UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #3**
PJ1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Dwayne Harrington, OSC
Date: 10/17/2018
Reporting Period: October 16-17, 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:	STATE	**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.

Today EPA accompanied TCC on an inspection of the facility to identify all areas of concern and determine facility operations that will need to be conducted by TCC after shutdown.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

EPA and NYSDEC personnel are currently on site during coke oven process shutdown and flaring of the flammable gases in the spherical gas tank. 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 was completed yesterday, October 16, 2018. The flaring of the flammable gases in the spherical gas tank and gas lines began on October 16, 2018, but the flaring was discontinued after the inventory of nitrogen was depleted. The purging/flaring process continued on October 17, 2018, after two truck loads of nitrogen gas were received. However, it is anticipated that the inventory of nitrogen gas will be depleted this evening prior to completely evacuating the spherical gas tank. Another truck load of nitrogen gas is scheduled for delivery tomorrow, after which the flaring process will continue and is anticipated to be completed in approximately one to two days. After the flaring is completed air monitoring operations shall be discontinued.

ERRD and an ERRS Response Manager met with TCC at the facility to conduct an initial Site inspection. 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 Site inspection shall continue tomorrow.

On October 17, 2918, the consent to access form was signed by TCC.

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, 2018, and analyzed for benzene was received today and reported no results above the detection level at any of the stations. Preliminary data for the 24-hour Summa canisters that were collected at the surveillance stations on October 15-16, 2018, and analyzed for benzene is expected on October 18, 2018, with the validated results anticipated on October 20, 2018.

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

The flaring of the flammable gases in the spherical gas tank and gas lines began on October 16, 2018, but the flaring was discontinued after the inventory of nitrogen was depleted. The purging/flaring process continued on October 17, 2018, after two truck loads of nitrogen gas were received. However, it is anticipated that the inventory of nitrogen gas will be depleted this evening prior to completely evacuating the spherical gas tank. Another truck load of nitrogen gas is scheduled for delivery tomorrow, after which the flaring process will continue and is anticipated to be completed in approximately one to two days. After the flaring is completed air monitoring operations shall be discontinued.

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 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. Personnel continue removing personal belongings from their lockers and vendors are removing equipment.

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 posed by the site.

2.2.2 Issues

TCC will not inform EPA 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

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

Four ERRD members, one DECA member, one ORC member, one ERT member, 1 ERRS member and four ERT-SERAS staff 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.