United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, January 16, 2014
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.:	59	**Site #:**	032H
Reporting Period:	12/20/2013 - 01/10/2014	**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. Mobilized personnel and some equipment back to the Site on January 6, 2014 after shutdown from December 21, 2013 through January 5, 2014.

B. Began excavation of a concrete feature located in parts of Grids 13, 14, 19 and 20. The northwest corner of this feature less than 5 feet by 5 feet was previously identified (see Action Item "D" in POLREP #54) but only partially excavated. The majority of the feature was excavated during this period. The feature is comprised of 6-inch-thick walls and a competent concrete slab. The feature measures approximately 60 feet east-west and 40 feet north-south, with the wall oriented east-west aligned parallel to West 2nd Street. The northern wall of the feature is located approximately 180 feet north-northwest of the northwest corner of the main building. The top of the walls are approximately 2 to 3 feet below the current cover grade. The feature is divided into two sections: a northern section comprising one-third of the area and a southern section comprising two-thirds of the area, with the two sections divided by a 6-inch-thick concrete wall. The bottoms of the northern and southern sections are approximately 4 and 6 feet, respectively. Black sludge of a thick pudding-like consistency was present at a thickness of up to 3 feet in the bottom of the northern section. Timber fragments, concrete and brick debris, pipe sections, metal pieces, and drum and container carcasses, all mixed with soil, were present in the northern section at a depth greater than 2 feet and extending downward into and mixing with the sludge. Lesser amounts of this debris and sludge were present in the southern section. After the debris was removed, the sludge in the feature was consolidated into the northern section. Approximately 9 tons of Portland cement was added to stabilize and solidify the sludge prior to excavation and staging for non-TSCA hazardous waste disposal (a sample previously collected from the sludge material during the initial discovery of the feature contained PCBs at a concentration of less than 1 ppm).

C. Numerous pipes were found associated with or in the vicinity of the concrete feature described in Action Item "B" of this POLREP. Descriptions of these pipes will be presented upon completion of the excavation.

D. A 6-inch square steel pipe, previously viewed via an in-pipe video survey was excavated in Grid 14. The square pipe was sleeved several inches inside of the 12-inch diameter green PVC pipe that is exposed in the bank of Stoney Creek. A 4-inch steel pipe was found to enter the square steel pipe through a rough-cut opening approximately 2 feet east (presumably upgradient) of the sleeve junction. The 4-inch steel pipe trends parallel to the west side of the main building. This triple junction was located approximately 180 feet north-northwest of the northwest corner of the main building addition where sandblasting and painting presently occurs. The 4-inch steel pipe transited over top of the foundation walls of the concrete feature described in Action Item "B" of this POLREP. Refer to Action Item "F" in POLREP #52, Action Item "C" in POLREP #54, or Action Item "C" in POLREP #55 for more information regarding the previous investigations of these pipes.

E. Five loads of 2A modified stone and two loads of 2B modified stone were delivered to the Site for use in stabilizing surface soil for vehicular traffic and as backfill in excavations below the water table.

F. Areas of the southwestern portion of the site used by the current owner for pipe storage, which were previously improved through the addition of modified stone (see Action Item "I" in POLREP #58), were locally soft and unstable for vehicle traffic. Additional crushed stone was added and compacted to additionally improve the area.

G. Preliminary (unvalidated) analytical results from soil/sludge samples collected on November 11 and November 13 and analyzed under CLP Case #43971 were received. These samples included results from sludge located inside of the main building floor drainage trench system, sludge from inside of the 15-inch steel pipe located in Grid 35, black charcoal-like material from Grid 35, and also sludge from inside of concrete feature located in Grid 13 and described in Action Item "B" above. See Action Item "F" in POLREP #54 for more information regarding the collection of these samples. The preliminary data indicates PCBs above 50 ppm along with VOCs were found in the sludge located in the main building floor drainage trench and sludge from the 15-inch steel pipe. The preliminary data indicates sludge found in the concrete feature contains PCBs at concentrations less than 1 ppm. Validated analytical data is expected during the next reporting period.

H. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage.

Note: The two-story, 100-foot by 360-foot structure located on the southern portion of the western parcel, including most attached structures, has been referenced as the "drum building," "oven building," or "main building" in historical documents. This structure was constructed by Stauffer Chemical c. 1920. The term "main building" will be used here and in the future.

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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