United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Friday, July 15, 2011

From: Terry Stilman, On Scene Coordinator

Subject: Continuation of slag processing

Gulf States Steel

2800 Norris Ave, Gadsden, AL

Latitude: 34.0119000 Longitude: -86.0469000

POLREP No.: 31 **Site #:** A499

Reporting Period: D.O. #:

Start Date:8/1/2007Response Authority:CERCLAMob Date:8/1/2007Response Type:Time-CriticalDemob Date:NPL Status:Non NPLCompletion Date:Incident Category:Removal Action

CERCLIS ID #: ALD004014973 Contract #

RCRIS ID #:

Site Description

A Time-Critical Removal Action began in September 2009 to address the hazards associated with the former Gulf State Steel Powerhouse, lagoons and Slag Piles.

Remaining removal activities: Slag pile processing, remaining waste lagoon management (2) and slag pile landfill creation. The slag piles are the source of continued release of characteristic hazardous waste. The caustic leachate containing pH values as high as 12.5 from the slag piles is directly discharging into Black Creek, an adjacent wetland area, and a residential neighborhood from drainage ditches outside the Site fence. Sloughing of slag from the piles has been observed on both the northern and southern piles. The sloughing allows for the production of more leachate due to the increase in surface area of new unweathered slag.

Current Activities

Slag processing from both the North and South piles continues. Material from both piles is transported to two on-site processing facilities for separation. Recyclable material is transported off-site. Non-recyclable material is moved to an area close to the North pile for consolidation in an on-Site Landfill and capping to halt the further production of high pH leachate.

Leachate coming from slag piles is currently being monitored for pH. pH ranges from 9 to 12.5. Air monitoring for particulates is also conducted during operations.

ERRS is in the processing of demobing equipment to allow for increased operation by the subcontractor HARSCO.

Material is dewatered if necessary before processing. Dust control continues.

Operation of processing at two plants (north and south) continues.

USCG GST on-site to assist with ERRS and START contractor oversite, including the operation of Datarams for air monitoring. The role of Site security, which focussed on control and oversite of trucks transporting recyclable materials has been assumed by GST and START.

Planned Removal Actions

Slag screening, reclamation and leachate reduction operations will continue.

Additional sources for recycling of A, B and C fines continues to be sought.

To date slag pile totals:

- · Recycled non ferrous and ferrous metal for slag piles 204,829,766 lbs
- \cdot Material awaiting shipment off-site, A-75 tons, Oversized-100 tons, B-1800 tons, C fines 300,000 tons, Misc 450-500 ton
- To date 47-50% of the North pile has been processed
- To date 15-18% of the South pile has been processed

Next Steps

EPA will investigate potential actions to stabilize the remaining two waste lagoons.

START has drafted a waste lagoon and creek sampling plan for EPA review.

EPA will also develop a final landfill management plan.

Key Issues

On August 9, 2011, OSC Terrence Byrd will assume the oversite role for the activites at the Gulf State Steel Site.

www.epaosc.org/GulfStatesSteel