UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #29**
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Peter Lisichenko, OSC
Date: 1/31/2019
Reporting Period: 12/28/18 through 1/31/19

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.

A Weir Tank (with baffles for oil, water and particulate separation) has been staged adjacent to the "moat". With the ammonia still no longer active, the tank will be used to store water that is collected from secondary impoundments including the moat. Once a sufficient volume is generated, water samples will be collected to determine if additional treatment is necessary prior to discharge to ensure compliance with the industrial discharge permit limits. A connection to the sanitary sewer has been identified adjacent to the Machine Shop.

The nitrogen supply to the LBA tower, which is suspected to contain deposits of iron sulfide (a pyrophoric substance when exposed to air), was suspended on January 23, 2019. A temperature monitoring system has been installed on the tower to remotely monitor changes in surface temperatures. Alarm notifications via text messaging and emails have been programmed to alert the OSC of increases in temperature. The nitrogen tank and connections remain on-site in the event of sudden increases in temperature, presumably from internal combustion of the iron sulfide material.

The decontamination of the "moat" area and various sumps has been delayed due to wintry conditions at the Site. Operations will resume as soon as conditions allow.

On January 23, 2019, RST contractor collected six pipe wrap samples for asbestos analysis from various overhead pipes throughout the Site. Analytical results indicate all six samples contained various percentages of friable asbestos.

An Action Memorandum for activities to date and future removal activities is currently being drafted.

The monthly samples for the industrial discharge permit and the SPDES permit scheduled for January 29, 2019 has been postponed due to weather conditions at the Site. The sampling event has been rescheduled for February 5, 2019 and will be conducted by the RST contractor with oversight by EPA DESA personnel.

The removal of the coal and coke at the Site by Powers Coal & Coke continued this week. To date, approximately 2,977 tons of coal has been removed.

Periodic maintenance of the storm water system continues to be performed by the ERRS contractor. Tasks include 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.

An access agreement for Site 108 between Tonawanda Coke Corporation and the PRP has been completed. Interim tasks at Site 108 include: stabilization and repair of secondary containment berms for the three bulk tanks; monitoring levels and removal of water within the secondary containments throughout the winter; characterization of products within the tanks; preparation of plans for product removal and the demolition of the tanks; monitoring of discharges from cut pipes; and re-tarping and installation of silt fencing downgradient of existing waste piles. A walk-through of the Site was conducted by the PRP contractors on January 28, 2019. The start of Site 108 activities is anticipated to begin shortly.

24-hour security continues to be maintained at the Site. It includes a security officer at the main gate and a periodic perimeter patrol of the entire facility. To date, no significant issues have been reported.

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. Continue to pump the contaminated water from the containment and sump areas for treatment in the Weir Tank.
2. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.

3. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
4. Continue to maintain and monitor both the plant process water and the surface storm water systems
5. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
6. Clean and subsequently remove the plant process containment areas.
7. Winterize the vessels and pipes on the Site to protect from freezing.
8. Evaluate methodology for sealing the sumps at the site.
9. Evaluate the removal of oven gas and by-products piping infrastructure.
10. Evaluate the removal of storage tanks and cylinders.

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	$1,550,000.00	$1,217,357.27	$332,642.73	21.46%
TAT/START	$50,000.00	$14,348.51	$35,651.49	71.30%
Intramural Costs				
Total Site Costs	$1,600,000.00	$1,231,705.78	$368,294.22	23.02%

* 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, 15 ERRS personnel 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.