



Department of
Environmental
Conservation

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

- Amended Toxic Chemical Release Inventory Reporting Forms for ammonia and benzene (2007-2012 for ammonia and 2009-2012 for benzene)
- Revised emissions inventory statements for the period of 2007-2014



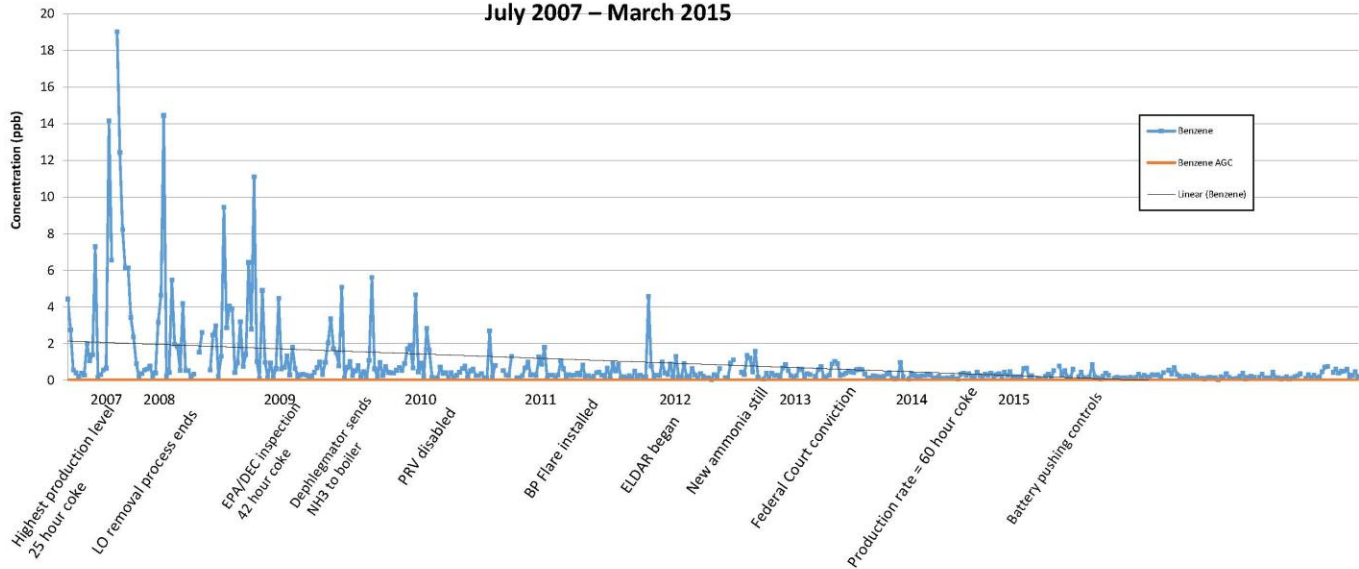
Additional Enforcement Actions (Non-Air Related)



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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