United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, December 19, 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.:	58	**Site #:**	032H
Reporting Period:	12/07/2013 - 12/19/13	**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. A snowfall event occurred the early morning of December 9 deposited approximately 6 inches of snow over the site. ERRS personnel spent the morning of December 9 clearing areas where work was planned.

B. Storm water drainage at the Main Building was improved to prevent accumulation of precipitation in and direct storm water beyond work areas. Due to the dilapidated condition of the building roof, the majority of precipitation that falls on and into the building and migrates through culverts (see Action Item "G" in POLREP #54) before discharging onto the ground surface west of the main building. A shallow trench was excavated between the end of the culvert system on the west side of the building and a location to the west near Stoney Creek within Grid 27. Flexible drain hose was installed in the excavation.

C. Soils previously excavated from the south half of Grid 37 were stockpiled for off-site disposal.

D. A sample collected from a depth of 6.5 to 7 feet below the ground surface in a test borehole (SB-106) advanced as part of the November 2005 ConocoPhillips due diligence investigation contained PCBs at a concentration greater than 50 ppm. The spatial position of the test borehole was located utilizing GPS technology. Soils from 3 to 9 feet below the ground surface within a 40- by 40-foot square area surrounding the borehole location were excavated and staged for disposal. During the excavation of the northwest portion of the 40- by 40-foot square area, a degraded concrete structure approximately 6 feet square was encountered approximately 4 feet below the ground surface. As this structure was being removed, a significant amount of sludge and NAPL was released from the structure into the excavation. The soil, sludge, and NAPL was stabilized within the excavation with Portland cement and permitted to harden before being removed and staged for disposal. Soils and non-ferrous construction debris, e.g., brick and concrete, not stained with NAPL or containing PCBs above 25 ppm were used to back fill the excavation above the water table. Crushed stone was used to back fill the excavation below the water table.

E. The remaining section of the 18-inch terra cotta pipe described in Action Item "A" in POLREP #56 and Action Items "B" and "D" in POLREP #57 was removed. The section was approximately 40 feet in length and located between the western edge of Grid 36 and the bulkhead at the bank of Stoney Creek.

F. The 8-inch steel pipe described in Action Item "C" in POLREP #57 was removed. (In Action Item "C" in POLREP #56, this pipe was mistakenly reported to have been removed.) This pipe contained sludge and was significantly rusted out on bottom portions of the pipe. A concrete-topped stone structure was found in Grids 34 and 35 at the northern end of this pipe (see Action Item "G" below).

G. A reinforced concrete-topped structure with walls constructed of natural stone was discovered in the northern end of Grids 34 and 35. The structure contained two equally sized chambers: the west chamber located in Grid 34 and the east chamber located in Grid 35. The concrete cover is reinforced with steel and is colored emerald green throughout. The top of the cover was located approximately 3 feet below the surface. The chambers are connected by a 4-inch-diameter steel pipe near the surface. Two circular access ports approximately 18 inches in diameter are present in the cover. Liquid containing NAPL and sludge were present in the structure. A pH of 6 to 7 was recorded for the liquid. Approximately 12 inches of sludge was accumulated at the bottom of the west chamber and NAPL coated the rock walls. The bottom of east chamber appears to be concrete and contain sludge, also. LNAPL was observed oozing from the east chamber to the west chamber though the 4-inch connecter pipe. NAPL and liquid was pumped out of the west chamber, through a bag filter unit, and into a portable 10,000-gallon steel storage tank for future disposal. The west chamber was removed. Sludge, NAPL, and impacted soils were excavated down to a depth of 10 feet below the ground surface and staged for future characterization and disposal. The excavation was backfilled using stone below the water table, and soil and non-ferrous construction debris above the water table. The east chamber was left in place due to its location under a heavily trafficked pathway and the pipe that connected the two chambers was cemented shut. The concrete cover was put back in place. The east chamber will be removed during future actions when vehicle traffic can safely be re-routed.

H. Several samples were collected during this reporting period. One grab soil sample was collected from 6.5 to 7 feet below the ground surface where SB-106 was determined to be located (see Action Item "D" above) for PCB analysis. One grab aqueous and one grab solid sample were collected from the liquid and sludge found in the west chamber of the stone-walled structure discussed in Action Item "G" above for PCB analysis. A composite soil sample of the TSCA waste pile was collected for full TCLP and RCRA characterization to determine potential disposal options.

I. ERRS accepted loads of approximately 500 tons of clean fill and approximately 300 tons of 2A and 2B modified stone. Grids 36 and 37 were backfilled using clean fill. Modified stone was spread and graded on the surface of Grids 28, 29, 31, 32, 33, 34, 36, 37, 38, and 39 to create a temporary clean cover and stabilize the area for storage of pipes by the current site owner.

J. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon

monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. A negative exposure assessment was performed on members of the crew performing various tasks to ensure proper PPE levels are used.

K. ERRS, EPA and START prepped for a Site shutdown from December 21, 2013 through January 5, 2014. Some equipment and personnel were demobilized. A local ERRS worker routinely inspected the Site to insure no vandalism, theft, or damage due to natural events occurred. The OSC instructed the Site owner to re-locate stockpiled pipe located in a future work zone to the re-graded area described in Action Item "I" above.

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. Review submitted bids and award subcontract for the offsite disposal of wastes removed from excavations.

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