

DRAFT

**ELECTRICAL HAZARDS
REMOVAL ACTION COMPLETION REPORT
YERINGTON MINE SITE**

August 19, 2010

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TABLE OF CONTENTS

SECTION	PAGE
SECTION 1.0 INTRODUCTION	1
SECTION 2.0 PHASE 1 REMOVAL ACTIONS.....	3
2.1 Potential Hazard #2 - Northeast Extension Power Line	4
2.2 Potential Hazard #3 - South Distribution Line	6
2.3 Potential Hazard #4 - Mega Pond Pump Station	9
2.4 Potential Hazard #5 - Slot Pond Pump Station	11
2.5 Potential Hazard #6 - Former Arimetco Lab Building	14
2.6 Potential Hazard #7 - VLT Pond Pump Station.....	18
2.7 Potential Hazard #8 - Arimetco Phase III Heap Leach Power Line	21
SECTION 3.0 PHASE 2 REMOVAL ACTION	24
3.1 Potential Hazard #1 - Site Substation.....	24
SECTION 4.0 HEALTH AND SAFETY, WASTE STORAGE AND EPA OVERSIGHT	27
4.1 Health and Safety.....	27
4.2 Material Storage and Waste Disposal	27
4.3 EPA Walk Through and Oversight.....	28
SECTION 5.0 REFERENCES	29

LIST OF FIGURES

Figure 1-1	Project Location
Figure 1-2	Yerington Mine Site Operable Units
Figure 2-1	Electrical Systems Potential Hazard Area

LIST OF APPENDICES

Appendix A	EPA Oversight Checklist
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LIST OF ACRONYMS AND ABBREVIATIONS

AC	Alternating Current
Amp	Amperage
AOC	Administrative Order on Consent
ARC	Atlantic Richfield Company
Anaconda	Anaconda Copper Mining Company
CERCLA	Comprehensive Environmental, Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
FMS	Fluid Management System
GFCI	Ground Fault Circuit Interrupter
HASP	Health and Safety Plan
HSSE	Health, Safety, Security and Environment
KVA	Kilo Volt Ampere
LOTO	Lockout/Tagout
O&M	Operations and Maintenance
OU	Operable Unit
PAR	PAR Electrical Contractors, Inc.
PCB	Polychlorinated Biphenyl
Phase 1A	Phase 1A Removal Actions
Phase 1B	Phase 1B Removal Actions
PWS	Pumpback Well System
SOW	Scope of Work
TSEA	Task Safety and Environmental Analysis
VLT	Vat Leach Tails

SECTION 1.0 INTRODUCTION

Atlantic Richfield Company (ARC) has prepared this Draft Electrical Hazards Removal Action Completion Report (DCR) to document the removal of identified potential electrical hazards at the Yerington Mine Site (Site). The Site is located adjacent to the City of Yerington in Lyon County, Nevada (Figure 1-1). The removal action was performed to address Site safety issues where workers or visitors may be exposed to hazards due to unused, but still energized, or other potentially unsafe electrical systems. The removal action was required under the Administrative Order on Consent (AOC) and associated Scope of Work (SOW)¹ dated April 21, 2009 (effective May 1, 2009). Section 5.0 of the 2009 AOC/SOW states that ARC:

1. *Shall submit a work plan to de-energize vestigial electrical systems within the Site, except those presently used or reasonably anticipated to be used to conduct response work within the Site*
2. *Shall submit a removal action report after completion of the activities above.*

Potential electrical hazards were identified in the *Potential Electrical Hazards Removal Action Work Plan* dated July 24, 2009 (Work Plan; Brown and Caldwell, 2009a). United States Environmental Protection Agency (EPA) approved the Work Plan on September 15, 2009. After discussing the scope of the project with a number of contractors and NV Energy (the local power company), ARC determined that a phased approach would be needed due to the use of different contractors with varied skill sets to perform the range of planned removal actions, and the involvement of NV Energy (the local power company) in the removal of the existing Site substation and the activation of new service to the Site. Inactive power poles were not included in the Work Plan because the poles may be needed for future Site activities (e.g., response work or industrial reuse such as mining), and do not pose a potential electrical hazard. The Site is located adjacent to the City of Yerington in Lyon County, Nevada (Figure 1-1).

¹ Administrative Order on Consent and Settlement Agreement for Past Response Costs Anaconda Copper Mine, Yerington Nevada; U.S. EPA Region IX; CERCLA Docket No. 09-2009-0010.

As indicated below, four of the following eight Operable Units (OUs; Figure 1-2) on the Site contain electrical system components subject to removal actions:

- Site-Wide Groundwater (OU-1)
- Pit Lake (OU-2)
- Process Areas (OU-3) - contains electrical systems subject to removal
- Evaporation Ponds and Sulfide Tailings (OU-4) - contains electrical systems subject to removal
- Waste Rock Areas (OU-5) - contains electrical systems subject to removal
- Oxide Tailings Areas (OU-6)
- Wabuska Drain (OU-7)
- Arimetco Facilities (OU-8) - contains electrical systems subject to removal

SECTION 2.0 PHASE 1 REMOVAL ACTIONS

The Work Plan identified eight potential hazards, and described a proposed action to remove or mitigate each of the hazards. Descriptions of the completed removal action with photo documentation are provided in this section of the DCR. Phase 1 removal action locations are shown on Figure 2-1. The following descriptions of completed removal actions, and associated photographs, retain the identification numbers presented in the Work Plan (each description also includes the planned removal action presented in the Work Plan).

Phase 1A removal actions (Phase 1A) occurred from January 13 to 19, 2010. These activities included: 1) repair of the dangling wire on the northeast extension of the north distribution power line (Hazard #2); 2) the removal of the south distribution overhead power line (Hazard #3); 3) removal of the Mega Pond electrical control panel and transformer (Hazard #4); and 4) removal of the Phase III Heap distribution overhead power line (Hazard #8)]. These activities involved working on medium voltage power services, and required the use of journeyman linemen and specialized equipment, including electrically insulated line truck and bucket truck for elevated work. PAR Electrical Contractors, Inc. (PAR) completed the Phase 1A removal actions.

Phase 1B removal actions (Phase 1B) occurred from February 10 to March 1, 2010 and addressed electrical lines originally installed as temporary (surface) installations for the Arimetco fluid management system (FMS) pumping operations and the lab building. These activities included: 1) installation of a buried conduit at the Slot Pond to convert the temporary electrical line to a permanent line (Hazard #5); 2) installation of a buried conduit for the surface electrical line from the lab transformer to the lab building (Hazard #6); and 3) containment of surface electrical cables at the Vat Leach Tails (VLT) Pond into a conduit for protection and installation of a Ground Fault Circuit Interrupter (GFCI) outlet for extension cord use (Hazard #7). Phase 1B removal actions were performed by Fawcett Electric and Desert Engineering.

2.1 Potential Hazard #2 - Northeast Extension Power Line

The approximate 3,000-foot northeast extension of the north distribution line (the portion between the Unlined Evaporation Pond and the Sulfide Tailings that extends to the Pumpback Well System (PWS) no longer had active service requirements, with the exception of providing power to air monitoring station AM-5. This extension (Photo 2-1) connects to the north distribution line at a tap junction, and remains charged to serve the VLT pump station, the Mega Pond and the Blue Shop.

A pole-mounted transformer, removed from service by opening one of the fuse connectors, is attached to the last power pole along the extension. Because the primary connection on one of the lines was loose, it was subject to wind movement and potential contact with one of the other lines on the pole, which could result in faulting, arc flash or service disruption on the remainder of the line (Photo 2-2).

Planned Action

ARC proposed to re-attach the dangling electrical wire to the fuse cut-out and remove the power pole cut-out fuses from the transformer in order to be able to re-store electrical power to air monitoring station AM-5. This approach would allow for the potential re-activation of AM-5 if needed, and would eliminate the potential electrical hazard associated with the dangling wire.

Completed Action

On January 13, 2010, PAR reconnected the dangling wire to the cutout switch, and left the fuse doors open but still attached for both cutouts (Photo 2-3). This would allow for availability of electricity to the AM-5 location, if needed. The northeast extension of the north distribution power line, shown in Photo 2-1, is still energized.

Photo 2-1.
Northeast extension overhead power line located along sulfide tailings embankment (looking southwest).



Photo 2-2.
Dangling wire on terminal pole near transformer (pre-removal).



Photo 2-3.
Dangling wire was reconnected, and the fuse cutout switch doors left attached but open. (1/13/10)



2.2 Potential Hazard #3 - South Distribution Line

The portion of the active south distribution line that runs from the tap junction near the Lab Building to the former crusher site is energized but currently not used. The presence of an unneeded 2,000-foot energized power line created a risk of faulting.

Planned Action

This section of power line would be disconnected from the remainder of the south line by removing a section of wire near the tap junction and, to anchor the line, ARC would install a guy wire.

Completed Action

Removal of the South Distribution Line was completed by PAR Electric from January 14 to 19, 2010. To complete this activity, PAR de-energized the entire south side electrical service at the Site substation, and transferred jumpers to the southeast line to allow continued power service to the Phase I pond and pumps after the system was re-energized. Initial planning documents for the Removal Action Work Plan identified these power lines as 4,160 alternating current (AC) volts. However, during the removal action they were confirmed to be 2,400 AC volts as are all other distribution lines on the Site. PAR installed guy wires on the twin poles at the lab transformer to provide strength and stability once the south lines were disconnected and removed (Photo 3-1).

Six 0000 gauge copper wire lines and two steel wire lines were disconnected from the insulators and the insulators were removed from each of the twin poles for the entire length of the south distribution line from the lab transformer to the end poles located near the Slot Heap Leach Pad. Poles were primarily accessed with the use of a bucket truck (Photo 3-2), but several poles had limited access and the linemen climbed the poles using standard climbing safety procedures and equipment (Photo 3-3).

The disconnected wire was gathered into coils of approximately 300-350 foot lengths using a spool mounted to the front bumper of the line truck (Photo 3-4). The coils were placed on wood pallets and stored in a secured cargo container on the Site. (Photo 3-5). Power poles were left in position because they do not represent a safety hazard for continues site activities (Photo 3-6), however, it is recommended they be inspected and evaluated for suitability if they are to be reused for re-installation of power lines in the future.

Photo 3-1.
Attaching guy wires and moving jumpers to southeast power line. (1/14/10)



Photo 3-2.
Disconnecting wire and removing insulators from power poles. (1/15/10)



Photo 3-3.
Climbing poles where bucket truck could not access. (1/15/10)



Photo 3-4.
Coiling of wire using spool mechanism on line truck. (1/15/10)



Photo 3-5.
Pallets of coiled wire in a secure storage area. (1/20/10)



Photo 3-6.

Remaining power poles with wire and insulators removed at completion of job. (1/20/10)



2.3 Potential Hazard #4 - Mega Pond Pump Station

The Mega Pond and associated pump station were used to collect and transfer drain-down solutions from the Arimetco Phase III South Heap Leach Pad, including fluids collected in the leak detection system (Photo 4-1). In 2007, EPA replaced the Mega Pond with a French drain that allowed the fluids to flow by gravity, which eliminated the need for electrical power to this location. The distribution lines and electrical panels to the Mega Pond facilities are still energized, resulting in a potential safety risk to Site workers.

Planned Action

ARC proposed to maintain electrical service to this location while completing an evaluation of the potential future needs for pumping capabilities from the former Mega Pond sump based on a water balance evaluation of the Phase III Heap Leach and Arimetco Fluid Management System (FMS). The water balance evaluation was not expected to be completed until late 2010. Therefore, this action was not expected to be completed during this phase of work.

Completed Action

The determination was made in December 2009 that pumping capability at the Mega Pond sump would not be necessary for the FMS because: 1) the Mega Pond had been removed; 2) the only solutions entering the sump would be small amounts of leak detection solutions during storm events; and 3) these volumes could be managed by alternative methods, if needed. The decision was made to remove the electrical control panel and transformer during Phase I removal activities. On January 13, 2010, PAR de-energized the north distribution line and opened the cutout switch to isolate the Mega Pond transformer. The transformer was disconnected and removed from the fenced enclosure using the crane on the line truck to lift it over the fence and set it nearby behind the crusher building, where a similar transformer is stored.

EPA tested the oil in this transformer during their transformer removal activities in 2006, and had marked this transformer as free of non-polychlorinated biphenyl (PCB). The wires to the electrical control panel were pulled, and the entire structure of the panel was removed in one piece by cutting it from the anchor bolts in the concrete pad (Photo 4-2). The control panel was moved to a secure storage area on the Site. The conduit that was attached to the side of the power pole for carrying electrical lines from the overhead wire to the transformer was removed and set aside (Photo 4-3).

Photo 4-1.
Mega Pond pump station transformer and electric service panels.



Photo 4-2.

Removal of the electrical control panel using the line truck crane. (1/13/10)



Photo 4-3.

Mega Pond transformer area after transformer, control panel and pole conduit have been removed. (1/13/10)



2.4 Potential Hazard #5 - Slot Pond Pump Station

Electrical service to the Slot Pond pump station consisted of a heavy-duty service cord suitable for outdoor applications with an oil-resistant outer jacket (SO-type cable), which has been installed on the ground surface where it is exposed to potential damage from vehicle and/or foot traffic. The cable enters the electrical equipment building through an unprotected opening in the metal siding on the west side of the building (Photos 5-1, 5-2 and 5-3).

This cable serves a pump starter which has been set in place as a temporary installation for the purpose of transferring drain-down solutions from the Slot Pond. The cable is not adequately protected and is subject to damage, which could result in: 1) temporary loss of power to the pump, inability to transfer fluids out of the pond and possible loss of containment; and 2) Site worker exposure to hazardous electrical shock/arc flash.

Planned Action

The cables to the temporary pump motor starter should be protected from damage by placing them in a conduit stub from the electrical equipment building and terminating in a J-Box. Where the cable crosses the roadway, it should be dressed in rigid conduit buried in a 24 inch deep trench. Two new NEMA 3R J-Boxes should also be installed near the pump starter switch and on the outside of the building. Because the pump and pump motor starter are temporary installations, the unprotected cable from the starter switch to the submerged pump is acceptable and does not require protection in conduit. Grounding conditions for the panel itself are not evident, and will be inspected during the repair activity.

Completed Action

On March 1, 2010, trenches were constructed at the Slot Pond to place wire in protected conduit below the traffic area. New fused disconnect switches were installed, and new wire was placed in buried conduits (Photo 5-4). Surface mounted weather proof safety switches on pump house exterior provide Lockout/Tagout (LOTO) safety levels and well as conduit termination points. The original cable was re-attached at the pond J-Box (Photo 5-5) so motor starter pedestal location could be flexible.

Photo 5-1.

Unprotected cable as it enters the electrical equipment building at the Slot Pond.



Photo 5-2.

Unprotected electrical cable on the ground surface as it crosses the roadway towards the pump motor starter.



Photo 5-3.

Pump motor starter for the 20-horsepower pump in Slot Pond.

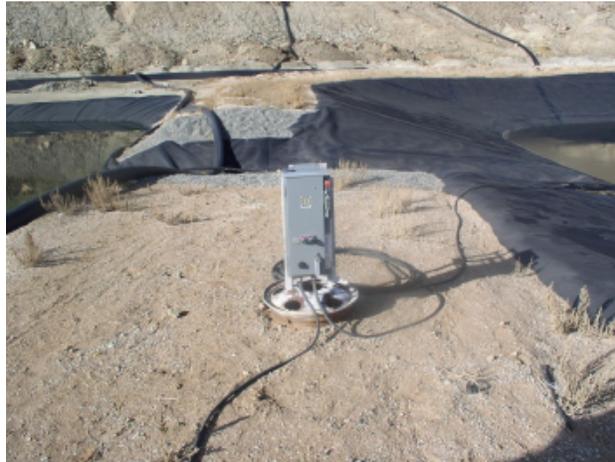


Photo 5-4.

New Fused Safety Switch with conduit riser.



Photo 5-5.

Motor starter termination J-Box enclosure at pond side.



2.5 Potential Hazard #6 - Former Arimetco Lab Building

The Lab Building is currently used to support field investigation activities (e.g., field supplies and groundwater sample storage) and Site Operations and Maintenance (O&M) activities (e.g., pump storage and repairs). The Lab Building is attached to the former Arimetco electro-winning facility, located on the south side of Burch Drive, and is served from a small single phase transformer (Photo 6-1) and disconnect switch, located approximately 120 feet west of the Lab Building. Prior to the removal actions, ARC confirmed that there were no additional potential electrical hazards in the area of the former Arimetco electro-winning/solvent extraction facilities.

The service cable (120/240 AC volt) to the Lab Building is an SO-type cable designed for heavy-duty outdoor service, and was installed on the ground surface where it is exposed to potential damage from vehicle or foot traffic (Photo 6-2). The cable is locally protected in a shallow buried conduit as it crosses the roadway (Photo 6-3), but is unprotected as it enters the Lab building. The cable is subject to damage, which could result in electrical shock/arc flash and/or service disruptions that could jeopardize the use of stored samples.

Planned Action

The existing conduit run should be buried and extended in both direction for increased safety and reliability. Load-center cable dressing should be installed in the conduit.

Completed Action

On March 1, 2010, 180 feet of trench was constructed for installation of new 1-1/2" Polyvinyl Chloride (PVC) conduit from transformer to Lab Building exterior wall. Number 2 type water resistance wire was installed in the conduit. The electrical service to the building was increased to accommodate an additional storage facility, if needed (Photos 6-4, 6-5, and 6-6).

Photo 6-1.
Lab Building transformer.



Photo 6-2.

Unprotected electrical cable on ground surface and entering conduit as it crosses roadway.



Photo 6-3.

Unprotected electrical cable exiting conduit and entering the south side of the Lab Building.



Photo 6-4.

Transformer No 2 wire for full 100 Amp service



Photo 6-5.

Two Pull Boxes installed



Photo 6-6.

Lab service termination into wireway with one disconnect switch, providing a new building main. A second safety switch was installed to service additional storage facility, if needed.



2.6 Potential Hazard #7 - VLT Pond Pump Station

The VLT Pond pump station service cable consists of heavy-duty service cord suitable for outdoor applications with an oil-resistant outer jacket (SO-type cable). The cable was installed on the ground surface, where it is exposed to potential damage from vehicle and/or foot traffic, and enters the electrical equipment building through an unprotected opening in the metal siding on the west side of the building (Photo 7-1). The cable serves a pump starter (Photo 7-2), which is temporary installation to assist in the transfer of drain-down solutions from the VLT Pond to the FMS Evaporation Pond via a 20-hp pump (Photo 7-3). In addition, a priming pump is operated by plugging an extension cord into a non-weather proof outdoor outlet at the switchbox. The identified potential hazards at this location include: 1) inadequate cable protection and potential damage; and 2) the extension cord plugged into a non-weather proof and non-GFCI outlet creates a risk of electrical shock to Site workers.

Planned Action

The power cable to the temporary pump motor starter should be protected from damage by placing them in conduit coming out of the electrical equipment building and terminating in a J-Box. A GFCI outlet should be installed near the point of use to provide a safe location for use of the extension corded priming pump.

Completed Action

On March 1, 2010, trenches were constructed at the VLT to place wire in protected conduit below the traffic area. New wire placed in buried conduits (Photo 7-4). A surface-mounted weatherproof J Box for connecting the pump panels was set on red wood post. The original cable was re-attached at the starter (Photo 7-5). The EPA transfer pump was repositioned and secured (Photo 7-6).

Photo 7-1.

VLT pumping station looking northwest with electrical equipment building and encased transformer.



Photo 7-2.

VLT pump starter with GFI receptacle and associated step-down transformer.



Photo 7-3.

20-horsepower pump



Photo 7-4.

New conduits dress out of the VLT Pump Building and routed below grade. GFI receptacle was relocated the building wall.



Photo 7-5.

Pump interconnect J-Box provided a protected installation.



Photo 7-6.

Pump feed conduit riser to pump starter from Pumphouse.



2.7 Potential Hazard #8 - Arimetco Phase III Heap Leach Power Line

A non-energized power line occurs between the Phase III South and the Phase III 4X Arimetco Heap Leach Pads that originates from the Tibbals shop area. The electrical service for the line was primary feed to a location which originally contained a transformer bank thought to be for the fine crushing circuit. The transformers were removed at an unknown time more than 6 years ago and the utility (NV Energy) removed power service to the line by disconnecting the power pole cross-arm jumpers (Photo 8-1). This line runs for about 1,500 feet between the two leach pads and, near its northern end, lays on the ground.

Planned Action

ARC proposed to eliminate that portion of the de-energized power line that occurs within the Site boundary (i.e., cutting the wires), including the wires that are suspended from the power pole. Per discussions with NV Energy, the line west of the Site boundary was to be left in place.

Completed Action

This activity was completed during Phase 1A of the removal action on January 13, 2010 by PAR. Prior to completing this wire removal activity, NV Energy detached the site wire from the utility owned pole located at the mine boundary fence. PAR used the bucket truck to access the poles to detach three parallel strands of #4 bare copper wire from the insulators and remove the insulators from the pole, leaving the pin attached to the pole (Photo 8-2). The insulators were also removed from the transformer bank location (Photo 8-3). The wire was coiled and banded into approximate 300-350 pound coils, which were placed on pallets and put into a secure storage area (Photo 8-4). Poles were left in place (Photo 8-5).

Photo 8-1.

The two cross-arms on the power pole have been separated, and the jumper wire was set over each insulator have been removed by NV Energy.



Photo 8-2.

Disconnecting the wire and removal of insulators. (1/13/10)



Photo 8-3.

Removing the insulators at the old transformer bank location at north end of Phase III power line. (1/13/10)



Photo 8-4.
Coiling the wire. (1/13/10)



Photo 8-5.
Remaining power poles after power line removal was completed. (1/13/10)



SECTION 3.0 PHASE 2 REMOVAL ACTION

The Phase 2 removal action included the installation of new power service at a location adjacent to the former Site substation on Burch Drive (Figure 2-1), which was disconnected. The new power service was designed to accommodate a much smaller demand capacity to meet current and anticipated electrical load needs for remedial investigation activities at the Site. The disconnected substation was not subject to demolition and removal as part of the removal action. The Phase 2 removal action was performed by Fawcett Electric and Desert Engineering. Final engineering plans were submitted to NV Energy on March 26, 2010. Construction activities started on April 20, 2010 and the removal action was completed on June 15, 2010.

3.1 Potential Hazard #1 - Site Substation

Electrical service provided by NV Energy through the Site substation supported a 5 mega-volt-ampere (5,000 KVA) demand. A load survey estimated a much lower demand for the Site. The substation originally supported eight distribution lines. Only the north and south overhead distribution lines remained active prior to the removal action. The substation received little or no maintenance over the past 10 years, and the condition of the equipment was not known. If the equipment sufficiently degraded since it was last maintained, operational efficiency and safety issues could result. Photos 1-1, -2 and -3 show the substation and interior of the control center.

Planned Action

In order to accommodate potential additional electrical demands at the Site, ARC proposed the following: 1) provide a new 225KVA electrical service drop adjacent to the existing substation location; 2) provide 75KVA electrical service for the southern half of the Site, which is approximately 50 percent greater than estimated current demand; and 3) provide 150KVA electrical service to the northern half of the Site, which is approximately 100 percent greater than estimated current demand. Upon further review, it was determined that demand capacity of the new service should be increased to a total 400KVA service drop with 75KVA service to the south side and 300KVA service to the north side of the mine property.

Planned Action

ARC proposed to install a reduced (480 volts AC, 600 amp) NV Engery power source for the north and south portions of the Site. The new service includes a new switchboard to manage power distribution to transformers that will supply 2400 volts AC power to the north and south overhead feeder lines.

Completed Action

Trenching and the installation of conduits occurred during the period April 20 through May 4, 2010. The sub-grade for new transformer pads, and the concrete pour of the pads, occurred through May 7, 2010. There was a delay in receiving all three transformers, and the last transformer arrived on May 20, 2010. Subsequently, electrical connections were made, circuit breakers were installed, fences and signage were erected and bollards were installed around the new equipment. Testing and pre-service energizing activities occurred through June 13, 2010. The system was energized on June 16, 2010 and a walk-through with NV Energy on June 17, 2010 completed the project. Photo 1-4 shows the new switchboard and security fence with signage.

Photo 1-1.

Site substation and transformers, located on Burch Drive.



Photo 1-2.
Substation control center



Photo 1-3.
Control center (inactive meter recorders)



Photo 1-4.
New Switchboard with security fence.



SECTION 4.0

HEALTH AND SAFETY, WASTE STORAGE AND EPA OVERSIGHT

4.1 Health and Safety

Evaluation and implementation of health and safety requirements were conducted during all phases of the removal actions, and were documented in field notes and project records. Health and safety activities included:

- Daily safety toolbox meetings;
- Use of work permits for high risk activities (e.g. ground disturbance, working at heights, and lifting operations);
- Energy isolation procedures and lockout/tagout to prevent unauthorized startup;
- Work risk assessments and task safety and environmental assessments (TSEA);
- Selection and use of qualified contractors; and
- Project oversight by a qualified electrical engineer and project safety manager.

Work was conducted in accordance with ARC's Health, Safety, Security and Environment (HSSE) safety standards and defined practices and with the *Site-Wide Health and Safety Plan* (HASP; Brown and Caldwell, 2009b).

4.2 Material Storage and Waste Disposal

Materials that were removed from service determined to have potential value or future use were placed in on-Site secured storage areas. Stored materials include copper and steel wire, power line insulators and electrical control panels. There are currently no plans to sell or dispose of this material as scrap. However, this may be feasible in the future, especially the copper wire.

No solid waste was generated during implementation of these work tasks with the exception of small volumes of construction waste (i.e. scrap wood, cardboard boxes, etc.). This material was placed in waste containers for disposal at the local landfill. No material was disposed in an on-site landfill as proposed in the Work Plan.

4.3 EPA Walk Through and Oversight

On July 9, 2010, a walk through of the removal action activities was conducted by Gary Barrett and Rich Mattucci (Brown and Caldwell), Nadia Hollan Burke (EPA), Ilka Dinkelman (CH2MHill), Joe Sawyer (Nevada Division of Environmental Protection), Justin Whitesides Yerington Paiute Tribe), Jack Oman (ARC) and John Batchelder (EnviroSolve). The tour began at the Slot Pond with a short tail gate meeting and proceeded northward with stops at each of the locations where action removal work took place to discuss in detail and show the work completed. The substation isolation location was by passed until the end of the tour. It was pointed out that the Phase One Pond location was deemed acceptable and did not require action removal. The EPA oversight checklist from the July 9, 2010 walk through is provided as Appendix A.

SECTION 5.0
REFERENCES

Brown and Caldwell, 2009a. *Potential Electrical Hazards Removal Action Work Plan, Yerington Mine Site*. Prepared for Atlantic Richfield Company, La Palma, CA. June 24, 2009.

Brown and Caldwell, 2009b. *Site-Wide Health and Safety Plan, Yerington Mine Site*. Revision 1. Prepared for Atlantic Richfield Company, La Palma, CA. December 21, 2009.