



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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January 7, 1998

TO: File

THRU: Daron Haddock, Permit Supervisor *DH*

FROM: Paul Baker, Reclamation Biologist *PB*

RE: PCB Cleanup at the Wellington Preparation Plant Pumphouse, Nevada Electric Investment Company, Wellington Preparation Plant, ACT/007/012, Folders #2 and 5, Carbon County, Utah

Abatement of cessation order C97-41-2-1 required the permittee to sample material on the pumphouse floor and discharged sediment and to have this material tested for PCB's. No PCB's were detected in the sediment, but the oily dirt on the floor contained 8 ppm PCB's.

Through Neil Taylor, I contacted Blake Robertson with the Division of Solid and Hazardous Waste to determine if cleanup would be required and if any special procedures needed to be followed. He responded by E Mail that the concentration of material to be cleaned up did not necessarily determine whether cleanup needed to be done. Rather, the important factor was the concentration of material spilled. He suggested I call Kim Le of the EPA in Denver for further clarification.

Ms. Le explained there are various situations that may or may not require cleanup. In this case, we considered the pumphouse to be a "restricted area" since it is normally locked. The standard for a restricted area is 25 ppm. Since the concentration was 8 ppm, cleanup would not be required. However, for the company's liability, she recommended it be cleaned up anyway.

Covol intends to remove the material even though removal is not required. While the oily dirt would be removed, the concrete is considered a porous material that is probably also contaminated, but it is not practical or required to remove the concrete.