

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #17  
Progress Report  
REEF Environmental

Sylacauga, AL  
Latitude: 33.1888040 Longitude: -86.2640480

**To:**  
**From:** Jason Booth, OSC  
**Date:** 2/4/2014  
**Reporting Period:** 11/1/2013-2/4/2014

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4W3	<b>Contract Number:</b>	EP-S4-07-03
<b>D.O. Number:</b>	TO-0132 Mod 2	<b>Action Memo Date:</b>	2/25/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/2/2012	<b>Start Date:</b>	10/2/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	1026286	<b>State Notification:</b>	ADEM
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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 H<sub>2</sub>S.

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 Nov 4, 2013 - Emergency and Rapid Response Services (ERRS) continued removing sludge from basin 3. Approximately 1/3 of the sludge from basin 3 was transferred to the drying beds to be solidified and stockpiled. Wastewater continued being treated as needed to keep water levels down. Air quality monitoring continued taking place along the perimeter of the Site and in a nearby neighborhood.

Week of Nov 18, 2013 - Emergency and Rapid Response Services (ERRS) continued removing sludge from basin 3. Approximately 3/4 of the sludge from basin 3 was transferred to the drying beds to be solidified and stockpiled. ERRS crews started removing sludge from the final aeration basin, bio-well re-cycler and sludge thickener. Sludge from the final clarifier was also being pumped out and sent to the drying beds. Wastewater continued being treated, as needed, to keep water levels down. Air quality monitoring continued to take place along the perimeter of the Site and in a nearby neighborhood.

Week of Dec 9, 2013 - ERRS continued removing the last amount of sludge from basin 3. Heavy rains slowed down the process some as the basin needs to be dewatered before sludge removal can begin. Approximately 5,000 tons of solidified sludge was disposed of off-site to reduce the size of the current stockpile. Wastewater continued being treated, as needed, to keep water levels down from the rain. Air quality monitoring continued taking place along the perimeter of the Site and in a nearby neighborhood.

Week of Jan 13, 2014 - Emergency and Rapid Response Services (ERRS) completed removal of sludge from basin 3. Basins 1, 2 and 3 are now completed. Approximately 10,000 tons of solidified sludge have been disposed of off-site. Crews began removing the remaining sludge in large clarifier. Wastewater continued being treated, as needed, to keep water levels down from the rain. Air quality monitoring continued taking place along the perimeter of the Site and in a nearby neighborhood.

Week of Jan 20, 2014 - Emergency and Rapid Response Services (ERRS) completed removal of sludge from the large clarifier. All three basins and the large clarifier are now completed. ERRS crews began working on removing the remaining sludge in the smaller clarifier. Wastewater continued being treated, as needed, to keep water levels down from the rain. Air quality monitoring continued taking place along the perimeter of the Site and in a nearby neighborhood.

Week of Jan 27, 2014 - Emergency and Rapid Response Services (ERRS) finished completion of sludge removal from the smaller clarifier. Snowy weather slowed progress on work. All three basins and the large clarifier are completed. Wastewater continued being treated, as needed, to keep water levels down from the rain. Air quality monitoring continued taking place in a nearby neighborhood only.

Week of Feb 3, 2014 -Emergency and Rapid Response Services (ERRS) finished completion of sludge removal from the smaller clarifier and sludge thickener. All sludge on site has been stabilized and all wastewater has been treated. The stabilized sludge is currently being disposed of to an off site landfill. Air quality monitoring continued taking place in a nearby neighborhood.

#### 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

<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	Filtration	Discharge to creek
Equalization Basin No. 2	Water	3-mil gal +	N/A	Filtration	Discharge to creek

Equalization Basin No. 1	Water	3-mil gal +	N/A	Filtration	Discharge to creek
Clarifier No. 1	Water	600K gal +	N/A	Filtration	Discharge to creek
Clarifier No. 2	Water	1-mil gal +	N/A	Filtration	Discharge to creek
Oily Sludge	Solid	600 tons	N/A	Stabilize	Landfill
Stabilized Sludge	Solid	10k tons	N/A	Stabilize	Landfill
Lab Packs	Liquid/Solids				TBA

## 2.2 Planning Section

### 2.2.1 Anticipated

Continue coordination with ADEM and Local officials.

#### 2.2.1.1 Planned Response Activities

Finish disposal of solidified sludge off site.

#### 2.2.1.2 Next Steps

See above.

### 2.2.2 Issues

## 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 and Viper Support)
- ERRS (WRS Compass) - 4 with 1 off site for accounting
- 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

