

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Sunday, April 18, 2010
From: Jordan Garrard, On Scene Coordinator

To: Matt Taylor, USEPA R4 ERRB Jim Webster, USEPA R4 ERRB

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

POLREP No.:	19	Site #:	A499
Reporting Period:	3/11/10-4/16/10	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 from 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. A Time-Critical Removal Action began in September 2009 to address the hazards associated with the Powerhouse and Slag Piles.

Current Activities

Demolition of the Powerhouse is complete. The remaining metal is being shipped offsite for recycling. Additional site cleanup activities continue. Remaining wastes (PCB oils, mercury, and lab packs) will be disposed of in April. Air monitoring continues around the slag pile areas. Data continues to confirm no impacts offsite above action levels.

Planned Removal Actions

A plan will be developed to lower lagoons 3 & 4 pH levels. Current pH levels in lagoons 3 and 4 are as high as 11.7. Currently, the US EPA Environmental Response Team (ERT) personnel are finalizing treatability tests procedures to assess which technologies will effectively reduce the pH levels in lagoon 3 and 4. Slag screening and reclamation operations will continue. Site activities will be suspended from April 16 through April 20.

Key Issues

pH levels in Lagoons 3 and 4.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$15,181,940.00	\$5,604,583.00	\$9,577,357.00	63.08%
IAGs - USCG GST	\$479,170.00	\$129,600.00	\$349,570.00	72.95%
RST/START	\$2,329,985.00	\$739,533.00	\$1,590,452.00	68.26%
Intramural Costs				
Total Site Costs	\$17,991,095.00	\$6,473,716.00	\$11,517,379.00	64.02%

* 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/GulfStatesSteel