UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #17**
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas Budroe, OSC
Date: 11/3/2018
Reporting Period: 11/3/2018

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 and addressed following facility

shutdown.

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.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing. A replacement rental diesel pump arrived at the Site at 8:30 AM. The pump was used to transfer the weak ammonia liquor from the south tank to the north tank for treatment. Approximately 45 minutes into the operation a hole developed in a four-inch steel pipe suspended 20 feet off the ground. The pump was shut down and boom was placed around the released material. Most of the release fell onto a paved roadway which sloped to the west. A sump was excavated on the roadside and a sump pump was used to pump approximately 150 gallons of material into 55-gallon drums. The hole in the pipe was repaired and transfer operations continued. Approximately 21,930 gallons of weak ammonia liquor was transferred from the south to the north tank for treatment. Following the conclusion of transfer operations, treatment through the Ammonia Still System commenced at 40 gallons per minute.

Drums and other containers scattered throughout the Site continued to be collected and brought to the containment areas.

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.

2.1.4 Progress Metrics

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

2.2 Planning Section

2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.
9. Winterize the vessels and pipes on the Site to protect from freezing.

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. The costs below include pending costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$550,000.00	$180,413.00	$369,587.00	67.20%

Intramural Costs				
Total Site Costs	$550,000.00	$180,413.00	$369,587.00	67.20%

* 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, 11 ERRS personnel and two 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.