UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #44**
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Peter Lisichenko, OSC
Date: 5/15/2019
Reporting Period: 05/10/2019 through 05/16/2019

1. Introduction

1.1 Background

Site Number:	A28U	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/17/2018	**Start Date:**	10/17/2018
Demob Date:		**Completion Date:**	
CERCLIS ID:	NYD088413877	**RCRIS ID:**	
ERNS No.:		**State Notification:**	Yes
FPN#:		**Reimbursable Account #:**	

1 Incident Category
Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description
Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location
The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat
Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses

a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted when conditions allow.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
EPA is evaluating the Site to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date
See previous POLREPS for additional response actions.

An Action Memorandum confirming three verbal authorizations of funding, and requesting additional funding and an exemption from the 12-month and $2 million limitations on removal actions, was put into concurrence on
April 24, 2019. The Action Memorandum will be routed from the Regional Administrator to the Assistant Administrator for the Office of Land and Emergency Management.

The discharge of southern secondary containment area (which includes ST21, ST22, and ST23) to the sanitary sewer was initiated this week. With recent rains and groundwater influx, water level had risen and was encroaching various pumps and filters within the containment, potentially causing a release of lubricants from this equipment. Though the fluids within the secondary containment is mostly groundwater and stormwater runoff, the discharge to the sanitary sewer is being done out of precaution (potential uptake of material from previous releases). The RST contractor continues to monitor the pH levels during the discharge. ST21 will be evaluated using a sludge judge to determine remaining volume and contents.

The transfer of material from the "moat" to the Weir tank continued this week. In addition, treated material from the Weir tank continues to be discharged to the Town of Tonawanda Wastewater Treatment Plant. An effluent sample the tank is be collected on May 15, 2019 to ensure compliance with the discharge permit and evaluate the maximum daily flow rate.

The removal of debris from areas in the "moat" that have been dewatered continued this week. Oil and tar covered debris (including pallets, buckets, oil cans, tools and other miscellaneous items) are being staged under cover. Removal of additional items is anticipated as water levels continue to recede.

The decommissioning of the sump adjacent to the oil and water seperator was initiated this week. Specific tasks include removal of pipes leading to the sump, removal of steel cover plates, dewatering of the sump to the "moat", and backfilling of the sump with crusher run gravel with fines. Trenches adjacent to the sump are to be decommissioned next.

Temperature monitoring of the LBA tower continues via infrared camera. No notable changes have been observed since the deactivation of the nitrogen supply on January 23, 2019.

The monthly sampling event for the industrial discharge permit and the SPDES permit is scheduled for May 22, 2019 and will be performed by the RST contractor.

The removal of the coal, coke, and breeze at the Site by Powers Coal & Coke continued this week. To date, approximately 7,912 tons of coal, 314 tons of coke, and 2,677 tons of breeze material have been removed.

Periodic maintenance of the storm water system continued this week. Tasks by the ERRS contractor included maintenance of the inclined retention basin (skimming of the surface water and readjusting the harbor boom that had been placed near the inlet to better capture surface material) and changing of absorbent boom at various catch basins throughout the Site.

The Site 108 draft Tank Product Removal and Demolition Plan provided by the PRP contractor has been reviewed by both the EPA and NYSDEC. Comments have been returned and revisions to the document by the PRP are due by May 24, 2019.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys. EPA is negotiating an Administrative Order on Consent regarding the Site 108 Phase 1 work with another PRP.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

1. Continue to pump water from the containment and sump areas for treatment in the Weir tank. Periodic discharge to the sanitary sewer will be guided by analytical results from the Weir tank water samples to ensure compliance with the Industrial Use Permit.
2. Continue to maintain stormwater discharges. Tasks to include periodic maintenance of the retention basin and maintenance of absorbent boom placed at catchbasins adjacent to the Oil

House.

3. Continue to discharge remaining liquids in the equailization tanks (ST21 and ST22) to the sanitary sewer system.
4. Continue to conduct monthly and semi-annual sampling events of discharges to the sanitary sewer system to ensure compliance with the Industrial Use Permit.
5. Continue to conduct monthly and semi-annual sampling events of stormwater discharges to ensure compliance with the SPDES Permit.
6. Continue to maintain essential services to the Command Post and Guard House including domestic water, sewer, electric, and heat.
7. Continue to maintain heat and electrical services at the Site 108 Pump House.
8. Remove contaminated surface soil and decontaminate sumps in the by-products area and backfill with crusher run gravel (with fines).
9. Develop and evaluate strategies to address the potentially pyrophoric material in the COG pipe infrastructure. Evaluations of the different strategies is to include cost effectiveness.
10. Develop a strategy for the removal of product lines and process vessels in the by-products area so that secondary containments can be decommissioned.
11. Identify tanks and vessels with residual material that may pose a threat and develop a strategy for the removal of the material which may include demolition of the structure.
12. Continue to clean the gas/coal tar secondary containment area "moat".

2.2.1.2 Next Steps
EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues
Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

2.3 Logistics Section
No information available at this time.

2.4 Finance Section
EPA is funding the Removal Action.

- October 14, 2018 - Verbal authorization provided a $200,000 total project ceiling, of which $150,000 was for mitigation contracting.
- October 18, 2018 - Verbal authorization provided a $500,000 total project ceiling increase, of which $400,000 was for mitigation contracting.
- November 20, 2018 - Verbal authorization provided a $1,200,000 total project ceiling increase, of which $1,000,000 was for mitigation contracting.
- April 17, 2019 - Authorization provided to increase mitigation contracting by $100,000 to $1,650,000.

The total project ceiling verbally authorized for the Site is $1,900,000, of which $1,650,000 is for mitigation contracting.

The costs below include pending costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,650,000.00	$1,600,751.91	$49,248.09	2.98%
TAT/START	$250,000.00	$86,701.38	$163,298.62	65.32%
Intramural Costs				
Total Site Costs	$1,900,000.00	$1,687,453.29	$212,546.71	11.19%

* 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.

2.5 Other Command Staff
No information available at this time.

3. Participating Entities
3.2 Cooperating Agencies
EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC, 3 ERRS and 2 RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.