United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, November 8, 2013
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

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

POLREP No.:	53	**Site #:**	032H
Reporting Period:	11/02/2013-11/08/2013	**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, parrafine 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. ERRS removed and area of soil that was mounded in Grid 27 in order to prepare the area for the Removal Action. The removed soil likely resulted from grading or construction activities at the Site after

the 1990 removal actions. The soil was found to be soils mixed with waste materials covered by what appeared to be clean soils. The soil cover was analyzed and determined not to be contaminated by PCBs. This soil was used to build a berm, which was covered with an imperviable barrier (plastic sheeting) creating two storage areas for soils awaiting further characterization and soils awaiting disposal. Excess removed soil was staged aside for future onsite re-use. The underlying waste soils remain awaiting further actions.

B. On 11/7/13 EPA representatives met with representatives from a group of potentially responsible parties to discuss the Removal Action. The general nature of the meeting was discussion of the potential that PRPs would undertake the removal action. A response was requested by close of business 11/14/13.

C. The OSC directed additional sample collection to further characterize PCB concentrations in sludge material found in the Drum Building floor drainage trench, soil mounds on Grid 27 and from sludge material found inside of removed sections of the 15-inch diameter steel pipe that was once buried (in part) in Grid 35.

D. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. ERRS utilized a water truck to apply water to ground surface for dust suppression in the work zone.

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 an 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. The pipes and associated contents and the material from the floor drains will be added to soil piles and staged for disposal.

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

C. Excavation operations in the source areas will commence pending receipt of information from the PRPs relating to the potential for enforcement-lead removal actions.

Key Issues

EPA has offered the PRPs the opportunity to enter negotations for an Administrative Order on Consent outlining performance of the Removal Action. If, by November 14, 2013, the PRPs decline to perform the removal action or if a response is not received, EPA will continue to perform the action without PRP participation.