

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Friday, October 25, 2013
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Approval of Action Memorandum and Initiation of Removal Action
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	51	Site #:	032H
Reporting Period:	07/11/2013-10/25/2013	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 petroleum storage, paraffine manufacturing, 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. 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. An Action Memorandum authorizing a time-critical removal action was signed August 26, 2013.

B. The Superfund Technical Assessment and Response Team (START) contractor, Weston Solutions, and the EPA RPM performed a shoreline assessment of Stoney Creek evaluating known outfall pipes and seep locations on July 25, 2013.

C. From July 31 through August 2, 2013, START utilized a sub-contractor to locate and map underground utilities, piping and other features associated with historic Site operations and waste disposal. The subcontractor conducted an inspection of the onsite storm-water drainage system using in-pipe robotic cameras, tracer wires and non-hazardous dyes to determine the overall condition, points of origin, contamination sources and outfall locations of the system. It was determined that the system was installed by the current tenants, in overall good condition, and did not contain junctions or underground connections to historic waste disposal operations at the Site. The green 12" PVC outfall hanging over Stoney Creek was inspected via in-pipe video camera survey by placing the camera up the outfall; refusal was met at 87' due to sediment and debris clogging the pipe. Many features were electronically identified and field located, but could not be verified as to purpose or condition.

D. A meeting was held September 16, 2013, attended by EPA OSC, EPA RPM, ERRS contractor (WRS Compass), START contractor (Weston Solutions), Remedial data evaluator (EA Engineering) and the Site owner to discuss the schedule and logistics of the upcoming Removal Action.

E. Approximately 45 surface and shallow soil samples were collected between September 16 and 26, 2013, to further characterize PCB contamination in surface and shallow soils in the western area of the Site for possible re-use as backfill during the removal action and to facilitate site control. Approximately 40 shallow test pits were excavated using a mini-excavator using a recently established grid system. This grid system defines 40 (60' x 60') grids in the western region of the Site.

F. On September 30th 2013, ERRS and START began to mobilize personnel and equipment to the Site to begin the Removal Action.

G. On October 4th 2013, activities at the Site were temporarily suspended due to the Government shutdown.

H. October 21st 2013, onsite activities were re-initiated and contractors completed mobilizing equipment, personnel and supplies.

I. As directed by the OSC, the ERRS crew began locating, excavating and removing underground drainage pipes related to historic Site operations. A buried 15-inch steel pipe clogged with unknown sludgy material, believed to be a waste water disposal conveyance pipe, connecting the Drum Building to a concrete separator in the direction of the waste impoundment was uncovered and removed. It was discovered that this pipe had an 8-inch hole in the side of it and was covered with a make-shift patch that had failed at some point, and showed evidence of a release of wastes into the nearby soils. The pH of the liquids in the pipe was approximately 12. Numerous other unknown smaller diameter pipes and conduits made of plastic, iron and steel containing liquid products with chemical- and petroleum-like odors were found and removed in the southwestern area of the Site. A concrete gutter system (culvert) filled with sludge was found in the Southwestern area of the Site, in the direction of the impoundment. The gutter system was buried approximately 2 feet below the current surface and sloped downward into the former impoundment. Drum remnants such as bungs and gaskets, were also found in this concrete feature. The green 12" PVC pipe that outfalls into Stoney Creek was located underground and partially excavated at the furthest known extent, it was discovered this pipe was broken and clogged with debris and sediment. Soils throughout the area between the Drum Building and Impoundment or Concrete Basin were heavily contaminated with petroleum and likely other substances, and locally contained elemental sulfur and had a strong hydrogen sulfide odor. NAPL was also present where ground water was encountered.

J. A floor drainage system of interconnected trenches is located within the building. Minimally, the trench system exits along the west side of the building near the location of the 15-inch steel pipe previously mentioned. Water migrating through the trenches is discharged onto the ground surface. The OSC found that the base of the sediment within the trenches is composed of oily sludge. The base of the trench also includes liquid which may also migrate through the sludge to the west of the building. An excavation at the point where the trench system exits the building verified that liquids have been migrating from the building through the trench system and into the nearby soils.

K. The ERRS contractor removed those pipes that were encountered and initiated the staging of the pipes, contents, and heavily contaminated surrounding soils.

Planned Removal Actions

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. Details of the proposed response actions are presented as follows:

1. Mobilize/demobilize personnel and equipment.
 2. Implement facilities and measures necessary to prevent access to the Source Areas by trespassers.
 3. Implement erosion and sedimentation control features (e.g., silt fencing and vegetative cover) to minimize migration of hazardous substances from the Source Areas during implementation of the Removal Action.
 4. Implement water management controls and actions, which may include (among other things) construction of berms and trenches and pumping and temporary collection and containment of potentially contaminated water, to minimize the migration of storm water into and from the Source Areas during performance of the Removal Action.
 5. Treat waters accumulated as a result of #4, above, and discharge such waters to the local sewage treatment plant or, if such discharge is not feasible, dispose of waters off-Site in accordance with CERCLA 121(d)(3) and 40 C.F.R §300.440.
 6. Prepare and maintain temporary storage for hazardous substances generated during the Removal Action.
 7. Locate, excavate, and remove pipes, drains, and related features (including surrounding soils impacted by pipes, drains, and related features) in and around the Source Areas through which hazardous substances may migrate. If a particular feature through which hazardous substances may migrate cannot be removed (e.g., active storm drain), investigate the cause or reason for the migration of hazardous substances into such feature (e.g., crack or interconnection) and repair the feature or takes steps to prevent hazardous substances from entering such feature.
 8. Locate, excavate, and remove buried drums, drum carcasses, their contents and surrounding soils impacted by drum contents (e.g., as by NAPL) in an around the Source Areas.
 9. Except as provided herein, excavate, and remove soil contaminated with PCBs in and around the Source Areas such that
 - (i) total PCB concentrations in remaining soils to a depth of 11 feet contain less than 50 mg/kg at any location in the subsurface (i.e., below 1 foot);
 - (ii) total PCB concentrations in remaining surface soils in the Source Areas (i.e., soils within the upper 1 foot of the surface) contain less than 25 mg/kg; and
 - (iii) total PCB concentration in remaining soils in the Source Areas containing NAPL contain less than 25 mg/kg.
- Excavation to remove PCBs shall not compromise the stability of any structure. Excavation below the depth of underground water shall be dependent upon the ability to control movement of water into the excavated area as determined by the OSC.
10. Segregate excavated soils and debris based upon PCBs concentration (i.e., greater than 25 or 50 mg/kg) and the presence of NAPL.
 11. Manage excavated soils and debris such that migration of water into or from the soils and debris is minimized.
 12. Backfill excavated areas. Soils and debris such as brick, block, or rubble which contains PCBs less than 25 mg/kg and no evidence of NAPL may be used to backfill excavated areas.

13. Grade and cover backfill and remaining soil in a manner which re-establishes flow patterns existing at the time the Removal Action was initiated and promotes sheetflow of storm waters towards Stoney Creek.

14. Dispose off-site the hazardous substances (e.g., contaminated water, drums, drainage features, and PCBs, or NAPL-contaminated soils) removed pursuant to #7, #8, and #9, above, and other wastes associated with the Removal Action, in accordance with CERCLA 121(d)(3) and 40 C.F.R. 300.440. Activities may include sampling, bulking, consolidating, drumming, pumping, or otherwise handling the hazardous wastes, hazardous substances, liquids, and wastes to ensure that they are properly transported.

15. Conduct continued removal site evaluation and sampling and/or analytical activities necessary to support the Removal Action.

16. Remove security measures installed pursuant to #2, above.

Next Steps

A. Underground pipes associated with historic Site operations will continue to be located and removed.

B. Sludge located within the Drum Building floor drains will be sampled and analyzed prior to the removal and disposal of the material.

C. Clearing and grubbing of vegetation near source areas will commence in preparation of excavation activities.

D. Source area material in the western portion of the Site will be excavated and disposed.

epaossc.org/metrocontainer