United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, May 27, 2016
From: Michael Towle

To: Dustin Armstrong, PADEP SERO

Subject: PRP Lead Removal Action
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	89	**Site #:**	032H
Reporting Period:	12/30/2015 through 5/27/2016	**D.O. #:**	
Start Date:	8/27/2015	**Response Authority:**	CERCLA
Mob Date:	12/15/2015	**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 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. Progress Report #2 was submitted January 5, 2016. Progress Reports summarizing activities will be submitted on a weekly basis.

B. Samples were collected from within the building of various building materials in order to assist in procedures relating to building demolition. Samples of concrete block, brick, paint, caulk, and suspected asbestos containing materials were collected for analysis. The analytical results will be incorporated into a technical memorandum to be submitted to EPA.

C. An assessment of the structure of the building was conducted. This assessment would assist the project determine appropriate procedures for demolition activities. The building is dilapidated. The results of the building structural assessment will be submitted to EPA in a technical memorandum.

D. On January 11, 2016, test pits were conducted in the vicinity of the larger building annex. Several pipe systems terminated under the asphalt in the vicinity of the large building annex (e.g., pipe systems C-1 and C-2 and pipe system D). These systems were investigated by EPA and flushed during the Removal Action, but the source area for these pipe systems could not be determined. Test pit activities unearthed an underground structure (pit) from which it appeared that pipe systems C and D originated and into which it appeared building drainage lines may have entered. It did not appear that excessive or significant amounts of oily liquids remained in this pit or entry pipes and no further work was deemed required. The OSC observed these activities and concurred on the observations and determinations.

E. Beginning on 1/11/16, the project team began arranging from the removal of certain roofing materials suspected to contain asbestos. Such removal would further enable safe access into the main area of the dilapidated building.

F. During the week of January 25, the project team arranged for the installation of soil borings under the main building and the collection of soil samples. The soil analytical data would assist the project team determine the extent of removal and the proper disposal of materials removed and encountered during removal activities inside/under the main building. The analytical results would be submitted to the EPA in a technical memorandum.

G. A demolition permit was received during the week of January 25.

H. A survey was conducted the week of February 1 in order to prepare a base map.

I. During the week of March 14, 2016, removal of asbestos containing materials was conducted in building areas A and B.

J. On March 24, 2016, the following reports were submitted to the EPA in the form of Technical Memoranda:

1) Structural Assessment
2) Building Materials Survey
3) Pre-Excavation Soil Investigation

in total, these documents support removal actions by providing information to guide demolition activities, segregate building materials as necessary to support safe operations and disposal, and guide the removal of soil containing elevated levels of PCBs.

K. Erosion and Sedimentation control plans were submitted to the Borough as the project team prepared to address various permit issues relating to Site actions inclusive of the installation of a temporary building in which the present Site tenant will be relocated for the duration of the Removal Action. The installation of the controls was begun during the week of May 2, 2016.

L. Construction of the temporary building was started during the week of May 9, 2016. This construction activity is underway.

Planned Removal Actions

A. Complete construction of the temporary building in which the tenant will be relocated for the duration of the Removal Action.

B. Complete final preparations before implementation of the Removal Action in accordance with the approved RAP.

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

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