United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, October 17, 2007
From: Jordan Garrard

Subject: Removal Action
Gulf States Steel
2800 Norris Ave, Gadsden, AL
Latitude: 34.0119000
Longitude: -86.0469000

POLREP No.:	4	**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

-14,000 gallons in Frac Tank #N48660 - analysis received, awaiting disposal - fuel blender
-11,000 gallons in Frac Tank #N45684.
-13,000 gallons of oil collected from the skimming operation by lagoon #1 in Frac Tank #FM310.

Steel recycled - 133,040 pounds
Copper recycled - 6,901 pounds

OSC Nattis, RPM Garrard, Attorney Stephenson and reuse contractor E^2 met with the Gadsden City planning office to discuss future ownership of the Gulf States Steel property and putting together a reuse plan.

Demolition of B7 has started. The removal of this building is required to gain access to the process vessels in Task 6.

Tanks - T-035, T-037, T-039 and T-041 from Task 4 have been removed and place in containment cell waiting to be processed

Completed phase 1 of the treatability study for Lagoon 1 (L1). Three discreet samples were taken from bottom of L1 with a Track hoe bucket. The study shows that Quicklime (CaO) at 5 - 10% mixture by weight worked best. The reaction is very exothermic and does release a lot of heat and steam. The reaction dried up the 3 samples well and changes the physical state if the oily material.

Planned Removal Actions

ERRS will continue to access, shear piping and associated AST's in Task 3 and 4, complete the demolition of B7, continue wrapping pipes with ACM, and begin water treatment of T-10 using Vacuum truck #1, which contains a mix layer of NH3 and a bottom layer of coal tar sludges.

Tanks - T-035, T-037, T-039 and T-041 from Task 4 will be emptied of sludges and processed for recycling.

Vacuum truck #2 will be used to capture the remaining oils and sludges from all opened and un-opened tanks once the skimming operation down on L1 is complete.

Phase 2 of the treatability study: The next phase of testing will be to develop larger batches of quicklime with the 3 samples in order to perform further physical testing. This phase will commence on October 22, 2007. This phase will coincided with an assessment of L1 which will be coordinated by RPM Garrard. The assessment will consist of a Geoprob to determine a confining layer surrounding L1 (Lithology) as well as product migration (sampling and field screening). At completion of the second Phase of the treatability study and the assessment, removal options and costs for L1 should be available by November 26. Later in the next 2 months, SESD will be on site to redevelop and sample the monitor wells by black creek and the lagoon area.

Next Steps

Over the next 2 weeks, Tanks: T-063, T-061, T-059, T-057, T-055 will be emptied of sludges, moved to the cell and processed for recycling.
Another Trackhoe with a shear attachment and a Trackhoe with a grapple attachment will be mobilized to site to assist with demolition of piping and process vessels as well as keep up with processing supporting structures, pipes, tanks and process vessels for recycling.
A crane will be also mobilized to site to assist with the dismantling of the 36 inch pipes attached throughout tasks 5 and 6.

Key Issues

T-010, T-012, T-014 and T-016 which during the colder season was determined to just be water and a solid sludge layer on the bottom. Now in the warmer months, the solid layer has phased with the water and is making water treatment slow to 1/3 the pace as there is a larger retention time required in the settling pools prior to running the water / NH3 mixture through the carbon and sand filtration. Samples of each tank have been pulled and a determination of what temperature will be required until the mixture settles back into 2 phases. This will determine whether or not the treatment of those 4 tanks continues now or is placed on hold until the colder months.

ACM pipe wrapping is taking longer then expected due to the amount of pipe needed to be removed and obstacles in the way, such as B-7. The majority of the pipe remaining to be wrapped is within dense pipe runs and between ASTs / process vessels and can not be addressed until additional removal of pipes, ASTs and process vessels happen.

Benzene and other Organic fumes detected during removal of tanks, process vessels and pipes.

Other key issues include:
- Overhead hazards
- Falling objects during the demolition operations and decreased structural integrity of buildings surrounding Tasks 4 and 5.
- Splash hazards from shearing and opening pipes.

Afternoon Thunderstorms

www.epaosc.org/GulfStatesSteel