

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #18  
Final POLREP  
REEF Environmental

Sylacauga, AL  
Latitude: 33.1888040 Longitude: -86.2640480

**To:**  
**From:** Jason Booth, OSC  
**Date:** 3/12/2014  
**Reporting Period:** 2/4/2014-3/12/2014

## 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>	3/5/2014	<b>Completion Date:</b>	3/10/2014
<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 Shirlee 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 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 24, 2014 - Emergency and Rapid Response Services (ERRS) finished load out of solidified sludge. Approximately 21,000 tons of sludge was shipped off site for disposal. All equipment was decontaminated and called off rent. Seeding of areas disturbed by equipment during the removal action was completed. Fencing around both clarifiers was completed. Patching of the perimeter fence and fence around the large basin was also completed. Air quality monitoring equipment was demobilized from the site.

Week of March 3, 2014 - A total of 45 totes, drums and lab-packs were shipped offsite. Ten lab packs remain onsite (2 x 55 gallon drums, 2 x 30 gallon drums, and 6 x 5 gallon pails). Water and electricity to the site was turned off. Both office trailers were demobilized. Final roll off was picked up for disposal. Keys to the facility were handed over to ADEM.

Week of March 10, 2014 - The final ten lab packs were shipped offsite for disposal.

#### **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**

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
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	21k tons	N/A	Stabilize	Landfill
Lab Packs/totes/drums	Liquid/Solids	55	N/A	Stabilize	Landfill

## **2.2 Planning Section**

### **2.2.1 Anticipated**

Open house with ADEM and EPA.

#### **2.2.1.1 Planned Response Activities**

None.

### **2.2.1.2 Next Steps**

None.

### **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**

None

## **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