

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Saturday, April 19, 2014
From: Michael Towle, On-Scene Coordinator
To: Dustin Armstrong, PADEP SERO

Subject: Buried Drum Removal/Off-Site Disposal of PCB Remediation Waste
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	70	Site #:	032H
Reporting Period:	04/13/2014-04/19/2014	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. Continued excavating in the suspected drum burial area using procedures described in Action Item "A" of POLREP #65. All work was conducted exclusively in Grid 10. An estimated 210 tons of drums and

soil in a portion of Grid 10 centered at ConocoPhillips direct-push sample location 05-MET-001 were removed and staged as TSCA-regulated waste. Location 05-MET-001 was located in the north-central portion of the grid. The total PCB concentrations in a sample collected from this borehole were 80 ppm. The soils from which the sample was collected were comprised primarily of black silt with construction debris and other waste, which was found from approximately 3 to 7.5 feet bgs in Grid 10. This interval of soil, drums, and debris was excavated and staged as PCB remediation waste for future disposal (approximately the material in the 3.5- to 7-foot interval). The remainder of Grid 10 was excavated to remove buried drums and adjacent soils that appeared to be impacted by the drum contents; these soils and materials were staged as non-TSCA-regulated wastes. Ground water was encountered with a petroleum-like sheen and NAPL at approximately 7 feet bgs. A sweet chemical odor was present locally within the excavations, along with odors consistent with weathered petroleum and hydrogen sulfide. VOC readings as high as 15 ppm were recorded on monitoring instruments from locations inside of excavation; no readings above action levels were detected outside of excavation in the breathing zone. After backfilling to a depth of approximately 1 foot below the former ground surface, a layer of clean cover soil was laid over top of the grid.

B. Site work was suspended approximately half way through the day on April 15 due to heavy, consistent rainfall that restricted the ability to continue the drum excavations and off-site loading of TSCA-regulated waste. Piles of staged wastes and clean fill materials were covered as necessary, and site equipment was secured prior to suspension of work.

C. ERRS imported multiple loads of 2A modified stone to be used as clean fill and cover material.

D. ERRS assisted the EPA RPM in seeking to identify a cast iron outfall pipe along the banks of Stoney Creek that was identified generally on a map in a 1990 investigation. An excavator was used to probe the surface material along the eastern bank from a point approximately 20 feet north of the concrete basin (see "Feature B" in maps from POLREP #61 or #62) to a point approximately 30 feet south of the basin. The bank appears to be comprised of an equal mixture of soil and construction debris, including but not limited to sections of concrete and brick foundations as large as 5 feet square, bricks, detached pipe sections, fencing, lumber/timber, miscellaneous metal scrap. A narrow strip of flood plain approximately 5 to 10 feet in width exists at this location between the base of the soil/debris bank and the stream. The pipe was not found, but a seep discharging black NAPL was observed at the bank at the base of the bank near the southern end of the investigated area. Distressed vegetation and heavily stained soil immediately below the vegetation was observed in an earthen culvert in the flood plain leading to the creek.

E. The off-site disposal of stockpiled and characterized TSCA-regulated PCB remediation waste conducted during the previous reporting period was continued. On 4/16/14, 16 intermodal containers were loaded with the estimated weight of 370.48 tons total. On 4/17/14, 16 intermodal containers were loaded with an estimated weight of 375.27 tons total. On 4/18/14, 13 intermodal containers were loaded with an estimated weight of 327.94 tons total. A total of 45 containers were loaded this week with an estimated weight of 1,073.69 tons of TSCA regulated soil. Intermodal containers were transported by truck to a railroad facility in Hainesport, New Jersey to then be transferred onto railcars for transport to Indiana, where the intermodal containers will then be placed on truck trailers for transport to the final disposal landfill facility located in Roachdale, Indiana.

F. START and ERRS collected disposal characterization samples from water in two 21,000-gallon steel water storage tanks staged on-site. The water was generated during previous excavations. In addition, a composite solid sample from the non-TSCA staged materials, comprised primarily of drums and soils generated from the northern portion of the Site, was collected for full TCLP and RCRA characteristics.

G. Air monitoring was conducted adjacent to operations for particulates, volatile organic compounds, carbon monoxide, hydrogen sulfide, lower explosive limit, and oxygen percentage. The monitoring was conducted to ensure worker safety. No health and safety limits were exceeded in the work areas.

Next Steps

- A. Continue excavations of drums and drum remnants source areas on the northwestern portion of the property.
- B. Continue off-site disposal of the first stockpile of TSCA-regulated wastes removed from excavations.
- C. Complete characterization of the current stockpile of non-TSCA regulated wastes to prepare for off-site disposal.
- D. Identify disposal options for truck inner tubes.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil and debris)	3,000.91 tons (measured)	Various (136 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	2,902.98 tons (estimated, ongoing)	Various (123 shipments to date)	Heritage Environmental Services Landfill, Roachdale, Indiana

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