U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #1**
Initial RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas Budroe, OSC
Date: 10/18/2018
Reporting Period: October 18, 2018

1. Introduction

1.1 Background

Site Number:	A28U	**Contract Number:**	EP-S2-15-02
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 to the environment.

1.1 Emergency Response

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. 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 inspecting the Site, with limited assistance from TCC, 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

On October 17, 2018, the consent to access form was signed by TCC.

Also on that date, ERRD and an ERRS Response Manager who mobilized to the Site that day, met with TCC at the facility to conduct an initial Site inspection. This is considered the start date for the RV1 removal action.
The PRP has stated that they will no longer monitor the discharge of the plant process water to the local POTW or the storm water discharge to the Niagara River. EPA also met on Site with the local POTW official and the NYSDEC to determine what must be done to ensure a proper discharge of the plant process water. The storm water discharge system was also inspected. A preliminary inspection of the Site fence was conducted and no breaches were observed. TCC personnel are currently providing 24-hour security. The tanks, vessels, piping and secondary containment areas are being inspected and documented. Preparations are being made to provide security and attempt to continue operating the Site boiler should the current owner decide to stop Site operations.

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 all utilities to maintain power to the facility, site security, and plant process and storm water treatment prior to discharge to two permitted outfalls (one to Publicly Owned Treatment Works (POTW) and one to the Niagara River). Additional activities will be added as the removal assessment progresses. The facility is still undergoing the shutdown process following the announcement of bankruptcy.

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. EPA was also informed that the boiler will be shut down tomorrow morning. While unable to confirm this information, our ERRS contractor began to explore the possibility of hiring plant boiler operators and other plant personnel to run critical equipment.

In addition to hiring plant personnel EPA is also attempting to hire a consultant with TCC plant experience to assist in the continued assessment of the site conditions. EPA will continue efforts to assume responsibility for all utilities in order to maintain power to the facility. Manager in attempt to gain knowledge of plant operations and potential hazards.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Following shutdown and purging of the coke process, 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 the transition. EPA was informed

that TCC plans to shut down the boiler in the morning. ERRS has begun to explore the possibility of hiring plant boiler operators.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

EPA is currently funding the removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$150,000.00	$0.00	$150,000.00	100.00%
Intramural Costs				
Total Site Costs	$150,000.00	$0.00	$150,000.00	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 NYSDEC and the Town of Tonawanda Water Resources Department during facility shutdown.

4. Personnel On Site

Two OSCs, one DECA member, one ORC member and one ERRS contractor are on site.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

7. Situational Reference Materials

No information available at this time.