United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, December 6, 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.:	57	**Site #:**	032H
Reporting Period:	11/30/2013-12/06/2013	**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 requested that the various pipes and drainage features located at the Site and/or discovered during the Removal Action be documented; a consistent naming strategy was also initiated.

B. The investigation of the 18-inch-diameter terra cotta pipe was continued east into Grid 39 (see POLREP 56 for a description of the removal of this pipe to the west). An area underlying the eastern portion of Grid 38 and a few feet of the western portion of Grid 39 could not be disturbed at this time due to the presence of a vertical tank containing sand used for sand-blasting by the current owner. The terra cotta pipe was observed in the western portion of Grid 39, east of the sand tank. The pipe was degraded, i.e., cracked throughout, and filled with sludge.

C. A concrete junction box approximately 3 feet by 3 feet in area and at least 3 feet deep was identified in the north-center portion of Grid 39. An 8-inch steel pipe appeared to enter the junction box from the north and a 12-inch steel pipe appeared to enter from the east. The 18 inch terra cotta pipe appears to have accepted discharge from the junction box or directly from other pipes, e.g., the 12-inch steel pipe. Remnants of terra cotta pipe were found adhered to a circular opening on the west side of the junction box. The northern end of the 8-inch steel pipe correlated with an opening in the 15-inch steel pipe that extended from the western end of the main building in the vicinity of the culvert to the screen box (see Action Item “B” in POLREP 52 for a description of the identification and removal of the 15-inch steel pipe). The 12-inch steel pipe may have extended through the junction box and into the terra cotta pipe; it is uncertain if the 12-inch steel pipe was connected to the junction box. In addition, a 4-inch gray Schedule 80 PVC pipe aligned parallel to the 12-inch steel pipe passed adjacent to but not through the junction box. Both the 4-inch PVC and 12-inch steel pipes were traced to the east into Grid 40, ending approximately 15 feet west of the southwest corner of the main building. Oily liquids, including thick black NAPL, were present in the steel and PVC pipes. The 12-inch steel pipe contained the majority of the oily liquid. All pipes were removed.

D. Two outfall pipes into Stoney Creek were discovered at the southwestern most portion of the property. The 18-inch terra cotta pipe was present in a 2-foot-high concrete headwall located approximately 3 feet from the bank of Stoney Creek. Sediment likely deposited during storm events in Stoney Creek overlying black, oily sludge was present in the pipe. The outfall of a 10-inch (nominal) steel pipe was found approximately 5 feet to the south of the terra cotta pipe outfall. The steel pipe extended approximately 2 feet out over Stoney Creek. No sediment, liquids, or residue was readily visible inside the steel pipe. Neither pipe at the stream bank was removed at this time. The portion of the terra cotta pipe including and east of Grid 36 was removed (see Action Item "A" in POLREP 56). The source of the 10-inch steel pipe is unknown.

E. The group of gray PVC pipes and at least one steel pipe appearing to emanate from the main building immediately south of the bay opening on the western wall were removed. The majority of these pipes trended away from the main building, in a direction that would have intercepted the northern part of the former impoundment (lagoon), although the exact purpose and destination of the individual pipes was not determined. The steel pipe was 2 inches in diameter and extended toward the south, nearly perpendicular to the western wall of the main building. The pipes were all present at a depth of less than 2 feet. A minor amount of oily liquid was identified in the PVC pipes. The nature of the connection of the pipes to the main building is not known.

F. The southern half of Grid 37 was excavated to a depth of up to 11 feet below the ground surface. The upper 1 foot of material was primarily light-brown sand with some fine gravel. Brick, construction debris, and soil (predominantly clayey and silty fine to medium sand, the majority containing a weathered petroleum odor but generally no NAPL) was encountered approximately from 1 to 5 feet below the ground surface. Material below 5 feet was comprised of black coal or coal-like material with a clayey to silty fine to medium sand texture and strong hydrogen sulfide odor. Also included below 5 feet was a black charcoal or charcoal-like material that locally contained brown NAPL in fractures. The charcoal or charcoal-like material had a wood-like grain or texture and was light in weight. Additionally, a solid, semi-glossy, black material that locally contained vesicles was also observed below 5 feet. The material was found in sizes ranging from less than an inch to more than 36 inches long. The material was moderately hard and fairly light in weight, and could be broken in hand with heavy pressure. Traces of a glossy, black, viscous NAPL was present in vesicles and fractures of this material. Two or more distinct black or black-stained intervals may be present, or the intervals may be intermixed. The excavation was terminated upon encountering an olive-gray clay interval identified in boreholes advanced at the Site during past investigations. The olive-gray clay is believed to be naturally deposited material at the base of fill emplaced by historic operations. The excavation was backfilled with crushed stone to a depth of approximately 8 feet (the apparent depth of the water table). The remaining excavation will serve as a water storage area while dewatering nearby excavations. Ground water entering the excavation contained an oily sheen.

G. A wire-reinforced, 15-inch concrete pipe was identified and removed during the excavation in Grid 37 (see “E” above). The pipe was located 6 to 7 feet below the ground surface in the northern part of the

grid, oriented parallel to the southern fence line. The pipe contained a thick gray-brown NAPL that was released into the excavation when the pipe was breached. At the midpoint of the grid, the pipe turned approximately 45 degrees to the north and extended approximately 20 feet before terminating in the southwestern portion of Grid 32 near the boundary with Grid 31. The end of this pipe is near the southern end of the "pond" feature identified on a 1917 Sanborn Fire Insurance Map, although it is unknown at this time if this pipe is related to the feature.

H. A portion of a monitoring well constructed of 4-inch-diameter, Schedule 40 PVC was found at the southwestern corner of Grid 39 during the excavation described in Action Item "F". The well was damaged and not visible prior to the excavation at the surface. The well appeared at least partially filled with dirt and debris. The depth, screen opening interval, date of installation, and other facts of the well are unknown.

I. The OSC directed START to file the necessary documentation to open a laboratory case through the CLP for the analysis of up to 12 soil samples for VOCs, SVOCs, and PCBs. Four samples during this period were collected from soil and sludge identified in various pipes: one sample from the 12-inch steel pipe in Grid 39 (see "C" above), one sample from the 8-inch steel pipe identified in Grid 39 (see "C" above), one sample from the outfall of the terra cotta pipe (see "D" above), and one sample from the wire-reinforced concrete pipe in Grid 37 (see "G" above).

J. One liquid sample was collected from the brown NAPL identified in the 15-inch concrete pipe. An oil fingerprint analysis of the sample will be conducted once a laboratory is identified.

K. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. During activities in Grid 37 (see "F" above), hydrogen sulfide readings as high as 7 ppm were recorded adjacent to the excavation. 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. Continue actions to minimize the migration of surface waters into the operations area.
C. Review submitted bids and award subcontract for the offsite disposal of wastes removed from excavations.

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