United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, May 24, 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.:	75	**Site #:**	032H
Reporting Period:	05/18/2014-05/24/2014	**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. The START TDD for assessment activities was increased by $34,799 in order to support a removal site evaluation in the vicinity of and beneath the main building.

B. This week began the disposal of ground water pumped from excavations and collected in a 21,000-gallon steel storage tank (for characterization purposes, designated Tank #2). The water was disposed of at Environmental Recovery Corporation in Lancaster, Pennsylvania. Three tanker truck loads were used to empty the tank leaving a thin layer of sludge to be removed during decontamination operations. One tanker truck disposed of 6,100 gallons of non-TSCA wastewater, one tanker disposed of 5,760 gallons of waste water, and the final truck dispose of 3,682 gallons for a total of 15,542 gallons. These waters predominantly resulted from operations related to removal of drainage systems located at or below the water table. The water was removed to facilitate inspection and removal of pipe systems.

C. Remaining sections of a 15-inch wire-reinforced concrete pipe (see Action Item "G" of POLREP #57 for more information regarding the initial discovery of this pipe) were removed. The sections were located in portions of Grids 37 and 38. The concrete pipe was 18 inches in diameter and reinforced with wire. This pipe was previously encountered in Grid 37 and removed to its westerly limit. The pipe ran at a depth of approximately 5.5 feet bgs, and paralleled the southern border fence. Continuing the inspection to the east (pipe was sloped downward toward the west), the pipe entered into a 4-foot by 4-foot buried brick lined box feature, then turned approximately 45 degrees, exited the brick box and trended northeasterly towards the building. The pipe ended to the east in an area of good quality clay. The pipe and its contents were removed. The content was an oily black sludge. All known sections were removed except an approximately 10-foot section under an immovable sand blast media storage vessel. The western extents of this pipe was removed during previous activities. Several sections of terra cotta pipe were found adjacent to the brick box on its southern side. These sections were found crushed and discontinuous.

D. Four attached outbuilding structures are currently located on the north side of the main building. From west to east, these structures are designated the covered open-air sand-blasting room, the painting room, the large annex, and the small annex. The sand-blasting room and painting room are both open-air and covered by the same corrugated roof. The large annex is used for materials storage and some painting. On the south side of the large annex is a former electrical room offset from the main building. The small annex is used for materials storage. Both annexes and the electrical room have light gray to white roofs in current aerial photographs. The OSC directed ERRS to inspect the area between the large and small annexes. Inspections conducted in the past 25 years indicate that drainage systems believed to exist in the vicinity of these outbuildings. The following features and pipes were found in this area (and are presented on Figure 1-P75):

• Feature P is a concrete pad with several cutouts and a trough. The pad is about 50 feet by 15 feet and located along the west side of the small annex. The trough originates at the east side of a bay opening to the main building between the annexes and trends north to a point even with the north side of the small annex. The trough is about 12 to 18 inches wide and grades from about 4 inches deep at the south end to about 18 inches deep at the north end. A 1-foot-wide and deep row of bricks comprised the west end of the pad. Two rough-edged cutouts, each about 4 feet square in area, were located in the center and southern portions of the pad. The purpose or function of the cutouts is unknown. Features or pipes that may underlie the pad are unknown at this time.

• Feature Q is a UST located in the southeastern corner of the area between the large and small annexes. The top of the tank is comprised of concrete; the underground portion of the tank may be constructed of concrete, or may be constructed of steel encased in concrete. The top of the tank is at the ground surface. The tank is about 15 feet (north-south) by 12 feet by 6 feet deep. A weir or dividing wall aligned north-south was detected in the tank when investigated with a curved probing device. Three equally spaced ports aligned north-south are on the eastern top of the tank, although it appears the ports access a single, shared enclosure. Clear liquid with no odor or sheen was detected in the tank.

• Feature R is a wooden-sided box constructed of 2×6 timbers, with overall dimensions of 4 feet by 6 feet by 2.5 feet tall and no bottom. The feature was discovered buried at the northern end of the drainage trough, with the top at a depth of about 1.5 feet bgs. A 2-foot by 4-foot catch basin connected to the existing storm water sewer is located north of the box. (Installation of the catch basin and storm sewer by the current site owner appears to have been obliterated some of the pipes in this area.) Numerous pipes originated from the area of the box, including Pipe WW, Pipe XX, a 10-inch-diameter terra cotta pipe, and a section of 6-inch-diameter steel pipe (see following bullets for descriptions of these pipes).

• Pipe WW is a 4-inch white Schedule 40 PVC pipe located about 1 foot bgs. The pipe extends from the area of Feature R and the northern end of the trough northwest to a location about 4 feet east of the northeastern corner of the large annex. The pipe was heavily broken and found in pieces in the excavations. A 2-foot-square concrete pad about 1.5 bgs was located near the northern portion of the exposed pipe. The function of the pad is unknown.

• Pipe XX is a 6-inch transite pipe trending northwest-southeast, from the northwest corner of the small annex to the northeast corner of the large annex. The pipe is 1.5 feet bgs and contains two formed concrete pipe support structures located about 10 and 20 feet from the north end of the exposed pipe.

• Pipe YY is a 4-inch steel pipe laid in the concrete of the main building floor. The top of the pipe is

located about 3 inches under the top surface of the floor. The north end of the pipe is broken at the top and enters the southern end of the trough. The pipe is filled with sludge or soil. Pipe YY trends about 15 degrees to the east of a line drawn parallel to the trough. The southern end of the pipe is unknown.
• Pipe ZZ is a 10-inch terra cotta pipe found trending in an east-west direction, approximately perpendicular to the trough, was found broken and discharging an orange-brown LNAPL into the excavation. A soft, gray sludge was present within the pipe. The pipe was located about 3 or 4 feet bgs.
• Three other pipes not designated at this time were also found: A section of 6-inch-diameter steel pipe near the northwest corner of the small annex was found trending nearly parallel to and aligned with Pipe XX. It is unclear whether the steel pipe and Pipe XX are part of the same discharge system and the area will be investigated further in the future. The 6-inch steel pipe was located about 6 feet bgs. A 2-inch steel pipe located about 2 feet bgs was located adjacent to and just east of the concrete pad associated with Pipe WW. A section of this pipe about 10 feet in length was found. The pipe ended a few feet south of the pad, and extends north an unknown distance. No liquids or sludges were present in the pipe. A 10-foot segment of a 6- or 8-inch steel pipe located 1.5 bgs was found west of the storm sewer catch basin. The areas to the east and west of this pipe will be investigated in the future.

E. A sample of liquid from the concrete underground storage tank (Feature Q) was collected through a 1-inch opening in one of the ports and submitted to Test America Laboratories for TCL VOC, TCL SVOC and PCB analyses.

F. ERRS continued to import loads of clean fill and modified stone onto the Site. ERRS backfilled the trench from which Pipe MM was removed with modified stone and clean fill. The clean fill and modified stone was also used to place a layer of clean cover overtop of Grids 27, 28, 29, 35, 39, and 40.

G. Analytical results were received for a sample of sludge collected from Pipe NN on 05/06/2014. Numerous VOCs were present in the sample, including but not limited to 1,2-dichlorobenzene (30 mg/kg), chlorobenzene (7.1 mg/kg), cis-1,2-dichloroethene (7.4 mg/kg), tetrachloroethene (33 mg/kg), trichloroethene (2.5 mg/kg), styrene (9.2 mg/kg), benzene (1.9 mg/kg), ethylbenzene (71 mg/kg), toluene (290 mg/kg), and total xylenes (210 mg/kg). Two PCB mixtures (Aroclor-1248 at 64 mg/kg and Aroclor-1260 at 25 mg/kg) were also present in the sample. Refer to Action Items "A" and "C" in POLREP #73 for more information about the discovery and sampling of Pipe NN.

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. Investigate remaining 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 two 21,000-gallon storage tanks (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
Liquid waste (purged ground water, PCBs 4.1 ppb)	15,542 gallons (estimated)	Various (3 shipments)	Environmental Recovery Corporation, Lancaster, Pennsylvania