

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

Date: Saturday, May 3, 2014
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Pipe System Removal (West Side of Main Building)
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	72	Site #:	032H
Reporting Period:	04/27/2014-05/03/2014	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. On April 29, 2014, EPA obligated an additional \$600,000 to the ERRS project ceiling. This amount raises the total amount available to the ERRS contractor to \$2,397,602.

B. ERRS continued excavations along the south wall at the southwestern corner of the main building to locate and remove suspected pipes from this location believed to be present and connected into the drainage system removed in November and December 2013 located along the southern fence line. A steel grate was found buried beneath approximately 3 feet of fill material. The grate was north of the 6-inch terra cotta pipe found last week (refer to POLREP #71 for more information on the initial discovery of this drop box and partial removal of the 6-inch terra cotta pipe). The steel grate was covering a 3.5-foot by 3.5-foot by 4-foot deep concrete drop box. A 15-inch-diameter terra cotta pipe exited the west side of the drop box and continued west into Grid 40. The 15-inch terra cotta pipe contained a wye fitting about 28 feet to the west of the southwestern corner of the main building. The northern branch of the wye fitting immediately entered into a 3-foot by 4-foot brick box located just to the north. The 15 inch terra cotta pipe connected to the southern branch of the wye fitting continued west Grid 40 and into the eastern portion of Grid 39. This pipe is believed to be the same terra cotta pipe removed in December 2013 that entered Stoney Creek at an outfall structure (refer to POLREPs #56, #57, and #58 for more information regarding the discovery and removal of this pipe system). The section of pipe in the northern branch between the wye and drop box was fairly clean. The section of the pipe in the southern branch west of the wye contained black oily sludge. The 15-inch terra cotta pipe and surrounding soils were removed and staged for disposal.

C. The 3-foot by 4-foot brick box described in Action Item "B" contained three pipes in addition to the 15-inch terra cotta comprising the northern branch of the wye fitting. The box was located in the western portion of Grid 40. A 6-inch-diameter terra cotta pipe on the east side of the box trended to the east at an upward slope for 6 linear feet before terminating at a 90-degree upward bend; this pipe contained black oily sludge and was removed. A 4-inch-diameter terra cotta pipe on the north end of the box trended generally north before ending; this pipe was comprised of several 90-degree elbow bends and contained what appeared to be dirt. An 8-inch-diameter terra cotta pipe in the southwest corner of the box trended to the west, parallel and slightly north of the 15-inch terra cotta pipe discussed in Action Item "B". The 8-inch pipe was full of oily sludge and bricked shut at the box. The 8-inch terra cotta pipe and surrounding soils were removed and staged for disposal.

D. The 6-inch-diameter terra cotta pipe located at the southwestern corner of the main building was identified and removed to the west into Grid 40. A section of this pipe extending from the southwestern corner of the building east for about 30 feet was uncovered and removed during the previous reporting period (refer to Action Item "C" of POLREP #71 for more information). As with the 30-foot section of pipe removed previously, this section of the pipe contained black sludge and a layer of tan-colored viscid material. The pipe extended to the west into Grid 40 for approximately 30 feet before turning 45 degrees to the northwest in a single elbow bell fitting. The pipe trended 6 feet from the 45-degree elbow, crossing the 15-inch terra cotta pipe, and then turned 45 degrees to the north in two 22.5-degree bell fittings. The pipe continued north for approximately 15 to 20 feet, passing west of the brick box, before entering into a concrete gutter drain oriented in an east-west direction. A 6-foot section of the pipe entered the approximate center point of the gutter. A single railroad tie and gasket material was wedged into the gutter at the mouth of the pipe. A deteriorated feature that may have possibly been a catch basin was located at the east end of the gutter. A concrete pad containing formed concrete pillars was located at the west end of the gutter. The relationship between the concrete pad and gutter was not apparent.

E. The layered sludge material in the 6-inch terra cotta pipe described in Action Item "D" was sampled for VOC, SVOC and PCB analysis to determine disposal options.

F. Ground water entering the pipe excavations contained dark brown NAPL that was pumped into a 21,000-gallon steel water storage tank for future characterization.

G. A group of three white Schedule 40 PVC pipes, 0.5, 1, and 2 inches in diameter, was discovered 0.5 foot bgs in Grid 40. The pipes trended east-west and appeared to go into the main building at the east end of Grid 40. An 18-foot length of 2-inch-diameter steel pipe containing a 1-inch diameter gray Schedule 80 PVC pipe sleeved inside was found in this area and also removed.

H. Disposal of non-TSCA-regulated debris continued this week. A total of 12 loads of non-TSCA regulated debris with an estimated weight of 298.09 tons was disposed of at the Republic Conestoga Landfill located in Morgantown, Pennsylvania. Disposal occurred as follows:

- On 4/29/14, three truckloads with an estimated weight of 75.91 tons were hauled out for offsite disposal.
- On 4/30/14, three truckloads with an estimated weight of 76.85 tons were taken for offsite disposal.
- On 5/1/14, three truckloads with an estimated weight of 72.24 tons were taken for offsite disposal.
- On 5/2/14, three truckloads with an estimated weight of 73.06 tons were taken for offsite disposal.

I. 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 in Grids 39 and 40.
- B. Identify and excavate remaining buried pipe systems in the vicinity of the west end of the main building.
- C. Continue off-site disposal of TSCA- and non-TSCA-regulated waste.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil and debris)	3,298.00 tons (estimated)	Various (148 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	2,902.98 tons (estimated, ongoing)	Various (123 shipments)	Heritage Environmental Services Landfill, Roachdale, Indiana

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