

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

Date: Saturday, April 5, 2014
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Buried Drum Removal/Off-Site Disposal of PCB Remediation Waste
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	68	Site #:	032H
Reporting Period:	03/30/2014-04/05/2014	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. All work was conducted exclusively in Grid 8. Drums and soil in a portion of Grid 8

centered at ConocoPhillips direct-push sample location 05-MET-075 (collected from a depth of 3.75 to 4.25 feet bgs) was removed and staged as TSCA-regulated waste. Location 05-MET-075 was located slightly northeast of the center of the grid. The total PCB concentrations at this location were 744 ppm. The soils from which the sample was collected were comprised primarily of a black sandy silt with construction debris and other waste, which was found from approximately 3.5 to 8 feet bgs in Grid 8. Ground water was encountered at 7 feet bgs, and had a strong sulfur and weathered petroleum odor. NAPL was present locally in the water within the excavation. The remainder of Grid 8 was also excavated down to 8 feet bgs. Numerous buried steel 55-gallon drum carcasses in poor condition, large amounts of bricks and other construction debris, wood, rubber strips, dried paint-like material and rubber tire inner tubes were identified in the excavations. The drums and surrounding soils along with soils containing NAPL were removed and stockpiled for future characterization. The rubber truck tire inner tubes were also removed to facilitate the backfill process. After backfilling to a depth of approximately 1 foot below the former ground surface, a layer of clean cover soil was laid over top of the grid.

B. The remaining section (approximately 50 linear feet) of the 12-inch-diameter sea foam-green PVC pipe (Pipe D1) which outfalls to Stoney Creek was excavated and removed. The eastern portion of Pipe D1 was removed earlier during this Removal Action. Refer to POLREP #61 for additional details regarding Pipe D1.

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

D. ERRS began the off-site disposal of the first stockpile of TSCA-regulated PCB remediation waste. This waste was generated during the pipe removal phase of operations. On 4/2/14, 16 intermodal containers were loaded with the estimated weight of 401.73 tons total. On 4/3/14, 16 intermodal containers were loaded with an estimated weight of 361.11 tons total. On 4/4/14, 14 intermodal containers were loaded with an estimated 311.38 tons total. A total of 46 containers were loaded this week with an estimated weight of 1,074.22 tons of PCB remediation waste. Intermodal containers were transported by truck to a railroad facility in Hainesport, New Jersey to then be transferred onto railcars for transport to Indiana, where the intermodal containers will then be placed on truck trailers for transport to the final disposal landfill facility, Heritage Environmental Services, located in Roachdale, Indiana.

E. Representatives from Heritage were on site to collect disposal characterization samples from the second stockpile of PCB remediation waste. This waste has been generated during the current drum removal phase of the removal action. The results of the samples will be used to confirm the planned disposal options.

F. 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 drum and drum remnant source areas on the northwestern portion of the property.
- B. Continue off-site disposal of first stockpile 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	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil and debris)	3,000.91 tons (measured)	Various (136 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	1,074.22 tons (estimated, on-going)	Various (46 shipments to date)	Heritage Environmental Services Landfill, Roachdale, Indiana