

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

**Date:** Saturday, June 21, 2014  
**From:** Michael Towle, On-Scene Coordinator

**To:** Dustin Armstrong, PADEP SERO

**Subject:** Pipe System Inspection and Cleanout (Completion)

Metro Container Corporation  
2nd & Price Street, Trainer, PA  
Latitude: 39.8249606  
Longitude: -75.3990472

|                          |                       |                            |                |
|--------------------------|-----------------------|----------------------------|----------------|
| <b>POLREP No.:</b>       | 79                    | <b>Site #:</b>             | 032H           |
| <b>Reporting Period:</b> | 06/15/2014-06/21/2014 | <b>D.O. #:</b>             |                |
| <b>Start Date:</b>       | 9/30/2013             | <b>Response Authority:</b> | CERCLA         |
| <b>Mob Date:</b>         | 9/30/2013             | <b>Response Type:</b>      | Time-Critical  |
| <b>Demob Date:</b>       |                       | <b>NPL Status:</b>         | NPL            |
| <b>Completion Date:</b>  |                       | <b>Incident Category:</b>  | Removal Action |
| <b>CERCLIS ID #:</b>     | PAD044545895          | <b>Contract #</b>          |                |
| <b>RCRIS ID #:</b>       |                       |                            |                |

#### 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 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.

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 on Consent. 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. Analytical results of liquids temporarily stored in a portable 21,000-gallon steel storage tank (Tank # 3, serial #253322) were received, indicating non-hazardous disposal. This week, three truckloads of

aqueous liquid totaling 16,292 gallons from Tank #3, were hauled to Environmental Recovery Corporation, Lancaster Pennsylvania for disposal. On 06/17/14, two loads were hauled off containing 6,100 gallons each. On 06/18/14, one truck hauled the remaining 4,092 gallons. The emptied tank was subsequently moved near Grid 10 area to support collection of water generated during the jetting of buried pipes and drainage systems.

B. Samples were collected for laboratory analysis from Tank #1 (serial #251955) and Tank #4 (serial #252663) for full TCLP and RCRA characteristics. These results will be used to determine disposal options.

C. ERRS continued the process of removing the contents from buried drainage pipes and other pipes that contained suspect contents that may have originated from beneath or within the former facility buildings. These pipes were those that could not be previously removed due to their location beneath the asphalt area of the current operational area or were otherwise too close to the building. A water jetting vehicle was mobilized for this task. Several of the pipes contained oily, sludgy material or free oil. The jet hose was advanced up the pipes until refusal was encountered. All liquids generated from the cleaning process were collected and containerized in portable steel storage tanks. Following pipe cleaning, an in-pipe video inspection was performed by a subcontractor to determine remaining pipe contents, connections, condition, direction and point of origin. Some video inspections were advanced farther into the pipes than the associated cleanout. Following the in-pipe video inspections, the OSC instructed ERRS to cement shut the exposed ends of the pipes to close them in place. The endpoints were recorded using GPS technology and the pipes will be backfilled. No camera runs were conducted in Pipes NN and TT (cleanouts were conducted during the previous reporting period). A summary of the camera "runs," as designated by the subcontractor, is as follows:

- Run 1 (Pipe WW) - Cleaned out a total of 2 linear feet; solid blockage due to gravel and brick pieces encountered.
- Run 2 (Pipe XX) - Cleaned out a total of 8 linear feet, traveled northwest under parking area; solid blockage in the pipe.
- Run 3 and Run 4 (Pipe AB) - Cleaned out a total of 15 linear feet traveling north (Run 3), and 8 linear feet traveling south (Run 4); blockage caused in both directions by pieces of broken pipe.
- Run 5 (former location of Pipe AH) - Pipe AH was pulled prior to the inspection. The square, formed opening in the concrete footer that previously held the pipe was inspected and found blocked about at about 2.5 feet by bricks, gravel, and other fill material.
- Run 6 (Pipe AF) - Cleaned out a total of 8 linear feet, traveled northwest; may have been broken during the installation of on-site storm water sewer.
- Run 7 (Pipe MM) - Inspected a total of 71 linear feet where solid blockage was encountered; pipe traveled northeast parallel to the sand-blasting room; the pipe was cleaned out to a distance of about 60 feet during the previous reporting period.
- Run 8 (Pipe Z2) - Cleaned out a total of 69 linear feet, able to advance camera 78 feet, traveling east, where blockage was encountered.
- Run 9 (Pipe F) - Cleaned out a total of 32 linear feet, determined to travel generally east, with a bend in the pipe changing direction to the northeast at 25 feet.
- Run 10 (Pipe E) - Cleaned out a total of 27 linear feet, advanced camera 32 feet to the east, where a solid concrete-like blockage was encountered.
- Run 11 (Pipe G) - Cleaned out a total of 51 linear feet. Advanced camera 59 feet to the east where a solid blockage was encountered.
- Run 12 (Pipe C1) - Cleaned out a total of 74 linear feet, advanced camera 87 feet. The pipe travels 45 feet to the east, then encounters a 45-degree bend, and travels southeast for an additional 42 feet, where blockage was encountered.
- Run 13 (Pipe C2) - Cleaned out a total of 40 linear feet, advanced camera 63 feet. The pipe trends adjacent and parallel to Pipe C1, The pipe direction travels 48 feet to the east, then encounters a 45-degree bend, and travels southeast for an additional 15 feet where blockage was encountered.
- Run 14 was not conducted.
- Run 15 (Pipe D2) - Cleaned out a total of 55 linear feet, inspected a total of 60 feet to the east and blocked by a large object; this pipe appears to travel under the covered open-air sand-blasting room and painting room.
- Run 16 (Pipe PP) - Cleaned out a total of 3 feet; blockage approximately at presumed location of entry into the sand-blasting room.
- Run 17 (Pipe M) - Cleaned out a total of 24 linear feet. Advanced camera a total of 28 feet to the southeast, where a blockage was encountered.
- Run 18 (Pipe YY) - Cleaned out a total of 15 linear feet; camera advanced 3 feet into pipe. The pipe trends southeast from the northern opening. The pipe appears to daylight in the floor of the main building about 15 feet from the northern opening and is either discontinued or partially sheared off at the floor level. The pipe appears filled with concrete near the southern exposed area. The exposed southern section of pipe is difficult to detect due to dirt and other debris on the surface.

- Run 19 (1 of 2) (Pipe K) - Cleaned out a total of 51 linear feet, inspected a total of 60 feet, traveling east; the inspection was then terminated at a solid object.
- Run 19 (2 of 2) (Pipe S) - Cleaned out a total of 60 linear feet, traced traveling southeast; terminated by solid blockage.
- Run 20 was attempted in an undesignated pipe located east of the concrete pad located northwest of the main building (Feature G). The inspection was terminated at 2 feet into the pipe due to a blockage. After inspection, the pipe was found to be an unconnected pipe section and disregarded.
- Run 21 (newly designated Pipe AK) – This is a run in a previously undesignated pipe identified during the uncovering of. Pipe AK is 4-inch steel and located about 2.5 feet bgs. A fitted cap covered the northern opening. The pipe trends approximately southeast from the opening toward the northwest corner of the open-air sand-blasting room. The pipe was cleaned out and inspected with a camera for a distance of approximately 52 feet, where the pipe was blocked with gravel or concrete.

D. An evaluation of the pipes and their contents and the length/orientation of the pipe run suggests that the pipes may have served or drained structures other than the existing buildings associated with the three-story, 40,000-square foot, brick and steel framed building (referenced primarily as the “main building” in POLREPs, “drum building” under Joseph A. Reis, Universal, and Metro ownership, and “oven building” under Stauffer ownership). Some of the pipes appear to start and then stop for no reason or end in clay or buried rubble (not connecting to an obvious drain or area of known operation). Other pipes, such as Pipe GG, extend directly under the concrete foundation footer of the main building. It is unknown if pipes that do not appear to have a purpose associated with the current Site layout or that are under the may be relating to an older facility (e.g., former Delaware Oil Works or Manufacturers Paraffine Company) or represent a configuration abandoned or reconstructed by Stauffer or others since the 1920s.

E. A roll off container was delivered to the Site on 06/20/14 and was loaded with suspect non-friable possible ACM (i.e., transite) pipe. The contents of the roll off container with an estimated weight of 15 tons were then disposed of at the Conestoga Landfill located in Morgantown, Pennsylvania. The emptied container was re-mobilized to the Site and loaded with additional suspect ACM, including Galbestos material. Galbestos is corrugated sheet metal coated with felt-like ACM, and may contain PCBs. A sample of the Galbestos material was sampled for PCBs to determine disposal options. The roll-off container was secured and is currently stored on-site awaiting sample results.

F. Analytical results from samples collected on 05/21/14 from the UST discovered between the large and small annexes (Feature Q) were received during this reporting period. The OSC determined that the aqueous contents of the tank pose little if any threat to human health or the environment. The tank contents appeared to be water with low levels of carbon disulfide (15 µg/L) and toluene (4.9 µg/L). 1,3,5-Trithiane was a tentatively identified compound (TIC) at an estimated concentration of 790 µg/L. The OSC directed no further actions at this time for this tank.

G. Laboratory analytical results from samples collected for analysis during the previous reporting period (solid samples MC-SO-Pipe EE and MC-SO-Pipe TT, and aqueous samples MC-AQ-Pipe EE and G30-TANK) were received.

- Sample MC-SO-Pipe EE contained elevated readings of numerous VOCs, including but not limited to benzene (0.69 mg/kg), toluene (11 mg/kg), ethylbenzene (9.1 mg/kg), xylenes (31 mg/kg), carbon disulfide (0.23 mg/kg), cis-1,2-dichloroethene (13 mg/kg), tetrachloroethene (1.7 mg/kg), and trichloroethene (4.2 mg/kg). The total concentration of VOC TICs was 230 mg/kg, including numerous aromatic benzene-structured compounds such as 1,2,3-trimethyl-benzene (24 mg/kg) and 1-ethyl-3-methyl-benzene (14 mg/kg). SVOCs detected include but are not limited to benzo(a)anthracene (3.6 mg/kg), benzo(a)pyrene (1.6 mg/kg), benzo(b)fluoranthene (5.4 mg/kg), benzo(k)fluoranthene (2.2 mg/kg), chrysene (5.8 mg/kg), fluoranthene (7.1 mg/kg), phenanthrene (5.2 mg/kg), and pyrene (4.8 mg/kg).
- With the exception of acetone at 74 µg/L, no VOCs were detected in aqueous sample MC-AQ-Pipe EE.
- Solid sample MC-SO-Pipe TT contained elevated readings of numerous VOCs and SVOCs similar to those identified in solid sample MC-SO-Pipe EE but at generally lower concentrations. Unlike Pipe EE, a PCB compound (Aroclor-1254) was present in sample MC-SO-Pipe TT, at a concentration of 1.4 mg/kg.
- Aqueous sample G30-TANK contained numerous VOCs at elevated concentrations, including acetone (4400 µg/L), methyl isobutyl ketone (1,400 µg/L), methyl ethyl ketone (400 µg/L), benzene (240 µg/L), toluene (950 µg/L), cis-1,2-dichloroethene (530 µg/L), tetrachloroethene (42 µg/L), trichloroethene (78 µg/L), and xylenes (320 µg/L). The total concentration of VOC TICs was 276,440 µg/L, and was comprised entirely of numerous sulfur-containing compounds, such as methyl mercaptan (or methanethiol) (54,000 µg/L), ethanethiol (740 µg/L), dimethyl sulfide (23,000 µg/L), dimethyl sulfide (190,000 µg/L), methyl ethyl disulfide (3,500 µg/L), 2,4-dithiapentane (1,800 µg/L), and dimethyl trisulfide (3,400 µg/L).

H. 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.

### Next Steps

- A. Complete off-site disposal of non-TSCA regulated waste.
- B. Drain and close in place the UST in Grid 30, and dispose of liquid waste.
- C. Dispose of liquid stored in portable steel tanks, then demobilize the remaining tanks.
- D. Decontaminate and demobilize heavy machinery used for waste removal, but no longer needed for final Site grading activities.
- E. Complete final backfill and grading operations.

### Disposition of Wastes

| Waste Stream                                           | Quantity                   | Manifest #                | Disposal Facility                                            |
|--------------------------------------------------------|----------------------------|---------------------------|--------------------------------------------------------------|
| Non-RCRA, non-DOT-regulated material (soil and debris) | 6,414.64 tons (estimated)  | Various (286 shipments)   | Republic Conestoga Landfill, Morgantown, Pennsylvania        |
| TSCA-regulated PCB remediation waste                   | 4,072.98 tons (estimated)  | Various (175 shipments)   | Heritage Environmental Services Landfill, Roachdale, Indiana |
| Non-hazardous liquid waste (purged ground water)       | 33,362 gallons (estimated) | Various (6 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)                     | 15 tons (estimated)        | 1 shipment (MCS-ASB-0001) | Republic Conestoga Landfill, Morgantown, Pennsylvania        |

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