

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

**Date:** Wednesday, September 24, 2008

**From:** Jordan Garrard

**Subject:** Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000

Longitude: -86.0469000

<b>POLREP No.:</b>	12	<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

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.

Stabilization and solidification (S/S) at Lagoon #1 (L-1) concluded on 9/11/08. Approximately 40% of L-1 has been brought up to grade and has been clay capped. Approximately 20% of L-1 remains below grade to date. L-1 is expected to be at grade by 9/26/08 and fully clay capped by 10/1/08.

Approximately 7 large ASTs were found back behind the northern slag pile in dense trees and on the slope leading towards black creek. These ASTs have been gathered and will be scrapped and recycled. There was some odor associated with some of the tanks, but no product has been observed. The tanks are in poor condition, rusty and full of holes.

The Elevator tower on the battery has been removed and the associated ACM collect for disposal.

The remaining structures within the southeast side of the concrete solo will be demolished once the remaining ACM covered pipes are wrapped for removal.

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 - ~ 8,507,955 tons.

USCG has been demobed from site.

Please see [www.epaosc.org/GulfStatesSteel](http://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 and tanks found by L-1.

Continue the re-grading of L-1 with fill material and completion of clay cap

Cover the L-1 capped area with topsoil and seed.

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

Site will be demobilizing 10/2/07 and will remobilize and begin work on 10/8/08.

### **Next Steps**

Continue evaluation of recycling / reclaiming the 2 slag piles.

Seal up concrete silo structure to prevent access post removal

Evaluate the drainage pathways around both 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**

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](http://www.epaosc.org/GulfStatesSteel)

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