

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

Date: Friday, November 29, 2013
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Pipe System/Source Removal (On-going)
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	56	Site #:	032H
Reporting Period:	11/23/2013-11/29/2013	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. The OSC directed ERRS to investigate a subsurface area along the fence line south of the former impoundment (lagoon) to determine if one or more buried pipes were present. Historical records report

the presence of seeps along the southernmost portion of the property that abuts Stoney Creek and a 4-inch-diameter gray PVC pipe that discharged into Stoney Creek. Furthermore, the OSC believed that a portion of the Site drainage would naturally occur to the southwest parallel to the fence line and was likely designed to flow in that direction by previous owners. In the subsequent excavation, an approximately 18-inch-diameter terra cotta pipe buried approximately 6 feet below ground surface and grading down toward Stoney Creek was identified along the southern border of the Site in Grids 36, 37, and the western two-thirds of 38. Thick black sludge, including NAPL, was discovered inside of the pipe during the removal of this section of this pipe. Complete tracing and removal of the pipe was not conducted west of Grid 36 at this time due to the presence of overgrown vegetation and the property fence, and is not presently possible in the eastern portion of Grid 38 due to the presence of a large sand tank used by the current property owner overlying the trajectory of the pipe. The pipe at the western side of Grid 36 was filled with hydraulic cement to prevent possible migration of contaminants should the pipe outfall into Stoney Creek.

B. The OSC directed ERRS to investigate buried sump areas adjacent to northern and western sides of the concrete basin (Grids 16 and 17) mentioned in previous reports. The sumps were found to be filled with concrete and connected by steel pipes. A horizontal section of pipe was found protruding from the east side of the northern sump. The feature the pipe previously connected to is unknown. The soil adjacent to the sumps was found to be oily.

C. A layer of black, charcoal or charcoal-like substance saturated with thick NAPL and containing a strong hydrogen sulfide odor was identified below the ground surface in excavations in the southwestern portion of the property, generally west of the main building. The substance was identified approximately 5 to 8 feet below the ground surface in Grids, 31, 32, 33, 34, 35, 36, 37, 38, 39 and 40 (deeper excavations have not been dug to date). In the excavations, this layer was located below the ubiquitous brick and construction debris layer present at the Site under the gravel/sand cover material. The black layer has not been fully delineated to date, and therefore, the exact boundaries and depths may be greater.

D. An aqueous sample was collected from a saturated layer of the substance described in Action Item “C” at approximately 5 feet below the ground surface in Grid 33. This sample will be analyzed for PCBs, TCL VOCs, TCL SVOCs and TAL metals.

E. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. ERRS utilized a water truck to apply water to ground surface for dust suppression in the work zone.

Planned Removal Actions

Refer to POLREP 51 for a description of the planned actions.

Next Steps

A. Continue excavations of source areas and removal of buried historic drainage systems.

B. Continue actions to minimize the migration of surface waters into the operations area.

C. Review submitted bids and award subcontract for the offsite disposal of wastes removed from excavations.

Key Issues

None.

epaossc.org/metrocontainer