Interim Remedial Measure Proposed

The New York State Department of Environmental Conservation (NYSDEC) is proposing an expedited cleanup for the Tonawanda Coke site ("site") located at 3875 River Road, Tonawanda, Erie County. Please see the map for the site location. Documents related to the cleanup of this site can be found at the location(s) identified below under "Where to Find Information."

Additional site details, including environmental and health assessment summaries, are available on NYSDEC's website at:


Draft Interim Remedial Measure Work Plan

An IRM is a cleanup activity that may be performed when a source of contamination or exposure pathway (the way in which a person may contact contamination) can be effectively addressed without extensive investigation and evaluation.

The draft IRM work plan describes the proposed cleanup activities for a portion of the site located between River Road and the Niagara River (Operable Unit 3). These activities include:

- excavation and removal of coal tar impacts from five subsurface soil locations and one sediment location in the on-site drainage ditch that discharges to the Niagara River;
- removal of coal tar from the three aboveground storage tanks (ASTs) in the former tank farm;
- excavation and removal of coal tar contained within the bermed area surrounding the former tank farm;
- cleaning, demolition, and removal of the ASTs, associated piping, and ancillary equipment from the former tank farm; and
- excavation and removal of any coal tar impacts identified beneath the former tank farm.

Tonawanda Coke Corporation (TCC) has proposed to recycle the removed coal tar and certain coal tar impacted material into their existing coking operations. This recycling is subject to review by the USEPA and NYSDEC, must comply with all applicable legal and regulatory requirements, and must not result in process disruptions that would result in increased emissions. Any coal tar or coal tar impacted material that cannot be recycled will be sent for disposal off-site at a permitted facility.

*Operable Unit: An administrative term used to identify a portion of a site that can be addressed by a distinct investigation and/or cleanup approach. An operable unit can receive specific investigation, and a particular remedy may be proposed.
TCC’s facility has completed an overhaul of their air pollution controls, revised their waste handling procedures, and updated their best management practices in response to recent enforcement actions by USEPA and NYSDEC. NYSDEC Division of Air Resources staff have inspected the facility to confirm that the new controls are in place and effective. These changes will keep air emissions below permitted levels during normal operating conditions.

The coal tar excavations will be completed in phases to provide accurate information regarding the volume and nature of the coal tar that exists on-site and to what extent it may be recycled. If the volume of coal tar becomes excessive or the material is not compatible with TCC’s coking process the IRM may be suspended. Any coal tar, or coal tar impacted material, not addressed by the IRM will require further assessment as part of the final site remedy selection process.

Summary of the Investigation
A confirmation investigation program was completed in 2016 to collected additional surface soil, subsurface soil, and sediment data to support the completion of the feasibility study for a portion of the site located between River Road and the Niagara River. The condition of the former tank farm was also assessed during the investigation to determine the amount of coal tar remaining in the tanks. The primary findings of the investigation are as follows:

- Semi-volatile organic compound (SVOC) concentrations were detected above industrial use soil cleanup objectives (SCOs) in on-site surface and subsurface soil samples. In most locations that exhibited significantly elevated SVOC concentrations the soil was comingled with coal and/or coke debris, coal tar deposits, or other industrial fill;
- The Niagara River embayment sediment investigation results show the sediments closest to shore and the drainage ditch outlet have higher concentrations of SVOCs at greater depths than sediments in the mid-section of the embayment;
- The on-site drainage ditch sediment investigation confirmed that there are sediments with elevated SVOC and metals concentrations. Coal tar was also identified at one location in both the ditch bank and channel sediments;
- The investigation of the former tank farm identified that coal tar surrounds the aboveground storage tanks (ASTs) on the ground surface within the secondary containment berms. The amount of coal tar present varies but is up to 1.5 feet thick in some areas. This coal tar appears to have been contained laterally by the soil berm that surrounds the tank farm. Vertical impacts have not yet been determined. It was also determined that various amounts of coal tar and water remain inside the ASTs; and
- Surficial deposits of coal and coke ‘breeze’ located in the western portion of the site were determined to be up to 5 feet thick, and are relatively free of soil or other materials.

Next Steps
NYSDEC will review the plan, revise the plan as necessary and approve the IRM work plan in consultation with New York State Department of Health (NYSDOH). The approved work plan will be made available to the public (see “Where to Find Information” below). After the work plan is approved, the activities detailed in the work plan will be implemented. Upon completion of the work, a Construction Completion Report will be prepared that documents the activities that were performed.

NYSDEC will keep the public informed throughout the investigation and cleanup of the site.
Background
Location: The site is located in the Town of Tonawanda, Erie County east of the Niagara River, approximately 0.5 miles south of I-190. The main plant property is located at 3875 River Road, Tonawanda, NY. The site is approximately 160 acres in size.

Site Features: The site is divided by River Road, with the main plant facility located to the east and a parcel adjacent to the Niagara River to the west. The main plant facility contains the coke ovens, supporting structures, and numerous coal/ coke piles.

The western parcel is adjacent to the Niagara River, and contains a pump station, an abandoned conveyor system, a former aboveground tank farm, and other unused industrial structures. This western portion of the site is not currently used for coke production and has become overgrown with shrubs and trees. A drainage ditch traverse the western parcel and discharges to a small embayment of the Niagara River.

Several other listed hazardous waste disposal sites are nearby the site. Allied Chemical – Special Chemical Division (#915003) is located to the south, Roblin Steel (#915056) is located to the west and north, and the River Road (#915031) and Cherry Farm (#915063) sites are located to the northwest of the site along River Road. The Erie County Water Authority Van de Water Treatment Plant is immediately south of the site along the Niagara River. The Huntley Generation Station’s fly ash landfill is immediately north of the plant portion of the site.

Current Zoning: The site is currently zoned and operated for industrial use. The surrounding parcels are currently used for a combination of commercial/industrial operations, utility right-of-ways, and public water utilities. The nearest residential area is located approximately 0.25 miles south of the site.

Historic Use: The Semet-Solvay Company, a subsidiary of Allied Chemical and Dye Corporation, began coke manufacturing operations at the site in 1917. In addition to producing coke, light oil distillation, ammonia recovery, and benzene, toluene, and xylene extraction were also conducted at the site. In 1978 the site was bought by Tonawanda Coke Corporation, who continues to operate the site as a coke manufacturing facility.

The first investigation at the site was completed by the NYSDEC in 1981, with follow-up investigations completed by the United States Geological Survey (USGS) in 1982 and 1983. Since these investigations several investigations have been conducted by Tonawanda Coke Corporation under NYSDEC oversight. These investigations indicated widespread on-site contamination resulting from the disposal of industrial and hazardous wastes at the site. The type of wastes vary by location, but in general include coke/cinders, building debris, coal tar sludge, scrap metal, wood, and saddle packing. Three historic disposal areas have been identified and are referred to as Site 108, Site 109, and Site 110.

Operable Units: The site has been divided into three operable units to facilitate remediation. An operable unit represents a portion of a remedial program for a site that for technical or administrative reasons can be addressed separately to investigate, eliminate or mitigate a release, threat of release or exposure pathway resulting from the site contamination.
OU1 (Site 110) is located in the northeast corner of the plant portion of the site. Materials such as coal tar sludge, wood shavings impregnated with iron oxide, fly ash, and cinders were reportedly disposed at OU1. The disposal activities are reported to have occurred prior to 1978. In March 2008 it was determined that OU1 does not present a current or potential threat to public health or the environment, and a no further action Record of Decision (ROD) was issued. The ROD requires that Tonawanda Coke restrict access to OU1 and that an environmental easement be filed to control the future use of the area. This easement has not yet been executed.

OU2 (Site 109) is located near River Road on the western side of the plant portion of the site. In 1977, an unknown quantity of brick, rubble, and related demolition waste was disposed. In March 2008 it was determined that OU2 does not present a current or potential threat to public health or the environment, and a no further action ROD was issued. The ROD requires that Tonawanda Coke restrict access to OU2 and that an environmental easement be filed to control the future use of the area. This easement has not yet been executed.

OU3 (Site 108) comprises the western parcel of the site adjacent to the Niagara River, and was used for transferring coal from the river to the plant facility via conveyor belts. In 1973 the Erie County Health Department granted Allied Chemical permission to establish a disposal area, which was subsequently filled with refuse, wood, scrap polyethylene and ceramic saddle packing from refining equipment. The disposal of coke/coal, fly-ash cinders, and coal tar sludge has also been documented. Additional investigation was conducted at OU3 in September 2016 to support the development of a final Feasibility Study.

Site Geology and Hydrology: The site generally slopes gently to the west towards the Niagara River. Surface water within the plant area is collected by a storm water collection system and directed to the SPDES permitted outfall west of the site. This outfall flows through the ditch that traverse OU3. Fill material is present as the uppermost stratigraphic unit over the entire site, fill thickness varying from approximately 1 to 10 feet. The fill encountered during the investigation consisted mainly of silt, gravel, cinders, slag, coke, and demolition debris. Underlying the fill is a unit composed primarily of red-brown to gray clay, with some silt and gravel lenses. Data from other investigations conducted at adjacent sites indicate that the clay stratum averages more than 50 feet in thickness.

The fill strata contain the uppermost water-bearing unit. This unit is not continuous in depth due to the varying thickness of the fill material across the site. The underlying clay strata act as a significant barrier to both horizontal and vertical groundwater movement. Bedrock is expected to be at least 50 feet below grade. Based on regional hydrogeology the upper bedrock is expected to be water bearing.

State Superfund Program: New York's State Superfund Program (SSF) identifies and characterizes suspected inactive hazardous waste disposal sites. Sites that pose a significant threat to public health and/or the environment go through a process of investigation, evaluation, cleanup and monitoring.

NYSDEC attempts to identify parties responsible for site contamination and require cleanup before committing State funds.

For more information about the SSF, visit: http://www.dec.ny.gov/chemical/8439.html
FOR MORE INFORMATION

Where to Find Information
Project documents are available at the following location(s) to help the public stay informed.

Kenmore Library
160 Delaware Road
Kenmore, NY 14217
phone: 716-873-2842

Who to Contact
Comments and questions are always welcome and should be directed as follows:

<table>
<thead>
<tr>
<th>Project Related Questions</th>
<th>Site-Related Health Questions</th>
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</thead>
<tbody>
<tr>
<td>Benjamin McPherson</td>
<td>Matt Forucci</td>
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<td>Department of Environmental Conservation</td>
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<tr>
<td>270 Michigan Ave</td>
<td>584 Delaware Avenue</td>
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<tr>
<td>Buffalo, NY 14203-2915</td>
<td>Buffalo, NY 14202</td>
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<td>716-851-7220</td>
<td>716-847-4501</td>
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We encourage you to share this fact sheet with neighbors and tenants, and/or post this fact sheet in a prominent area of your building for others to see.

Receive Site Fact Sheets by Email
Have site information such as this fact sheet sent right to your email inbox. NYSDEC invites you to sign up with one or more contaminated sites county email listservs available at the following web page:
http://www.dec.ny.gov/chemical/61092.html. It’s quick, it’s free, and it will help keep you better informed.

As a listserv member, you will periodically receive site-related information/announcements for all contaminated sites in the county(ies) you select.

Note: Please disregard if you already have signed up and received this fact sheet electronically.
FIGURE 1.1

TONAWANDA COKE SITE

SITE 108

SOURCE: USGS QUADRANGLE MAP; BUFFALO NW, NEW YORK