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TO: ROBERT W HARDING, CHIEF
FIELD OPERATIONS SECTION

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SUBJECT: TSCA PCB INSPECTION - U.S. SMELTING (SHARON STEEL) SUPERFUND SITE
MIDVALE, UTAH

ADMINISTRATIVE RECORD

ON JUNE 20, 1986, I DROVE TO THE UNITED STATES SMELTING CO (SHARON STEEL CORP) SUPERFUND SITE IN MIDVALE, UTAH TO WORK WITH MR LARRY BARDWELL, GEOLOGIST, UTAH STATE DEPARTMENT OF HEALTH, REGARDING SEVERAL PCB TRANSFORMERS ON THIS SITE. I HAD TELEPHONED LARRY BARDWELL ON THE AFTERNOON OF JUNE 19th AND I EXPLAINED TO HIM THAT I WAS REQUIRED BY LAW TO PRESENT MY CREDENTIALS AND GET WRITTEN CONSENT TO ENTER PRIVATE PROPERTY BEFORE I COULD CONDUCT A TSCA-PCB INSPECTION. BARDWELL SAID THAT THIS WAS SUPERFUND SITE AND THE OWNER OF THIS PROPERTY - SHARON STEEL CORP, THE UTAH DEPARTMENT OF HEALTH, AND THE U.S EPA HAD ALL COME TO AN AGREEMENT TO ALLOW ACCESS TO THIS PROPERTY BY CONTRACTORS AND STATE AND FEDERAL OFFICIALS INVOLVED IN MONITORING AND CLEANUP OF THIS SUPERFUND SITE. WITHOUT FIRST HAVING TO OBTAIN PERMISSION FOR EACH VISIT. BARDWELL SAID THAT THERE WAS ONLY A SINGLE GUARD EMPLOYED BY SHARON STEEL CORP AT THE ABANDONED U.S SMELTING CO FACILITY, AND THAT WE WOULD HAVE TO SIGN THE GUARD'S REGISTER BEFORE ENTERING THIS PROPERTY

LARRY BARDWELL GAVE ME A COPY OF A REPORT PREPARED BY GENERAL ELECTRIC TO SHARON STEEL CORP FOR CONTRACT TO SAMPLE ALL OIL FILLED TYPE TRANSFORMERS, THE RESULTS OF ANALYSIS, AND THE EVENTUAL DISPOSAL OF ANY PCBS. THIS REPORT HAD BEEN GIVEN TO LARRY BARDWELL BY SHARON STEEL CORP. THIS GE REPORT REFLECTS THAT THERE ARE 22 TRANSFORMERS AT THE U.S. SMELTING CO. SITE. ANALYSIS SHOWS THAT THERE ARE 3 PCB TRANSFORMERS AND 1 PCB CONTAMINATED TRANSFORMER. HOWEVER, OF THE 14 TRANSFORMER MFG. I.D. PLATES THAT I WAS

ABLE TO EXAMINE I COULD ONLY IDENTIFY THE 1000KVA GE PYRANOL TRANSFORMER NORTH OF THE MAIN BLDG AND THE 750KVA GE PYRANOL TRANSFORMER IN THE MAIN BUILDING AS PCB TRANSFORMERS. THE TRANSFORMER I.D. PLATE INFORMATION READS AS FOLLOWS: (1) GENERAL ELECTRIC, NO. 8112207, 1000KVA, 1170 GAL. 1467 PYRANOL, PCB MARKED, SLIGHT WEEP AT DRAIN (SEE PHOTO) - SAMPLE NO 0620801691 0101 - THERE APPEARS TO BE A SEALING BETWEEN THE DRAIN THREADS BUT DIELECTRIC STILL APPEARS TO HAVE WEEPED AROUND THIS SEALANT; (2) GENERAL ELECTRIC, NO. 8112655, 750KVA, 380 GAL. 1467 PYRANOL, PCB MARKED, WEEP AT BUSHING (SEE PHOTO) - SAMPLE NO 0620801691010 GE TRANSFORMER NO. 8112207 IS ON A CONCRETE PAD (SUBSTATION) OUT-OF DOORS AND IT IS NOT DATED. GE TRANSFORMER NO. 8112655 IS INSIDE THE MAIN BUILDING, WITH WALLS AND CEILING, THE FLOOR IS CONCRETE AND I DID NOT SEE A FLOOR DRAIN, THERE IS NO 6" HIGH CONTINUOUS DIKE, THE TRANSFORMER WAS NOT DATED, AND THE BUILDING WAS NOT PCB MARKED. THIS TRANSFORMER WAS OBVIOUSLY IN STORAGE. MR. DALE PALMER, SITE MANAGER (GUARD) EMPLOYED BY SHARON STEEL CORP SAID THAT HE PERIODICALLY (AT LEAST MONTHLY) INSPECTS EACH TRANSFORMER FOR LEAKS BUT HE DOES NOT HAVE ANY RECORD OF THESE INSPECTIONS. THERE ARE 10 POLE MOUNT DISTRIBUTION TYPE TRANSFORMERS AT VARIOUS LOCATIONS AROUND THE MILL SITE - NONE OF THESE APPEARED TO BE LEAKING - AND I COULD NOT EXAMINE THE MANUFACTURER'S I.D. PLATE BECAUSE THEY WERE ALL 10-15' ABOVE THE GROUND. PAGE NO 2 OF THE GE CONTRACT REFLECTS 22 TRANSFORM THERE WERE IN FACT AT LEAST 3 MORE POLE MOUNT TYPE TRANSFORMERS NOT LISTED ON THIS PAGE. THE TWO PAGE DENVER 'LIL' DIELECTRIC SAMPLE ANALYSIS REFLECTS 24 SAMPLE ANAYSIS (23 TRANSFORMERS, 1 BARREL OF CHEVRON OIL) BUT I COULD NOT FIND MFG. I.D. PLATE SERIEL NO'S. TO CORRESPOND TO EACH OF THE SERIEL NO'S IN THESE TWO PAGES.

ON JULY 1, 1986, I TELEPHONED THE MIDVALE FIRE DEPARTMENT (801-566-1261) AND I ~~TALKED~~ TALKED TO MIDVALE FIRE C'HEF MERRILL ROSS TO FIND OUT IF SHARON STEEL

CORP. HAD REGISTERED ANY PCB TRANSFORMS FROM THE U.S. SMELTING CO SITE WITH IS FIRE DEPT. CHIEF ROSS SAID THAT HE HAD BEEN CONCERNED THAT THEIR MIGHT BE PCB TRANSFORMERS ON THIS SITE BUT HE HAS NOT BEEN NOTIFIED BY ANYONE TO REGISTER THE 2 PCB TRANSFORMERS IN QUESTION.

IN SUMMARY, I OBSERVED TWO WEEPING ~~PC~~ GENERAL ELECTRIC PYRANAL TRANSFORMERS ON THE SHARON STEEL CORP - U.S. SMELTING CO - SUPERFUND SITE. THESE TRANSFORMERS ARE PCB MARKED, BUT ARE NOT CURRENTLY IN SERVICE. NEITHER OF THE TRANSFORMERS IS DATED. DALE PALMER, SITE MGR (GUARD) EMPLOYED BY SHARON STEEL CORP. CLAIMS TO BE PERIDICALLY INSPECTING ALL OIL FILLED TRANSFORMERS FOR LEAKS, BUT HE KEEPS NO RECORD OF THESE INSPECTIONS. THE TWO GE PYRANAL TRANSFORMERS HAVE NOT BEEN REGISTERED WITH THE MIDVALE FIRE DEPARTMENT. IF EITHER OF THESE TWO PCB TRANSFORMERS IS IN STORAGE FOR DISPOSAL THEN THEY ARE ALSO BE STORED NOT IN COMPLIANCE WITH THE TSCA - PCB REGULATIONS.

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ATTACHMENTS

1. COPY: GE REPORT TO SHARON STEEL CORP.
2. PHOTO. WEEPING G.E. TRANSFORMER NO. 8112207 - SAMPLE NO. [illegible]
3. PHOTO WEEPING G.E. TRANSFORMER NO. 8112655 - SAMPLE NO. [illegible]