

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, October 27, 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.:	13	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

Demolition of Battery #1 and #2 (Coke oven) are complete. The remaining work around the coke oven area will be restoration and clearing the remaining demolished debris.

Lagoon #1 (L-1) has been clay capped and the final restoration will be completed early this week. The area has been covered with approximately 6 inches of top soil. The area has been seeded and covered with hay.

All cutting of metal on site has been completed.

The remaining transformers from coke oven area have been sampled and are waiting disposal.

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 - ~ 9,348 tons or 18,696,700 lbs.

Personal remaining on site = 7

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

Final Restoration of the Coke plant area will include a slight re-grading of the area to enhance proper surface water runoff. The area behind the former Battery area (south side) will be covered with brick to prevent dust migration.

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 post removal.

Next Steps

Continue evaluation of recycling / reclaiming the 2 slag piles.

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. High pH water with ditch area around the south slag pile.

www.epaosc.org/GulfStatesSteel

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,006,319.00	\$3,329,665.00	\$676,654.00	16.89%
IAGs - USCG GST	\$75,000.00	\$74,882.14	\$117.86	0.16%
RST/START	\$538,001.00	\$466,106.00	\$71,895.00	13.36%
Intramural Costs				
Total Site Costs	\$4,619,320.00	\$3,870,653.14	\$748,666.86	16.21%

* 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 #13 Last Updated 2/23/2009