

**United States Environmental Protection Agency**  
**Region IV**  
**POLLUTION REPORT**

**Date:** Wednesday, September 5, 2007

**From:** Jordan Garrard

**Subject:** Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000

Longitude: -86.0469000

<b>POLREP No.:</b>	2	<b>Site #:</b>	A499
<b>Reporting Period:</b>		<b>D.O. #:</b>	
<b>Start Date:</b>	8/1/2007	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	8/1/2007	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	ALD004014973	<b>Contract #</b>	
<b>RCRIS ID #:</b>			

#### **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.

#### **Current Activities**

ERRS completed demolition of B-6 and begin preparing T-016 and T-014 for aeration and pump into frac

tanks prior to transfer into water treatment system. ERRS has begin pumping T-043 contents to water treatment.

START starts collection GPS points of site to construct a site activities map

ERRS has also sorted and scrapped metals

Site demobed for the holiday weekend and will remobe 09/04/07

EPA OSC Nattis contacted ADEM in reference to the Asbestos Containing Materials (ACM) on site.

#### **Planned Removal Actions**

ERRS and START will resume operations of the water treatment system and continue pumping contents of AST's suitable for water treatment into vac truck for transport to water system.

ERRS will begin shearing and cutting piping associated with Task 3 and accessing associated AST's in the work zone.

ERRS will also start bulking oils from ASTs in frac tanks

START will conduct oversight of initiation of shearing and demo operations in Task 3 zone addressing pipes and AST's. START will also oversee building demo operations and other associated requirements of Task 3. Additional operations will include oversight of waste water treatment.

START will generate site specific maps

#### **Next Steps**

ERRS and START will conduct a Asbestos survey of B-5 and B-13 and determine the demolition process of each building.

EPA will notify ADEM of ACM abatment and the processes that will be followed.

ERRS will continue to pumped water and oils from the ASTs for treatment or bulking.

#### **Key Issues**

ACMs in buildings, around pipes and tanks

Hot weather and dry conditions

Increasing oil on lagoon #1

[response.epa.gov/GulfStatesSteel](http://response.epa.gov/GulfStatesSteel)