United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Monday, December 15, 2008

From: Jordan Garrard

Subject: Clean-up Complete

Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000 Longitude: -86.0469000

POLREP No.: 14 **Site #:** A499

Reporting Period: D.O. #:

Response Authority: Start Date: 8/1/2007 **CERCLA Mob Date:** 8/1/2007 **Response Type:** Time-Critical **Demob Date:** 12/12/2008 **NPL Status:** Non NPL **Completion Date:** 12/12/2008 **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

All site work has been complete based on the current Action Memorandums.

EPA will be starting an assessment of the 2 Slag piles in early January. EPA will be working with ADEM to determine the best means of disposal of the waste material from the slag piles.

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

Planned Removal Actions

Continue evaluation of recycling $\!\!\!/$ reclaiming the 2 slag piles. The evaluation will take place early in January 2009

Key Issues

pH of water within ditch area around the south slag pile.

www.epaosc.org/GulfStatesSteel

response.epa.gov/GulfStatesSteel