

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, July 9, 2008

From: Jordan Garrard

To: Matt Taylor, USEPA R4 ERRB

Jim Webster, USEPA R4 ERRB

Subject: Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000

Longitude: -86.0469000

POLREP No.:	10	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 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

Battery #2 (Coke oven) and all associated piping is on the ground and the remaining brick and associated structures are being demolished, recycled and scrapped.

Demolition of Battery #1 (Coke oven) has begin and currently all ACM has been removed. All ancillary structures, including over head piping, over doors and concrete walkways are in the process of being removed.

Stabilization and solidification (S/S) at Lagoon #1 (L-1) continues. To date, approximately 60% has been completed. A combination of crushed brick from Battery #1 and CaCO are being using as the reagents for the stabilization process. About 40% of the brick from battery #2 has been crushed and removed from the coke plant area.

Disposal of the petroleum contact ammonia water commenced on July 1, 2008 from T-10, T-12, T-14, and T-16. These tanks contain a total of ~330,000 (last POLREP mentioned an approx. 500,000 gallons, but latest measurements are more actuate) gallons of petroleum contact ammonia water. The solution contains 660 ppm of Ammonia. To date, 130,000 gallons has been sent off for disposal.

A total of 126.55 tons of Ammonium Sulfate from B-3 have been sent off site for disposal. Once the Ammonium Sulfate was removed from B-3, the building was demolished and all ACM, coal tar and other ammonia water was stage, prepared and sent off for disposal. All metal structures have been prepared and sent off for recycling.

Remaining C/D wastes and well as ACM wastes are being loaded into properly lined roll off boxes and are being sent off for disposal.

Metal recycled to date - ~10,724,149 pounds.

Please see www.epaosc.org/GulfStatesSteel for the pictures

Planned Removal Actions

Continue T&D activities at coke plant. These activities include C&D material, ACM, transformers and coal tar coated pipes, T-010, T-012, T-014, T-016.

Continue to scrap steel and other metals from demolition from Coke ovens and associated structures.

Continue S/S of L-1.

Assessment of the Power Plant will take place the week of July 14th. In the mean time, EPA will no longer allow access to the Power Plant until further notice. If access is required, EPA oversight, including proper training (Hazardous waste operations and emergency response. - 1910.120) will be required to access the structure.

Next Steps

Continue evaluation of recycling / reclaiming the 2 slag piles.

Demolition T-010, T-012, T-014, T-016 once disposal of all contents have been disposed, stabilized or removed..

Land re-use planning with E2 and the city of Gadsden.

Key Issues

Trespassers taking risks to access the coke oven and other structures to strip and dismantle scrap metal, copper and other metals. EPA may contact FBI for assistance.

Ammonia water remaining in T-10, T-12, T-14, T-16

ACM within Battery #1

Organic Fumes, coal tar seeps, Overhead hazards, falling objects during demolition operations, slips around lagoon areas and hot and cold stress.

www.epaosc.org/GulfStatesSteel

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$3,481,319.00	\$2,380,540.00	\$1,100,779.00	31.62%
IAGs - USCG GST	\$75,000.00	\$65,326.00	\$9,674.00	12.90%
RST/START	\$538,000.00	\$409,252.00	\$128,748.00	23.93%
Intramural Costs				
Total Site Costs	\$4,094,319.00	\$2,855,118.00	\$1,239,201.00	30.27%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/GulfStatesSteel

POLREP #10 Last Updated 7/10/2008