

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #10
Progress Report
REEF Environmental
B4W3
Sylacauga, AL
Latitude: 33.1888040 Longitude: -86.2640480

To: Jim McGuire, USEPA R4 ERRB

From: Jason Booth, OSC

Date: 2/27/2013

Reporting Period: 2/7/13-2/27/13

1. Introduction

1.1 Background

Site Number:	B4W3	Contract Number:	EP-S4-07-03
D.O. Number:	TO-0132 Mod 2	Action Memo Date:	2/25/2013
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 Feb 11, 2013 - Emergency and Rapid Response Services (ERRS) completed stabilization of the oily sludge that was collected from basin 1. A waste profile of the sludge mixture was generated and sent to the Alabama Department of Environmental Management (ADEM) for approval. ERRS continued to inventory and consolidate drums, totes and other small containers on site. Laboratory results from samples collected from all the tanks on site have been completed. All samples came back as non-hazardous and tank contents will be bled off and added to the basins once treatment has begun. ERRS crews began preparing the discharge point piping and constructed spargers which will be used for aeration during treatment. Superfund Technical Assessment and Response Team (START) was tasked to conduct a baseline sampling event on Shirtee Creek to establish background levels prior to discharging. The OSC continued to work with ADEM to establish provisional ecological discharge parameters. Approximately 220 tons of solidified sludge was transported off site for disposal. The OSC submitted a draft Change of Scope Action Memorandum to Superfund management to address the treatment and discharge of the waste water, and also address all tanks, drums, totes and other containers on site.

Week of Feb 18, 2013 - Emergency and Rapid Response Services (ERRS) received and installed all necessary tankage and appurtanances for the water treatment system. The water treatment system was started and allowed to run to push out any dust or previous material in the system. The OSC halted treatment and disposal operations of solids to focus resources on water treatment. ERRS completed inventory and bulking of all drums, totes and containers. Bids for drum and tote disposal were sent out.

Week of Feb 25, 2013 - The Change of Scope Action Memorandum to address treatment and discharge of the waste water on site has been approved. ERRS continues to tweek and maximize the efficiency of the waste water treatment system. Post treatment samples were collected and sent to the lab for analysis. Samples results showed elevated levels still present for Titanium, TKN and TSS. The OSC and ERRS are currently developing a plan to implement a flocculant to reduce these numbers.

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
Oily Sluge	Soil	600 tons		Stabilize	Started
Drums	Liquid	15 drums			TBA

Lab Packs	Liquid	13 packs			TBA
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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.

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

2.4.1 Narrative

On October 15, 2012 the Superfund Division Director verbally approved a \$200K increase in funding to continue EPA & support contractor's presence at the site to evaluate treatment and disposal of the waste water and waste seepage into Shirtee Creek.

On December 3, 2012 the Superfund Division Director signed/approved a Ceiling Increase and \$2-Million Exemption Action Memorandum to support funding for completion of Phase I to control source release of the H2S and develop and implement Phase II to treat and dispose of the waste water inventory at the Site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,650,000.00	\$1,148,011.68	\$501,988.32	30.42%
TAT/START	\$142,000.00	\$98,036.87	\$43,963.13	30.96%
REAC	\$125,000.00	\$15,500.00	\$109,500.00	87.60%
Intramural Costs				
Total Site Costs	\$1,917,000.00	\$1,261,548.55	\$655,451.45	34.19%

* 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

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) - 6
- 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

POLREP #10 Last Updated 4/22/2013