UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #10**
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas Budroe, OSC
Date: 10/27/2018
Reporting Period: 10/27/2018

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.

EPA was informed that the Tonawanda Coke Corp. (TCC) would be leaving the plant during a Saturday - Sunday, October 27 - 28, 2018, transition period. The TCC boiler operators shall operate the boiler until 8:00 AM on Sunday, October 28, 2018. One TCC By Products Operator and one TCC security guard shall also work until 8:00 AM on Sunday, October 28, 2018. The remainder of the TCC staff shall be laid off sometime on Saturday, October 27, 2018. EPA is preparing to continue running the boiler and operations necessary to treat the contaminated aqueous waste streams stored on-site. One former TCC employee began working for EPA's ERRS contractor as a By Products Operator/Supervisor on Saturday, October 27, 2018. Seven additional former TCC employees shall begin working for EPA's ERRS contractor as By Products Operators, Boiler Operators and one as an electrician beginning on Sunday, October 28, 2018. The accounts for each utility servicing the plant are being transferred to EPA's ERRS contractor.

A pump supporting the Ammonia Still system once again became clogged with tar and the system shut down. The pump was cleaned, repaired and placed back into service. Rather than cycling up to the maximum achievable treatment rate of 50 gallons per minute (gpm) the system shall be tested at 30 gpm to determine if the pump clogs with tar. If treatment is successful at this rate it will be sequentially tested at 40 gpm.

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
EPA is preparing to assume responsibility for securing the Site. Upon being notified that TCC is no longer maintaining the treatment of storm water and process water discharges, EPA reached out internally to obtain information regarding the two treatment system design and operation. EPA is considering operating these systems with input of experts from EPA's Division of Enforcement and Compliance Assistance (DECA). In order to evaluate the current effectiveness of these systems, EPA will be sampling the discharge from both during the week of October 22, 2018. DESA will conduct sample collection and samples will be analyzed by the EPA Region 2 lab. There has been conflicting information from TCC regarding the layoff of plant personnel responsible for the operation of the boiler which is necessary to maintain steam lines which will provide for additional purging of the system and operation of the byproduct treatment system. It is however EPA's understanding that TCC will continue to operate the boiler in the near term. EPA will continue efforts to assume responsibility for all utilities in order to maintain power to the facility. EPA will also continue to work with the TCC Environmental Manager to gain information regarding plant operations and potential/actual releases of hazardous substances.EPA is preparing to sample and cleanup contamination in two separate plant areas.

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
TCC will not inform EPA how long they will remain on site to assist with transition.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$550,000.00	$0.00	$550,000.00	100.00%
Intramural Costs				

Total Site Costs	$550,000.00	$0.00	$550,000.00	100.00%

* 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 OSCs, four 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.