**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Region II**

**Subject:** **POLREP #32**
**Tonawanda Coke Corporation**
**0201601**
**Tonawanda, NY**

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**From:** Peter Lisichenko, OSC
**Date:** 2/21/2019
**Reporting Period:**

## 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.

The transfer of material from ST22 to ST21 continued this week. Utilizing a two-inch trash pump, material is being pumped during working hours, via collapsible hose, due to the limited capacity of the fuel tank. The pump and hose are flushed and emptied each day to eliminate the potential of ice build-up during non-working hours.

The transfer of standing water from the "moat" to the Weir tank was suspended when the tank was filled to capacity this week (approximately 18,600 gallons). A sample of the water in the third baffle was collected by the RST contractor and submitted to a laboratory for industrial discharge permit parameters. Results are anticipated the week of February 25, 2019 and will be used to determine if additional treatment is necessary prior to discharge to the sanitary sewer.

Temperature monitoring of the LBA tower continues. No notable changes have been observed since the deactivation of the nitrogen supply on January 23, 2019. A two-inch flange was removed from the side of the tower on February 5, 2019. A second 12-inch flange was removed on February 12, 2019. The flange removal is to introduce air into the tower and evaluate the potential for pyrophoric reaction. The nitrogen tank and connections remain at the Site in the event of sudden increases in temperature, presumably from internal combustion of the iron sulfide material.

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

On February 20, 2019, EPA personnel met with technical vendors to evaluate the use of solvent based naturalization products for the treatment of iron sulfide within the pipes and process tanks. A site walk was conducted and the vendor provided EPA technical feedback based on site conditions. EPA continues to evaluate various options to address the iron sulfide issue.

The monthly samples for industrial discharge permit and the SPDES permit is scheduled to begin on February 26, 2019 by EPA DESA personnel.

The removal of the coal and coke at the Site by Powers Coal & Coke continued this week. To date, approximately 4,743 tons of coal has 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 PRP contractor for Site 108 has received approval from the NYSDEC for the import of soils. The soils, consisting of a clay matrix, will be used to fortify and repair the berms surrounding the three large aboveground storage tanks that have been structurally compromised. Equipment and personnel are scheduled to mobilize to Site 108 on February 25, 2019 to begin work. In addition to stabilizing the berms, other site activities during this phase includes covering the three waste piles with polyethylene tarps and installing erosion engineering controls. The contractor continues to monitor water levels within the berms after precipitation events.

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 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. Backfill sump areas in the by-products area with crusher run gravel (with fines) to prevent sumps from filling with water and potentially discharging to the stormwater system.
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.

**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.

The total project ceiling verbally authorized for the Site is $1,900,000, of which $1,550,000 is for mitigation contracting.

The costs below include pending costs.

**Estimated Costs ***

| | Budgeted | Total To Date | Remaining | % Remaining |
|---|---|---|---|---|
| **Extramural Costs** | | | | |
| ERRS - Cleanup Contractor | $1,550,000.00 | $1,305,360.81 | $244,639.19 | 15.78% |
| TAT/START | $50,000.00 | $23,423.51 | $26,576.49 | 53.15% |
| **Intramural Costs** | | | | |
| | | | | |
| **Total Site Costs** | $1,600,000.00 | $1,328,784.32 | $271,215.68 | 16.95% |

* 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**
Two OSC, 3 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.