Tonawanda Community Air Quality
Status Report

December 6, 2016
Legal Actions Requiring Injunctive Relief

Joint DEC/EPA Consent Order – 2011
Joint Federal/State Consent Decree – 2015
Several DEC Consent Orders – 2014 - 2016
Injunctive Relief Categories

- Repair & Rehabilitation
- Improved Systems
- Newly Installed Equipment
- Removed Source
- Evaluations & Audits
- Updated Emission Reporting
Repair & Rehabilitation
Repair & Rehabilitation

- Quench Tower Baffles
- Coke Oven Wall sections
- Coke Oven Gas (COG) piping
- Tar Decanter top
- Tar Precipitator
- Ammonia Scrubber
Improved Systems
Improved Systems

- Enhanced Leak Detection & Repair Program (ELDAR)
- COG condensate handling
- Process vessel venting
- Existing primary cooler → extractive type cooler
- Boiler #7 fuel injection
Improved Systems

• Operational limitations on coke production to reduce green pushes and HAP emissions

• Outdoor venting of manifold rupture disks

• Desiccant quality assurance & periodic maintenance

• Additional Human Machine Interfaces (HMI) & alarms
Improved Systems

• Revisions to existing and development of new SOPs for various operational procedures

• Battery Work Practice plans

• Development of a Fugitive Dust Control Plan
Installation of New Process & Control Equipment
New Process and Control Equipment

- Battery Pushing Controls (pushing side shed capture system)
- COMS (continuous opacity monitoring system)
- By-product Area Flare
- Ammonia Still
- PLC (programmable logic controller) hub system
Removed Source

Light Oil Scrubber
Removed Emission Source

Light Oil Scrubber

• Taken out-of-Service
• Permanently disconnected
• Purged of volatile materials
• Nitrogen blanketed
Evaluations & Audits
Evaluations & Audits

• Coke Oven Walls - Condition & Repair Recommendations

• Ammonia Still Operation

• Boiler #7 Efficiency

• BWON (Benzene Waste Operations NESHAP) audit

• Performance of a facility-wide Clean Water Act compliance audit (SPDES and Town Industrial Use permit)
Updated Emission Reporting
# Updated Emission Reporting


- Revised emissions inventory statements for the period of 2007-2014
Additional Enforcement Actions (Non-Air Related)
Additional Enforcement Actions (Non-Air Related)

- Caustic tank spill/failure to timely report Consent Order
- PBS/CBS (petroleum/chemical bulk storage) Consent Order
- Petroleum spill remediation Stipulation Agreement
- Superfund Consent Orders
- Condensate tank spill Consent Order
GIBI Benzene - Individual 1-in-6 day Summa Canister Monitoring Data
July 2007 – March 2015
Thank You

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