

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, March 15, 2014
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

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

POLREP No.:	65	Site #:	032H
Reporting Period:	03/09/2014-03/15/2014	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, 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. During this period, ERRS continued excavating in the suspected drum burial area, working primarily in Grids 3, 3W, 4, and 7 and including partial sections of Grids 5 and 6. 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. Aerial photographs from the early 1960s through late 1980s suggest the northwestern portion of the property may have been incrementally backfilled from southeast to northwest with soil and debris that included but was not limited to drums, drum remains/contents, drum carcasses, or other containers (hereafter, collectively referenced as “drums”). Where excavations for suspected drums was determined to be necessary based on this information, the entire soil profile was inspected for the presence of drums down to an olive-gray silty clay layer believed to represent the uppermost native (undisturbed) subsurface deposits at most areas of the Site. (In some areas, this silty clay was light yellowish brown; in other areas, particularly in the vicinity of Stoney Creek, a black silty clay with abundant roots was present.) The silty clay occurred at approximately 7 to 10 feet bgs in the northwestern portion of the property. The drums were removed along with soils in the immediately vicinity that appeared to be impacted by releases from the drums, and were staged for characterization and disposal. After removal, the remaining soils were used to backfill the excavation.

B. Prior to the inspection and removal of drums in a grid as outlined in Action Item “A,” the removal of PCB-contaminated soils requiring TSCA-regulated disposal was conducted. During this period, two regions of soil containing PCBs above 50 ppm were targeted for removal based on sampling and analysis conducted to date:

- Removed approximately 4,500 cubic feet of soil from an area in the southwestern portion of Grid 3 and overlapping Grids 3W, 5, and 6. Soils in a 30-foot by 30-foot area centered at ConocoPhillips sample location 05-MET-129 and extending from 5 to 10 feet bgs were removed and staged for disposal. A total PCB concentration of 1,300 ppm was reported in a sample collected from 5 to 6 feet bgs in boring 05-MET-129. The material reported from 5 to 6 feet at the location of 05-MET-129 was found to extend to a depth of 10 feet in the current excavations.
- Removed approximately 7,200 cubic feet of soil from the southern half of Grid 4 and northern half of Grid 7. Soils in a 60-foot by 60-foot area centered at EPA sample location TP-04 and extending from the surface to a depth of 2 feet bgs were removed and staged for disposal. A total PCB concentration of 83 ppm was reported in a sample collected from 0-2 feet bgs in excavation TP-04.

C. ERRS crew cleared brush and chipped trees in Grid 3 and Grid 3W in preparation of the excavation around sample location 05-MET-129 (described in the first bullet of Action Item “B” above).

D. 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 excavation and removal of drums on the northwestern portion of the property.
- B. Begin off-site disposal of TSCA-regulated wastes from earlier excavations.
- C. Complete characterization of non-TSCA-regulated wastes to prepare for off-site disposal.

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