United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, June 7, 2014
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

Subject: Pipe System Removal/Off-Site Transport of PCB Remediation Waste
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	77	**Site #:**	032H
Reporting Period:	06/01/2014-06/07/2014	**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. ERRS continued the process of re-exposing buried pipes and drainage systems previously encountered. Select pipes in the Grid 19 and 20 area were re-located using GPS (see POLREP #61)

and were re-exposed to prepare for the removal of their contents and tracing to determine their area of origin. ERRS prepared for tracing the pipes by excavating and stabilizing the excavation floor and sidewalls. During this process, the 8-inch-diameter transite pipe designated Pipe G broke and released brown LNAPL into the excavation dug in Grid 20. Any NAPL-impacted water in the excavation was pumped to Tank #1 for storage.

B. Buried features and pipes in the area between the large and small annex outbuildings continued to be exposed to prepare for cleaning and tracing. Features and pipes newly discovered or further inspected during this period are presented on Figure 1-P77, and are described as follows:

- Feature S is a brick catch basin/drop box located at the northwest corner of the small annex. The box is located directly below the square opening at the northeast corner of the concrete pad (Feature P). The box is 2 feet by 2 feet by 2 feet tall, with the top located 2 feet bgs. A section of the north side of the box was deteriorated and may have been cut out. Pieces of terra cotta were found in the excavation north of the box.
- The 12-inch terra cotta pipe designated Pipe ZZ (previously measured as 10 inches; see Action Item "D" in POLREP #75) was further inspected to the east and west. At a location about 8 feet east of the large annex, the pipe was cracked and not found further to the west. Additional quantities of a thick orange- to yellow-brown LNAPL discharged into the excavation when exposed. (In field notes, this pipe was erroneously identified as a new pipe and designated Pipe AE. Pipe ZZ and Pipe AE are the same pipe. The designation of Pipe ZZ will be retained.)
- Pipes AB, AC, and AD are located adjacent and parallel to the west side of the large annex, about 60 feet north from the bay opening to the main building between the annexes. Pipe AB is a 6-inch terra cotta pipe located 2 feet from the large annex at a depth of about 2.5 feet bgs. Pipe sections with bell joint fittings oriented with the bell opening to the south were observed, suggesting the pipes were laid to direct flow toward the north. Black oily water and medium brown to black sludge was present in the pipe. Pipe AC and AD are 4-inch metal (likely cast iron) pipes with bolted flange fittings connecting the sections. Pipe AC is located 4 feet east of the large annex at a depth of about 2.5 feet bgs. Pipe AD is located about 5 feet east of the large annex at a depth of about 3 feet bgs. About 8 to 10 feet of the pipes were exposed. The section of Pipe AB that was exposed was readily broken using a shovel. The sections of Pipes AC and AD that were exposed appeared structurally competent and were not inspected for the presence of oil or sludge.
- Pipe AF is a 6-inch-diameter terra cotta pipe trending from an unknown location under the small annex toward the northwest at an angle about 10 degrees west of a line drawn parallel to the long edge of the annexes, i.e., from the north wall of the small annex generally toward the southwestern corner of the former locker room. Pipe sections were each 2 feet in length with bell joint fittings oriented with the bell opening to the north, suggesting the pipes were laid to direct flow toward the south. The pipe was located about 2 feet bgs. The southern end of the pipe was located adjacent to or under the foundation wall of the small annex, about 5 feet east of the northwestern corner of the annex. The end contained a piece of concrete that fit loosely in the pipe. It is not clear if the concrete was the result of an attempt to plug the pipe, or if the concrete had been placed in the pipe during construction of the small annex (in the case where the pipe was present before the annex foundation as poured). The pipe contained about 1 inch of sludge in distinct layers either medium brown or black in color. An aluminum can, drum gaskets, and bung rings, along with other miscellaneous trash, was also present in the pipe.
- Pipes AG, AJ, and AI, listed in sequential order from west to east, are a group of 2-inch steel pipes located north of the small annex and about 2 feet north of Pipe AF. The pipes are aligned parallel to one another and appear to be parallel to Pipe AF. The northern extent of the pipes is unknown. The pipes appear to extend under or through, or terminate at the foundation of the small annex (inspections were limited adjacent to the annex due to structural concerns). Pipe AI appeared to be coated with asphalt or asbestos-containing materials (possibly transite).

C. Additional pipes were discovered traveling under the easternmost extension to the main building. Several pipe penetrations were unearthed at the foundation level. A 6" diameter terra cotta pipe (designated AF), was discovered traveling north-south, cemented shut at the building foundation with drum bungs, gaskets and aluminum soda cans found inside the pipe. Other pipes discovered running under the main building's eastern most extension were: pipe AH, a 6" diameter steel pipe, sleeved in a square opening in the foundation. Pipe AI is a 2" steel pipe with a thick transite-like coating. Pipe AJ is a 2" steel pipe traveling under the building in the same pipe penetration as AG.

D. While exposing buried pipes in Grid 19, a brick drop box covered with a 2.5-foot by 2.5-foot steel inlet grate was found. Broken pieces of a 4-inch-diameter terra cotta pipe were found in the immediate vicinity of the brick drop box, but no connections were confirmed due to the deteriorated condition of the box, and due to the proximity of live underground utilities.

E. Under the direction of the OSC, ERRS cleared a concrete pad discovered in Grid 24 approximately 1 ft below ground surface. An 8-inch steel pipe and an adjacent 4-inch steel pipe, both oriented vertically,

were discovered on the northern end of the pad. Several 4-inch steel and cast iron pipes were discovered directly adjacent to the concrete pad. Comparisons to historic images reveal what appears to be a structure in the area.

F. Tank #3 (serial # 253322) was sampled for full TCLP analyses to determine disposal options.

G. ERRS resumed the off-site disposal of TSCA-regulated PCB remediation waste generated during the drum removal phase of operations: On 6/4/14, 4 intermodal containers were loaded with the estimated weight of 90 tons total. On 6/5/14, 19 intermodal containers were loaded with an estimated weight of 427.5 tons total. On 6/6/14, 19 intermodal containers were loaded with an estimated weight of 427.5 tons total. A total of 42 containers were loaded this week with an estimated weight of 945 tons of PCB remediation waste. Intermodal containers were transported by truck to a railroad facility in Hainesport, New Jersey to then be transferred onto railcars for transport to Indiana, were the intermodal containers will then be placed on truck trailers for transport to the final disposal landfill facility located in Roachdale, Indiana.

H. An underground utility locator was on-site to determine the presence of any live or historic utilities in and around the main building in support of upcoming removal site evaluation activities.

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.

Next Steps

A. Expose remaining drainage piping and other designated piping in preparation for removal and tracing operations.
B. Continue off-site disposal of TSCA-regulated PCB remediation and non-RCRA wastes.

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	3,847.98 tons (estimated)	Various (165 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