UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #26**
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Peter Lisichenko, OSC
Date: 12/14/2018
Reporting Period: 11/28/18 through 12/14/18

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.

ERRS contractor continued to excavate contaminated soil in the processing area. Areas completed are described as the by-products area, west of the "moat", approximately 12,000 square-feet of area has been addressed. The depth of excavation is from the surface up to 6-inches below grade and is intended to mitigate the migration of contaminants to the stormwater system. Sludge like material are being bulked in 55-gallon drums while the stained soils are staged in lined containment areas. To date, approximately 75-cubic yards has been excavated and laboratory analysis for disposal characterization have been received. Excavated areas were then backfilled with 2-inch crusher-run gravel (with fines). In addition to the soils, ERRS contractor continue to remove sludge and debris from secondary containment areas and structures that had been impacted by the byproducts operations. To date, approximately 54 55-gallon drums of sludge material has been accumulated. Locations completed include the Ammonia House and sump, the Steel Sump, and the Exhauster Building . The water accumulating is secondary containment are periodically being pumped and treated on-site.

The ammonia solution transfer from the south storage tank (ST23) to the weak ammonia liquor tank (PT02) continues. On Thursday, December 6, 2018, solution levels within ST23 receded down to the withdraw port (on the side of the tank), prohibiting further extraction of solution. On Thursday, December 13, 2018, a "cold cut" services contractor arrived on-site and cut a 31-inch port 12-inches above the solution level using a water laser. Once the port was accessed, a "Sludge Judge" was used to evaluate tank contents. Approximately 4.5-feet of solution overlays 1-foot of sludge and 1-foot tar. A rigid hose, connected to a 3-inch pump, was lowered into the tank just above the sludge level and transfer operations resumed. For this operational period, approximately 405,800 gallons of ammonia solution were transferred from the south to the north tank for treatment in the Ammonia Still System at a rate of 40-gallons per minute. In total, approximately 685,300 gallons of ammonia solution has been processed.

The process to de-energize and take off-line utilities in unused portions of the facility is underway. To date, electric, water, and steam has been terminated to the coke ovens and coal handing structures including Battery No. 2, Coal Handling Building, Coal Screening and Loading Station, Coal Breaking Building, and the subsurface conveyor system from the coal yard. A strategy to de-energize the remaining portions of the site, once the boiler is deactivated, is underway. The facility fire suppression system (i.e. water hydrants) is still operable.

On Monday, December 3, 2018, the ERRS contractor removed a section of process gas piping adjacent to the west flare. The pipe was removed to (1) determine if iron sulfide had accumulated, (2) would the iron sulfide react to the open air, and (3) can the iron sulfide be removed easily. Upon removal, it was determined that the pipe was substantially filled (80-percent) by a gritting tar-like material. The pipe was placed in a empty roll-off container in an isolated location on-site for further evaluation. A sample was collected of the tar-like material for disposal characterization.

The Emergency & Hazardous Waste Contingency Plan for the facility was updated by EPA to represent current conditions at the site. On Friday, December 7, 2018, EPA OSC presented the plan to the local first responder HAZMAT community at the Brighton Volunteer Company 5 Firehouse in Tonawanda. Topics covered included the current conditions, current operations by EPA and its contractors and site procedures in the event of an emergency. The presentation was well received and the first responders requested periodic updates in the future.

The removal of the coal and coke at the Site by Powers Coal & Coke was initiated on Wednesday, November 28, 2018. To date, 1,129 tons of coal material has been transported offsite. EPA has requested a projected schedule for the removal of coal, coke, and breeze material from the site. The removal of the coal tar product by Powers is pending and awaiting approval from the receiving facility.

On Tuesday, December 4, 2018, EPA approved a work plan submitted by PRP contractors to address critical issues at Site 108. Tasks to include berm water removal, berm stabilization and repair, soil pile tarping and installation of silt fencing, and the characterization of tank contents. A site walk was held on Friday, December 14, 2018, with the PRP and their contractors to view current conditions and to discuss the implementation of the work plan. The PRP is currently awaiting a signed access agreement from Tonawanda Coke prior to implementing the work plan.

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.
10. Evaluate methodology for sealing the sumps at the site.
11. Evaluate the removal of oven gas and by-products piping infrastructure.
12. 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	$1,050,000.00	$863,566.74	$186,433.26	17.76%
TAT/START	$50,000.00	$2,530.00	$47,470.00	94.94%
Intramural Costs				
Total Site Costs	$1,100,000.00	$866,096.74	$233,903.26	21.26%

* 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.