

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

**Date:** Saturday, March 8, 2014  
**From:** Michael Towle, On-Scene Coordinator  
**To:** Dustin Armstrong, PADEP SERO

**Subject:** Buried Drum and Drum Remnant Removal  
Metro Container Corporation  
2nd & Price Street, Trainer, PA  
Latitude: 39.8249606  
Longitude: -75.3990472

<b>POLREP No.:</b>	64	<b>Site #:</b>	032H
<b>Reporting Period:</b>	03/02/2014-03/08/2014	<b>D.O. #:</b>	
<b>Start Date:</b>	9/30/2013	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/30/2013	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	PAD044545895	<b>Contract #</b>	
<b>RCRIS ID #:</b>			

**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. On Monday, March 3, a planned shutdown of Site activities was planned due to a forecast of heavy snow.

B. This week ERRS began excavating in the suspected drum burial area. The suspected drum burial area is identified from previously conducted EM-61 geophysical survey data, test pit data, direct-push soil boring data, historic aerial imagery, and other means. Grids 41, 2 and the eastern half of Grid 1 were excavated down to an olive-gray colored clay layer believed to represent the uppermost native (undisturbed) subsurface deposits at most areas of the Site. This clay occurred at approximately 8 feet below ground surface (bgs) in the excavations at this location of the Site. The drums or drum remains/contents encountered were removed along with soils impacted by discovered drums, drum remains, or contents. After removal, the remaining soils were used to backfill the excavation.

- Grid 41 was excavated down to 9 ft bgs, and contained several buried steel 55 gallon drum carcasses in deteriorated condition. The contents in many of the drums appeared to be dried paint-like material containing multiple thin, multi-colored, stratified layers. Also encountered were an abundant amount of old truck tires and rims, bricks, metal debris, drum bungs, bung gaskets, cement blocks, wood and other debris. The drums and surrounding soils were removed and stockpiled for future characterization, and the truck tires were also removed to facilitate the backfill process.
- Grid 2 was excavated down to 7 feet bgs, and contained several buried steel 55 gallon drum carcasses in deteriorated condition. During the excavation of Grid 2, an individual on the property immediately north of the Metro property indicated he believed a buried gas pipeline was in the immediate area of the excavation. A pipeline marker was visible on the adjacent property approximately 50 feet to the north, and was not marked out during previous Miss Utility or private underground utility locator surveys. As a health and safety contingency, ERRS immediately stopped excavating and contacted the utility owner, who promptly arrived on site and informed Site representatives of the correct pipeline orientation, which was outside of the excavation area to the north of the Site. After it was determined safe to resume, ERRS finished the excavation activity in Grid 2. The drums and surrounding soils were removed and stockpiled for future characterization.
- The eastern half of Grid 1 was excavated down to a depth of 7.5 ft bgs. Very little evidence of buried drums was found as the excavations proceeded westward in Grid 1. Due to the absence of evidence indicating container burial in the eastern part of Grid 1, the excavations were terminated and not continued to include the western part of the grid.

C. ERRS utilized a mechanical metal shear to cut up pipes that had thus far been excavated during the entirety of the Removal Action and stockpiled for future off-site disposal. The 15-inch diameter steel pipe previously removed from Grid 35 was segregated and will be disposed of as TSCA-regulated waste due to elevated PCBs concentrations found within (see POLREPs #52, #53, and #54 for more information regarding the 15-inch pipe).

D. On March 6, soil samples were collected from fly ash-like material buried from 1.5 feet to 4 feet below ground surface in Grid 6 and sampled for analysis of TCLP metals and PCBs. The stained soil layer underneath the fly ash was also sampled for analysis of PCBs.

E. A representative from the disposal contractor selected to remove the TSCA-regulated wastes was onsite collecting composite samples of the TSCA soil stockpile to evaluate disposal characteristics.

F. Following the excavation and removal of buried drums in Grids 2 and 41, ERRS constructed a plastic-lined containment area for the temporary storage of discovered drum carcasses and relating NAPL-impacted soils.

G. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. No exceedances were observed.

### **Next Steps**

- A. Continue excavations of drums and drum remnants source areas on the northwestern portion of the property.
- B. Begin offsite disposal of TSCA-regulated wastes removed from excavations.
- C. Complete characterization of non-TSCA-regulated wastes to prepare for offsite disposal.