

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, July 5, 2014

From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

Subject: UST Decommissioning and Removal/Site Restoration (On-going)

Metro Container Corporation

2nd & Price Street, Trainer, PA

Latitude: 39.8249606

Longitude: -75.3990472

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|--------------------------|-----------------------|----------------------------|----------------|
| POLREP No.: | 81 | Site #: | 032H |
| Reporting Period: | 06/29/2014-07/05/2014 | 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. During this reporting period, EPA obligated an additional \$21,714 to the START Removal project ceiling. This addition raised the total amount available to the START contractor to \$129,741.

B. During this reporting period, EPA obligated an additional \$180,000 to the ERRS project ceiling. This addition raised the total amount available to the ERRS contractor to \$2,577,602.

C. Disposal of non-TSCA regulated soils continued this week: twelve loads of non-TSCA regulated soils with a total estimated weight of 220 tons and two loads of non-TSCA debris with an estimated weight of 44 tons were disposed of at the Republic Conestoga Landfill located in Morgantown, Pennsylvania.

D. Results of disposal sampling of two portable steel storage tanks (Tank #1/serial #251955, and Tank #4/serial #252663) were received, indicating the contents were non-hazardous. The sample results will be used to create waste profile for disposal facilities to determine whether they will accept the waste.

E. At the direction of the OSC, ERRS pumped contents of the estimated 500-gallon UST found in Grid 30 into 55-gallon drums for future off-site disposal. A total of five drums were filled with liquid from the tank. The liquid had a strong sulfur odor. Following bulk liquid removal, the tank was excavated, wrapped in plastic and placed in a soil containment berm. Future operations will remove sludge and residue remaining in the tank.

F. A berm was created in portions of Grids 16 and 21 to direct overland flow into the drainage swale (see Action Item "B" in POLREP #80) prior to discharge into Stoney Creek. The swale was constructed in an area where overland flow is naturally directed during storm events.

G. ERRS decontaminated the small rented excavator in preparation for demobilization of the equipment.

H. START decommissioned the five shallow temporary monitoring wells that were drilled as part of assessment water sampling activities in and around the main building. The upper riser section of each well was unthreaded or broken off below the ground surface, and the wells and boreholes were backfilled with bentonite chips to seal the annular opening. The ground was restored after the wells were decommissioned.

I. 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 over top of all or portions of Grids 1, 2, 14, 14, 19, 41, and 42. Also, additional clean soil and stone was put in place between the large and small annexes, completing restoration of this area.

J. 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. Due to dry conditions, ERRS utilized a water truck to apply a small amount of water to disturbed areas for dust suppression.

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. Dispose of liquid stored in portable steel storage tanks and demobilize tanks from the Site.
- D. Dispose of containerized material removed from the UST in Grid 30.
- 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 |

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