

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

Date: Saturday, March 22, 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

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|--------------------------|-----------------------|----------------------------|----------------|
| POLREP No.: | 66 | Site #: | 032H |
| Reporting Period: | 03/16/2014-03/22/2014 | 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. ERRS continued the removal of PCB-contaminated waste requiring TSCA-regulated disposal. During this period, two regions of soil containing PCBs above 50 ppm and any associated drums in these intervals

were targeted for removal based on sampling and analysis conducted to date:

- Removed an estimated 2,700 cubic feet of soil from an area in the central portion of Grid 5. Soils in a 30-foot by 30-foot area centered at ConocoPhillips sample location 05-MET-072 and extending from approximately 4 to 7 feet bgs were removed and staged for disposal. A total PCB concentration of 756 ppm was reported in a sample collected from 4 to 4.5 feet bgs in boring 05-MET-072. The material reported from 4 to 4.5 feet bgs at the location of 05-MET-072 was found to extend from 4 to 7 feet bgs in the current excavations.
- Removed an estimated 2,700 cubic feet of soil from an area that includes the southwestern portion of Grid 5, the southeastern portion of Grid 5W, the extreme northeastern portion of Grid 8, and the extreme northwestern portion of Grid 9. Soils in a 30-foot by 30-foot area centered at EPA direct-push sample location SB-05(west) and extending from a depth of approximately 5 to 8 feet bgs were removed and staged for disposal. A total PCB concentration of 250 ppm was reported in the sample collected from this location. In addition, a 55-gallon steel drum remnant containing a vibrant blue-green, viscous semi-solid material along with a fiber drum containing a cream-colored material resembling dried paint was discovered at a depth of approximately 5 to 6 feet.

B. Continued excavating in the suspected drum burial area using procedures described in Action Item "A" of POLREP #65. Drums and surrounding soils were removed and staged for future characterization and disposal. Significant quantities of rubber truck inner tubes were present in the majority of excavations. The tubes were present in homogeneous layers from 2 to 3 feet thick. The tubes were excavated and removed in order to facilitate removal of the drum and PCB remediation waste, and staged on a separate pile for future characterization and disposal. The work during this period was conducted primarily in Grids 5, 5W, 7, 43, 45, and minor portions of Grids 8 and 9:

- The southern half of Grid 7 was excavated to 7 feet bgs, and contained several buried steel 55-gallon drum carcasses in deteriorated condition. (The northern half was excavated during the previous reporting period - see POLREP #65). The contents in many of the drums appeared to be dried paint-like material containing multiple thin, multi-colored, stratified layers. Inner tubes were present throughout the majority of Grid 7 from about 3 to 6 feet bgs. Ground water was encountered below the debris at 6.5 feet bgs and had a heavy sheen.
- Grid 43 was excavated to 7 feet bgs, and contained several buried steel 55-gallon drum carcasses, and other drum parts such as bungs and gaskets in deteriorated condition.
- The southwestern edge of Grid 45 had the possibility of buried drums based on EM-61 geophysical data. Drums and drum remains were found only in the extreme southwestern-most portion of Grid 45 at a depth of approximately 6.5 feet bgs. The excavation was expanded to include the entire southwestern quarter of Grid 45. No evidence of buried drums was found in the eastern portion of Grid 45; therefore, the excavation of the remainder of Grid 45 was discontinued.
- Grid 5 was excavated to a depth of 8 feet bgs. Several buried steel 55-gallon drum carcasses and other drum parts such as bungs and gaskets were found. A greater amount of drums, drum carcasses, pieces of drums, rubber strips, tire inner tubes and impacted soils were found than were present in grids farther to the north. A portion of the far northeastern section of Grid 8 and the far northwestern section of Grid 9 were excavated during the removal of the 2,700-cubic-foot volume of material described in the first bullet of Action Item "A."

C. ERRS imported loads of 2A modified stone to be used as clean fill and cover material.

D. A sample was collected of the stained soil found intermixed with rubber strips and tire inner tubes for analysis of PCBs by EPA Method 8082.

E. 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.

Disposition of Wastes

Waste Stream -- Non-RCRA, non-DOT-regulated material (soil and debris); Quantity -- 3,000.91 tons (measured); Manifest No. -- Various (136 shipments); Disposal Facility -- Republic Conestoga Landfill, Morgantown Pennsylvania

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