

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

Date: Saturday, June 14, 2014
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Pipe System Inspection and Cleanout (On-Going)
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	78	Site #:	032H
Reporting Period:	06/08/2014	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 attempted to conduct an inspection of the exposed pipes using simple, non-pressurized tools such as a plumber's auger (or "snake") but was unsuccessful due to the compacted nature of the material

within the pipes.

B. ERRS further excavated around the square concrete pad (Feature G) in Grid 24. This pad is near Pipe S. A significant amount of oil is found in the soil and ground water northeast of Feature G at the level of Pipe S. Several minor undesignated pipes trending adjacent to the concrete pad were removed. Refer to Figure 1-P62 in POLREP #62 for more information about Feature G.

C. Operations relating to the disposal of TSCA-regulated PCB remediation waste were concluded. A total of 10 intermodal containers loaded with an estimated total weight of 225 tons (22.5 tons each) were shipped off-site for disposal this week. Intermodal containers were transported by truck to a railroad facility in Hainesport, New Jersey to then be transferred onto railcars for transport to Indiana, where the intermodal containers will then be placed on truck trailers for transport to the final disposal landfill facility (Heritage Environmental Services) located in Roachdale, Indiana. No additional staged PCB remediation waste currently remains on site. Additional PCB remediation waste may be generated during pipe jetting activities.

D. Disposal of non-hazardous soils and waste continued this week. A total of 63 loads with an estimated weight of 1,417.5 tons were disposed of at the Conestoga Landfill located in Morgantown, Pennsylvania, as follows:

- On 6/10/14, 17 truckloads with an estimated weight of 382.5 tons were hauled out for off-site disposal.
- On 6/11/14, 21 truckloads with an estimated weight of 472.5 tons were taken off-site for disposal.
- On 6/12/14, 19 truckloads with an estimated weight of 427.5 tons were taken for off-site disposal.
- On 6/13/14, 6 truckloads with an estimated weight of 135 tons were taken for off-site disposal.

E. A steel UST was found in the southeastern portion of Grid 30 while exposing nearby Pipe PP. The tank is adjacent to the low concrete wall of the covered sand-blasting area, just northwest of the northwest corner of the main building. The tank is oriented with its long axis parallel to the west side of the main building. The eastern side of the tank may extend under a portion of the concrete wall (only the upper, northwestern portion of the tank was exposed at this time). The tank appears to be approximately 250 gallons in capacity. The top of the tank is about 2.5 feet bgs. The upper part of the tank was inadvertently punctured by the excavator, causing a translucent yellowish brown liquid to be released from a small hole. A sample was collected before sealing the puncture with hydraulic cement. Hydrogen sulfide and VOC headspace readings of 200 ppm and 220 ppm, respectively, were recorded using a multi-parameter air monitoring instrument. The pH of the liquid was between 10 and 11, and a small volume of the liquid (less than one ounce) was miscible in water. The liquid had a strong, nondescript chemical odor.

F. The inspection and removal of pipe systems located on the southern side of the main building continued during this period. Three pipes were previously identified in this area, within 10 feet of the main building:

- Pipe EE is a 6-inch terra cotta pipe containing a black and light brown sludge with a mild solvent odor, located about 2.5 feet bgs,
- Pipe FF is a 2-inch metal pipe, locally deteriorated, located 6 feet bgs, and
- Pipe GG is a 3-inch metal pipe, locally deteriorated, located 7 to 8 feet bgs and containing water with a thick medium-brown NAPL.

Refer to Action Item "C" in POLREP #71 and Action Item "B" in POLREP #72 for additional discussion of these pipes. Figure 1-P78, attached to this POLREP, provides a sketch of the pipes at the southwestern corner of the main building as recorded during inspection and removal of the observed sections of the three pipes in April 2014. The inspection during this reporting period focused on tracing Pipe EE east from the east end of the previous excavation (about 35 feet east of the southwestern corner of the building). The pipe was traced, inspected, and removed from west to east starting at that location. The pipe ended in a buried mass of loose bricks located about 120 feet east of the southwestern corner of the main building. Pipe EE contained both rubbery material and fine sludge intermixed with liquid. Samples were collected from the sludge (MC-SO-Pipe EE) and liquid (MC-Aq-Pipe EE) and shipped to TestAmerica for analyses. Sample MC-SO-Pipe was submitted for VOC, SVOC, and PCB analyses. Sample MC-Aq-Pipe EE was submitted for VOC analysis.

G. To the east of the pile of buried bricks discussed in the previous Action Item were two connected concrete pads located adjacent to the foundation of the main building. The pads are located approximately at the mid-point of the long axis of the building on the south side. The pad closest to the building (the inner pad) was about 10 inches lower than the pad farther from the building (the outer pad). The outer pad surrounded the inner pad on the south and east sides. An opening in the concrete curb at the building edge was present in the northeast corner of the inner pad. The western side of the inner pad was curved upward in the last few feet to meet the ground surface. The historic function of these pads is unknown. A light-colored area or feature that may be these pads is present on a 1940 aerial photograph. Separate railroad sidings appear to approach the pads from the west and abut the pads to

the south. The tracks to the west of the pad were identified during the excavations.

H. An additional 21,000-gallon steel liquid storage tank was mobilized to the site in anticipation of the collection of water generated during the jetting procedure of buried pipes and drainage systems.

I. ERRS began internal inspections of buried pipe systems on Friday, June 13 during this reporting period. The internal inspections were conducted for those pipe systems for which it was determined that use of an excavator was impractical or not feasible due to their location beneath the asphalt area of the current operational area or were otherwise too close to the main building and associated outbuildings. A water-jet system and a vacuum truck unit were utilized to clear the pipes. To pipes were cleaned out using water-jetting during this period:

- Pipe MM was cleaned out to a distance of 60 feet from the entry point. Black oily material was removed from the pipe.
- Pipe NN was cleaned out to a distance of less than 5 feet from the entry point, or a distance of about 3 feet under the main building. The contents were light-colored and oily (see Action Item “A” in POLREP #73 for a more detailed discussion of Pipe NN contents).
- Pipe TT was cleaned out a distance of 2 feet from the entry point, which is at the location of the main building foundation.

In all instances, the jetting hose was unable to advance beyond the reported termination distance due to unspecified restrictions, which may include a blockage within the pipe, weakened structural integrity causing collapse of overlying soil into the pipe, an impassable sharp bend or joint in the pipe, or other similar factors. A video inspection will be conducted during the

J. Final analytical results from two samples collected on May 13, 2014 were received: aqueous sample MC-051314-GW-35 collected from ground water within an excavation in Grid 35 and solid sample MC-051314-SO-34-5-6 collected from material within Grid 34. The description of the solid matrix sample provided in Action Item “C” of POLREP #74 as “heavily oiled soils” is not correct. The material from which the solid sample was collected by OSC Towle was not oily soil, but black, tarry, non-native material presumably buried or deposited at that location during filling of this portion of the property. The tarry material was found existing within a matrix of brittle black solid material present in a layer about 4 feet below grade. The solid sample collection location was approximately midway between Features M and O. Carbon disulfide was present in the solid sample at a concentration of 42,000 mg/kg. Several PAHs, including but not limited to benzo(a)anthracene at 470 mg/kg, benzo(a)pyrene at 430 mg/kg, benzo(k)fluoranthene at 220 mg/kg, chrysene at 710 mg/kg, and pyrene at 350 mg/kg were detected in the solid sample. The liquid sample was collected from ground water containing NAPL. Carbon disulfide was present in the liquid sample at a concentration of 6,900 µg/L. Several PAHs, including but not limited to benzo(a)anthracene at 120 µg/L, benzo(a)pyrene at 100 µg/L, benzo(k)fluoranthene at 56 µg/L, chrysene at 180 µg/L, and pyrene at 130 µg/L. The total concentration of tentatively identified semi-volatile compounds in sample MC-051314-GW-35 was 7,010 µg/L, and the concentration of total PCBs was 15 µg/L. The collection location of the aqueous sample was approximately at the point of the one 45-degree bend in Pipes OO and SS as presented on Figure 1-P74 in POLREP #74 (north of Feature M and west of Feature N).

K. From June 11 through June 13, the OSC directed START personnel to conduct additional removal site inspection activities primarily beneath and around the main building. Surface soil (0 to 2 feet bgs), subsurface soil, ground water, and surface water samples were collected to obtain analytical data to assist in determining whether additional removal response actions are warranted. Sixteen test boreholes were advanced using direct-push technology and approximately 32 soil samples were collected. Temporary wells were constructed at six of the soil boring locations using pre-packed PVC well screens (clean silica sand enclosed within wire mesh around the slotted PVC by the manufacturer) and PVC riser. The wells were not developed and only intended to permit the collection of one round of ground water samples. Samples were collected within 48 hours of installation. The surface water sample was collected from the outfall of the current storm sewer system to Stoney Creek. An orange precipitate has been recently observed in this system and at the outfall into Stoney Creek. The flow from the outfall is minimal but persistent. Soil and aqueous samples were sent to a CLP laboratory for TCL VOC, TCL SVOC, TAL metals (including Hg and Cn) and PCB analyses under standard turnaround times.

L. 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. Complete operations relating to the removal of the contents of drainage pipes to remain.
- B. Continue off-site disposal of non-TSCA regulated waste.

C. Reconstruct surface drainage; initiate final backfill and grading operations.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil and debris)	6,414.64 tons (estimated)	Various (286 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	4,072.98 tons (estimated)	Various (175 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

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