

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

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

Subject: Site Restoration/Off-Site Disposal of IDW
Metro Container Corporation
2nd & Price Street, Trainer, PA
Latitude: 39.8249606
Longitude: -75.3990472

POLREP No.:	83	Site #:	032H
Reporting Period:	07/13/2014-07/19/2014	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 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. ERRS continued the disposal of water collected in portable steel storage tanks. The water was hauled to Environmental Recovery Corporation located in Lancaster, Pennsylvania for disposal.

- On 7/14/14, two tanker loads of waste water from Tank #4 (252663) was transported off-site for disposal. Each shipment contained 6,200 gallons, for a total of 12,400 gallons.
- On 7/15/14, three tanker loads of waste water from Tank #4 and Tank #1 (251955) was transported off-site for disposal. A total of 18,550 gallons was transported.
- On 7/16/14, the remaining 3,690 gallons of waste water in Tank #1 was disposed of.

B. On 7/17/14, a representative from PADEP was onsite to observe the status of the Removal Action.

C. After removal of all waste water as described in Action Item “A”, ERRS crew entered Tank #1 and Tank #4 via confined space entry permit for the purpose of removing residual sludge material and decontamination. Removed sludge was placed in the existing non-TSCA regulated soil stockpile awaiting off-site disposal.

D. ERRS demobilized Tank #3 (253322) from the Site.

E. ERRS demobilized from the Site an above ground storage tank used to fuel equipment in support of the Removal Action and a pump along with assorted hoses.

F. ERRS continued to import loads of clean fill and modified stone onto the Site. The clean fill and modified stone was also used to place a layer of clean cover over top of portions of Grids 10 and 11.

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.

Next Steps

- A. Finish off-site disposal of non-TSCA regulated waste.
- B. Determine disposal options for approximately 100 truck tires encountered during excavation efforts.
- C. Complete decontamination process of portable steel storage tanks and demobilize the tanks from the Site.
- D. Dispose of drummed material removed from the Grid 30 UST.
- E. Decontaminate and demobilize heavy machinery used for waste removal, but no longer needed for final Site grading activities.
- F. Complete final backfill and grading operations.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Non-RCRA, non-DOT-regulated material (soil)	6,425.02 tons (estimated)	Various (289 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
Non-RCRA, non-DOT-regulated material (debris)	712.73 tons (estimated)	Various (30 shipments)	Republic Conestoga Landfill, Morgantown, Pennsylvania
TSCA-regulated PCB remediation waste	4,184.34 tons (actual)	Various (175 shipments)	Heritage Environmental Services Landfill, Roachdale, Indiana
Non-hazardous liquid waste (purged ground water)	68.002 gallons (estimated)	Various (12 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 pipe)	15 tons (estimated)	1 shipment (MCS-ASB-0001)	Republic Conestoga Landfill, Morgantown, Pennsylvania