

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

**Date:** Wednesday, December 30, 2015

**From:** Michael Towle

**To:** Dustin Armstrong, PADEP SERO

**Subject:** Initiation of Enforcement-Lead Removal Action

Metro Container Corporation  
2nd & Price Street, Trainer, PA  
Latitude: 39.8249606  
Longitude: -75.3990472

<b>POLREP No.:</b> 88	<b>Site #:</b> 032H
<b>Reporting Period:</b> 8/27/2015 through 12/30/2015	<b>D.O. #:</b>
<b>Start Date:</b> 8/27/2015	<b>Response Authority:</b> CERCLA
<b>Mob Date:</b> 12/15/2015	<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 an NPL Site and 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. Refer to POLREP #86 for a detailed description of removal activities conducted by EPA between September 2013 and September 2014 as well as a summary of the analytical results of samples collected and a description of the wastes disposed. Beginning August 27, 2015, the Removal Action will continue as an enforcement-lead action conducted by a group of potentially responsible parties and pursuant to an Administrative Settlement Agreement and Order on Consent, dated August 27, 2015.

A. The subject Removal Action is a continuation of the Removal Action conducted by EPA between September 2013 and September 2014 which could not be completed, in part, due to the presence of a dilapidated building on the premises.

B. The Site includes multiple systems of underground pipes and other drainage systems which were largely removed by EPA in its removal activities of 2013 and 2014 (see POLREP #86). However, some of these pipes extended under the dilapidated buildings on the Site. The pipes and conveyance systems are of unknown purpose. Some of these pipes are known to have discharged unknown substances directly into Stoney Creek for unknown reasons. Other parts conveyed liquids from the area of building, but did not daylight into Stoney Creek. The removal of these systems which convey hazardous substances are the subject of removal actions.

**Current Activities**

A. On August 27, 2015, the EPA and a group of potentially responsible parties (PRPs) agreed on the conduct of continued removal response actions pursuant to an Administrative Settlement Agreement and Order on Consent for a Removal Action (Consent Order). The Consent Order contains the required work items to be implemented by the group and the requirements for such implementation.

B. In September 2015, the PRP group identified de maximus, inc. as its Project Coordinator and GHD and EWMI as its prime contractor and major subcontractor, respectively, to conduct and implement the Removal Actions (i.e., Work requirements) required by the Consent Order. The EPA Project Coordinator (OSC Towle) approved the contractors on September 23, 2015.

C. On October 28, 2015, on behalf of the group of PRPs, de maximus, inc. submitted the first draft of

a Response Action Plan (RAP) required by the Consent Order. The Consent Order identifies work requirements to implement the Removal Action in Section 8.3. The RAP also contained a Health and Safety Plan, Environmental Monitoring Plan, and Field Sampling Plan as well as a Quality Assurance Plan. After review, the EPA Project Coordinator disapproved the RAP and requested clarification and amendment on November 10, 2015. EPA requested that the amendments and clarifications be submitted to EPA in letter form along with revised RAP pages.

D. On December 1, 2015, on behalf of the PRPs, de maximus, inc. submitted its response to the EPA requests to clarify and amend and change the RAP. After review, the EPA Project Coordinator approved the RAP on December 8, 2015.

E. In short, the RAP describes activities to complete the Removal Action inclusive of relocating the existing business, demolition of parts of the dilapidated buildings, removal of pipes and sources of hazardous substances beneath the building footprints. The activities also include sampling of materials, excavation of testpits, air monitoring, and removal of wastes.

F. On December 15, 2015, GHD initiated activities at the Site. A pre-demolition assessment and engineering survey were performed. Activity included the collection of samples for possible asbestos. The PRPs are also discussing future actions with the current site owner relating to the operations of the business alongside the conduct of the Removal Action

G. Progress Report #1 was submitted December 18, 2015.

#### Planned Removal Actions

A. await results of the pre-demolition assessment and survey.

B. conduct testpits to determine the conditions relating to the pipes which traverse under the building.

#### Key Issues

A. The PRP group has requested EPA assistance with discussions with the landowner relating to the conduct of the Removal Action.

B. The costs to date reflected in this POLREP address the EPA contractor costs relating to the EPA Removal Action between 2013 and 2014. They will not be updated further.

#### 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	4,184.34 tons (actual)	Various (175 shipments)	Heritage Environmental Services Landfill, Roachdale, Indiana
Non-hazardous liquid waste (purged ground water)	68,002 gallons (estimated)	Various (12 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
PCB Remediation Waste and Asbestos-Containing Material (Galbestos)	3,700 pounds (estimated)	1 shipment (012265068JJK)	Waste Disposal Company, Belleville, Michigan
Reactive sulfide wastes (hazardous waste, n.o.s. (sulfide), 9 PGIII, D003)	3,500 pounds (estimated)	1 shipment (012094953JJK)	Envirite of Pennsylvania, York, Pennsylvania

PCB Remediation Waste	75 pounds (estimated)	1 shipment (000558359 VES)	Veolia ES Technical Solutions, Port Authur, Texas
-----------------------	--------------------------	----------------------------------	--

[response.epa.gov/metrocontainer](https://response.epa.gov/metrocontainer)