

**United States Environmental Protection Agency
Region III
POLLUTION REPORT**

Date: Saturday, February 22, 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.:	62	Site #:	032H
Reporting Period:	02/08/14-02/22/14	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, paraffine 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. Continued removal of the remaining pipe systems associated with Features D and E. Work was conducted west of Feature D in Grids 17 and 18 (see features and expanded limit of excavations on

Figure 1-P62). Several pipes located during past activities under this removal action, along with several previously unidentified pipes, were encountered (see Figure 2-P62 for sketch of pipes encountered in the expanded excavations). Abundant quantities of surface water and ground water readily filled the excavations in this work area, limiting the ability to fully identify and evaluate the excavations for additional pipes or features. The current phase of pipe system excavations was completed on February 18.

B. Pipes discovered during past excavations and encountered in the current excavations include the following:

- Pipes U, C1, and C2 were traced and removed from the northern portion of the western side of the west wall of Feature D westward in an excavation for approximately 100 feet toward Stoney Creek. The excavations were terminated where the pipes ended or were no longer present. All three pipes continued for the full length of the excavation. Dark brown to black, thick NAPL was present in all three pipes. Pipe U contained flange-style connections, and the western end of the pipe terminated at a male threaded plug. Pipes C1 and C2 were located 2 to 4 feet south of Pipe U, and were observed to terminate in no particular end joint or feature.
- Pipe P (see POLREP #61) was traced and removed from the southern portion of the western side of the west wall of Feature D westward in an excavation for approximately 100 feet toward Stoney Creek. The pipe at the easternmost portion of the excavation was cemented into a concrete and brick headwall. The pipe extended west for approximately two feet then bent 45 degrees to the northwest. At the location where the pipe crossed under the current storm sewer it bent back 45 degrees to the west and continued westward. The pipe terminated to the west at a buried concrete sump feature, hereafter referenced as "Feature H," located in the central portion of Grid 17 (see Action Item "E" in POLREP #54). Pipe P was comprised of cast iron bell and spigot pipe sections connected with lead and oakum joints. Oily product was present within the pipe.
- A 3-inch metal pipe was observed about 3 to 4 feet below the ground surface just west of the headwall that contained Pipe P. The 3-inch pipe trended northwest-southeast at this location, and based on position, depth, and composition, is believed to be Pipe V (see POLREP #61). The pipe was not readily visible in the northern wall of the excavation. However, an identical pipe was found in a separate east-west trending excavation dug about 10 feet to the north. The pipe in this excavation was found to be trending east-west rather than northwest-southeast. No similar pipe was found in the northernmost east-west excavation (the excavation dug to remove Pipes U, C1, and C2). It is likely that this east-west trending pipe is Pipe V. The westernmost end of Pipe V was found approximately 20 feet west of the west wall of Feature D. The end was an unplugged, threaded joint.
- Fragments of a terra cotta pipe were observed in the excavation dug during the removal of Pipe P. A 6-inch terra cotta pipe was observed during the initial inspection of Feature H (see POLREP #54). It is unknown whether the 6-inch terra cotta pipe, the pipe fragments, and Pipe T described in POLREP #61 are part of the same pipe system.
- A 6-inch metal pipe trending east-west was observed in the western 40 feet of the southern wall of the excavation dug during the removal of Pipe P. The pipe broke easily during removal and was disintegrated in places on the bottom of the pipe. The exposed portion of the pipe contained three 45-degree elbow joint pairs that served to incrementally advance the pipe northward (the elbow joints were connected to each other in sets of two, with the pairs spaced about 10 feet apart). The pipe appeared to connect to Feature H at its western end. The eastern end terminated in the southern limit of the expanded excavation. It is believed that this pipe section is the westernmost portion of Pipe S.

C. Pipes encountered for the first time include the following:

- Pipes W1 and W2 are north-south trending pipes identified in the western portion of the excavation that contained Pipes U, C1, and C2. Both pipes were metal pipes 4 inches in diameter. The pipes aligned parallel to one another, spaced about 2 feet apart, and were about 5 feet below the current ground surface. The pipes were located about 60 feet west of the western wall of Feature D. The pipes crossed over Pipes U, C1, and C2. Pipes W1 and W2 trended to the south and appeared to connect to Feature H described in the first bullet of this section. The pipes were not identified north of the excavation containing Pipes U, C1, and C2.
- Pipe BB1 is a 4-inch pipe trending southwest-northeast that was identified about 5 feet below the current ground surface in the excavation dug during the removal of Pipe P. The pipe is manufactured of possible asbestos-containing cement sections. The pipe was first identified in the excavation about 10 to 15 feet west of the western wall of Feature D. This pipe was not identified farther to the east. The pipe extended approximately 10 feet to the southern limit of the expanded excavation. The ERRS equipment operator pulled an additional 10 feet of the pipe from the southern wall of the excavation. The trend of the pipe was toward Feature B, although the fate of the pipe on its western extent is unknown.
- Pipe CC1 and CC2 are 3-inch and 4-inch steel pipes, respectively, trending north-south between the storm sewer and Feature D. The pipes were located about 2 feet apart approximately 5 feet below the current ground surface. The pipes crossed above Pipe P. An estimated 6 to 10 feet of each pipe was

present. The origin and fate of the pipes, or reason for the limit segments present in the subsurface, is unknown.

- Pipe DD1 is a 4-inch cast iron pipe trending east-west approximately from the central portion of the western wall of Feature D westward for approximately 50 feet. The pipe is located about 5 feet below the current ground surface. The eastern fate of the pipe is unknown, but may have been connected to the shallow end of Feature D. At the western end of the pipe is a flanged double joint that contains a 90-degree bend and a 22.5-degree bend. The bends are on the same side of the joint and are oriented in the same plane; however, the orientation of the pipe joint as it existed in the ground is unknown. The bends may have gone toward the south and Feature H, or toward the north and an unknown destination.

D. Inspected and removed Feature H during the pipe excavations. The sump was about 4 feet by 4 feet by 4 feet deep. The walls were constructed of 6-inch concrete. The top of the walls were about 3 feet below the current ground surface. A competent concrete floor was present. A single steel gear with teeth, an oblate spherical body, and mounting legs was identified, unattached, in the bottom of the feature. As outlined earlier, several pipes appeared to enter or exit the feature. The walls of the feature were broken into pieces and used to backfill a portion of the excavation.

E. The ERRS contractor conducted limited dewatering operations on a daily or more frequent basis in order to facilitate the subsequent removal of pipes/drainage systems. Water in excavations that contained NAPL was pumped to a 20,000-gallon holding tank. Water in excavations that did not contain NAPL was pumped to a temporary holding area adjacent to the excavation and allowed to infiltrate back to the subsurface. Melting snowpack combined with a consistent volume of clean water entering the excavations above the water table regardless of current and recent precipitation additionally contributed to difficult conditions for the subsurface investigations. The water typically entered the excavations from the northeast. During the excavation that included Pipe P, the influx of water greatly limited the ability to thoroughly identify potential pipes and features in the deeper portions of the excavations. It is possible that pipes remain in the expanded area of excavation.

F. Restored the excavation areas around Feature D and E. Excavations dug below the water table were backfilled with crushed stone. Excavated soil that contained neither PCBs greater than or equal to 25 ppm, NAPL, or appeared visually stained was used to fill the excavations above the water table. Imported clean silt loam soils were used to fill the excavations to a depth of about 1 foot below the former ground level, and crushed stone was used to raise the restored area to the former ground level.

G. A culvert was re-constructed to direct overland flow toward Stoney Creek. A shallow trench was dug to a depth of approximately 1 to 2 feet was dug near and parallel to the southern limit of the excavations, lined with polyethylene, and filled with riprap stone. A silt fence was placed on the western end of the culvert near the tree line adjacent to Stoney Creek.

H. Site work was not conducted on February 13 due to heavy snowfall (about 14 inches). In advance of the event, ERRS personnel covered soil piles stages for disposal, clean soil piles, and crushed stone piles. Conducted snow removal in work areas after February 13 precipitation event.

I. Site work was not conducted on Monday, February 17 due to the Presidents' Day federal holiday.

J. START personnel re-established grid locations on the far northern portion of the property in advance of the next phase of work (drum and drum remnant excavations).

K. On February 20, began off-site disposal of non-hazardous, non-TSCA-regulated wastes via truck to Republic Conestoga Landfill in Morgantown, Pennsylvania. A total of 413.54 tons were shipped in this reporting period (210.61 tons in 10 truckloads on 02/20/14 and 212.93 tons in 10 truckloads on 02/21/14).

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

Next Steps

A. Begin excavations of drums and drum remnants on the northwestern portion of the property.

B. Continue off-site disposal of non-TSCA-regulated wastes.

C. Review submitted bids and award subcontract for the off-site disposal of TSCA-regulated wastes removed from excavations.