United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, February 20, 2008
From: Jordan Garrard

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

POLREP No.:	7	**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

An Action Memorandum requesting a change in scope and ceiling increase was signed and dated January

30, 2008. The change in scope and ceiling increase is to address L-1 and the surrounding structures at the Site to abate the release or threat of release of hazardous substances from the Site into the environment

Metal recycled - 2,576,989 pounds

Tasks 1 - 7 are complete. The remaining sections of the pipe run which ran between the coke plant and the coke battery has been demolished. The remaining pipes have either been cleaned and scraped or sent off for disposal.

Task 8: T-010 has started to leak coal tar from a bottom value. Approximately 500 gals leaked prior to discovery. The leak has been temporary stopped and all materials that leaked out have been stabilized and moved to cell 1.
The weather has not been as cold as anticipated to complete phase separation of the contents of the 4 tanks (T-010, T-012, T-014 and T-016), therefore, further structural assessments of T-010, T-012, T-014 and T-016 are needed to determine long term stability of containment.

Remaining C/D wastes and well as Asbestos containing material (ACM) wastes are being loaded into properly lined roll off boxes and are being sent off for disposal

USCG along with START and ERRS dewatered L-1 (~8,000,000 gals)

Diversion of the outfall into L-1 has been completed. L-1 is now closed off from the system and water diverts directly into L-3. Also structures have been demolished around L-1.

Survey Lagoon area and both slag piles

To date, there is an approximately 360 cubic yards of stabilized material.
Cell #1 has a total capacity of approximately 360 cubic yards.
Cell #1 is at 100% capacity

Planned Removal Actions
Continuation of Survey of Lagoon area and slag piles.

Continue to scrap steel and other metals from Task 8.

Continue T&D activities at coke plant. These activities include C&D material, ACM, transformers and coal tar coated pipes.

Continue preparation of L-1 and surrounding area for stabilization and solidification (S/S):
A long reach excavator will be on-site next week to build a sump in the back right side of L-1 to promote water drainage. Water will then be run through an oil / water separator and discharged into L-3. This process will run for at least a week to dry out as much of the oily sediments as possible prior to start of the S/S process

Site will demobe 2/21 and start back up 2/26.

Next Steps
Determine alterative fill options for L-1. Currently 35,000 cubic yards of fill is anticipated to backfill L-1 once the S/S process is complete. ERRS and EPA is currently looking for alterative means of supplying fill. Instead of bringing in fill from off-site, ERRS and EPA is assessing the potential use of material already onsite for fill. These materials include but are not limited too:
-Bricks from buildings already demolished.
-Stabilized material from all ASTs, process vessels and precipitators staged in Cell 1.
-6 – 12 inch soil scrapes from area around Coke plant
-Additional buildings at Coke plant currently standing
-2 large smoke stacks
-Fire brick from power plant area.

This plan will look at costs and benefits of using onsite material vs. offsite.

Key Issues
Organic fumes, overhead hazards, Asbestos exposure, cold stress and lightning.

Please visit www.epaosc.org/GulfStatesSteel for additional information (maps and photos)

response.epa.gov/GulfStatesSteel