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| Soil & Groundwater Investigations

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| Phase I Assessments

| Storm Water & Spill Plans

| Underground Tank Services

| Toxic Release Inventory

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| Litigation Support & Expert Witness

REPORT OF REMOVAL ACTION

**Transformer Disposal
McGill Ball Park
56 South 4th Street
McGill, Nevada
NDEP Contract #10-008
Task M05-13**

Prepared for:

*State of Nevada
Department of Conservation & Natural Resources
Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701*

On behalf of: White Pine County

June 13, 2013

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Figure 1 Project Location Map

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EXECUTIVE SUMMARY

This report presents the activities and results associated with the removal of eight pole-mounted electrical transformers from the McGill Ball Park located in McGill, Nevada. The activities associated with this removal took place between March 19, 2013 and March 21, 2013.

In May of 2012, a Phase I Environmental Site Assessment (ESA) was performed by MGA on the subject property utilizing an Environmental Protection Agency (EPA) Brownfields Coalition Assessment Grant. The grant was awarded to the Rural Desert Southwest Brownfields Coalition (RDSBC) which is comprised of five Nevada and California counties, including: Nye County (Nevada); Esmeralda County (Nevada); White Pine County (Nevada); Lincoln County (Nevada); and Inyo County (California). The assessment revealed that based on the estimated age of the aerial transformers, polychlorinated biphenyls (PCBs) were most likely present within the transformers formerly utilized at the park.

Based on the Phase I ESA findings, MGA conducted transformer sampling activities in June of 2012. Those activities were conducted as part of the Nevada Brownfields Program (NBP) for the Nevada Division of Environmental Protection (NDEP). The assessment determined that three of the transformers contained PCBs at levels below 5 mg/Kg (non-PCB transformers) and three contained PCBs at levels between 5 mg/Kg and 500 mg/Kg (PCB-contaminated). Two of the transformers were not accessible during the assessment. However, both were similar in size and shape to the three PCB-contaminated transformers. Therefore, it was determined that those two transformers were likely PCB-contaminated as well. Once the PCB levels were determined for the transformers, removal activities were proposed and accepted into the NBP.

Transformer removal at the McGill Ball Park was performed by Linnell Electric, a State of Nevada licensed electrical contractor. Removal activities took place on March 19, 2013. Once removed, the transformers were placed in a secure area until placed into overpack drums and 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.

1. INTRODUCTION

McGinley & Associates (MGA) conducted and managed activities for the removal, transport, and disposal of eight pole-mounted transformers formerly utilized at the McGill Ball Park in McGill, 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.

2. OBJECTIVES AND SCOPE OF SERVICES

The objectives of the activities were to remove, transport, and dispose of eight pole-mounted electrical transformers. 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:

- Removal of eight pole-mounted electrical transformers by a State of Nevada licensed electrical contractor;
- Placement of the transformers into overpack drums prior to transport;
- Pick-up and transport of eight overpack 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.

3. TRANSFORMER REMOVAL

On March 19, 2013, Linnell Electric of Ely, Nevada removed eight pole-mounted electrical transformers from the McGill Ball Park field. Due to the nature of the transformers containing PCBs, the transformers were checked for proper seal prior to disassembly. Once disassembled, the transformers were placed onto the overhead lift and placed in a secure area for storage. MGA field staff provided oversight during the removal activities. No leaks were noted to be emanating from any of the transformers during the removal process and all transformers appeared to be in very good condition.

4. PACKAGING AND STABILIZATION FOR TRANSPORT

After removal and placement in a secure area, the eight pole-mounted transformers were separately packaged within two 3-mil poly contractor bags and placed into overpack drums. Each drum was 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. TRANSPORT AND DISPOSAL

On March 21, 2013, AET Environmental collected the overpack 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.

6. SUMMARY OF FIELD ACTIVITIES

- Eight pole-mounted transformers were disassembled and removed from the poles;
- All transformers were placed in a secure area prior to packaging in drums;
- All transformers were placed in 3-mil poly contractor bags and packaged into overpack drums;
- The drums were placed into the transport truck and secured for transport;
- All drums were transported to the US Ecology landfill in Beatty, Nevada; and
- MGA staff provided field oversight until transport of the drums occurred.

7. CONCLUSIONS

McGinley & Associates was contracted by the NBP on behalf of White Pine County to remove, transport, and dispose of eight pole-mounted transformers formerly located at the McGill Ball Park. 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 removal and packaging 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, all eight pole-mounted transformers were successfully removed from the light poles and transported for disposal. No damage to the transformers was observed during the removal activities and no leakage of fluids was observed while MGA was available for field oversight. Further, all eight drums containing the transformers were accepted as waste at the US Ecology landfill in Beatty, Nevada. Therefore, based on the removal activities, it does not appear that any further actions are warranted regarding transformers formerly located at the McGill Ball Park.

8. CLOSING

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

Respectfully submitted,

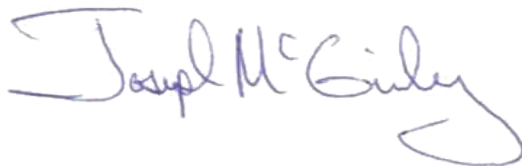
McGinley and Associates, Inc.

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.

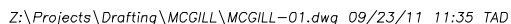


Brett C. Bottenberg, C.E.M. #1690, Exp. 10/07/13
Senior Project Manager

Reviewed by:

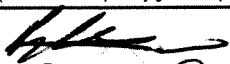
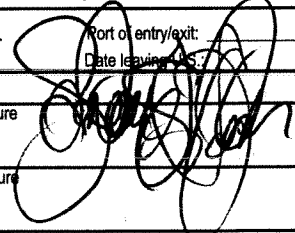
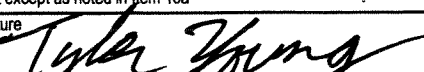


Joseph M. McGinley, P.E., C.E.M. #1036, Exp. 11/12
Principal



APPENDIX A

Uniform Hazardous Waste Manifest

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 40CFR PART 761	2. Page 1 of	3. Emergency Response Phone 800-535-5053 Infotrac	4. Manifest Tracking Number 005313337 FLE	
		5. Generator's Name and Mailing Address White Pine County Commission Ely, NV 89301 Generator's Phone: 702 232-5247				
6. Transporter 1 Company Name AET ENVIRONMENTAL, INC.					U.S. EPA ID Number NVR0000034780	
7. Transporter 2 Company Name					U.S. EPA ID Number	
8. Designated Facility Name and Site Address U.S. ECOLOGY HWY 95, 12 MILES SOUTH OF BEATTY BEATTY, NV 89003					U.S. EPA ID Number NVT330010000	
Facility's Phone: 775 553-2203						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No.	Type	11. Total Quantity
		1. UN2315 Polychlorinated biphenyls, liquid, 9		008	DF	1670
		2.				
		3.				
		4.				
12. Unit Wt./Vol. K						
13. Waste Codes Non RCRA						
14. Special Handling Instructions and Additional Information 8-550 drums in over pack 110G US Ecology 070201001-0 ERC #171						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name X Biren Patel				Signature 		Month Day Year 3 21 13
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.					
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name SIDNEY STATED Signature  Month Day Year 3 21 13					
	Transporter 2 Printed/Typed Name Signature Month Day Year					
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection CHANGES OK PER ED DOMANICO W/ AET Manifest Reference Number:					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	Facility's Phone:					
	18c. Signature of Alternate Facility (or Generator) Month Day Year					
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Tyler Young Signature  Month Day Year 3 28 13						

US Ecology Nevada, Inc.
P.O Box 578
Beatty, Nevada 89003

Phone: (800) 239-3943
(775) 751 6788
Fax: (775) 553 2125

US Ecology Nevada, Inc.

a US Ecology Inc. company

05/16/2013

MCGILL BALL PARK SITE/ MCKNIGHT ASSC.
56 S 4TH ST
MCGILL , NV89318


CERTIFICATE OF INCINERATION

The following Waste(s) received on uniform hazardous waste manifest no.005313337FLE/005313337FLE 11 was disposed by incineration at VEOLIA ES TECHNICAL SOLUTIONS., EPA #TXD000838896 on 05/07/2013, on manifest number 008624278JJJ. Reference certificate of disposal no.PTA634693-1-1

1 SYSTANK (PCB OIL > 50)
PCB WASTE

Under civil and criminal penalties of law for making or submission or fraudulent statements or representations [18 U.S.C 1001 and 15 U.S.C 2615], I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified sections(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direction, made the verification that this information is true, accurate and complete

Printed Name: SCOTT WISNIEWSKI

Signature: 

Title: ENV HEALTH & SAFETY MANAGER

Reference Number : 13032502129-005313337FLE-1-1

Customer: AET ENVIRONMENTAL, INC.

US Ecology Nevada, Inc.
P.O Box 578
Beatty, Nevada 89003

Phone: (800) 239-3943
(775) 751 6788
Fax: (775) 553 2125

US Ecology Nevada, Inc.

a US Ecology Inc. company

05/16/2013

MCGILL BALL PARK SITE/ MCKNIGHT ASSC.
56 S 4TH ST
MCGILL , NV89318

CERTIFICATE OF INCINERATION

The following Waste(s) received on uniform hazardous waste manifest no.005313337FLE/005313337FLE 11 was disposed by incineration at VEOLIA ES TECHNICAL SOLUTIONS., EPA #TXD000838896 on 05/07/2013, on manifest number 008624278JJJ. Reference certificate of disposal no.PTA634693-1-1

1 SYSTANK (FLUSHATE)
PCB WASTE

Under civil and criminal penalties of law for making or submission or fraudulent statements or representations [18 U.S.C 1001 and 15 U.S.C 2615], I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified sections(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direction, made the verification that this information is true, accurate and complete

Printed Name: SCOTT WISNIEWSKI

Signature: 

Title: ENV HEALTH & SAFETY MANAGER

Reference Number : 13032502129-005313337FLE-1-1

Customer: AET ENVIRONMENTAL, INC.

TSCA CERTIFICATE OF DISPOSAL

April 09,2013

MCGILL BALL PARK SITE/ MCKNIGHT ASSC.
56 S 4TH ST
MCGILL, NV 89318

This is to certify that waste as defined on Waste Manifest number 005313337FLE/005313337FLE was received by U.S. Ecology, Inc., on 03/28/2013. The waste(s) were subsequently managed as required by U.S. Ecology's Part B and/or TSCA permits where applicable and disposed of by 04/03/2013 in accordance with permits and laws regulating this facility.

Reference Number: 13032502129-005313337FLE-1-1

Material: 8 55 GALLON PLASTIC DRUM (EMPTY CARCASS)

Process: Direct Landfill

Facility: U.S. ECOLOGY NEVADA, INC.
HWY 95 11 MILES S. OF BEATTY
BEATTY, NV 89003
EPA ID: NVT330010000

Customer: AET ENVIRONMENTAL, INC.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements of representations [18 U.S.C. 1001 and 15 U.S.C. 2615], I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Printed Name: SCOTT WISNIEWSKI

Signature:



Title: ENV HEALTH & SAFETY MANAGER

APPENDIX B

Photographs



Secure intermediate storage of removed transformers



Placement of transformer into overpack drums



Placement of transformer into overpack drums



Overpack drums securely placed within transport vehicle