

Appendix C
Unison Facility Information
(Compact Disk)

Appendix C: Unison Transformer Facility Information

Building K, the former Truck Shop located in the Process Areas of the Yerington Mine Site, was leased by Unison Transformer Services, Inc. (Unison), and used as a transformer destruction and recycling facility from 1985 to some time between 1991 and 1993. The facility operated under NDEP permit number WMS-PCB-001, and EPA identification number NVS-PCB-001. The facility was permitted to store and dismantle PCB electrical equipment, and did not treat or dispose of hazardous waste.

NDEP issued a permit to Unison to operate a “storage facility for the management of PCB and PCB-contaminated material”, effective August 31, 1985 to August 31, 1990. The permit called for “surface samples” of solids to be collected “quarterly for one year and annually thereafter until closure of the facility”. The sampling locations were the entrance gate of the facility, entrance to the loading/unloading area, and exit from the loading/unloading area.

The permit allowed a maximum inventory of 200,000 pounds of PCB or PCB-contaminated materials, of which a maximum of 7,500 gallons of liquid was allowed. The storage of flammable solvents was not allowed, as a condition of the permit. The permit required weekly inspections of areas where PCB-contaminated materials and PCB containers were stored for leaks and the structural integrity of containers and floor.

Only PCB and equipment containing PCB were stored at the Unison facility. No other solvents or ignitable materials were received or stored. Each transformer received at the facility was tagged with a unique identification number, and the oil inside the unit was analyzed for PCB concentration. Units that had a PCB concentration of 500 ppm or greater were shipped to another offsite Unison facility. Storage of the transformer oil was in the original transformer unit or in Department of Transportation approved steel drums, in accordance with 40-CFR-761.

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The Unison building (i.e., former Anaconda Truck Shop) is made of steel walls with 16 to 30-inch thick concrete floors. All cracks and expansion joints in the floor were sealed and coated with an epoxy floor sealer. All transformer disassembly was conducted inside steel containment pans. Of the 13 overhead doors along the northeast side of the building, only two were routinely used for loading and unloading. No precipitation could enter the building under normal conditions, and there were no floor drains in the containment areas. The containment areas were inspected on a regular basis to ensure that there were no cracks in the concrete floors. All containment areas had secondary containment consisting of concrete curbing.

The main containment area was located in the northeast portion of the building, and was used to store the transformers and electrical equipment. The main containment area consisted of approximately 8,000 square feet with a seven-inch curb, for total containment of over 30,000 gallons. This was more than all of the PCB liquids stored in the entire facility, limited by the county permit to 7,500 gallons (or 140 55-gallon drums) of PCB or PCB-containing fluids.

Drums of liquid were stored adjacent to the main containment area in a separate containment area approximately 1,200 square feet and secondary containment capacity of approximately 5,200 gallons, or 95 drums. Drums of solid waste were stored in another separate storage area adjacent to the main containment area, approximately 1,300 square feet in area and, with containment curbing. All secondary containment areas were within the EPA requirements for secondary containment capacity.

All loading and unloading of materials was conducted inside the building on the concrete floor, in an area along the northeast loading ramp, as shown in the attached figure. All transformers and electrical equipment were unloaded inside the secondary containment areas, to avoid any contamination outside the building. The contents were drained into 55-gallon drums and stored within the containment areas.

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The closure plan for the Unison building included:

- Off-site disposal of transformers at a landfill in Beatty, Nevada.
- Off-site incineration of PCB liquids and solids, and PCB decontamination wastes in containers at Rollins Environmental Services in Deer Park, Texas.
- Vacuuming the entire facility using a HEPA filtered vacuum cleaner to remove all particulate matter from the floor, walls, and equipment.
- Decontamination of all equipment, floors, and walls using isopropanol, and double-washing and rinsing in accordance with 40 CFR 761.79.
- After decontamination, cleaning of all equipment, floors, and walls using CAPSUR[®].
- Cleaning of all surfaces in the building to less than 10 µg PCB per 100 square centimeters of surface area.
- Cleaning of all surfaces outside the building to less than 100 µg PCB per 100 square centimeters of surface area and “encapsulation”, with EPA approval.
- Sampling and analysis in accordance with the EPA Field Manual for Grid Sampling of PCB Spill Sites (EPA 560/5-86-017).
- Post-cleanup verification sampling by wipe samples.

References

NDEP PCB Storage Permit Application, July/August 1990, NDEP Unison file folder.

Nevada PCB Storage Permit for Unison Transformer Services, Inc., August 1985, NDEP Unison file folder.

Attachment 5: Closure Plan and Financial Requirements, July 1, 1985, NDEP Unison file folder.