

Pollution Report 94 (and Final)
Metro Container Corporation NPL Site
2nd and Price Street
Trainer, Delaware County, PA 19061

LAT: 39°49'29.93" north
LONG: 75°23'56.57" west

ATTN: RRC
C. Sklaney
G. Heston
D. Armstrong, PADEP

DATE: February 3, 2017

The Metro Container Site is an NPL Site and comprised of two tax parcels located south of the intersection of West 2nd Street and Price Street in the Borough of Trainer, Delaware County, Pennsylvania. For more than 100 years, the property has been used exclusively for industrial and commercial purposes, including the distillation of lubricating oil and paraffin wax, carbon disulfide manufacturing, and steel and fiber drum reconditioning. The parcels are currently owned and occupied by an entity that did not conduct the original operations at the Site and occupied by an entity involved in industrial painting. The Site is surrounded by a chain-link fence and covers an estimated 10.4 acres.

This Pollution Report (POLREP) document is prepared to summarize the Removal Action conducted by a PRP Group at the Metro Container Corporation NPL Site between August 27, 2015 (when an Administrative Settlement and Order by Consent was signed) and December 15, 2016 (when a Final Report summarizing the Removal Action was approved by EPA).

The Site was the subject of several prior Removal Actions conducted by EPA and/or potentially responsible parties (PRPs) and removal site evaluation activity. These past Removal Actions and relating removal site evaluation activities are summarized in POLREP #86 and not again summarized herein.

The subject Removal Action is a continuation of the Removal Action conducted by EPA between September 2013 and September 2014 which could not be completed, in part, due to the presence of a dilapidated building on the premises (partially occupied by the present Site owner) which impeded the ability to complete the actions.

The Site includes multiple systems of underground pipes and other drainage systems which were largely removed by EPA in its removal activities of 2013 and 2014 (see POLREP #86). However, some of these pipes extended under the dilapidated buildings on the Site. The pipes and conveyance systems are of unknown purpose. Some of these pipes are known to have

discharged unknown substances directly into Stoney Creek for unknown reasons. Other parts conveyed liquids from the area of building, but did not daylight into Stoney Creek. The removal of these systems which convey hazardous substances are the subject of the current removal actions.

I. SUMMARY FACT SHEET

Site Name: Metro Container Corporation NPL Site

Size: approximately 10 acres

Location: Trainer Borough, Delaware County, PA

Administrative Settlement Agreement and Order by Consent: August 27, 2015

Project Period: 8/27/2015 through 12/9/2015 (approval of Final Report 12/15/2015)

Project Description: This Removal Action addressed PCBs-contaminated soils, an area of reported crushed and buried drums, and pipe systems or drainage features that conveyed hazardous substances into or towards Stoney Creek which were located under or immediately adjacent to the dilapidated building.

Hazardous Substances Present: PCBs, Carbon Disulfide, Toluene, Others

Quantities Removed: See Table in Section II below

OSC: Michael Towle, RPM: Christopher Sklaney

Primary Cleanup Contractors: GHD and demaximus, Inc

Disposal Location: Various, See Table in Section II below

II. DISPOSITION OF WASTES

Waste Stream	Quantity	Manifest #	Disposal Facility
Asbestos-Containing Materials, Non-Friable	99 tons	34976, 34979, 50205, 50206, 50207, 50208, 50210, 50211, 50212, 50213	Conestoga Landfill, 420 Quarry Road, Morgantown, PA
Soil, DOT/RCRA Non-Regulated	838 tons	50195, 50196, 50197, 50198, 50485, 50486, 50487, 50488, 50489, 50490, 50491, 50517, 50518, 50519, 50520, 50521, 50522, 50523, 50524, 50525, 50526, 50527, 50528, 50529, 50530, 50531, 50532, 50533, 50534, 50539, 50540, 50549, 50550, 50551, 50552, 50553, 50554, 50555, 50556	Conestoga Landfill, 420 Quarry Road, Morgantown, PA
Soil, PCB Remediation Waste	526 tons	015378968JJK, 015378969JJK, 015378970JJK, 015378971JJK, 015378971JJK, 015378972JJK, 015378974JJK, 015378975JJK, 015378975JJK, 015378976JJK, 015378977JJK, 015378978JJK, 015378980JJK, 015378981JJK, 015378982JJK, 015378983JJK, 015378984JJK, 015378985JJK, 015378986JJK, 015378987JJK, 015378988JJK, 015378989JJK	Wayne Disposal Inc. Site #2 Landfill, 49350 N. I-94 Service Drive, Belleville, MI

Water, DOT/RCRA Non-Regulated (Groundwater)	11,900 gallons	33587, 33588	Environmental Recovery Corporation, 1076 Old Manheim Pike, Lancaster, PA
Water, DOT/RCRA Non-Regulated (Decontamination IDW)	40 gallons	50608	Environmental Recovery Corporation, 1076 Old Manheim Pike, Lancaster, PA
Solid, DOT/RCRA Non-Regulated (PPE Waste)	500 pounds	50612	Environmental Recovery Corporation, 1076 Old Manheim Pike, Lancaster, PA
Scrap Metal	248 tons	34977, 34980	Camden Iron & Metals, 1400 S. Front Street, Camden, NJ
		34981, 34982, 34983, 34984, 34985, 34986, 34987, 34988, 34989, 34990, 34991, 34993, 34994, 34995, 34996, 55260	European Metal Recycling Ltd, 2942 E. Tioga Street, Philadelphia, PA

III. OUTCOME MEASURES

Site Name: Metro Container Corporation NPL Site

Site Address: Corner of Second and Price Street, Trainer, Delaware County, PA 19061

Site ID: 032H

Lat./Long.: 39°49'29.93" north / -75°23'56.57" west

Contaminant Names: PCBs, VOCs (e.g., carbon disulfide, toluene), PAHs (e.g., benzo(a)pyrene)

Est. Volume of Contaminant Removed: See Section II above

Contaminated Medium: Soil (included water and debris)

Number of People for Whom Exposure is Avoided: est. 100

Extramural Funding: (see Section IV; Project completed by Potentially Responsible Party)

IV. COST SUMMARY

On August 26, 2013, EPA Region III approved an Action Memorandum and selected a Time-Critical Removal Action pursuant to Section 104(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), determining it is appropriate and necessary to mitigate threats posed by the release and threatened release of hazardous substances from the Site. A Removal Action ceiling of \$4,051,100, of which \$3,923,600 is from the Regional Removal Allowance, was approved by Region III. On February 24, 2015 additional monies were approved to address the threats which could not be completed during the Removal Action largely due to the presence of a dilapidated building impeding removal of certain sources of hazardous substances. The ceiling was raised to \$4,667,500, of which \$4,400,000 is from the Regional Removal Allowance. EPA did not conduct the Removal Action. The costs incurred by the potentially responsible party in the conduct of the Removal Action summarized herein are not discussed herein.

V. ROSTER OF AGENCIES

EPA OSC – Michael Towle (Towle.Michael@epa.gov)

EPA RPM – Chris Sklaney

Oversight Contractor – Tetra Tech

VI. REMOVAL SITE EVALUATION (PRIOR TO REMOVAL ACTION)

This Removal Action was a continuation of the Removal Action initiated by EPA in September 2013 and not completed due largely to the presence of the dilapidated building. The scope of the Removal Action would largely entail removal of contaminated soils and sources of hazardous substances under or near the building that posed a threat to the environment and which were not removed as part of the EPA Removal Action initiated by EPA in 2013. The Site conditions at the end of the EPA Removal Action are summarized in POLREP #86. Actions necessary to address those threats were summarized in the Action Memorandum, dated 2/24/15 and the scope of the Administrative Settlement and Order by Consent (Order), dated 8/27/15, and the Response Action Plan (required by the Order) approved by EPA on 12/8/2015.

Additional evaluations of the structural nature of the dilapidated building, the materials comprising this building, and the extent of PCBs contamination in soils under the building were performed by the PRP Group prior to removal of the contaminated soils and source materials. These evaluations were conducted to support the demolition of the building and to further delineate the extent of PCBs-contaminated soil. The structural analysis of the dilapidated building was conducted in September 2015 and provided information to guide demolition. An evaluation of the materials comprising the building (and impacts upon disposal) was conducted in December 2015 to assist in disposal of building debris. Sampling activity under the building intended to further delineate PCBs contamination in soil was conducted in January 2016 and showed limited areas of elevated PCBs contamination in soils largely located near the trench system in Area B. The results of these evaluations were provided to EPA in the form of Technical Memoranda.

VII. NARRATIVE SUMMARY OF REMOVAL ACTION

The EPA and a PRP Group signed an Administrative Settlement and Order on Consent (Order) on August 27, 2015. Section 8.3 of the Order defined the work required in order to complete the Removal Action. A Response Action Plan was prepared and submitted to EPA on October 28, 2015. EPA approved the RAP on December 8, 2015. The Order basically required the PRP Group to address potential threats posed by certain pipe systems and sources remaining at the Site.

The pipe systems and waste materials which are described as “Source Areas” which continued to release hazardous substances into the environment and which were the focus of the response actions completed by the Removal Action are generally described as follows:

- **Source Area A** – This general area includes the area under the former “lid room” of the main building. Buried drums and wastes were alleged to be located under a floor in this portion of the main building. Analysis of material under the “lid room” floor includes elevated concentrations of numerous hazardous substances. The hazardous substances found under the lid room floor include: chlorinated solvents (e.g., PCE), chlorinated benzene compounds (e.g., dichlorobenzene), aromatic hydrocarbons (e.g., toluene), phenol, bis (2 ethyl hexyl) phthalate, 1’ 1 – biphenyl, and polycyclic aromatic hydrocarbons (PAHs)(e.g., benzo(a)pyrene). The concentrations of these substances found under the lid room floor are higher than concentrations found in other nearby places.
- **Source Area B** – This general area includes a trench system running through the floor of the dilapidated building in and under which elevated concentrations of hazardous substances have been identified. The hazardous substances found within and under the trench system include: PCBs (both aroclor mixtures and many individual congeners), chlorinated solvents (e.g., PCE), chlorinated benzene compounds (e.g., dichlorobenzene), aromatic hydrocarbons (e.g., toluene), bis (2 ethyl hexyl) phthalate, and polycyclic aromatic hydrocarbons (PAHs)(e.g., benzo(a)pyrene). A 15” steel pipe originally drained these trenches and these same hazardous substances were also found in the pipe. Currently, these trenches are exposed to rain events which drain directly to the environment as evidenced by the elevated concentration of these hazardous substances in the soil beneath the trenches. Pipe NN originates from an area immediately adjacent to these trenches and also contained these same hazardous substances. Ground water downgradient of this area contains elevated concentrations of PCBs indicating mobilization of PCBs by organic compounds such as toluene.
- **Source Area C** – This general area includes the area of the main building formerly functioning as a loading dock on which drums of various wastes were processed. “Subfloor” tanks were reportedly in this area as observed in 1988 by EPA. A “waste burner” was located in this area. The UST found by EPA in 2014 was immediately adjacent to the wall and partially beneath the floor of this area of the building. The soil and ground water adjacent to and under this area is highly contaminated with NAPL. Hazardous Substances found under the former loading dock area include: phenol and other phenolic compounds, bis (2 ethyl hexyl) phthalate, low levels of PCBs and 1,1’-biphenyl, and polycyclic aromatic hydrocarbons (PAHs)(e.g., benzo(a)pyrene). Pipe PP originates from under this area of the building and contains elevated concentrations of PCBs, phenolic compounds, and PAHs, but many other compounds such as chlorinated hydrocarbons (dichloroethene), aromatic hydrocarbons (toluene), bis (2 ethyl hexyl) phthalate, and methyl benzenes suggesting a source other than the soil under the building.
- **Source Area D** – This general area includes the area under the northern portions of the main building and its annexes and an immediately adjacent asphalt-covered area from which numerous pipes originate. The origination point and purpose for the pipes which conveyed numerous hazardous substances is unknown. The condition of these pipes (as observed in the removal of certain sections) is known to be poor and likely unable to

contain any hazardous substances therein. The hazardous substances found migrating through the pipes and originating from unknown points of origin for unknown purposes include: PCBs, bis (2-ethyl hexyl) phthalate, toluene, tetrachloroethene (PCE), benzo(a)pyrene, and dichlorobenzene. Specific pipes include MM, D, C-1, and C-2.

The PRP Group was required to submit weekly Progress Reports documenting actions required by the Order. These Progress Reports are in the Site file. This POLREP provides only a brief synopsis of activities.

In September 2015, the PRP Contractor conducted structural evaluations of the dilapidated building in order to best guide demolition activity and proper disposal. An evaluation of the building's construction materials was conducted in December 2015. Minor amounts of asbestos-containing materials were identified.

In January 2016, after coordinating the relocation of parts of the operations of the current Site were relocated, the PRP contractors excavated the area believed to be the point of origin of Pipes D, C-1, and C-2 (Area D). A small brick and concrete box was discovered with minor amounts of oily residuals. Some other pipes also entered this box, but did not show to be continuing to release hazardous substances or oil. The OSC determined that the EPA Removal Action had resulted in the complete removal of the threats posed by pipes D, C-1, and C-2. The area was backfilled.

In January 2016, additional sampling of soils under the dilapidated building indicated areas of PCBs contamination requiring excavation and removal. These PCBs-contaminated soils were largely associated with the trench system that ran through the building.

The PRP contractors worked with the current occupant of the Site and arranged for the construction of a pole building into which the current occupant moved operations. This allowed the removal of ongoing sandblasting and painting operations from the dilapidated building into the pole building. Construction of the building was approved in February and the occupant was completely moved in June and July 2016.

Mobilization to start demolition activities began in July 2016. The dilapidated building (which originally housed carbon disulphide manufacturing operations and then housed drum reconditioning operations) was demolished and the structural steel was removed for recycling. The uncontaminated bricks were piled on the Site. Demolition activities continued into September and included removal of portions of the concrete floor to allow for soil excavations in known areas of soil contamination (A, B, C).

Excavation of soil in Area A was begun in August. The excavation eventually extended downward to the level of an original concrete floor (about 6 feet below the present floor). The soils contained elevated concentrations of organics, but were not found to be contaminated by PCBs to require such regulated disposal.

Excavation of the trench system in Area B was begun in August and continued in September. The area was “stepped out” from the original position of the trench a number of times based upon the continued detection of PCBs in soils adjacent to the trench. The construction of the trench included a large amount of brick which was removed. It is most likely that PCB-contaminated fluids migrating in the trench leaked into adjacent soils in limited locations. Pipe NN which entered the building on its western edge, was located and found to have been completely removed previously by EPA. The remaining “pipe” was simply a penetration through the foundation wall of the building with no observed continuation. The OSC was onsite and determined after review of data that Area B was concluded.

Excavation of Area C was begun in September. This area included Pipe PP known to contain elevated levels of PCBs and which extended from an area west of the building to the edge of the building (known to then continue underneath). The pipe was re-located and then excavated from under the demolished building and removed along with surrounding soils. Data confirmed elevated PCBs contamination. The pipe extended to a point (believed to be a constructed drop-box) at which Pipe MM was also found to terminate. Pipe MM which extended from the bank of Stoney Creek to the building was found to have been previously plugged with cement (meaning that EPA’s activities completed the cleaning process of Pipe MM). A pipe entering this box was also found to be full of black material. This pipe was located extending in a southerly direction and removed. The pipe ended in what appeared to be easterly trending pipe that ended in what was believed to be a wooden box. The OSC was onsite and determined that Area C was appropriately completed.

All excavation was completed in September 2016. The OSC agreed that excavation activities had satisfactorily addressed the source areas. Restoration and backfill activities were begun in September.

Disposal activities were conducted in July, August and September 2016 as wastes were generated. See Table in Section II. Demobilization of the Site was completed October 17, 2016.

The PRP Group completed a Final Report which summarized the Removal Action and submitted the Report on December 9, 2016. The OSC reviewed the Report, coordinated with the EPA RPM for the Site, and approved the Report on December 15, 2016. The approval documents that the Removal Action fully performed the activities required by Section 8.3 of the Order.

VIII. FACTORS AFFECTING FUTURE SITE USE

This Site is on the National Priorities List and will be subject to future monitoring and activities by or under the direction of EPA. Future Remedial Actions are expected to address Site-wide threats.

Michael Towle, OSC
EPA Region III
Philadelphia, PA