United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, April 26, 2014
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

Subject: Pipe System/Buried Drum Removal (On-Going)
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	71	**Site #:**	032H
Reporting Period:	04/20/2014-04/26/2014	**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, parrafine 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. Work during this period was conducted in Grids 11, 44, 47, and 48, as follows:

• Grid 11: The eastern portion of Grid 11 contained a 2-foot-thick layer of ash overlying a layer of glass bottles and bottle fragments. The southern and western portions were unremarkable; few drum carcasses were encountered and no ash, pipes, or glass bottles were encountered. The northern portion of Grid 11 contained black-stained soil with significant quantities of lumber and concrete. A 4- or 6-inch terra cotta pipe was discovered 7 feet bgs. The pipe is believed to be a storm water drainage pipe related to a structural feature observed in Grid 47 during some historical aerial photographs. The section of pipe in Grid 11 was removed and later evaluated in Grid 47. An olive-gray clay believed to represent native deposits was observed at 7 feet bgs.
• Grid 44: The western and southern portions of Grid 44 were excavated. Groundwater was not encountered. Many drum pieces and lids were encountered. An olive-gray or orange-brown clay was observed at approximately 3 to 4 feet bgs.
• Grid 47: Only the western portion of Grid 47 was excavated. The terra cotta pipe first discovered in Grid 11 was found in the westernmost portion of the grid at a depth of approximately 5 feet bgs. The pipe contained a perched supply of water and trended west-southwest. In the west-central portion of the grid, the pipe was broken and fragmented. Black-stained soil was encountered from 2-5 feet bgs with scattered drum parts. An olive-gray clay was present below 5 feet bgs.
• Grid 48: An excavation was dug in the vicinity of a magnetic anomaly to determine if buried drum remains exist in the area. No drums or drums remnants were observed. The subsurface materials were comprised of approximately 1 foot of surface soils/cover overlying 1 foot of black-stained soil, overlying olive-gray or orange-brown clay. No further excavations occurred in Grid 48.

B. ERRS assisted the EPA OSC to locate and remove a pipe suspected along the western edge of the Site near the southern edge of Grid 21. A pipe had been reportedly observed near this location in the 1990s. A seep was also observed along the bank of Stoney Creek in this area. Excavating at the southern boundary of Grid 21, a 6-inch-square steel pipe was identified at a depth of approximately 10 feet bgs. The pipe contained an oily liquid and, based upon the trend of the exposed segment, would run towards the northwestern corner of the main building. A total of 24 linear feet of this pipe was removed from Grid 21 and staged for disposal. Additional segments could not be removed eastward due to the owners' materials temporarily staged above the proposed excavation trench. To the west, this pipe disappeared and a 6-inch-diameter cylindrical steel pipe was found in the side wall of the excavation, running presumably west toward Stoney Creek. The 6-inch cylindrical pipe was removed. An additional segment may exist westward but was not further investigated due to the proximity to Stoney Creek and an abundant quantity of concrete, brick, and other construction debris that appears to currently provide stability to the stream bank.

C. Excavations along the south wall at the southwestern corner of the facility were commenced to locate and removed suspected pipes at this location believed connected into the drainage system removed in December 2013 located along the southern fence line. A 6-inch-diameter terracotta pipe (2.5 feet bgs), 3-inch-diameter steel pipe (7 to 8 feet bgs) and 2-inch-diameter metal pipe (6 feet bgs) were found at this location. The pipes trended west-southwest. The terra cotta pipe appeared to trend exactly parallel to the southern edge of the main building, but the steel pipes trended nearly but not exactly parallel to the southern edge of the building. The 3-inch pipe was present beneath the footer at the southwestern corner of the building. The terra cotta pipe contained black and light-brown layered sludge. The 3" diameter steel pipe was compromised in several locations and contained water with a thick, medium-brown NAPL. The 2-inch pipe was abundantly deteriorated and found in sections. Portions of the pipe uncovered in the excavation were removed and staged for disposal. Ground water entered the excavation at approximately 5 to 7 feet bgs, and contained NAPL and produced a hydrocarbon sheen. The location of the pipes are presented on the attached sketch, Figure 1-P71.

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

E. 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. Excavate remaining PCB-impacted areas and remove remaining buried piping adjacent to the main building.
B. Continue off-site disposal of TSCA regulated wastes removed from excavations.
C. Receive and evaluate laboratory data for non-TSCA regulated wastes to prepare for offsite 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	2,902.98 tons (estimated, ongoing)	Various (123 shipments to date)	Heritage Environmental Services Landfill, Roachdale, Indiana

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