United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, May 17, 2014
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

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

POLREP No.:	74	**Site #:**	032H
Reporting Period:	05/11/2014-05/17/2014	**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. ERRS continued excavating in Grid 30 adjacent to the main building. Numerous pipes west of the main building were discovered or further investigated:

• An 8-inch square, thin-walled steel pipe identified during a previous reporting period (see Action Item "B" in POLREP #71) was located again and removed from Grid 27. The pipe is furthermore designated Pipe MM. The pipe was found to trend to the east through Grids 28, 29 and 30 and removed. The pipe slopes downward to the west and Stoney Creek. The pipe was in deteriorated condition, corroded out in places and filled with black, oil-impacted water. The pipe contained a large amount of black, oily liquid, sludge and contained a strong hydrogen sulfur odor. The square pipe continued to trend east of Grid 30 under equipment used by the current owner, and from this point was left in place, to be addressed in the future. Approximately 200 linear feet of this pipe was removed. The pipe was about 10 feet bgs at the western end of its length in Grid 27 and approximately 4 feet bgs at the eastern side of Grid 30. For the majority of its length, the pipe was below the water table. A number of small-diameter plastic pipes (all 4 inches or less) were encountered while removing the square pipe. The OSC believes these pipes originally conveyed wastes into the concrete impoundment and most of the lengths of these pipes from the buildings towards the concrete impoundment were previously removed. Several drum carcasses and drum parts such as lids, bungs and gaskets were encountered.
• A layer of square terra cotta pipe/tile was found beneath Pipe MM in Grids 29 and 30. The amount of water in the excavation prevented additional investigation. The OSC believes these tiles simply allowed dewatering of the area as they were not connected in conduit fashion.
• Pipes OO and SS were located again at the north side of the excavation opened during the last reporting period (see POLREP #73) and investigated further. The pipes continued toward the northwest in a concrete trench and under a rail spur and switch. On the west side of the rail, the pipes and trench angled upward 45 degrees and then bent 45 degrees to the west. The pipes continued in the trench for an additional 15 to 20 feet. The trench ended at this location, although the pipes turned 90 degrees and continued at least 30 feet to the north. The pipes became increasingly deteriorated and were no longer visible at the north end of the excavation. Based upon historic aerial photography, it is believed these pipes may have surfaced at the location of what may have been a loading rack alongside the spur track that curved around the west and north sides of the main building. A wooden plank floor or walkway was present south and adjacent to the concrete trench at the location of the 90-degree bend. The planking was present about 4 feet bgs. A thick layer of black, solid, tarry material was located directly below the planking. Samples were collected from the tarry material, and from oily liquids that discharged from the pipes and trench.
• An 8-inch steel pipe was removed. The pipe was empty and located about 4 feet bgs. This pipe began in Grid 40 at a valve, trended north through Grid 35 and under the 90-degree bend of Pipes OO and SS, before bending 45 degrees to the northeast in Grid 30. The pipe was not further investigated after the OSC concluded that it was likely from a historic water distribution system.
• Buried concrete pipe and terra cotta piping in Grids 38 and 39 areas were located again. See Action Items "G" and "C," respectively, in POLREP #57 for more information on these pipes. The pipes paralleled the southern fence line of the Metro property west of the main building. The pipes exposed in this excavation will be investigated further during future reporting periods.

B. The removal of the two-chambered, concrete-covered, flagstone-walled basin (Feature O) in the western quadrant of Grid 35 was completed. The western chamber was removed in December 2013 (see Action Item "G" in POLREP #58). Liquid in the eastern chamber was pumped into a storage tank for future characterization and disposal. The containment contained thick black sludge, with a heavy oil layer and strong sulfur-like and septic odor. The sludge was stabilized using Portland cement and removed. The containment area had an 18-inch-diameter manway hole in the lid, along with a 4-inch-diameter opening on the lid. The eastern wall of the containment had a 4-inch-diameter steel pipe, the western wall contained a 4-inch-diameter pipe leading directly to the former western chamber.

C. Two samples were collected during this period. The first sample was of oily brown water that entered the excavation in Grid 35 during pipe removal activities relating to Pipe SS and Pipe OO. In this excavation, the OSC also found a layer of structural lumber (planks) which appeared to cover a layer of black and heavily oiled soil. A sample of soil located under the planks and encountered in Grid 34 at a depth of 5 to 6 feet bgs was collected. The samples were sent to Test America for VOC, SVOC, and PCB TCL analyses. The soil sample was subjected to a headspace field screening, which registered VOC readings above the PID instrument maximum limit of 3,000 ppm.

D. PCBs were present at a concentration above 50 ppm (149 ppm) in a sample collected from 1.5 to 2 feet bgs in ConocoPhillips direct-push borehole location 05-MET-104, located in Grid 30 adjacent to the main building. A 30-foot-square area of soil from a depth of 0 to 2 feet bgs centered about location 05-MET-104 were removed and staged for future disposal. After removal of the upper 2 feet, the excavation was continued to investigate the presence of additional pipes. Ground water with thick brown NAPL was encountered at 3.5 feet bgs. The ground water entering the excavation was pumped into a steel storage tank (Tank #3) to permit the excavation work to continue.

E. Disposal of non-TSCA regulated soils resumed this week: a total of 59 loads of non- TSCA regulated

soils, generated during the drum removal effort, with an estimated weight of 22.5 tons each, for a total of 1,327.5 tons was disposed of at the Conestoga Landfill located in Morgantown, Pennsylvania this week.
• On 5/13/14, 23 truckloads with an estimated weight of 517.5 tons were transported off-site for disposal.
• On /14/14, 22 truckloads with an estimated weight of 495 tons were transported off-site for disposal.
• On 5/15/14, 14 truckloads with an estimated weight of 315 tons were transported off-site for disposal.

F. ERRS removed sand and debris from inside western side of the main building and from within the floor drainage trenches. The work was conducted using mini-excavators and by hand.

G. ERRS continued to import loads of clean fill and modified stone onto the Site.

H. 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.

Next Steps

A. Excavate remaining buried piping adjacent to the main building and drainage pathways.
B. Continue off-site disposal of TSCA regulated wastes removed from excavations.
C. Continue off-site disposal of non-TSCA regulated waste.
D. Decontaminate and demobilize steel storage tanks no longer needed (Tanks 1 and 2).

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil and debris)	4,997.14 tons (estimated)	Various (223 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	2,902.98 tons (estimated)	Various (123 shipments)	Heritage Environmental Services Landfill, Roachdale, Indiana
Non-hazardous liquid waste (purged ground water)	17,070 gallons (estimated)	Various (3 shipments)	Environmental Recovery Corporation, Lancaster, Pennsylvania

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