

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

**Date:** Tuesday, September 25, 2007

**From:** Jordan Garrard

**Subject:** Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000

Longitude: -86.0469000

<b>POLREP No.:</b>	3	<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**

1. Treated approximately 191,900 gallons of water.

2. Oil wastes collected:

-14,000 gallons in Frac Tank #N48660. Material has been sampled and waiting analytical for disposal.

-9,000 gallons in Frac Tank #N45684.

-5,500 gallons of oil/water mixtures collected from the lagoon in Frac Tank #FM310.

### **Planned Removal Actions**

Continue to coordinate with EPA's remedial section on their reuse plan. Meeting to be held on site with OSC, RPM, E<sup>2</sup>, and the city of Gadsden the October 15, 2007.

Continue to assess Lagoon #1 and start oil skimming operation.

ERRS will continue to access and shear piping associated with AST's in TASK 3 and 4 and start in Task

5. Piping will be segregated based on ACM and non-ACM.

All ACM pipe insulation will be wet down and wrapped prior to shearing.

ERRS will continue to pump waste oil from lagoon AST's

START will oversee and collect samples as needed for asbestos and / or metals during the removal operations in the working zone and around the perimeter of the site boundaries

USCG will continue air monitoring during shearing and removal operations.

USCG will continue medical monitoring and provide overall health and safety for site activities.

### **Next Steps**

Meeting on site - October 2, 2007 with EPA and ADEM.

Continue to coordinate with EPA's remedial section on their reuse plan. Meeting to be held on site with OSC, RPM, E<sup>2</sup>, and the city of Gadsden the October 15, 2007.

Continue to assess Lagoon #1 and prepare for oil skimming operation to determine recharge rate of oil to the surface of the lagoon.

### **Key Issues**

Oil covering 1/3 - 2/3's of Lagoon #1;

Asbestos pipe wrapping;

Benzene and other organic fumes;

Overhead hazards;

Falling objects during demolition operations;

Splash hazards from shearing and opening piping;

Heat stress and;

Thunderstorms

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