



Department of
Environmental
Conservation

Tonawanda Community Working Group

Superfund and Brownfield Progress Update

September 18, 2024

Brownfield Site

Riverview Innovation &
Technology Campus,
#C915353



Work Plan/Report	Submitted	Status	Progress
Interim Site Management Plan (ISMP)	3/6/2020	DEC Approved	Continuous
Light Oil Area Secondary Containment Investigation Work Plan	3/6/2020	DEC Approved	Complete
Remedial Investigation Work Plan	3/12/2020	DEC Approved	Complete
Stormwater Pollution Prevention Plan	3/12/2020	DEC Approved	Continuous
Storm Sewer IRM Work Plan	4/12/2020	DEC Approved	Complete
Mixing Pad IRM Work Plan	5/5/2020	DEC Approved	Complete
PCC Excavation Work Plan	5/11/2020	DEC Approved	Complete
ISMP - Work Scope 2	5/11/2020	DEC Approved	Complete
Container Management IRM Work Plan	6/17/2020	DEC Approved	Complete
ISMP - Work Scope 3	7/6/2020	DEC Approved	Complete
Storm Sewer IRM Phase 1 Report	8/5/2020	DEC Approved	Complete
Abandoned Pipeline IRM Work Plan	8/19/2020	DEC Approved	Complete
PCC Grading Concept Plan	9/10/2020	DEC Approved	Complete
South Road Reconstruction Plan	11/17/2020	DEC Approved	Complete
Surface Water Phase 3 Work Plan	12/22/2020	DEC Approved	Complete

Work Plan/Report	Submitted	Status	Progress
AST Management Work Plan	12/23/2020	DEC Approved	Field Work Complete
Abandoned Pipeline IRM Report	1/20/2021	DEC Approved	Complete
Building Demolition Work Plan	1/26/2021	DEC Approved	Field Work Complete
PBS/CBS Tank Work Plan	2/15/2021	DEC Approved	Field Work Complete
Access to Coal Breaker Building	2/15/2021	DEC Approved	Complete
Secondary Containment Investigation Work Plan	3/10/2021	DEC Approved	Field Work Complete
Box Culvert Lining Work Plan	4/2/2021	DEC Approved	Complete
Supplemental Remedial Investigation	5/28/2021	DEC Approved	Field Work Complete
Mixing Pad Cleaning Completion Report	6/21/2021	DEC Approved	Complete
Byproducts Pipe Sealing Work Plan	6/30/2021	DEC Approved	Complete
Concrete Settling Pond Cleaning	6/30/2021	DEC Approved	Complete
Lime Still IRM Work Plan	7/14/2021	DEC Approved	Field Work Complete
Coke Oven Gas Bench Scale Testing	8/13/2021	DEC Approved	Complete
PFAS Sampling Work Plan	8/19/2021	DEC Approved	Complete
COG Pipe and Residual IRM Work Plan	8/25/2021	DEC Approved	Field Work Complete
Groundwater Treatment Plant IRM	10/5/2021	DEC Approved	Ongoing

Work Plan/Report	Submitted	Status	Progress
Groundwater Treatment Plant IRM – Addendum	2/15/2022	DEC Approved	Ongoing
Remedial Investigation Report (RIR)	3/11/2022	DEC Review	Complete
Process Equipment Removal IRM WP	4/14/2022	DEC Approved	Field Work Complete
ST24 Secondary Containment WP	5/31/2022	DEC Approved	Completed
Alternatives Analysis Report	6/30/2022	DEC Review	Complete
ST24 Bioremediation IRM Work Plan	9/23/2022	DEC Approved	Field Work Complete
Pre-Design Investigation Work Plan	11/10/22	DEC Approved	Ongoing
Pump House Sampling Work Plan	12/1/22	Rescinded	Rescinded
Junction Building NAPL Removal	1/11/23	DEC Approved	Field Work Complete
Solidification IRM WP	8/16/23	DEC Approved	Field Work Complete
Breeze Adsorption Testing Work Plan	8/30/23	DEC Approved	Completed
Breeze Adsorption Testing Report	10/5/2023	DEC Approved	Completed

Work Plan/Report	Submitted	Status	Progress
Radiological Work Plan	12/4/23	DEC Approved	Field Work Complete
ST21-ST23 Investigation Memo	2/13/24	DEC Review	RITC to Revise
IRM Data Package	3/14/24	In Review	Ongoing
ST24 Bioremediation IRM Report	7/16/24	In Review	Resubmitted 8/29/24
ST21-23 Bioremediation RAWP	9/12/24	In Review	
Radiological Investigation Report	9/17/24	In Review	

Alternatives Analysis Report

- Public comment period was held from June 5 to July 20, 2024. Thank you to those who submitted comments!
- DEC accepted the Alternatives Analysis Report and Remedial Investigation Report on August 28, 2024.
- Decision Document (DD) issued on August 28, 2024.
- Next Steps:
 - Limited RAWPs
 - Complete outstanding IRM reporting
 - Begin the Remedial Design



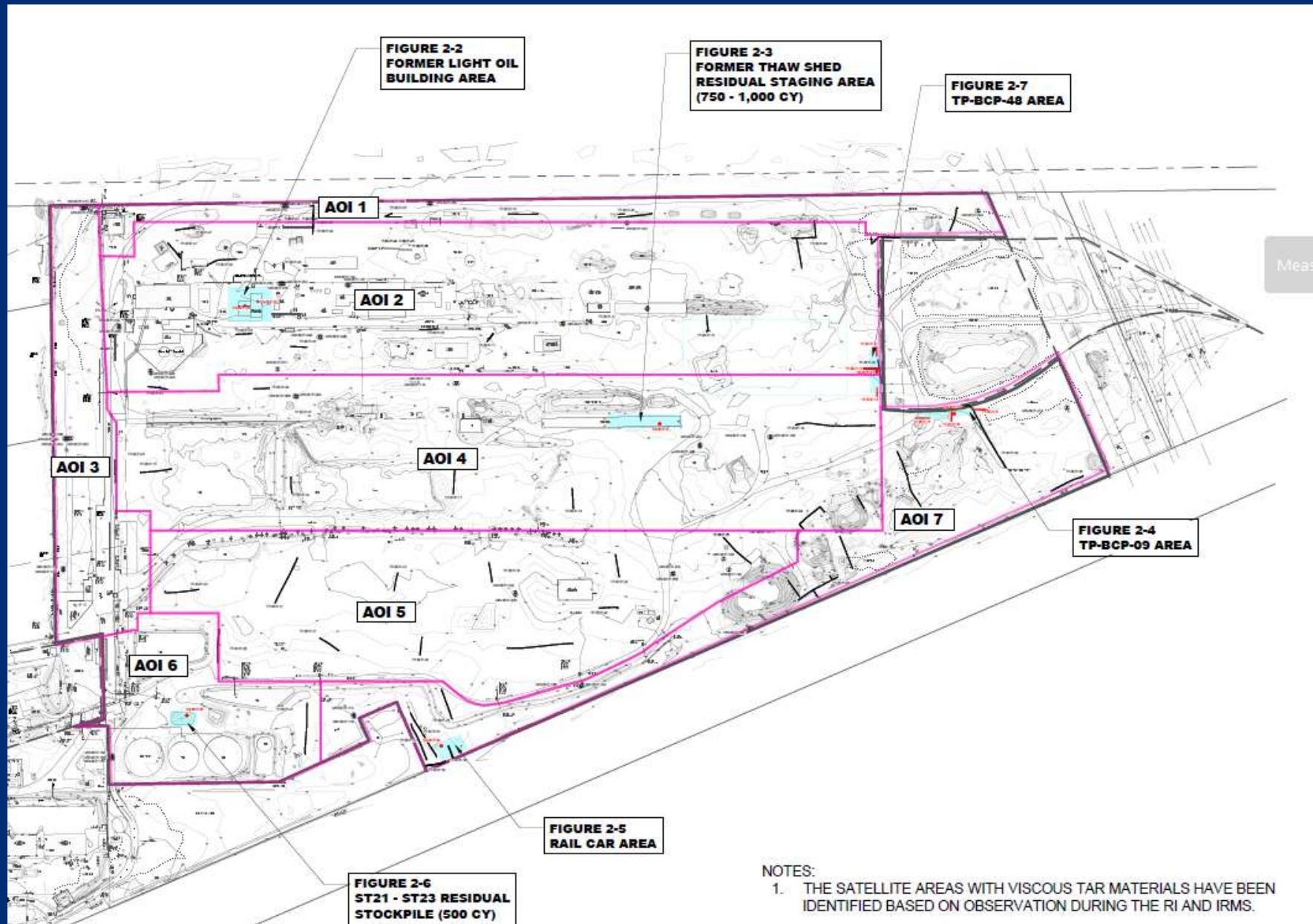
Limited Remedial Action Work Plans

- RITC submitted two work plans during the public comment period proposing further solidification actions and bioremediation of the ST21-ST23 Area.
- DEC did not review these work plans as they touched on aspects of the remedy that was out for comment.
- Since issuance of the DD, DEC has instructed RITC to resubmit these proposals as Remedial Action Work Plans (RAWPs).

Limited Remedial Action Work Plans

- Solidification:
 - Proposes to complete solidification of surficial materials that are grossly contaminated.
 - Does not include subsurface materials, those will be covered in the remedial design.
- ST21-ST23 Area:
 - Residual impacts remain below the former tanks.
 - Proposes bioremediation to address this discrete area.

Limited Remedial Action - Solidification



Limited Remedial Action – ST21-ST23



Limited Remedial Action Work Plans

- These actions are relatively small in scope and can be completed with a significant design phase.
- Will allow for work to continue while the larger reports and design documents are reviewed and finalized.

Outstanding IRMs

- Multiple interim remedial measures (IRMs) are substantially complete, but do not have final construction completion reports (CCRs).
- Many of these CCRs are needed to fully support the remedial design.
- DEC has told RITC that the remedial design will not be reviewed until the outstanding CCRs are submitted.

Outstanding IRMs

- Drum and Container Management Work Plan;
- AST Management IRM;
- Demolition Work Plan;
- CBS/PBS Tank Closure Work Plan;
- Secondary Containment Closure Work Plan;
- Coke Oven Gas Pipe and Coke Oven Gas Pipe Residuals Interim Remedial Measures Work Plan;
- Lime Still IRM;
- Process Equipment IRM; and
- Junction Building NAPL Removal IRM.



Superfund Site

Tonawanda Coke, #915055



Investigation Status

Site 108:

- Revised Remedial Investigation Report (RIR) was submitted to DEC on October 3, 2023.
- Feasibility Study (FS) submitted to DEC on June 29, 2024.
- DEC intends to review the RIR and FS at the same time.

Investigation Status

Site 109:

- Public comment period held from February 28 to April 30, 2024.
- Remedial Investigation Report and Focused Feasibility Study are approved.
- DEC issued the Amended Record of Decision (AROD) on June 4, 2024.
- Pre-design investigation proposed to confirm the depth to clay for better estimates of the amount of material that will need to be excavated.

Site 109



Investigation Status

Site 110:

- Remedial Investigation Report submitted to DEC on October 26, 2023. Made publicly available November 1, 2023.
- Focused Feasibility Study submitted June 30, 2023, but did not propose a remedy for the National Grid portion of the site. DEC provided comments on existing document on September 4, 2024.

Thank You

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