

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

Date: Saturday, March 29, 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.:	67	Site #:	032H
Reporting Period:	03/23/2014-03/29/2014	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. 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 drums and nearby impacted soils, and staged on a separate pile for future characterization and disposal. The work during this period was conducted primarily in Grids 5 and 6, and minor portions of Grids 8 and 9:

- The remaining eastern area of Grid 5 was excavated to 12 feet bgs (the western area of Grid 5 was excavated last week). At a depth of 10 to 12 feet bgs, several buried steel 55-gallon drum carcasses in deteriorated condition were removed. The contents in many of the drums had a strong solvent-like odor. An abundant amount rubber strips and rubber truck tire inner tubes and other debris were observed between 7.5 to 10 feet bgs.
- Grid 6 was excavated to 7.5 or 8 feet bgs, and contained several buried steel 55-gallon drum carcasses and drum parts such as bungs and bung gaskets in deteriorated condition. The drums contained a thick red clay-like residue that had a strong solvent odor. Also encountered were large amounts of metal debris, wood, rubber strips and rubber tire inner tubes. The drums and surrounding soils were removed and stockpiled for future characterization, and the rubber truck tire inner tubes were also removed to facilitate the backfill process. Ground water was encountered around 6 feet bgs and was very turbid black in color with a heavy sheen. After backfilling, a layer of clean cover soil and 2A modified stone was laid over top of the grid.

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

C. Received laboratory results for PCB analysis performed on a sample collected on March 20 from Grid 5 area at a depth of 6 to 8 feet bgs consisting of a black stained soil matrix found intermixed with rubber strips/tire inner tubes. Total PCBs were present at a concentration of 0.16 mg/kg.

D. Air monitoring was conducted adjacent to operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. The monitoring was conducted to ensure worker safety. No health and safety limits were exceeded in the work areas.

Next Steps

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