

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

Date: Saturday, February 1, 2014
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.:	60	Site #:	032H
Reporting Period:	01/11/2014 - 01/24/2014	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 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. Work continued excavating a complex of concrete features located in Grids 13, 14, 19 and 20 (see Action Item "B" in POLREP #59). The complex appears to primarily include a rectangular basin (western

feature) and building foundations with sumps and channels (eastern feature). The complex is centered approximately 150 feet north-northwest of the northwestern corner of the portion of the main building currently used for sandblasting and 200 feet west-southwest of the western end of the office building. Excavation of the southern half of the eastern area revealed multiple pipes and a sludge-filled sump. The sump appeared to be constructed of pre-formed concrete, and contained a manhole opening and rebar steps. An estimated three to five "channels," oriented parallel to the long axis of the eastern feature, i.e., approximately north-south, were observed in part of the northern half of the eastern area. The channels were each about 2 to 3 feet wide and separated by 6-inch concrete walls. A concrete floor was present at the bottom of the feature at a depth of approximately 6 feet below the current ground surface. Black sludge of a thick, pudding-like consistency was present in the bottom of the eastern feature. Timber fragments, concrete and brick debris, pipe sections, metal pieces, and drum and container carcasses, all mixed with soil, were present at a depth greater than 2 feet and extending downward into and mixing with the sludge.

B. ERRS continued excavation along the eastern end of the complex and located a green 12-inch-diameter PVC pipe filled with wet sludge and oily liquid. The western end of the PVC pipe was located next to and just south of the western end of a 6-inch-square thin metal pipe (similar to drain pipe) filled with soil/sludge. Both pipes entered into a 3-foot-square rectangular basin comprised of cinder block reinforced with rebar. The basin was located in the eastern-central part of the eastern feature described in Action Item "A". The pipes crossed over top of the blocks to enter the basin; the pipes were not cut into the block. Roots were found with sludge in the soil of the basin. The PVC pipe trended from the basin east-southeast toward the location of the former boiler room; the pipe was traced and removed only to the edge of the asphalt pavement (in Grid 25) at this time (about 25 feet). The 6-inch square metal pipe trended from the basin east toward a point just south of the former locker room, although the origin of this pipe was not investigated further at this time. The PVC pipe that entered the cinder block basin was identical in manufacture to the PVC pipe located to the west that extends from the bank of Stony Creek to the triple junction described in Action Item "D" of POLREP #59. The distance between the cinder block basin and the triple junction was approximately 40 feet. No PVC pipe was found between the basin and triple junction. The 6-inch steel pipe comprising the eastern pipe of the triple junction trended east directly toward the cinder block basin. While investigating the eastern section of green PVC pipe, a buried storm water drainage pipe in Grid 25 was punctured and then repaired by ERRS personnel.

C. A 6-inch-diameter pipe located underneath the green PVC pipe was located and found to have multiple junctions and a 45-degree angle turn towards the current sandblasting building.

D. Soil excavated from the concrete complex was staged in a stockpile (non-TSCA) awaiting off-site disposal.

E. Validated analytical results from soil/sludge samples collected on November 11 and November 13, 2013 under CLP Case # 43971 were received. These samples included sludge from inside of the main building floor drainage trenches, sludge from inside of the 15-inch-diameter steel pipe from Grid 35 area, black charcoal-like material from Grid 35, and also sludge from inside of concrete feature located in Grid 13. The data indicates sludge found in the concrete feature (located in Grids 13, 14, 19, and 20), which is currently being excavated, is not expected to have PCB contamination. The data also indicates PCBs along with VOCs were found in the oily soil located in the main building floor drainage trench and sludge from the 15-inch steel pipe removed from Grid 35.

F. The site was closed on January 20, 2014 due to the Martin Luther King Holiday.

G. An underground utility locator was on site January 21, 2014 to trace/determine the origin of seven pipes located in Grids 19 and 20 using electrical or probing methods. An approximately 4-inch-diameter possible concrete-asbestos pipe discovered in Grid 20 could not be traced. Site work ceased approximately halfway through the work day due to heavy snow. Approximately 8 to 10 inches of snow fell the remainder of the day and prior to the next day. A portion of the morning on January 22 was spent clearing snow from work areas.

H. On January 23-24, additional soil sampling occurred in the northern section of the site to further characterize subsurface soils in an effort to delineate the area of PCB contamination. A direct-push unit was used to advance 21 borings up to 15 feet below the ground surface and collect approximately 60 soil samples for PCB aroclor analysis from a CLP laboratory; a 7-day turnaround time was requested.

I. Air monitoring was conducted during operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage.

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

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