

**NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET**

(Pursuant to NAC 445A.236)

Permittee: Sierra Pacific Power Co
P O Box 10100
Reno NV 89520

Permit No.: NEV98004

Facility: Electrical Transformer Spill Remediation

General: This permit was originally issued in 1998 and sets up a program for remediation and reporting of transformer leaks. Transformer leaks are routine, well understood occurrences. The effect of this permit is to require compliance with applicable state and federal regulations, while eliminating unnecessary reporting and allowing higher levels of non-PCB contaminated soil to remain in place; thereby minimizing excavation. Although this permit is issued by the Division's Bureau of Water Pollution Control, it is at the request of and in support of the Bureau of Corrective Action, due to a lack of permitting authority in that bureau.

Rational for Permit Requirements The main component of these spills is mineral oil, a petroleum byproduct with industrial uses as well as skin care and laxative applications. Of greater concern, are varying concentrations of poly chlorinated biphenyls (PCBs) that are sometimes present. The permit specifies three categories of clean up criteria based on PCB concentration: less than 2 ppm, between 2 and 45 ppm, and greater than 45 ppm. Best management practices (BMPs) are required for locations near water or other environmentally sensitive areas to minimize impacts both from the spill and remediation. The lowest concentration category, less than 2 ppm PCB, allows soils with up to 10,000 ppm total petroleum hydrocarbon (TPH) to remain in place based on the lack of mobility, propensity for biodegradation, and the value of maintaining existing property conditions.

Under the permit, eligible spills are remediated by the power company, with summary reports submitted twice a year. The reports are logged by the Bureau of Water Pollution Control, and reviewed by the Bureau of Corrective Actions.

Changes from Previous Permit The previous permit had an error in the under 2 ppm PCB category which resulted in the power company reporting spills of less than 25 gal, or resulting in less than 3 yd³ of soil contamination, which is not necessary or intended. That has been corrected in the current permit to only spills that exceed those thresholds.

Nevada Division of Environmental Protection

Fact Sheet

Sierra Pacific Power Company - Transformer Spill Remediation

NEV98004

Page 2 of 2

Compliance History There is no record of permit violations in Division enforcement files.

Schedule of Compliance: The Permittee is required to comply with the effluent limitation upon issuance of the permit.

Procedures for Public Comment: The Notice of the Division's intent to renew water pollution control permit NEV98004 authorizing simplified remediation and reporting of electrical transformer spills, subject to the conditions of the permit, is being sent to the **Reno Gazette Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline by which all written comments are to be postmarked or hand delivered to the Division is Tuesday March 28, 2006 by 5:00 pm.

A public hearing on the proposed determination can be requested by the applicant, any affected state or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing the Administrator determines to be hold must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to renew the proposed discharge permit for a five year term.

Prepared by: Robert J. Saunders
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 Bureau of Water Pollution Control
 February 15, 2006