

**United States Environmental Protection Agency
Region III
POLLUTION REPORT**

Date: Friday, November 1, 2013
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Site Preparation/Pipe System Removal
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	52	Site #:	032H
Reporting Period:	10/26/2013-11/01/2013	D.O. #:	
Start Date:	9/30/2013	Response Authority:	CERCLA
Mob Date:	9/30/2013	Response Type:	Time-Critical
Demob Date:		NPL Status:	NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	PAD044545895	Contract #	
RCRIS ID #:			

Site Description

The Site is 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 petroleum storage, paraffine manufacturing, carbon disulfide manufacturing, and steel and fiber drum reconditioning. The parcels are currently owned 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. Refer to POLREP 50 for more detailed background information.

A. The Metro Container Corporation Site was listed to the National Priorities List on March 15, 2012. See POLREP 50 for background information considered in the removal site evaluation leading to current removal actions.

B. The Site was the subject of a Removal Action initiated by EPA in June 1988 and completed by Potentially Responsible Parties pursuant to an EPA Order. The primary goals of the Removal Action were to address contaminated liquids pooled at the Site and migrating from the Site towards Stoney Creek alongside the Site and removal of thousands of drums containing residuals. The Removal Action was restarted in 1990 to address drums unearthed during investigations at the Site. The investigations were conducted in response to learning of drum burial activities during legal proceedings.

C. On August 26, 2013, EPA Region III approved an Action Memorandum for 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. The Removal Action generally entails the elimination of migration pathways (buried pipes), removal of soils impacted by greater than 50 parts per million PCBs and high concentrations of NAPL, and threats posed by the historic crushed drum area. Actions will be consistent with future anticipated remedial actions and will contribute to the efficient performance of any future remedial action.

D. The Site includes multiple systems of underground pipes and other drainage systems. The pipes are of unknown purpose. Two of these pipes are known to have discharged unknown substances directly into Stoney Creek for unknown reasons. The removal of these systems which convey hazardous substances are the subject of the initial removal actions.

Current Activities

A. Multiple pipes and conduits of various sizes and construction were excavated and removed in the southern region of the Site adjacent to a concrete basin which is believed to be the "separator" referenced

in Site documentation (Grids 38, 39, 34, 28, 22, 17 & 18). The pipes originated from the area of the facility building and progressed towards the separator, lagoon/impoundment or the former concrete basin used to hold liquid wastes. Several of the pipes contained thick black sludge-like material with elevated photoionization detector (PID) readings and petroleum-like odors.

B. A 15-inch iron pipe originating from the facility was found nearly full of waste material with a petroleum-like odor and also conveyed clear liquid with pH 12 into the separator. The separator was the subject of previous removal actions (sludge removed, lined and filled with clay); however, the pipe continued to convey liquid behind the liner. The OSC requested START to sample the pipe content.

C. The origination point for the 15-inch iron pipe is not yet determined as it lies beneath the sand tanks currently in use at the Site. It is believed that a system of drains in the building which conveys liquids outside of the buildings along its western edge may empty into the 15-inch pipe. The OSC investigated the floor drainage and found black material with a petroleum-odor in the drainage. The OSC requested START to sample the drainage system contents.

D. A concrete gutter filled with black material was found running east/west alongside the separator and into the area of the former lagoon/impoundment.

E. Multiple attempts in Grids 16, 21, 26, 31, & 36 were made to locate historic outfall pipes or other process related infrastructure. An additional test trench was dug east of the historic concrete basin where a process vessel, several pipes, and a concrete sump associated with historic operations were uncovered.

F. A 12-inch green plastic pipe is located alongside the Site. This pipe is documented to have served as an outfall from the Site. A 34 foot section of green 12-inch diameter PVC pipe was removed. However, the pipe was found broken and its origination point undetermined. A section that exists through the debris comprising the bank of the Site remains.

G. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage.

Planned Removal Actions

1. Mobilize/demobilize personnel and equipment.
2. Implement facilities and measures necessary to prevent access to the Source Areas by trespassers.
3. Implement erosion and sedimentation control features (e.g., silt fencing and vegetative cover) to minimize migration of hazardous substances from the Source Areas during implementation of the Removal Action.
4. Implement water management controls and actions, which may include (among other things) construction of berms and trenches and pumping and temporary collection and containment of potentially contaminated water, to minimize the migration of storm water into and from the Source Areas during performance of the Removal Action.
5. Treat waters accumulated as a result of #4, above, and discharge such waters to the local sewage treatment plant or, if such discharge is not feasible, dispose of waters off-Site in accordance with CERCLA 121(d)(3) and 40 C.F.R §300.440.
6. Prepare and maintain temporary storage for hazardous substances generated during the Removal Action.
7. Locate, excavate, and remove pipes, drains, and related features (including surrounding soils impacted by pipes, drains, and related features) in and around the Source Areas through which hazardous substances may migrate. If a particular feature through which hazardous substances may migrate cannot be removed (e.g., active storm drain), investigate the cause or reason for the migration of hazardous substances into such feature (e.g., crack or interconnection) and repair the feature or takes steps to prevent hazardous substances from entering such feature.
8. Locate, excavate, and remove buried drums, drum carcasses, their contents and surrounding soils impacted by drum contents (e.g., as by NAPL) in and around the Source Areas.
9. Except as provided herein, excavate, and remove soil contaminated with PCBs in and around the

Source Areas such that

- (i) total PCB concentrations in remaining soils to a depth of 11 feet contain less than 50 mg/kg at any location in the subsurface (i.e., below 1 foot);
- (ii) total PCB concentrations in remaining surface soils in the Source Areas (i.e., soils within the upper 1 foot of the surface) contain less than 25 mg/kg; and
- (iii) total PCB concentration in remaining soils in the Source Areas containing NAPL contain less than 25 mg/kg.

Excavation to remove PCBs shall not compromise the stability of any structure. Excavation below the depth of underground water shall be dependent upon the ability to control movement of water into the excavated area as determined by the OSC.

10. Segregate excavated soils and debris based upon PCBs concentration (i.e., greater than 25 or 50 mg/kg) and the presence of NAPL.

11. Manage excavated soils and debris such that migration of water into or from the soils and debris is minimized.

12. Backfill excavated areas. Soils and debris such as brick, block, or rubble which contains PCBs less than 25 mg/kg and no evidence of NAPL may be used to backfill excavated areas.

13. Grade and cover backfill and remaining soil in a manner which re-establishes flow patterns existing at the time the Removal Action was initiated and promotes sheetflow of storm waters towards Stoney Creek.

14. Dispose off-site the hazardous substances (e.g., contaminated water, drums, drainage features, and PCBs, or NAPL-contaminated soils) removed pursuant to #7, #8, and #9, above, and other wastes associated with the Removal Action, in accordance with CERCLA 121(d)(3) and 40 C.F.R 300.440. Activities may include sampling, bulking, consolidating, drumming, pumping, or otherwise handling the hazardous wastes, hazardous substances, liquids, and wastes to ensure that they are properly transported.

15. Conduct continued removal site evaluation and sampling and/or analytical activities necessary to support the Removal Action.

16. Remove security measures installed pursuant to #2, above.

Next Steps

A. Sludge material located within the 15 inch pipe and Building floor drains will be sampled, analyzed, removed, and disposed.

B. Clearing and grubbing of vegetation near source areas will commence in preparation of excavation activities.

C. Source area material in the western portion of the Site will be excavated and disposed, beginning with the historic lagoon area.

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