

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #9
Progress
REEF Environmental

Sylacauga, AL
Latitude: 33.1888040 Longitude: -86.2640480

To:
From: Jason Booth, OSC
Date: 2/7/2013
Reporting Period: 1/21/13 to 2/7/13

1. Introduction

1.1 Background

Site Number:	B4W3	Contract Number:	EP-S4-07-03
D.O. Number:	TO-0132 Mod 2	Action Memo Date:	12/3/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
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.:	1026286	State Notification:	ADEM
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Reef Environmental Services facility in Sylacauga, Alabama was a centralized waste treatment facility. The facility was permitted to accept industrial waste water (waste water and oily contact water) for treatment and discharge to the Sylacauga public operated treatment works (POTW) 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, Talladega County, Alabama

1.1.2.2 Description of Threat

The abandoned facility has several priority issues that will be addressed under a phased approach. The first phase involved the emergency response action that mitigated the trapped gases under the 3 million gallon biological reactor tarp/liner of Equalization Basin No. 2 (EQ 2). An additional 3-million gallons treatment basin, Equalization Basin No. 1 (EQ 1) also has a failed tarp/gas retention system that was not under high pressure, but required mitigation work. Trapped gases exist under this liner and will be addressed under the emergency phase of the response action. The trapped gases total approximately 175,000 cubic feet contained dangerous elevated levels of volatile organics and hydrogen sulfide and presented a release and explosion risk. 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

chemicals onsite.

The first phase addressed the release threat of the trapped gases and release of EQ 2 to Shirtee Creek followed by a series of chemical treatments of EQ 1 & 2 to stop the emissions of H₂S.

The second phase will involve an analytical assessment of the waste water inventory of the Site. Based on the technical review of the analytical a treatment and disposal scheme will be implemented for the estimated 14-million gallons of waste water in the three major waste water basins and two clarifiers.

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

The facility is an abandoned former waste treatment facility that was referred to the EPA ERRB by ADEM. Subsequent assessments identified unstable conditions relating to accumulating gases (organic and hydrogen sulfide) under the containment tarp/liner covering Equalization Basins 1 & 2.. Additional assessments identified an oily sheen being released from the facility as well as abandoned hazardous chemicals both on the facility grounds and in the onsite facility lab.

2.1.2 Response Actions to Date

Week of Jan 28, 2013 - Emergency and Rapid Response Services (ERRS) has begun solidifying and stabilizing the approximately 815 cubic yards of sludge that was collected from basin 1 with soils on site from the drying beds and sawdust. A sample of the sludge mixture was collected and sent to the laboratory for analysis for disposal. ERRS has checked all tanks on site for any presence of liquids remaining and sampling has begun to determine constituents present in each. Drums have been ordered to start consolidating like materials. ERRS started inventory of all drums, totes and other small containers on site. The EPA and ERRS contractor in partnership with Alabama Department of Environmental Management (ADEM) conducted another bench study to evaluate different types of flocculent for treatment of waste waters from the various basins. ADEM has also approved provisional discharge limits for 0.275 million gallons a day (MGD). The EPA along with ADEM concurrence have approved the Quality Assurance Project Plan (QAPP) for the scheduled sampling event on Shirtee Creek. The study will focus on 5 sampling locations while discharging to the creek.

Week of Feb 4, 2013 - Emergency and Rapid Response Services (ERRS) continues to solidify and stabilize the oily sludge that was collected from basin 1. Bids have been sent out for the transport and disposal of sludges. ERRS continues inventorying and consolidating drums, totes and other small containers on site. Nine frac tanks were brought onto the site as contingency to increase the available free board of basins. Approximately 40,000 gallons were transferred from each of the smaller basins while approximately 80,000 gallons was transferred from the large basin. ERRS crews prepared the area where the water treatment system will be placed by grading, covering with poly lining and applying rock. The OSC has submitted a draft Change of Scope Action Memo to Superfund management to address the treatment and discharge of waste water, and also address all tanks, drums, totes and other containers on site. The OSC conducted interviews with CBS 42 Birmingham and The Daily Home for updates regarding OSC changes and current site conditions.

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

The Office of Environmental Accountability (OEA) is pursuing enforcement.

2.1.4 Progress Metrics

Currently, Initial oxidative treatment listed below is 35% hydrogen peroxide to control hydrogen sulfide gas emissions.:

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Aeration Basin	Water	7-mil gal	N/A	Oxidation	TBA
Equalization Basin No. 2	Water	3-mil gal	N/A	Oxidation	TBA
Equalization Basin No. 1	Water	3-mil gal	N/A	Oil Removal	TBA
Clarifier No. 1	Water	250K gal	N/A	TBA	TBA
Clarifier No. 2	Water	1-mil gal	N/A	Oxidation	TBA

2.2 Planning Section

2.2.1 Anticipated

Continue coordination with ADEM and Local officials.

2.2.1.1 Planned Response Activities

Begin treatment of the approximately 14-million gallons of waste water and discharge it to Shirtee Creek per parameters established by ADEM.

Inventory, sample and bulk all tanks, drums, totes and other containers on site and prepare for offsite disposal.

2.2.1.2 Next Steps

Initiation of Phase II.

2.2.2 Issues

- Media and public relations have been positive during the end of Phase I
- Waste water parameters parameters TKN and COD to be worked on and resolved prior to disposal

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

2.5.2 Liaison Officer

2.5.3 Information Officer

Ms. Kerisa Coleman (Region 4 CIC)

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 (OSC) - 1
- START (Tetra Tech) - 1 (for off site sampling on Shirtee creek)
- ERRS (WRS Compass)- 7
- 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

None available at this time