

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
B4W3
Sylacauga, AL
Latitude: 33.1888040 Longitude: -86.2640480

To: Jim McGuire, USEPA R4 ERRB

From: Jason Booth, OSC

Date: 3/12/2014

Reporting Period: 2/4/2014-3/12/2014

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:	3/5/2014	Completion Date:	3/10/2014
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 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

<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 Sluge	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

2.4.1 Narrative

On January 22, 2014 the Superfund Division Director signed/approved a Ceiling Increase to dispose of the remaining solidified sludge on site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,669,143.00	\$4,603,641.94	\$65,501.06	1.40%
TAT/START	\$450,887.00	\$428,183.24	\$22,703.76	5.04%
REAC	\$41,000.00	\$15,500.00	\$25,500.00	62.20%
Intramural Costs				
Total Site Costs	\$5,161,030.00	\$5,047,325.18	\$113,704.82	2.20%

* 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

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

