TABLE OF CONTENTS

FIGURES

APPENDICES

EXECUTIVE SUMMARY

This report presents the activities and results associated with the removal and disposal of all known capacitors previously discarded at the former Lackawanna Mill property located in Ely, Nevada. The activities associated with this removal took place between March 19, 2013 and March 21, 2013.

In June of 2012, a Phase I Environmental Site Assessment (ESA) and Limited Phase II ESA were performed by MGA on the subject property utilizing grant funding provided by the State of Nevada Brownfields Program (NBP). The assessment recommended that the discarded and damaged capacitors be removed and disposed at a landfill permitted to accept PCB waste of this type.

Based on those recommendations and the possibility of a public health risk due to PCB contamination at the site, MGA utilized NBP funds to remove and discard all found capacitors at the site. The removal was performed by trained MGA staff following a NDEP-approved Corrective Action Plan (CAP) and the site-specific Health and Safety Plan previously prepared by MGA for sample collection at the site in the Phase II ESA. In addition, over-excavation and disposal of poly-chlorinated biphenyl (PCB) impacted soil located beneath and proximal to the removed capacitors was conducted at the time of capacitor collection and removal.

Once collected, the capacitors were placed in 55-gallon steel drums lined with two poly bags. Over-excavated soil was also placed within the drums for disposal. The drums were then sealed for transport to the US Ecology landfill in Beatty, Nevada. AET Environmental transported all sealed drums to the landfill on March 21, 2013 and disposed of them in accordance with local, State of Nevada, and Federal regulations.

Soil samples were collected at the extent of the over-excavation for comparison to EPA Region 9 Regional Screening Levels (RSL) for industrial soil to ensure all PCB-contaminated soil was removed. Approximately one cubic foot of soil was removed at each location associated with a discarded capacitor found on soil. With the exception of one capacitor location, it appears that soil was removed beyond the extent of contamination. One location still exhibited a concentration of Aroclor 1242 at 1,200 mg/Kg which is well above the RSL for industrial soil of this compound at 0.74 mg/Kg.

Therefore, it is recommended that additional soil be removed and a sample collected at the extent for final analysis. Based on the sample location and the amount of soil removed from all locations, MGA is of the opinion that the volume of soil contaminated with PCBs at this location is less than three cubic yards and does not constitute a reportable spill event. It is anticipated that less than two cubic feet of soil will be required to be removed and disposed.

McGinley & Associates was contracted by the NBP on behalf of The City of Ely to remove, transport, and dispose of discarded capacitors formerly utilized at the Lackawanna Mill site in Ely, Nevada. The property consists of one parcel of land that is listed with White Pine County, Nevada as Assessor's Parcel Number (APN) 010-420-06. The activities were supervised and reviewed by a Nevada Certified Environmental Manager (CEM) as required by the State of Nevada NAC 459.

During this removal action, 24 capacitors were found and successfully removed and transported for disposal. Of those 24 capacitors, two were located on native soil. The soil beneath these two capacitors was excavated to the perceived extent of potential PCB contamination. At the extent of the excavated areas, confirmation samples were collected and subsequently submitted via proper chain-of-custody protocol to ESC Lab Sciences for PCB analysis by EPA Method 8082. The results of one of the samples indicated that not enough soil was excavated beneath the corresponding capacitor. However, based on known site conditions and contaminant physical properties, it is MGA's opinion that less than two cubic feet of PCB contaminated soil remains at the location. MGA recommends that the additional two cubic of soil be excavated and disposed per local, state, and federal regulations. In addition, it is recommended that one additional confirmation sample be collected to ensure the contamination has been removed.

1. INTRODUCTION

McGinley & Associates (MGA) conducted and managed activities for the removal, transport, and disposal of all known capacitors previously discarded at the Lackawanna Mill Site in Ely, Nevada. The former mill site is located on Lackawanna Road approximately two miles north of the City of Ely, White Pine County, Nevada. Specific geographic positioning system (GPS) coordinates for the site entrance is: Latitude 39°16'59" North, Longitude 114°52'04" West. The subject property lies in the western portion of Steptoe Valley at the eastern slopes of the Egan Range (Figure 1). It is listed as White Pine County Assessor's Parcel number 010-420-06 and is located within Section 03, Township 16 North, Range 63 East of the Mount Diablo Base and Meridian (MDB&M).

2. OBJECTIVES AND SCOPE OF SERVICES

Per the NBP reviewed and approved corrective action plan (CAP) previously prepared by MGA staff, the objectives of the activities were to remove, transport, and dispose of all observed capacitors at the site. In addition, soil beneath any capacitor found to be located on soil was to be over-excavated and a confirmation sample collected at the extent of the excavation to determine if the contamination was removed appropriately in comparison to RSLs for industrial soil. As required by the State of Nevada Administrative Code (NAC) 459, all MGA services were supervised and reviewed by a Nevada Certified Environmental Manager (CEM).

The activities performed by MGA for this removal action included:

- Collection and removal of 24 capacitors;
- Placement of the capacitors into poly-lined 55-gallon steel drums prior to transport;
- Over-excavation of soil located beneath capacitors found on soil;
- Collection of soil samples at the extent of each over-excavation;
- Placement of over-excavated soil into poly-lined 55-gallon steel drums prior to transport;
- Pick-up and transport of four 55-gallon steel drums by AET Environmental to the US Ecology landfill in Beatty, Nevada; and
- Delivery of waste drums to the US Ecology landfill with final disposal per local, State of Nevada, and Federal regulations.
- Preparation of this Report.

3. CAPACITOR REMOVAL

On March 20, 2013, MGA staff searched the mill site for discarded capacitors. Twenty-four capacitors were observed, removed, and placed into poly-lined 55-gallon drums. Two of the capacitors were discovered proximal to an access road and on soil. Twenty-two capacitors were collected from the concrete building pad located at the upper portion of the mill site.

4. PACKAGING AND STABILIZATION FOR TRANSPORT

After removal, the 24 capacitors were packaged within two 3-mil poly contractor bags and placed into 55-gallon steel drums. Each drum was sealed and then placed into a transport truck by AET Environmental and secured within the truck to ensure the drums would not tip over. No issues were observed or noted during the packaging and stabilization process.

5. OVER-EXCAVATION OF SOIL AND SAMPLE COLLECTION

Of the 24 capacitors found at the mill site, only two were located on areas containing native soil. At those locations, soil from beneath each capacitor was excavated and placed into 55-gallon steel drums. Approximately one cubic foot of soil was excavated from each capacitor location, which was anticipated to be the volume required to remove soils contaminated with PCBs above EPA Region 9 RSLs. Once the anticipated volume was removed, a confirmatory soil sample was collected at the extent of the excavation. The soil samples were collected within glass jars, sealed, placed on ice, and shipped to the laboratory for PCB analysis.

In addition to excavation of soils, material located proximal to capacitors removed from the concrete pad which appeared to be stained with capacitor oil was collected and placed into 55-gallon steel drums for subsequent disposal.

6. LABORATORY ANALYSIS OF SOIL SAMPLES

Two collected soil samples were submitted via proper chain of custody protocol to ESC Lab Sciences for analysis. Each sample was analyzed for PCBs via EPA Method 8082. Table 1 presents the results for both samples.

EPA Region 9 RSLs Industrial

Table 1: Summary of Soil PCB Results

Parameter	Units	LVBRN019 SS-01	LVBRN019 SS-02	So	RSLs
PCB 1016	mg/Kg	ND	ND		21
PCB 1221	mg/Kg	ND	ND		0.54
PCB 1232	mg/Kg	ND	ND		0.54
PCB 1242	mg/Kg	ND	1,200		0.74
PCB 1248	mg/Kg	0.12	ND		0.74
PCB 1254	mg/Kg	0.041	ND		0.74
PCB 1260	mg/Kg	ND	ND		0.74

Results from soil sample SS-01 indicate that PCB concentrations within the collected samples were below the compound-specific RSLs in industrial soil. Therefore, it appears that excavation of soils at this location was adequate to remove PCB contaminated soils. However, the sample collected at the second capacitor location exhibited PCB concentrations (PCB 1242) at 1,200 mg/Kg. This indicates that the extent of PCB soil contamination at this location was not found. Based on knowledge of the site and physical characteristics of PCBs, it is MGA's opinion that the additional amount of PCB contaminated soil left at this location is less than two cubic feet of soil.

7. TRANSPORT AND DISPOSAL

On March 21, 2013, AET Environmental collected the 55-gallon drums, secured them within their transport truck, and delivered them to the US Ecology landfill located in Beatty, Nevada. The drums were accepted for disposal. The Uniform Hazardous Waste Manifest associated with the disposal is provided in Appendix A.

8. SUMMARY OF FIELD ACTIVITIES

- Twenty-four capacitors were located, removed, and placed into 55-gallon drums;
- Soil beneath two capacitors found on soil was excavated and placed into 55-gallon drums;
- Sealed 55-gallon drums were picked up by AET Environmental and transported to the US Ecology hazardous waste landfill in Beatty, Nevada for proper disposal;
- Confirmation soil samples were collected at the extent of each excavation;
- Collected soil samples were analyzed for PCBs via EPA Method 8082;

9. CONCLUSIONS

McGinley & Associates was contracted by the NBP on behalf of The City of Ely to remove, transport, and dispose of discarded capacitors formerly utilized at the Lackawanna Mill site in Ely, Nevada. The property consists of one parcel of land that is listed with White Pine County, Nevada as Assessor's Parcel Number (APN) 010-420-06. The activities were supervised and reviewed by a Nevada Certified Environmental Manager (CEM) as required by the State of Nevada NAC 459 and conducted following a NDEP-approved CAP.

During this removal action, 24 capacitors were found and successfully removed and transported for disposal. Of those 24 capacitors, two were located on native soil. The soil beneath these two capacitors was excavated to the perceived extent of potential PCB contamination. At the extent of the excavated areas, confirmation samples were collected and subsequently submitted via proper chain-of-custody protocol to ESC Lab Sciences for PCB analysis by EPA Method 8082. The results of one of the samples indicated that not enough soil was excavated beneath the corresponding capacitor based on comparison to RSLs for industrial soil. However, based on known site conditions and contaminant physical properties, it is MGA's opinion that less than two cubic feet of PCB contaminated soil remains at the location. MGA recommends that the additional two cubic of soil be excavated and disposed per local, state, and federal regulations. In addition, it is recommended that one additional confirmation sample be collected to ensure the contamination has been removed to EPA Region 9 industrial soil standards.

10. CLOSING

Should you have any questions regarding this report please contact Brett Bottenberg at (702) 260-4961, ext.-7003.

Respectfully submitted,

McGinley and Associates, Inc.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations, and ordinances.

Brett C. Bottenberg, C.E.M. #1690, Exp. 10/07/13
Senior Project Manager

Reviewed by:

Joseph M. McGinley, P.E., C.E.M. #1036, Exp. 11/14
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