

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

**Date:** Saturday, June 28, 2014  
**From:** Michael Towle, On-Scene Coordinator  
**To:** Dustin Armstrong, PADEP SERO

**Subject:** Test Pit Investigation/Waste Characterization/Site Restoration  
Metro Container Corporation  
2nd & Price Street, Trainer, PA  
Latitude: 39.8249606  
Longitude: -75.3990472

<b>POLREP No.:</b>	80	<b>Site #:</b>	032H
<b>Reporting Period:</b>	06/22/2014-06/28/2014	<b>D.O. #:</b>	
<b>Start Date:</b>	9/30/2013	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/30/2013	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	PAD044545895	<b>Contract #</b>	
<b>RCRIS ID #:</b>			

**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. At the direction of the OSC, ERRS dug one test pit in an existing break in the concrete floor in the southeastern-most room of the main building for the purpose of investigating reports of buried drums or

other waste in this area. (This room is currently the most southeastern-most portion of the building. A section that historically existed adjacent to and east of this room is no longer present, although the footer and concrete pad still exists. The current owner stores junked vehicles in this section.) The test pit was dug in the southwestern corner of the room, just inside the southwestern bay entrance and about 5 to 10 feet from the southern wall of the room. The pit was dug down to 5 feet bgs. Clean soil was observed from 0 to 2.5 feet bgs, and typical construction backfill omnipresent at the Site (e.g., bricks, concrete, and gravel mixed in with soil) was present from 2.5 to 5 feet bgs. No waste or evidence of drums were encountered in the test pit. The floor of this room is about 4 feet higher than other floors of the main building, and equal in elevation to the concrete floor of the open-air section immediately to the east.

B. ERRS repaired and restored a drainage swale in the Grid 19 and 20 area designed to reduce ponding water on the surface of the Site.

C. At the direction of the OSC, ERRS punctured a hole in the top of the buried UST in Grid 30 in order to permit access to further characterize the contents and determine disposal options. Atmospheric conditions of the headspace in the UST, recorded using a multi-parameter meter, revealed readings of over 1,650 ppm VOCs and over 200 ppm hydrogen sulfide. Samples were collected on June 25 and submitted to TestAmerica for analysis of full TCLP, RCRA characteristics, and PCBs.

D. ERRS decontaminated and demobilized the off-road dump truck, 3-inch dry-prime water pump and scaffolding.

E. ERRS continued to import loads of clean fill and modified stone onto the Site. The clean fill and modified stone was also used to place a layer of clean cover overtop of areas in Grids 19, 20, 21, 41, and 42. Also, excavations between the large and small annexes were backfilled and covered with a layer of clean soil. An excavation on the southern side of the drum building was backfilled and was covered with a layer of clean soil.

F. 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 off-site disposal of non-TSCA regulated waste.

B. Determine disposal options for approximately 100 truck tires encountered during excavation efforts.

C. Address UST in Grid 30.

D. Dispose of liquid stored in portable steel storage tanks and demobilize tanks from the Site.

E. Decontaminate and demobilize heavy machinery used for waste removal, but no longer needed for final Site grading activities.

F. Complete 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)	33,362 gallons (estimated)	Various (6 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
Suspect non-friable ACM (transite)	15 tons (estimated)	1 shipment (MCS-ASB-0001)	Republic Conestoga Landfill, Morgantown, Pennsylvania

