United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, September 4, 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.:	11	**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

Battery #1 and #2 (Coke oven) and all associated piping is on the ground and the remaining brick and associated structures are being demolished, recycled and scrapped.

Pumping down the 1.5 million gals of water received from TS Fay that filled up the remaining section of L-1 and the associated drainage ditch. Site activities shit down for a few days early prior to demobilization for the Labor Day weekend due to excessive amounts of rain and unsafe working conditions due to the Storms.

Stabilization and solidification (S/S) at Lagoon #1 (L-1) continues. To date, approximately 90% has been completed. A combination of crushed brick from Batteries and CaCO are being using as the reagents for the stabilization process.

Disposal of the petroleum contact ammonia water has been completed and the 4 ASTs have been demolished, recycled and scrapped.

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 within the Battery

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

Continue S/S of L-1.

Continue to fill in all holes in and around the coke plant with brick to provide a safe area for site closure.

Seal up concrete silo structure to prevent access.

Next Steps
Continue evaluation of recycling / reclaiming the 2 slag piles.

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

Potential removal action of some items within the Power Plant located west of the Coke plant. Items included but not limited to include, Lab chemicals, Drums, ACM and ASTs.

Key Issues
TS Fay flooding

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	$2,867,918.00	$613,401.00	17.62%
IAGs - USCG GST	$75,000.00	$71,200.00	$3,800.00	5.07%
RST/START	$538,000.00	$441,540.00	$96,460.00	17.93%
Intramural Costs				
Total Site Costs	$4,094,319.00	$3,380,658.00	$713,661.00	17.43%

* 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.