UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #2**
PJ1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Dwayne Harrington, OSC
Date: 10/16/2018
Reporting Period: October 15, 2018 - October 16, 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:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/13/2018	**Start Date:**	10/13/2018
Demob Date:		**Completion Date:**	
CERCLIS ID:	NYD088413877	**RCRIS ID:**	
ERNS No.:		**State Notification:**	Yes
FPN#:		**Reimbursable Account #:**	

1 Incident Category

1.1 Emergency Response

1.1.2 Site Description

Tonawanda Coke Corporation is an industrial coke 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

There is an immediate threat of release of hazardous substances during the flaring off of coke oven gases. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA and NYSDEC personnel are currently on site during coke oven process shutdown. EPA is conducting air monitoring and sampling in support of NYSDEC's oversight of shutdown activities to assess public impact in the event of a release.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

EPA and NYSDEC personnel are currently on site during coke oven process shutdown. EPA is conducting air monitoring and sampling in support of NYSDEC's oversight of shutdown activities to assess public impact in the event of a release.

The coke battery purge is complete. The unit is venting nitrogen; no residual hydrogen has been detected. The flaring of the coke oven gas sphere and gas lines began this morning, but the flaring has been temporarily discontinued while nitrogen trucks are being refilled. This may take about a day since the nitrogen supplier isn't local. Once the purging/flaring process resumes the facility estimates that the project will be completed within 5-10 hours, after which the process shutdown will be complete.

ERRD and ORC met with the TCC attorneys this afternoon to discuss access and what future activities the company is prepared to take. ERRD will meet with TCC personnel at the facility for a site walkthrough tomorrow. The access form has been presented to TCC for signature.

All six air surveillance stations are fully operational and are located:

TCP 01 - Tonawanda Coke Plant Guardhouse – On the Southwest corner of the Plant
TCP 02 - River Road Volunteer Fire Stations – South of plant, adjoining a small residential area. Located in the side yard next to the fire station
TCP 03 - Sheridan Fire District – behind the firehouse secured to the fencing surrounding their emergency generator
TCP 04 – DEC Grand Island Boulevard Station – NE of Plant. Semi-permanent trailer established by DEC for their historic benzene monitoring (no live transmittal of data) and sampling program (once every 6 days)
TCP 05 – DEC Brookside Terrace Station - NE of Plant in a residential neighborhood. Semi-permanent trailer established by DEC for their historic benzene monitoring (no live transmittal of data) and sampling program (once every 6 days)
TCP 06 - William Kaegebein Elementary School – NW of plant, in a residential neighborhood. Station is placed in the courtyard of the school at the request of the Superintendent to ensure the security of the equipment.

Preliminary data for the 24-hour Summa canisters that were collected at the surveillance stations on October 14-15 and analyzed for benzene is expected tomorrow afternoon with the validated results expected on Friday.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy today, October 16, 2018. ORC remains in contact with TCC attorneys.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

The coke battery purge is complete. The unit is venting nitrogen; no residual hydrogen has been detected. The flaring of the coke oven gas sphere began this morning, but the flaring has been temporarily discontinued while nitrogen trucks are being refilled. This may take about a day since the nitrogen supplier isn't local. Once the purging/flaring process resumes the facility estimates that the project will be completed within 5-10 hours, after which the process shutdown will be complete.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Following shutdown and purging of the coke process, EPA will assess the potential public and environmental threats presented by the site.

2.2.2 Issues

TCC has not revealed 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

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

EPA is coordinating with NYSDEC during facility shutdown.

4. Personnel On Site

Four ERRD members, one DECA member, one ORC member, one ERT member, and four ERT-SERAS staff are on site.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.