

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, April 18, 2008

From: Jordan Garrard

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

POLREP No.:	8	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

Stabilization and solidification (S/S) at Lagoon #1 (L-1) continues. To date, approximately 20% has been

completed. S/S material from coke plant which was staged in Cell #1 (C-1), crushed up brick, concrete, slag as well as off site clay and top soil is being used for fill. Please see www.epaosc.org/GulfStatesSteel for the latest pictures and completion map

Tasks 1 - 7 are complete. The only remaining tanks from the Task 8 area are T-10, T-12, T-14, and T-16. These tanks contain a total of 750,000 gallons of petroleum contact ammonia water. The solution contains 660 ppm of Ammonia. Current disposal / recycling options are still being researched.

The leak from T-010 has been temporarily plugged and the coal tar from a bottom valve has stopped flowing. A sand berm has been constructed around the weakened piping / valves in case the plug releases.

Remaining C/D wastes and well as Asbestos containing material (ACM) wastes are being loaded into properly lined roll off boxes and are being sent off for disposal

The Survey of the Lagoon area determined the total volume of both slag piles to be ~2.7 million cubic yards.

The demolition of B-4 has been complete. Demolition of B-1 continues. All metal and brick from the building will be scrapped or crushed and used as fill material in L-1.

Metal recycled - 4,778,209 pounds.

Planned Removal Actions

Continue T&D activities at coke plant. These activities include C&D material, ACM, transformers and coal tar coated pipes.

Continue to scrap steel and other metals from demolition of B-1 and B-3

Continue S/S of L-1. Oily sediments are much deeper than first thought. These sediments are up to ten feet deep in areas. Therefore, additional quick lime will be needed for the S/S. However, due to the extended period of dry weather and proper mixing, the sediments are drier than expected.

Site will demolish 4/25 and start back up 4/30.

Next Steps

Evaluate the demo of both coke batteries for fill material and recycled metal vs. cost of demo.

Evaluate recycling the slag piles. There are three associations interested in buying the material; The Slag association, the Portland Cement Association and the Federal Highway association.

Key Issues

Recycled Metal prices

Ammonium Sulfate in B-1

Ammonia water remaining in T-10, T-12, T-14, T-16

Organic Fumes, Overhead hazards, falling objects during demolition operations, slips around lagoon areas and hot and cold stress.

www.epaosc.org/GulfStatesSteel