United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Tuesday, August 21, 2007
From: Jordan Garrard

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

POLREP No.:	1	**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.

Current Activities

EPA mobilized to the site along with CMC, TN&A and the U.S. Coast Guard, Gulf Strike Team on 08/01/2007 and immediately began stabilization efforts by fencing and securing the premises and setting up equipment to address the hazardous environment at the Coke plant. Site activities to date include mobilization, site security, setting up decontamination and exclusion zones. EPA also cleared portions of the surrounding area for use in staging and sampling hazardous materials in drums, tanks, process units and pipes. EPA has already completed:
Task 1: Remove and dispose of 79 drums and numerous small containers totaling 1,400 gallons out of B-1. EPA had START bring out an Asbestos expect to help identify Asbestos and non Asbestos containing material

EPA also met with local officials, the Gadsden City Fire and the community to address the time-critical removal action.

EPA and START passed out fact sheets to adjacent residential and commercial residences.

Planned Removal Actions
Conduct personnel and site air monitoring activities and other health and safety actions as may be required.

Start addressing
Task 2 of the purposed Actions, which includes the storage tanks at waste water lagoons containing sulfuric acid and waste oil

and;

Task 3, the process units and tanks from B-13 south to B-3/B-5.

Next Steps
Begin to dismantle the piping units around buildings B-13, B-5 and B-3. This will require the pipes to be opened and allowed to drain down into tanks. The pipes will then be cut out to gain access to the tanks for drainage and disposal. The pipes which have Asbestos containing material will be staged inside B-5 for a proper abatement prior to disposal.

Key Issues
The Site represents an actual ongoing release to human health, welfare and the environment from the listed RCRA wastes (refer to Table 1A). Waste samples also exhibited characteristics of hazardous waste exceeding corrosivity, ignitability, and toxicity standards (refer to Table 1). Three waste stream composite samples contain flash points of 90° F, 120° F and 125° F which are below the ignitability characteristic of a hazardous waste (140° F) listed in 40 CFR 261.24. These wastes streams pose an explosion/fire hazard to adjacent residences when adverse weather conditions exist. Based on analytical results from waste stream samples and field observations; including 79 unsecured bulging drums containing incompatibles, leaking ASTs, and evidence of trespassing and vandalism, pose an immediate hazard to human health and the environment

Deteriorating site conditions threatens to expose toxic and explosive substances to the atmosphere and surface waters. The listed RCRA wastes are currently being stored in multiple ASTs, drums, and other storage containers. Various ASTs do not contain secondary containment and are in poor and leaking conditions due to the lack proper maintenance since the closing of the facility. The drums identified during the assessment range in different stages of deterioration. Assessment activities identified approximately 81,000 gallons of listed or characteristic hazardous wastes which are continuing to leak from the containers into the environment due to weather and trespasser activities. The wastes pose an immediate threat to the nearby residences and trespassers due to the ignitability and toxicity of these wastes. ASTs and process vessels containing these wastes will be treated and disposed of off-site, but continued actions are necessary to dismantle and remove poor conditioned tanks and drums, in order to mitigate continued toxic releases.

Neither the State nor county government has resources to acquire the proper disposal equipment and services required for a Site of this magnitude

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