LANCE R. LEFLEUR
DIRECTOR

KAY IVEY
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Alabama Department of Environmental Management
adem.alabama.gov

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Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

July 11, 2017

Alex Sellers, CEO
Invictus Energy, Inc.
365 River Valley Road
Atlanta, GA, 30328

RE: Facility Inspection
Russell County Facility
NPDES Permit # IU305700001
FID 46274
Inspected 7/6/2017

Dear Sir/Madam:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.alabama.gov or by phone at (334) 271-7943.

Should you have any questions regarding observations noted during the inspection, please contact me by email at dp@adem.alabama.gov or by phone at (334) 394-4319.

Sincerely,

Don Prempramot
Field Operations Division

File: INSPR/41655
ecopy: Water Division
Enclosure: Inspection Report

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

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2204 Perimeter Road
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Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Alabama Department of Environmental Management
GENERAL SITE INSPECTION REPORT

Company/Operator/Permittee: Invictus Energy, Inc.			Phone Number: (678) 477-2778
Mailing Address: 365 River Valley Road	City: Atlanta	State: GA	Zip Code: 30328
Responsible Official/Operator Name: Alex Sellers, CEO			

Facility Name: Russell County Facility	Facility ID # or Permit #: IU305700001	Inspection Entry Date & Time: 7/6/2017 9:56 am CST	County: Russell
Activity Description: SID, Waste Storage	NMS Inspection #: 57622	Inspection Exit Date & Time: 7/6/2017 12:50 pm CST	Report Complete Date: 7/11/2017

Inspection Type: ☐ CEI ☒ CSI ☒ Inspection Request Routine ☐ Complaint ☐ Photos Taken ☒ Samples Collected ☒

Township, Range, Section: T14N R31E S6

Physical Address/Location Description (include nearest city): 265 Terminal Road, Fort Mitchell, AL.

Entrance Latitude & Longitude: 32.233611 & -84.960556

Discharge Point(s) Latitude & Longitude: No constructed discharge point observed.

Receiving Water(s): Chattahoochee River

Weather Conditions: Sunny, Hot Temperatures.

Observations/Comments:

The inspection was conducted at the request of ADEM Industrial Branch. Matt Thomas (Field Operations), Kirk Chandler (Field Operations), Don Prempramot (Field Operations) and Drew Philips (Land Division) from ADEM were present during the inspection.

Met Mr. David Chunn, ATEC Site Supervisor onsite at 9:56 am on July 6, 2017. During the inspection, Mr. David Chunn indicated that the material stored on-site contained oil (synthetic and petroleum), coolants and waste water from Tier II facilities.

HEPACO trucks were present during the inspection. HEPACO was cleaning equipment and hauling the wastewater from the clean-up operations offsite.

During the inspection, the facility's pond located east of Tank 1 (white tank) appeared to be dug in excess of 15 feet. The water contained at the base of the pond appeared to have a dark colored material and a sludge on the surface (photos taken). The pond located east of Tank 2, 3 and 4 has been filled with soil.

Along the embankment on the east side of the facility, two hoses were located (photos taken). No staining was observed near the hoses, however, dark water and/or soil was observed between the bank and the vegetation. No oil sheen was observed at this location. This location was very steep and not accessible during the inspection.

An old structure was observed in the northeast corner of the facility. The structure appear to be part of an old discharge pipe base.

Tank 1, 2, 3 and 4 were sampled for metals, VOC and SVOC. The samples were taken from the top of the tanks through open ports. The ports were not covered at the time of the inspection. No tools were available to bolt covers closed.

Tank 1 (white tank) was observed to be at full capacity while being sampled from the top of the tank. Tank 2 was observed at full capacity with evidence of overflow while being sampled from the top of the tank (photos taken). Tank 3 was observed at full capacity with evidence of overflow while being sampled from the top of the tank. Tank 4 (smallest capacity tank) was observed as having approximately 18" of capacity remaining. Tank 4 had a sludge layer on the surface that had to be penetrated with the sampling equipment prior to obtaining the sample. All samples were viscous in nature with Tank 4 being the most viscous during the inspection.

The containment structure around the tanks appear to be under repair. The containment structure did not appear to be sealed with any material other than unsealed cinder blocks. No completed containment structure was observed around Tank 2 and 3.

Name(s) of On-site Representative(s) and Phone Numbers: David Chunn, ATEC, Site Supervisor, (205) 616-2436		
Name of Inspector: Don Prempramot	Signature of Inspector:	Date: 7/11/2017
Name of Reviewing Supervisor: Gina L. Curvin	Signature of Reviewing Supervisor: Gina L Curvin	Date: 7/11/2017

FOD Office: ☐ Birmingham ☐ Decatur ☐ Mobile ☒ Montgomery

Invictus Site Visit
7/6/2017

Matt Thomas

Don Prempramot

Kirk Chandler

View of Tank 2 and 3 South Side
Not Containment Structure Observed
Berm Does Not Completely Surround Tanks

Area around
Tanks 4

Area around
Tanks 4

Area around
Tanks 4

Area around
Tanks 4

Tank 1

View Towards
Pond Near
Tank 1

Pond East of
Tank 1
Floating Material
On Surface

Pond East of
Tank 1
Floating Material
On Surface

View From Pond
Tank 2, 3 & 4
Cut In Berm

Trench Along
East Side

View Towards
Northeast
Corner of Facility

Former Stormwater Pond
East of Tanks 2, 3 & 4
07/06/2017 10:17

Former Stormwater Pond
East of Tanks 2, 3 & 4
07/06/2017 10:17

North End of
Trench
Northeast Corner of Property
07/06/2017 10:18

North End of
Trench
Northeast Corner of Property
07/06/2017 10:18

View of Tanks
From Northeast Corner

These are pipes that were found coming out the side of the bank directly above the water. The bank angle was too steep and filled with debris to get a decent pic.

Alternate View of Pipes

No sheen was visible on the water but black staining was observed along the bank.

Marker Near
Bank

Appears to Be the Base
An Old Discharge Structure
Located Northeast of Facility
Near the water

Appears to Be
the Base
An Old
Discharge
Structure
Located
Northeast of
Facility
Near the water
07/06/2017 10 42

Old Dock
Located on
South Side of
Property
07/06/2017 10 59

View North From Dock Towards Facility

View West From Top of Tank 3

View West From Top of Tank 3 View of HEPACO Operations

View West From Top of Tank 3 View of Tank 1

Note: tank is
at capacity
07/06/2017 11:58

View West
From Top of
Tank 3
View of Tank 1
07/06/2017 11 57

View West
From Top of
Tank 2
View of Pond
Near Tank 1
07/06/2017 11:57

Tank 2
Note: tank is at
capacity and evidence
of overflow;
Inspectors said this
was left uncapped by
facility
07/06/2017 12 01