

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

**Date:** Wednesday, December 19, 2007

**From:** Jordan Garrard

**Subject:** Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000

Longitude: -86.0469000

<b>POLREP No.:</b>	6	<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**

-28,500 gallons of oil sent for disposal to a fuel blender

-11,000 gallons in Frac Tank #N45684.

Steel recycled - 639,200 pounds

Copper recycled - 11,329 pounds

All of task 3 and 5 are complete. This includes tanks:

T-045, T-047, T-049, T-051, T-053 - Task 3

T-048, T-050, T-052, T-054, T-056, T-058 - Task 5

Tanks T-062, T-064, T-066 remain in Task 5 but are empty. These tanks may be addressed (removed/scrapped) based on further assessment of the area.

Further assessment of Task 6, including process vessels T-022, T-024, T-026, T-028, T-030, T-032 are on-going. A structural assessment was performed by a START structural engineer of B-3, the building immediately adjacent to Task 6, and the associated piping. A plan is currently being worked on to take down these towers/process vessels safely and without damaging the neighboring structures as well as maintaining all sludges within the units during the demolition. The plan is currently in review by EPA, USCG, START and ERRS. The target date for demolition of the first process vessel (T-032) is January 7th, 2008.

The remainder of the Benzene tank farm has been cleared out to prep the entire secondary containment area for additional cell space - Cell 2, Cell 3 and Cell 4. A hoe ram will be needed to break up the footers instead of digging them out and potentially unearthing benzenes within the soil.

During the completion of Tasks 3 and Task 5, about 16,000 Half (.5) inch pipes, approximately 30 feet in length and weighing around 60 pounds each, was collected from tanks T-045, T-047, T-049, T-050, T-053, T-054, T-058. These pipes are all coated with coal tar from within the process vessels. The current plan for managing these pipes and the leaky coal tars is to place them in the newly constructed lined cells and allow the warmth of the spring to aid in the collection of all tars.

Continued assessment on Task 8 - T-010, T-012, T-014, T-016. On December 18th, the tanks we're sampled for separation and depth of separation. The clear liquid columns in the tanks have reached 12 feet and a hard sludge bottom is beginning to form.

To date, there is an approximately 355 cubic yards of stabilized material.

Cell #1 has a total capacity of approximately 360 cubic yards.

Cell #1 is at 99% capacity.

### **Planned Removal Actions**

Prepare the site for Holiday Demobe.

Clean and Scrap all metal on site and conduct a house cleaning of scrap piles.

Continued assessments and preparation work for Task 6.

### **Next Steps**

Site mobilization on January 2nd, 2008.

Begin work on Task 6.

Continue work on cleaning and scrapping of all demolition metals, which include AST, Process vessels, pipes, cat walks, etc.

Begin hoe ram operations in Cell 2 - 4 as well as additional footers throughout coke plant that were left during previous demolition operations.

Assess Task 8 and collect sample for analytical profile to determine disposal options.

Survey lagoons and slag piles.

Conduct air survey of entire Gulf States Steel site (flyover / aerial photography).

### **Key Issues**

~16,000 coal tar coated pipes from Task 3 and Task 5.

Benzene and other organic fumes, Overhead hazards, falling objects during demolition operations, cold stress.

Please visit [www.epaosc.org/GulfStatesSteel](http://www.epaosc.org/GulfStatesSteel) for addition information (maps and photos)

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