambient and local air conditions.

Initial air monitoring results are follows:

- Biological Treatment Basin (approx 3 million gallon)
 - FID - sustained reading at surface of approximately 60 ppm and background in the breathing zone.
 - H2S - sustained reading of 10 - 20 ppm at the surface and 10 ppm in the breathing zone.
- Pump Stationn (approx 1000 gallons)
 - FID - sustained readings of 60 ppm total volatile organics at the surface with max of 2000 ppm and approx 50 ppm in the breathing zone.
 - Hydrogen sulfide (H2S) - sustained readings of 20 ppm with max of 125 ppm at the surface and 10 ppm in the breathing zone.
- No other parameters were detected.
- Air monitoring results outside the immediate area of the basins and within the property boundaries were at background.
- Air monitoring results outside the fenceline and at the closest residence were at background.

Additional actions:

- OSCs conducted an additional entry to collect samples for hazardous categorization as well as waste profiling.
- Liquid and sludge samples will be sent for 24 hours turn around analysis.

OSC Neal also conducted a scoping meeting with ERRS based on air monitoring data collected.

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

PRP is Reef Environmental

OSC Francendese contacted the PRP by phone and outlined that site activities that need to be addressed. The REEF representative stated that they do not have the resources to perform the work. REEF gave verbal access to EPA to address EPA's concerns on site.

2.1.4 Progress Metrics

<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

- Continue to assess gas bubbles under the tarps covering the Biological Treatment Basin and Equalization Basin and develop a mitigation plan.
- Continue air monitoring to ensure no unacceptable air concentrations impact nearby residents or worker safety.
- Continue coordination with State and Local officials.
- Address waste oil contamination migrating off-site.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

EPA

ADEM

3.2 Cooperating Agencies

City of Sylacauga

Talladega County EMA

Alabama EMA

4. Personnel On Site

EPA - 4

START - 2

ERRS - 3

ADEM - 1

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.