United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, November 22, 2013
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

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

POLREP No.:	55	**Site #:**	032H
Reporting Period:	11/16/2013-11/22-2013	**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. The OSC directed ERRS to construct a shallow drainage trench across the Site in Grids 18, 19 and 20 to convey storm water originating from the asphalt paved area away from the work zone, and reduce

standing water after rain events. This trench follows the position of a currently clogged swale likely constructed to convey storm waters across the Site and into Stoney Creek, and also appears as the preferred path of overland flow in areas where actions are planned. Construction of this trench was necessary to reduce infiltration from precipitation and overland flow at the Site and mitigate saturation in the vadose zone. This preparation activity is expected to improve subsurface conditions in advance of planned excavations.

B. The pipes and sump exposed in Grid 17 conveyed a black liquid into the excavation, and had to be de-watered by pumping the accumulated liquid into an onsite storage tank for storage and future treatment or disposal. An additional tank was brought onsite to support future operations.

C. A utility- locating company was onsite to assist in determining the origins of the pipes found last week. The green PVC pipe was entered at its broken end in Grid 18 and video footage was recorded while moving in an easterly direction. Video footage was unable to advance more than 25 feet into the pipe, where the PVC pipe was apparently slipped over a smaller-diameter square concrete pipe. Subsequent efforts with a tracer wire traced the pipe 175 feet to the east were the pipe could no longer be located under an asphalt parking area. Inspections of the 8-inch-diameter steel pipe and 6-inch-diameter terra cotta pipe located in Grid 17 were attempted, but refusal was encountered due to large amounts of sludge in the pipes. The steel pipe was traced in an easterly direction into the area of Grid 18. Following the inspections, these pipes were cemented shut to reduce transport through the pipes until they can be addressed later in the Removal Action.

D. Soil samples were collected for PCB analysis in Grids 26, 27, 31, 32, 33, 34, 36, 37, 38 and 39 in order to assist in evaluating disposal options.

E. Excavations commenced after completion of preparation activities involving moving excess soils mounded around the south west corner of the concrete basin. Soils at a depth of 0 to 2 feet in Grids 21, 26, 27 (eastern side only), and 36 were removed and staged for future disposal as TSCA-regulated material (concentrations greater than 50 mg/kg). Soils in Grid 31 were not found to contain PCBs above 50 mg/kg and were removed and staged for possible use as backfill.

F. Investigated historic pipes and product-covered wire found at the southwest corner of the concrete basin (Grid 21), and piping discovered in Grid 40.

G. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, Lower explosive limit, and oxygen percentage. 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. Continue excavations of source areas and removal of buried historic drainage systems.

B. Solicit bidders for the offsite disposal of wastes removed from excavations.

Key Issues

None.