

## Memorandum

TO: File

FROM: Tony Cox  
Environmental Administrator II  
Central Regional Office  
Mississippi Department of Environmental Quality

DATE: October 27, 2017

RE: Unannounced inspection at Rebel High Velocity Sewer Services  
333 Wilmington Street, Jackson, MS  
Hinds County

On October 24, 2017, I conducted an unannounced inspection at Rebel High Velocity Sewer Services (Rebel) after observing a tanker-style trailer driving onto the lot at the above-mentioned location. Upon entering the facility (figure 1), I was immediately greeted by Mr. Dan Warren, who identified himself as not employed by Rebel. Mr. Warren accompanied me to Mr. Andy Walker, owner of Rebel (also known as Walker Environmental). I introduced myself to Mr. Walker and presented him with my official Mississippi Department of Environmental Quality (MDEQ) employee identification badge. I told Mr. Walker that I was conducting an inspection regarding waste materials that were received on the property. At this point, Mr. Warren left. Mr. Walker explained to me that the company has two different waste streams that they handle. The first system he called an ALAR system (figures 2 through 5). The system, a Diatomaceous Earth Rotary Vacuum, removes grease from water and is designed to function on the grease trap business that Rebel handles. According to Mr. Walker, this system produces a total of 40,000 gallons of waste water per month. The other system that is in place handles wastewater from Gold Coast Commodities (Gold Coast) in Brandon, Mississippi.

I asked Mr. Walker about the system that handles the Gold Coast business. He told me that the tanker truck on the property at that time was from Gold Coast (figures 6 through 8). I asked him to explain the process to me. He said that the tankers pull onto the lot, connect a hose to a large above ground tank (figure 9), empty into the tank, and then discharge the waste via a direct onsite connection to the City of Jackson wastewater collection system (figures 10 and 11). Mr. Walker stated that they are aerating the waste water during this process. He said through the

nature of pumping the waste into the above ground tank and then pumping it into Jackson's collection system, the waste is being aerated.

I asked Mr. Walker if he had obtained permission from the City of Jackson to discharge into their collection system. Mr. Walker told me that initially the waste was being transported to Jackson POTW (Savannah Street Wastewater Treatment Plant / NPDES MS0024295). However, due to the volume of water being disposed of at the plant and the frequency the of loads, he was told that Rebel could discharge into the City's collection system on the Rebel property. I asked Mr. Walker if there was a connection made specifically for Gold Coast. He told me that several years ago, Rebel was working with the City of Jackson regarding equipment on the grounds at Rebel. Mr. Walker told me that Butch Mayfield, a retired sewer superintendent for the City of Jackson, had installed piping on the Rebel property. Mr. Walker stated, "Butch Mayfield from the City installed the pipes." I asked if there was a letter or document giving permission to discharge into the City's collection system; he replied that the Mississippi Department of Environmental Quality (MDEQ) gave him a letter giving him permission. I asked to see a copy of this letter. He directed an employee to provide me with the letter. Mr. Walker stated that he did not think there was a problem with dumping it directly into the collection system because Mr. Tom Douglas (co-owner of Gold Coast) told him that Gold Coast had dumped into the City of Brandon's collection system for years. He said there was a conflict with the City of Brandon's attorney, Mr. Mark Baker, and with the City of Brandon. The conflict was due to Gold Coast having a strong odor. The City of Brandon was trying to shut down Gold Coast and discontinue the discharge into the collection system of the City of Brandon. Mr. Walker said he was told by Mr. Douglas that Gold Coast was treating its waste water the same way it had for years. According to Mr. Walker, since it was okay for Gold Coast to discharge into the City of Brandon's collection system. Then it would be okay to dump into the City of Jackson's collection system since Brandon is connected to the City of Jackson's collection system, as well.

I asked Mr. Walker about the letter of permission from MDEQ again. At this point he presented me with a document (figures 12 and 13) from Mr. Christopher Messemore (Environmental Permit Division of MDEQ). The letter is attached to this report. The letter specifically discusses the ALAR system that Rebel uses. There is a specific number of less than 25,000 gallons per day allowed in order to discharge to the City of Jackson's collection system without a pretreatment permit. This is strictly for the ALAR system and does not mention the Gold Coast waste system. I discussed with Mr. Walker that there was no mention of the Gold Coast treatment system and that only the ALAR treatment system was discussed in the letter. I told him that the treatment system in place to handle the Gold Coast system would more than likely require a pretreatment permit. I highly encouraged Mr. Walker to take the proper steps to seek coverage to discharge into the City of Jackson collection system. I advised him that he needed to go to the permitting section of MDEQ's website and find the correct division that he thought fit his business and then to contact the proper personnel.

I asked Mr. Walker about manifests for the wastes that are received from Gold Coast. He told me that every load received has a manifest with it. On the manifest the pH is indicated for each load. It also lists the number of barrels that are in the load. The standard load coming into the facility has 150 barrels of waste which is approximately 6,300 gallons. Mr. Walker provided me

with invoices dating to the first of 2017. Each invoice covers a single week's worth of deliveries from Gold Coast to Rebel. The materials are transported by a truck owned by Partridge-Sibley Industrial Services, Incorporated (Partridge-Sibley). The truck is dedicated to the task of transporting from Gold Coast to Rebel and back again, making multiple trips daily. Mr. Walker stated that deliveries are made four days each week. On the days that deliveries are made, a minimum of two up to a maximum of six loads are taken each day. Photographs of invoices are attached to this report dating back through the week of July 31 (Figures 14 through 25). A photograph of the daily manifest record, indicating pH and number of barrels per load is also attached (figure 26). However, all invoices dating to January 2017 were made available to me.

I asked Mr. Walker if Rebel ever checked the pH of the materials received from Gold Coast. He provided me a copy of test results from Waypoint Analytical (235 Highpoint Drive, Ridgeland, MS 39157), dated December 19, 2016, from testing that Gold Coast had performed on its waste material (figures 26 through 33). Those sample results are also attached to this report. I asked specifically if Rebel ever checked the pH of the loads coming into the facility from Gold Coast. Mr. Walker again repeated that he thought if it was okay in Brandon he thought it would be okay to discharge the material in Jackson's collection system. Mr. Walker asked me if he should discontinue accepting wastes from Rebel. I told him that I could not answer that question, but it was up to him to make that decision.

As I was finishing my inspection, Mr. Dan Warren, employee of Partridge-Sibley, came into the office and asked me to move my vehicle as it was blocking the exit. I then left the meeting to move my vehicle. Upon returning, I summarized my findings with Mr. Walker. I explained that the letter from Mr. Messemore (MDEQ) only mentioned the waste stream processed in the ALAR system. It did not mention the Gold Coast waste stream. I explained that even if Mr. Walker thought the letter covered the Gold Coast waste stream, that the facility was potentially exceeding the 25,000 gallons per day threshold expressed in Mr. Messemore's letter since a maximum of six loads of 6,300 gallons were being disposed of daily at the facility (37,800 gallons per day of the Gold Coast waste material were possibly disposed of at Rebel). I again repeated my suggestion that Mr. Walker contact MDEQ to determine if Rebel needed pretreatment coverage due to aerating the waste from Gold Coast and then discharging it into the City of Jackson's collection system. Mr. Walker stated that he would indeed seek a determination if the facility needed pretreatment coverage. I thanked Mr. Walker for his time and left the facility.

After leaving the facility, I contacted Mr. Ricky Knight (United States Environmental Protection Agency, Criminal Investigation Division), and arranged to meet with him, Mrs. Molly Blythe (Special Agent of the United States Federal Bureau of Investigation, Jackson Field Office), and Detective Gerald Duckworth (City of Brandon Police Department). We met at a nearby business. There, we discussed my findings during the inspection of the Rebel facility. I explained that I was unable to collect any wastewater samples from the Partridge-Sibley truck as it was unloading during my interview with Mr. Walker. I explained that once the interview was finished, the truck had finished its off-load, and it appeared that the facility was no longer discharging. I then decided that we would return to the Rebel facility, so I could collect samples from the elevated manhole that was located just outside of the gate entering Rebel (figure 34).

Upon returning to Rebel and having the manhole cover removed, steam began leaving the collection system. Also, a strong odor was detected that I have personally observed while at Gold Coast Commodities during an inspection on October 7, 2016. Looking inside the manhole, I observed a thick, greasy looking material on the surface of the water in the structure (figure 35). I determined the pH and temperature of the water in the manhole by probe sampling, *in situ* sampling technique with MDEQ Yellow Springs Instruments (YSI) meter (MDEQ inventory #0092972). Photographs of the display on the YSI meter are attached (figures 36 and 37). However, these pictures were taken several minutes before the meter was displaying a stable reading. The meter used was calibrated the morning of the inspection and then checked for accuracy at the end of the day. A copy of the calibration log (figure 38) is attached to this report. I recorded a temperature reading of 55.695° Celsius (132° Fahrenheit). I recorded a pH reading of 6.51. I then collected grab samples for Oil and Grease, metals, Biochemical Oxygen Demand (BOD), and Total Suspended Solids (TSS). Upon adding chemical preservatives to the metals (nitric acid) and oil and grease (hydrochloric acid) samples, I had to add three vials of acid to each container of samples to get the pH of the sample down to a pH of 2.0 for proper chemical preservation. Typically, a single vial is all that is required to lower the pH of a sample to 2.0. All samples were then placed into an ice chest filled with ice in my vehicle to be transported back to MDEQ's Laboratory in Pearl, Mississippi.

Due to arriving back to the Central Regional Office (CRO) after 5:00, the ice chest was placed in my office and locked in the office overnight. No other employee or anybody else has access to my office when the door is locked. This is standard procedure for how to handle samples when samples are received after 5:00 P.M. No one else had access to this ice chest. Therefore, it remained in my possession until I returned to the office at 6:20 A.M. on the morning of October 25, 2017. I personally then delivered the samples to the MDEQ lab on the morning of October 25, 2017. A temperature reading in the ice chest was recorded at 1.0° Celsius. Completed MDEQ sample request and chain of custody forms are attached (figures 39 and 40).

Shortly after noon on October 25, 2017, Mr. David Singleton (MDEQ Lab Director) contacted me about the samples being analyzed. He stated that one of the samples had exploded in the lab (figures 41 and 42). During the digestion process of testing for metals, the sample had exploded. Upon further clarification from Mr. Matt Pyles (MDEQ Lab) the sample had essentially reached its boiling point. Pressure increased in the vial and forced the lid off the container. The sample was initially 50 milliliters in volume. After the "explosion" approximately 20 milliliters were left in one container and approximately 30 milliliters were left in the other container. Mr. Singleton asked me to come to the lab to take pictures of the samples (figures 43 through 50) and containers and to discuss further actions. Photographs of the laboratory observations are attached to this report.

If you have any questions or comments, please contact me at 601.961.5612. Multiple attachments are included with this report. Photographs of the Rebel property, photographs of records obtained from Rebel, photographs of the samples/containers, calibration records, sample request paperwork, as well as chain of custody are attached with this report. Finally, pictures showing the frontage of Rebel are attached, including the location of the manhole where the samples were collected (figures 51 through 55). Final testing results of all samples collected

were not completed at the time this report was finished. Those sample results will be sent to Mr. Chris Sanders (MDEQ Office of Pollution Control) when available.