United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, November 15, 2013
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

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

POLREP No.:	54	**Site #:**	032H
Reporting Period:	11/09/2013-11/15/2013	**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 completed building a staging area for contaminated soils. The staging area is surrounded by a berm and covered with plastic sheeting to minimize the potential for migration of contamination from the

staging area. Soil piles will also be covered while awaiting disposal.

B. On November 7, 2013, EPA representatives met with representatives from a group of potentially responsible parties (PRPs) to discuss the possibility that PRPs would undertake the Removal Action. The group of PRPs subsequently declined to participate in the Removal Action.

C. ERRS assisted the OSC to locate the origins of and remove a 12-inch-diameter green PVC pipe that once functioning as an outfall from the Site. The operations were located in and near Grid 18. Previously, the pipe was traced from its outfall position to a break (a section of this pipe was removed previously in this Removal Action, see POLREP 52 for details). During excavations another basin was uncovered (see Action Item "D" below). The pipe discharged water and an unknown black liquid when exposed. The OSC directed that the hole be secured to allow this pipe to be traced. Information indicates that its origins are in the former facility, but possible interconnections will be evaluated.

D. While investigating the green PVC pipe (see Action Item "C" above), a concrete wall was discovered. The feature was evaluated and found to be a component to a basin of unknown size. The basin contains an unknown amount of black oily sludge. The feature will not be removed at this time since it is positioned in an area under use by the Site owner, but will be addressed during the Removal Action.

E. The OSC directed ERRS to evaluate an area of the Site where a possible drainage feature is observable on historic aerial photographs within Grid 17. A buried concrete sump was identified during an excavation at the presumed location. An approximately 8-inch-diameter steel pipe and approximately 6-inch-diameter terra cotta pipe were discovered leading directly to the sump area. These pipes were found filled with sludge, and conveying black sludge-like liquid and water into the excavation. These pipes will be traced in an effort to determine an origination point.

F. Samples were collected for PCB analysis in the following areas: in sludge material found in the main building floor drainage trench, sludge material found inside of removed sections of the 15-inch-diameter steel pipe that was once buried in Grid 35 area, sludge from inside a buried concrete basin in Grid 13, sludge-like soils surrounding a steel and terra cotta pipe found in Grid 18, Grid 27 surface soils on the now native grade, Grid 37 surface soils inside of the lagoon footprint, and a black unknown charcoal-like substance in Grid 35.

G. Sludge and sediment found in the trenches within the building was excavated and staged for future offsite disposal. This material was found in portions of the trench system within the building. The main portion of the trench extends from northeast to southwest through the main building, with several connected branches extending perpendicular to the main portion. The trench is approximately 12 inches wide and based on construction, i.e., the presence of a "lip", may have formerly been covered with a metal grate. The bottom and sides of the majority of the trench network are composed of concrete, although the bottom is absent locally. The main portion of the trench grades from a depth of a few inches in the eastern portion of the building to approximately 24 inches at the western end. At present, precipitation that falls through open portions of the main building roof drains through this trench network.

H. 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

Refer to POLREP 51 for a description of the planned actions.

Next Steps

A. Pipe inspections and tracing will be conducted in order to find origin points of buried underground piping.

B. Excavation operations in the source areas will commence.

Key Issues

On November 14, 2013, EPA was notified by a group of PRPs that the parties would not accept EPA's offer to participate in the Removal Action at this time.