United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, July 12, 2014
From: Michael Towle, On-Scene Coordinator

To: Dustin Armstrong, PADEP SERO

Subject: UST Decommissioning/Site Restoration/Off-Site Disposal
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	82	**Site #:**	032H
Reporting Period:	07/06/2014-07/12/2014	**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. Disposal of non-TSCA-regulated soils continued this week: On 7/8/14, a total of 12 loads of non-TSCA-regulated soils with a weight of 255.64 tons were disposed of at the Republic Conestoga Landfill

located in Morgantown, Pennsylvania. On 7/10/14, nine truckloads with a weight of 203.47 tons were also disposed of at the Republic Conestoga Landfill. The overall total of material disposed of this week was 459.11 tons of material in 21 loads.

B. The analytical results of a sample of solids collected from within the UST found in Grid 30 were received. The samples were collected on 06/25/14 and submitted for full TCLP analyses. Among other things, the results indicated reactive sulfide in the solids extract at a concentration of 768 mg/L. The sample results will be used to create a waste profile for potential disposal facilities.

C. Analytical results from samples of Galbestos material that was loaded in a secured roll off container (See POLREP #79) determined the suspect ACM material has a PCB (1268) concentration of 25,000 ppm. This data will be used to determine offsite disposal options of the estimated 15 tons of material. The Galbestos was found buried along the banks of Stoney Creek in the area west of Grids 3 and 5.

D. 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 portions of Grids 41 and 42. Additional grading and soil cover placement was also performed between the large and small annexes to the main building.

E. ERRS crew entered steel storage Tank #3 (serial #253322) via confined space entry for the purpose of removing residual sludge material and decontamination. Removed sludge was placed in the existing non-TSCA regulated soil stockpile awaiting off-site disposal.

F. As directed by the OSC, ERRS emptied remaining solid residuals (coating the tank) from the estimated 500-gallon UST removed from the base of the main building in Grid 30. The solids were placed in drums awaiting disposal. The soil surrounding the UST during removal was also excavated, it was laid out on plastic to be exposed to sunlight, then was added to the existing non-TSCA waste stock pile awaiting offsite disposal. The UST was then cut to size appropriate for disposal.

G. ERRS removed debris from the site generated during the Removal Action such as off-spec pallets, posts, fencing, plastic and other materials.

H. ERRS decontaminated the vibratory roller in preparation for demobilization of the equipment.

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. Finish 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 steel storage tanks, and then demobilize the tanks from the Site.
D. Dispose of drummed material removed from the Grid 30 UST.
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)	6,425.02 tons (estimated)	Various (289 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
Non-RCRA, non-DOT-regulated material (debris)	712.73 tons (estimated)	Various (30 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 pipe)	15 tons (estimated)	1 shipment (MCS-ASB-0001)	Republic Conestoga Landfill, Morgantown, Pennsylvania

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