

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

Date: Saturday, April 12, 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.:	69	Site #:	032H
Reporting Period:	04/06/2014-04/12/2014	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 9. Drums and soil in the southeastern

quadrant of Grid 9, centered at START direct-push sample location MC-SO09-0-2 (collected from a depth of the surface to 2 feet bgs), was excavated and staged as TSCA-regulated waste. The total PCB concentration in this sample was 73 ppm. The remainder of the grid was divided into quadrants and investigated for the presence of buried drums. At approximately 7 feet bgs, a 4-inch layer of stone overlying landscaping fabric was present in the eastern half of the grid. The stone and fabric may have been associated with installation of the existing storm sewer system. Soils in all grids were locally stained black and had an odor of weathered petroleum. The total depth of the excavations was 7 to 8 feet bgs. Findings in the four quadrants were as follows:

- No drums and only minimal debris were found in the northeastern quadrant.
- The northwestern quadrant contained numerous drums and the strongest weathered petroleum odor.
- No drums and minimal debris were encountered in the southwestern quadrant.
- No drums and minimal debris were encountered in the southeastern quadrant. A white fine crystalline solid was found approximately 2 to 3 feet bgs below the soils excavated as TSCA-regulated wastes. Approximately 3 cubic yards of the white material was removed.

B. ERRS imported approximately 20 loads of 2A modified stone to be used as clean fill and cover material.

C. ERRS continued the off-site disposal of TSCA regulated soils generated during the pipe system phase of operations. On 4/7/14, 16 intermodal containers were loaded with the estimated weight of 374.79 tons total. On 4/8/14, 16 intermodal containers were loaded with an estimated weight of 380.5 tons total. A total of 32 containers were loaded this week with an estimated weight of 755.29 tons of TSCA regulated soil. 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 located in Roachdale, Indiana.

D. ERRS cleared and grubbed a minor area in Grid 12 in preparation for evaluation for the presence of pipe systems. This area, located between the southern boundaries of Grid 12 north to the former location of Pipe D1 had not been previously investigated for pipes. While excavating a 25-foot-long north-south trench in the center of Grid 12, a 55-gallon drum full of an oil-like liquid was discovered. The drum was ruptured upon discovery, and the drum and underlying soils were excavated. The excavation was subsequently expanded to the west, where the following drums were found: one 55-gallon drum full of an oil-like substance, one 55-gallon drum full of bearing grease, one 40-gallon drum half full of an oil-like substance. Parts of approximately 12 crushed drums and containers containing a minor amount of oil-like substances were found both east and west of the initial trench. The following pipes were identified:

- Six to 12 1.5-inch iron pipes in the south-central part of Grid 12. The pipes were generally oriented parallel to Stoney Creek and buried 5 to 7 feet below the ground surface. Various malleable iron joints or fittings were observed. The source or destination of the pipes and possible connection to one another is unknown. Some of the pipes were degraded or filled with sludge.
- Two 2-inch iron pipes oriented north-south and buried 5 to 7 feet below the ground surface were found in the southeastern part of Grid 12. The pipes were spaced approximately 3 to 5 feet apart and were believed to be the northernmost representation of Pipes W1 and W2.

E. In order to address erosion found to occur in the drainage swale, ERRS increased the swale and placed additional filter fabric and riprap.

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 drums and drum remnants source areas on the northwestern portion of the property.
- B. Continue off-site disposal of staged and characterized TSCA-regulated PCB remediation waste.
- 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	1,829.29 tons	Various (78)	Heritage Environmental Services

remediation waste	(estimated, ongoing)	shipments to date)	Landfill, Roachdale, Indiana
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