

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, August 27, 2015

From: Michael Towle

To: Dustin Armstrong, PADEP SERO

Subject: Modification of Action Memo and Signed Administrative Order on Consent

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

POLREP No.:	87	Site #:	032H
Reporting Period:	10/30/2014 through 8/27/2015	D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:		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. Refer to POLREP #86 for a detailed description of removal activities conducted by EPA between September 2013 and September 2014 as well as a summary of the analytical results of samples collected and a description of the wastes disposed.

A. NOTE: POLREP #86 is labeled as "Final". However, the same Removal Action is now continued as an enforcement-lead action. POLREP #87 is the first Pollution Report to document activities under the enforcement-lead Removal Action.

B. The Metro Container Corporation Site was listed to the National Priorities List on March 15, 2012. See POLREP #86 for a summary of information considered by the OSC in determining the need for additional removal actions. In short, the Removal Action conducted by EPA between September 2013 and September 2014 could not be completed, in part, due to the presence of a dilapidated building on the premises.

C. 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 Site was also the subject of a Removal Action conducted by EPA between September 2013 and September 2014. See POLREPS #50 and #86 for a summary of information.

D. 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.

E. On February 24, 2015, EPA Region III approved an Action Memorandum which changed the scope

and increased the funding for a Time-Critical Removal Action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) and the NCP. The Removal Action is necessitated largely due to the presence of a dilapidated building on the Site which prevented completion of removal activities. As such, additional actions are necessary to mitigate threats posed by the release and threatened release of hazardous substances from the Site. A new Removal Action ceiling of \$4,667,500, of which \$4,400,000 is from the Regional Removal Allowance, was approved by Region III. The Removal Action generally entails the continuation of previous actions involving the elimination of migration pathways (e.g., buried pipes) and removal of highly contaminated soils impacted by PCBs and high concentrations of NAPL. Since the building is in very poor shape and the source areas are largely under the building, its demolition (or partial demolition) may be necessary. Actions will continue to be consistent with future anticipated remedial actions and will contribute to the efficient performance of any future remedial action.

F. On August 27, 2015, EPA Region III and several potentially responsible parties entered into an administrative settlement agreement and order by consent (Consent Order) for completion of the Removal Action specified in the February 2015 Action Memorandum.

G. The Site includes multiple systems of underground pipes and other drainage systems which were largely removed by EPA. However, some of these pipes extended under the dilapidated building. The pipes are of unknown purpose. Some of these pipes are known to have discharged unknown substances directly into Stoney Creek for unknown reasons. Other parts conveyed liquids from the area of building, but did not daylight into Stoney Creek. The removal of these systems which convey hazardous substances are the subject of removal actions.

Current Activities

A. By September 5, 2014, the EPA Removal Action was completed to the extent practical given the presence of dilapidated buildings on the Site and other factors. Wastes generated during the action were disposed from the Site. All the activity is summarized in POLREP #86. POLREP #86 is labeled as a final POLREP, but additional actions were identified as being required therein in order to address the threats posed by the Site.

B. Beginning in 2013, EPA had initiated activity to identify and coordinate with parties potentially responsible for the release of hazardous substances at the Site. EPA sent letters to these entities to notify them of their potential CERCLA liability. On September 9, 2014, representatives of the potentially responsible parties met with EPA to discuss the conditions at the Site.

C. In September and October 2014, the EPA OSC continued an assessment of the release of hazardous substances at the Site. POLREP #86, dated October 29, 2014, contains a detailed summary of that evaluation. On December 5, 2014, the potentially responsible parties notified EPA of their willingness to participate in discussions concerning the Site. Each of the parties ultimate decision to enter into any agreement with EPA would depend upon their ability to understand certain issues and EPA's decisions relating to additional actions which may be required at the Site.

D. On February 24, 2015, EPA Region III approved an Action Memorandum which changed the scope of the existing Removal Action and increased the funding to allow for additional Time-Critical Removal Action pursuant to CERCLA and the NCP. The Removal Actions were necessitated largely due to the presence of a dilapidated building on the Site which prevented completion of the removal activities conducted between September 2013 and 2014 and as further identified by the OSC's evaluation of existing information. A new Removal Action ceiling of \$4,667,500, of which \$4,400,000 is from the Regional Removal Allowance, was approved by Region III. The Removal Action generally entails the continuation of previous actions involving the elimination of migration pathways (e.g., buried pipes) and removal of highly contaminated soils impacted by PCBs and high concentrations of NAPL. Since the building is in very poor shape and the source areas are largely under the building, its demolition (or partial demolition) may be necessary.

E. Between May 2015 and August 27, 2015, the group of potentially responsible parties and the EPA discussed Site conditions and the actions required by EPA as indicated in the February 24, 2015 Action Memorandum.

F. On August 27, 2015, the EPA and potentially responsible parties agreed to conduct removal response actions pursuant to an Administrative Settlement Agreement and Order on Consent for a Removal Action (Consent Order). The Consent Order contains the required work items to be implemented by the group of potentially responsible parties and the requirements for such implementation.

Planned Removal Actions

The group of potentially responsible parties (PRPs) will propose contractors and develop and submit for approval a Response Action Plan (RAP) under which the work requirements of the Consent Order will be implemented.

Next Steps

Await RAP and other notification requirements relating to the Consent Order.

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
PCB Remediation Waste and Asbestos-Containing Material (Galbestos)	3,700 pounds (estimated)	1 shipment (012265068JJK)	Waste Disposal Company, Belleville, Michigan
Reactive sulfide wastes (hazardous waste, n.o.s. (sulfide), 9 PGIII, D003)	3,500 pounds (estimated)	1 shipment (012094953JJK)	Envirite of Pennsylvania, York, Pennsylvania
PCB Remediation Waste	75 pounds (estimated)	1 shipment (000558359 VES)	Veolia ES Technical Solutions, Port Arthur, Texas