

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Monday, November 13, 2006

From: Leigh Vorreuter

To: Beverly Blagg, ADEM

Subject: Initiation of Action
McCullough Oil
148 County Road 523, Verbena, AL

POLREP No.:	1	Site #:	A4KL
Reporting Period:		D.O. #:	
Start Date:	11/7/2006	Response Authority:	CERCLA
Mob Date:	11/6/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ALN000409805	Contract #	
RCRIS ID #:			

Site Description

McCullough Oil was a former waste oil storage facility. The Site contains over 100 55-gallon drums and 20 ASTs. Many of the drums and tanks contents contain combustible and flammable materials. Also, the hazardous substances' pH range from 1 to 14. One of the drums tested positive for halogens. It was estimated that 105,000 gallons of waste oil contained in the ASTs required removal to prevent a major waste oil discharge in the future.

The Site is situated on an approximately 8-acre parcel in rural Alabama. The Coosa River and Mitchell Dam are approximately 1.7 miles northeast of the Site property. An unnamed stream southeast of the site is a tributary of the Coosa River and the topography is sloping downward towards the unnamed stream.

In January of 2005, the Alabama Department of Environmental Management (ADEM) became aware of the potential of environmental impact from the release of unsecured materials at McCullough Oil. ADEM also has evidence that suggests that the site is being used for unauthorized disposal by unknown parties.

Current Activities

On Monday, November 6, 2006, ERRS Contractor WRS and START-3 Contractor T N & Associates mobilized personnel and equipment to the Site in Verbena, AL. EPA OSC Vorreuter also mobilized to the Site. Site safety plans were reviewed by all personnel and a safety briefing was held prior to the initiation of activities. START personnel conducted air monitoring using a PID/FID and four-gas meter. No elevated air monitoring readings were encountered. During the week, ERRS and START worked at the Site and accomplished the following activities:

- ERRS cut down brush and trees near the staged drums and tanks;
- ERRS inspected each drum and recorded labeling and other information on drum logs;
- ERRS sampled some of the drums and conducted hazard categorization tests on the samples;
- ERRS bulked compatible waste streams and shipped the samples off site for analysis. A total of 8 waste samples were sent to the laboratory;
- START conducted air monitoring using the PID/FID and four-gas meter throughout the week. All work was conducted in Level C PPE and all air monitoring levels were below action levels for upgrade to Level B PPE;
- START documented site activities, maintained a photo log and conducted oversight of ERRS activities.

On November 10, 2006 ERRS and START secured the Site and demobilized all personnel and equipment.

Planned Removal Actions

Once analytical sampling results for waste samples are received, ERRS and START will re-mobilize personnel and equipment back to the Site. ERRS will procure waste transportation and disposal services based on the analytical results and generator knowledge. The tanks will be cleaned, dismantled, and

disposed of at an off site facility. Drums and other containers will also be disposed of at an off site facility. Soil excavation will occur where needed. Additional soil sampling may transpire.

Next Steps

Receive and review analytical results and procure off site transportation and disposal services.

Key Issues

None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$273,000.00	\$12,724.00	\$260,276.00	95.34%
RST/START	\$26,000.00	\$6,383.00	\$19,617.00	75.45%
Intramural Costs				
Total Site Costs	\$299,000.00	\$19,107.00	\$279,893.00	93.61%

* 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.

response.epa.gov/McCulloughOil

POLREP #1 Last Updated 11/21/2006