United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, May 31, 2014
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

Subject: Pipe System Inspection and Removal
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	76	**Site #:**	032H
Reporting Period:	05/25/2014-05/31/2014	**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 the distillation of lubricating oil and paraffin wax, 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 on Consent. 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. Site work was not conducted on Monday, May 26, 2014 in observance of Memorial Day.

B. ERRS removed remaining sludge and cleaned the interior of the 21,000-gallon steel storage tank designated "Tank #2" and on May 29, 2014 the tank was demobilized from the Site. Sludge removal was conducted by hand and tank cleaning was conducted using a hot-water pressure washer. Cleaning of Tank #1 was also started. Recovered sludge was transferred to the on-site staging areas for future disposal; Tank #1 contained low concentrations of PCBs, and therefore, sludge from this tank was staged as TSCA-regulated PCB remediation waste. Water generated during tank cleaning was collected and transferred to Tank #3 for future disposal. All tank entries were conducted under confined space entry permits.

C. The ends of pipes in the vicinity of Grids 19 and 20 area that were cemented shut in January 2014 (see POLREP #61) were re-located using GPS technology. The pipe ends were exposed again in order to perform water-jetting and possibly identify the extent of the pipes.

D. The concrete slab (Feature P) between the large and small annex outbuildings was investigated. The 4-foot by 4-foot cutout opening in the approximate center of the slab contained about 6 to 12 inches of silty organic soils and phragmites. Below this interval was brick and soil coated with a vibrant sheen. Ground water containing a sheen and NAPL was present at about 1 to 1.5 feet bgs. Most of the slab was scraped of soil and debris in order to observe the surface. A 3-inch-diameter steel pipe was discovered trending northeast to southwest at approximately 2 feet bgs, adjacent and parallel to the north side of the concrete underground storage tank (Feature Q). The pipe was left in place for future exploration. Refer to Figure 1-P75 in POLREP #75 for the locations of these features.

E. Cover soil over top of the concrete basin was scraped off and used as backfill in portions of Grids 21 and 28.

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

G. Air monitoring was conducted adjacent to operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. Air monitoring was also conducted of the confined space entry into the steel storage tank during cleaning activities described in Action Item "B." 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 staged soils and waste.
C. Clean and demobilize Tank #1 and Tank #3 when no longer needed.

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