United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, September 14, 2009
From: Jordan Garrard, On Scene Coordinator

Subject: Initiation of Removal Action
Gulf States Steel
2800 Norris Ave, Gadsden, AL
Latitude: 34.0119000
Longitude: -86.0469000

POLREP No.:	15	**Site #:**	A499
Reporting Period:		**D.O. #:**	
Start Date:	8/1/2007	**Response Authority:**	CERCLA
Mob Date:	8/1/2007	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	ALD004014973	**Contract #**	
RCRIS ID #:			

Site Description

Gulf States Steel, Inc. began operations at the site on February 1, 1986, although the facility was previously operated and owned by other entities since its construction since 1902. Gulf States Steel was a fully integrated steel manufacturing facility that manufactured a diversified product line including steel plates, hot and cold rolled steel sheets, and galvanized steel sheets. Major process operations occurred at the coke and by-product plant, the blast furnace area, and at the basic oxygen plant. The coke and by-product plant at the Gulf States Steel site produced metallurgical coke, and coke oven gas, coal tar, ammonium sulfate, light oil, and naphthalene through the distillation of coal with a high volatile organic content in the absence of air. There are four waste oil lagoons which are unlined surface impoundments that were apparently used to reclaim waste oil form wastewaters generated by steel finishing processes.

Gulf States Steel was listed in the CERCLIS database with a discovery date of August 1, 1980; however, the site is currently not on the NPL. Gulf States Steel entered the RCRA program as a treatment, storage, and disposal facility (TSDF) on September 25, 1990. The Site was listed as a large quantity RCRA generator. On September 27, 1994 Gulf States Steel entered into a Consent Decree with the USEPA. Due to sampling results of sediments in Black Creek the Superfund Remedial Branch began RI/FS activities.

On July 1, 1999, Gulf States Steel filed a voluntary petition for bankruptcy under Chapter 11. After a lengthy attempt to reorganize and emerge from bankruptcy, on November 14, 2000, the Chapter 11 reorganization bankruptcy was converted to a Chapter 7 liquidation bankruptcy. As part of that liquidation, the United States was able to recoup approximately $2 million which has been placed into a special account to be used to conduct and/or finance response actions at the Site. By Order dated December 5, 2006, the U.S. Bankruptcy Court closed the GSS bankruptcy. The funds received through the bankruptcy settlement have been tentatively allocated to address the ecological impacts emanating from the sediments in the 4 waste water lagoons

On January 22, 2007, EPA conducted a Site Assessment at the Site, by RPM Jordan Garrard. During site assessment several items were observed including bulging drums, leaking aboveground storage tanks (ASTs) containing listed hazardous wastes, and oil spills. RPM contacted the Removal Section of the ERRB to initiate a Removal Site Evaluation (RSE). RPM Garrard continued with site assessment activities, including waste stream sampling of drums and ASTs, and surficial soils in the coke plant area. On February 21, 2007, OSC Randy Nattis conducted a RSE. Based on analytical results from waste stream samples and field observations; including unsecured drums, leaking ASTs, and evidence of trespassing, pose an immediate hazard to human health and the environment. OSC Nattis identified along with RPM Garrard and START, 8 different tasks that warranted time critical removal action based upon those factors listed under Section 300.415(b)(2) of the NCP.

A limited RSE was conducted in July 2008 on the Powerhouse building. The RSE identified multiple

leaking transformers containing PCBs, leaking ASTs, and unsecured drums which contained hazardous substances, and exposed asbestos insulation within the building. There is visible evidence of trespassers scraping metal from the powerhouse exposing PCBs, hazardous substances, and asbestos insulation to the environment.

The slag piles are the source of continued release of characteristic hazardous waste. The caustic leachate containing pH values greater than 12.5 from the slag piles is directly discharging into Black Creek, an adjacent wetland area, and a residential neighborhood from drainage ditches outside the Site fence. Sloughing of slag from the piles has been observed on both the northern and southern piles. The sloughing allows for the production of more leachate due to the increase in surface area of new unweathered slag. Based on the results of the Powerhouse RSE and the leachate release from the slag piles a time critical removal action was warranted based upon those factors listed under Section 300.415(b)(2) of the NCP.

Current Activities

ERRS and START contractors mobilized to the Site on September 8, 2009. Current removal activities include the site preparation, clearing and grubbing around the outside of the Powerhouse building.

Planned Removal Actions

1) Dewatering of the cooling pond located along the southern edge of the building;

2) Removal and disposal of 55-gallon drums and various other containers located throughout the powerhouse;

3) Removal and disposal of wastes associated with the numerous ASTs and process vessels located inside and outside of the powerhouse;

4) Drainage and disposal of transformers and oil circuit breaker PCB fluids;

5) Removal and disposal of asbestos containing materials;

6) Demolition of the powerhouse and demolition and removal of buildings, tanks, piping, abandoned equipment, and concrete associated with powerhouse;

7) Address remaining three million cubic yards of slag and caustic leachate runoff through the generation and / or migration pathway of the leachate into the neighboring residences and Black Creek. Based on the results of the pilot study, the EPA will determine appropriate removal actions. If the pilot study results are favorable the EPA removal actions will include the mitigation of generation pathways for the leachate. If the pilot study results are not favorable the EPA will address migration pathways of the leachate by redirecting the leachate from the receptors.

response.epa.gov/GulfStatesSteel