



CUSTOMER AUDIT HANDBOOK



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INTRODUCTION

This customer audit handbook has been prepared to provide an orientation to the company, the facility, and its specific permitted features. This handbook provides useful information in this regard, although customers may have additional questions. Please contact US Ecology, Idaho (USEI) for information on items not covered in this document and waste acceptance capabilities. Due to the large number of pages, the facility's hazardous waste permits and other permits are available as separate pdf files on the web page. Customer contract forms, waste profile forms, and other documents may also be downloaded from the web page.

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US ECOLOGY IDAHO DETAILS

1. Location

The US Ecology Idaho (USEI) hazardous waste treatment, storage, and disposal facility is located approximately 10.5 miles west of Grand View, Idaho. (See Site Map) Grand View has a population of 499. The nearest private residence is 1 mile southeast of the site.

2. General Facility Description

The USEI facility lies far from population centers in an arid climate with low rainfall and a high evaporation rate. The 328-acre site in Owyhee County is located on more than 1,250 contiguous acres of land owned by USEI. These factors, in combination with thick sub-surface layers of highly impermeable silts, clays and sediments, make the site ideally suited for the secure treatment and long-term disposal of hazardous and industrial wastes.

The facility provides a full scope of waste management services including chemical stabilization of organic and inorganic solids, sludges, and liquids, along with landfill disposal, aqueous evaporation treatment, debris treatment, and PCB management and disposal. USEI is fully permitted to manage RCRA, TSCA and CERCLA wastes, along with NORM/NARM, TENORM and NRC-exempted radioactive waste. The facility's combined state and federal RCRA Part B Operating Permit was renewed July 28, 2016. Please contact the facility for waste acceptance capabilities.

USEI offers rail transportation service to the facility from all points in the continental United States. This expanded transportation service provides economical disposal and treatment services to generators throughout the nation. Nearly 3,000,000 tons of wastes have been received at the Rail Transfer Facility (RTF) in the last five years, demonstrating an ability to compliantly manage fast-paced, high-volume environmental remediation projects.

3. Site History

The USEI site was originally constructed as a U.S. Air Force Titan 1 Missile Complex and eventually decommissioned by the U.S. Air Force in 1965. In 1973, the State of Idaho permitted Western Containment, Inc. (Wes-Con) to dispose industrial waste at the site. Wes-Con received and disposed of industrial and PCB wastes in trenches and in portions of the abandoned Titan Missile silos. In 1980, Wes-Con submitted a Part A notification under the Resource Conservation and Recovery Act (RCRA) for hazardous waste disposal. EnviroSAFE Services of Idaho, Inc. (ESII) purchased the site in 1981 and was granted RCRA interim status the same year. ESII obtained a RCRA Part B Operating Permit on December 15, 1988, and a TSCA Storage and Disposal Permit on November 29, 1991. The facility was purchased by US Ecology Corporation in January 2001, and renamed US Ecology Idaho, Inc. in May 2001.

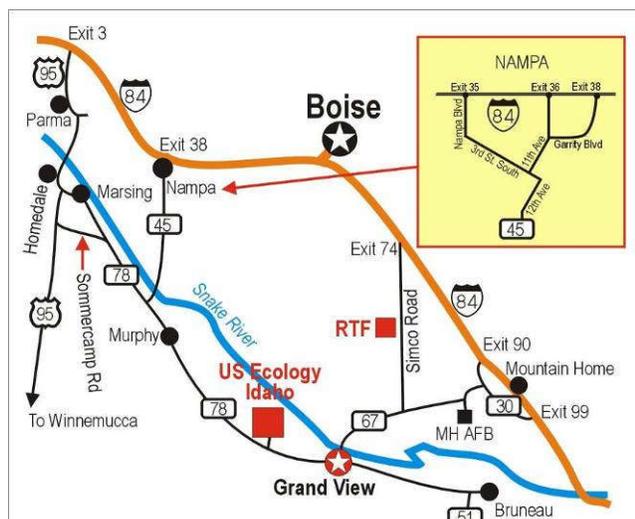


Figure 1 - Grand View site location map

4. Health and Safety Program

US Ecology Idaho has a robust safety program which encourages effective training, hazard prevention and control, worksite analysis, and a cooperative relationship between management and employees. The site's Health and Safety Plan is available for review. USEI's EH&S Manager monitors all safety programs and employee health programs on-site. Additionally, corporate safety personnel perform audits of USEI's facilities and health and safety program. USEI's drug testing program conforms to the requirements of the Drug-Free Work Place Act.

All personnel receive the required 24-hour OSHA training (HAZWOPER) and annual 8-hour refresher training. Additionally, personnel receive TSCA training, radiological safety training, and any specific job training needed to perform the duties assigned.

All employees receive a pre-employment physical to determine a baseline for medical monitoring. Employees assigned to areas processing hazardous materials or wastes are evaluated each year. Additional medical testing and monitoring is performed if, during health and safety monitoring of work areas, OSHA mandated levels are exceeded.

The security system deters unauthorized entrance to the site. Twenty-four hour guard service is provided by a contracted security service. The security service detects abnormalities and reports discrepancies to law enforcement and USEI personnel. During operating hours, the security service ensures visitors are signed in and escorted when on-site. In the event of a security breach, the security service contacts a site emergency coordinator.

The site is surrounded by chain link fence topped with three strands of barbed wire. All gates are locked unless attended. Warning signs are posted routinely along the fence.

USEI maintains emergency procedures for all required plans according to both RCRA and TSCA permits. A Contingency Plan is maintained per USEI's RCRA permit. At a minimum, one unannounced evacuation drill is performed annually. All visitors are required to read provisions of the Contingency Plan in the event an evacuation is called for, and all visitors sign an acknowledgement and waiver when entering the site.

5. Geography and Climate

The USEI facility is located off of Highway 78 approximately 10.5 miles west of the town of Grand View, in Owyhee County, Idaho.

The site is situated on a one-mile wide plateau that slopes from south to north. Maximum surface relief on the facility is 90 feet and the mean surface elevation is 2,600 feet above sea level. The site is located in a desert environment with an average rainfall of 7.26 inches per year and an average evaporation rate in excess of 42 inches per year.

Castle Creek, the nearest surface water, is an intermittent creek located one-half mile west of the site that lies topographically 150 feet below the facility. The Snake River, the largest surface water source near the site, lies approximately 2½ miles north and 350 feet in elevation below the facility. EPA site evaluations indicate little possibility of site flooding due to a number of factors, primarily low rainfall, high evaporation, and location of the facility outside the 100-year flood plain.

The facility is located within seismic zone 2 and therefore does not require a seismic standard demonstration under 40 CFR Part 264 Appendix IV. (See Section 6 for discussion of site geology.)

6. Geology

The USEI facility is situated within the western portion of a 20,000-square mile physiographic unit known as the Snake River Plain. The plain extends from the vicinity of Ashton, Idaho to north of Ontario, Oregon. The Snake River Plain is approximately 350 miles in length and varies in width from 25 to 75 miles. USEI Site B lies within the lowland area of the Owyhee subunit of the Snake River Plain at an elevation range of 2,525 to 2,635 feet.

Site geologic and hydrogeologic conditions are well understood based on decades of environmental study and reports by USEI and previous owners of the facility.

Below a thick vadose (dry) zone underneath the facility there are two, independent, water-bearing zones within 300 feet of the surface. These units have been designated the Upper and Lower Aquifers, although neither “aquifer” is capable of producing significant water.

Underlying the Lower Aquifer and extending to a depth of approximately 2,400 feet are progressively indurated (hardened) clays and shale that comprise the confining bed for a deep, geothermal, artesian aquifer present in basalt.

6.1 Geologic History

The general geologic history begins with the placement of the Banbury Basalts in late Miocene time, approximately 5 to 6 million years ago. Overlying the Banbury Basalt is the Glens Ferry Formation of Pliocene age (approximately 5 to 2 million years ago). The Glens Ferry Formation consists of a thick section of predominantly clay, silt and fine sand beds deposited in a series of large, regional lakes that formed behind temporary lava dams across the Snake River near the Idaho-Oregon border. The Glens Ferry Formation beneath Site B consists of both lacustrine (lake deposits) and fluvial (flood plain) sediments. The sedimentary record at Site B reflects a general pattern of coarsening upward, as the large regional lakes filled in, dried up or drained. In general the deeper portions of the Glens Ferry Formation is almost entirely thick, massive, lacustrine clay and silt but the upper parts, including the Upper and Lower Aquifers and much of the overlying vadose sediments, represent a transition from lacustrine to fluvial sediments.

Above the Glens Ferry Formation is the Pleistocene Bruneau Formation (less than 1.5 million years ago) that forms a mantle of fine to coarse sands and mixed sand and gravel. The Bruneau Formation was deposited, and subsequently reworked, by the Snake River after the regional lake forming conditions at the end of the Pliocene had ceased.

6.2 Hydrogeology

The vadose zone at the USEI site is 130 to 200 feet thick. The upper part of the vadose zone, below the surficial gravels (where present), consists of thick beds of dry, fine to medium, sand with thin beds of silt and clay. The lower part of the vadose zone consists of medium to thinly bedded fine silty sand, silt and clay. The overall low moisture content and hydraulic contrast between the numerous discrete beds of the vadose zone provide a high degree of protection against vertical movement of water from the surface to the Upper Aquifer.

The Upper Aquifer is an unconfined or water-table aquifer. Water levels in the Upper Aquifer range from 130 to 200 feet below ground level. The top of the aquifer is defined by the current position of the water table. The lower part of the Upper Aquifer consists of fine sand and silt beds in a predominantly silty-clay matrix. Well yields in the Upper Aquifer range from less than 0.5 upward to 3 gallons per minute.

Underlying the Upper Aquifer is a thick, massive clay and silty clay 20 to 35 feet thick with sufficiently low permeability to hydraulically separate the Upper and Lower Aquifers. The permeability of samples of the deep lacustrine clays determined during site characterization range from 1.0×10^{-6} cm/sec to 1.0×10^{-7} cm/sec.

The Lower Aquifer is a confined aquifer and is saturated beneath the entire site. It is bounded by upper and lower confining clays and consists of a “swarm” of thin lamina, partings, and thin beds of very fine sand with an aggregate thickness of approximately 3 feet that is embedded in approximately 30 feet of silty clay. The Lower Aquifer is an extremely low water yielding formation. None of the Lower Aquifer wells can be pumped continuously and estimates from observations of water level recovery rates indicate that even under extreme drawdown conditions the formation yields less than 0.01 gpm. Beneath the southern edge of the Site the depth to water in the Lower Aquifer is typically 190 to 210 feet.

Based upon the log of the 3,100 foot deep artesian supply well drilled on site by the U.S. Air Force, approximately 2,285 feet of clay and shale underlie the Lower Aquifer and separate it from the Banbury Basalt and deeper basalt aquifers. The Banbury Basalt and deeper basalts are local and regional geothermal, artesian aquifer. The artesian well at Site B was plugged and abandoned in 1985 using oil field techniques and contractors.

6.3 Groundwater Recharge

Four potential sources of groundwater recharge have been evaluated by past studies of the USEI site: deep percolation of precipitation, infiltration of ponded precipitation in uncompleted waste cells; streamflow losses from creeks, and upward leakage from the geothermal artesian aquifer or from the abandoned artesian well.

The arid conditions and thick vadose zone at the site preclude measurable recharge to the saturated zone from infiltration of precipitation. The mean annual precipitation at the site is less than 7 inches per year based upon 47 years of record at Grand View Idaho. Annual precipitation in Grand View, Idaho since 1993 has averaged 6.1 inches, while the annual average potential evapotranspiration (PET) has averaged 57.3 inches. All precipitation falling on the site is returned to the atmosphere by ET from the soil zone before it infiltrates deeper.

The liner and leachate collection systems for the waste cells at the USEI site are constructed to contain and remove any liquids that may accumulate as a result of an extreme rainfall event falling on the cells prior to closure. Any water from a liner failure would not reach the water table in the Upper Aquifer because it would be retained by capillarity in the thick vadose zone present at the site.

Nearby perennial streams are the probable recharge sources for the Upper and Lower Aquifers, which probably occurs along the reach of Castle Creek lying south of the site.

7. Site Design Features

7.1 Treatment Systems

Primary treatment operations are conducted at the Indoor Stabilization Building and Outdoor Stabilization Facility. In the Indoor Stabilization Building waste is placed into Mixing Tanks and reagent is either delivered via an auger system or loader. At the Outdoor Stabilization Facility, wastes and reagents are delivered from overhead gantries and mixed in containers located on a

system of rail tracks. Treated wastes are winched onto haul trucks and carried for disposal in the landfill.



Indoor Stabilization Building



Indoor Stabilization Building Treatment Mixing Tanks

7.2 Landfills

Three RCRA landfills are actively used to dispose of bulk and containerized solids. Of these three landfills, two are TSCA permitted for disposal of PCB contaminated materials (i.e. small capacitors, transformer carcasses, etc.) USEI’s landfill liner system for active cells 14, 15, and 16 consists of a dual composite liner with a leak detection system overlying the primary liner. See Figure 2 for a schematic of the liner. The liner system consists of:

- Subgrade: In-situ compacted silty, sandy soil.
- Secondary Soil Liner: Minimum 36-inches of recompacted clay with a permeability of less than 1×10^{-7} cm/sec.
- Secondary Flexible Membrane Liner: 60 or 80 mil high density polyethylene.
- Leak Detection Zone: Composite layer consisting of a synthetic drainage net, geotextile fabric, and a secondary geotextile fabric.
- Primary Flexible Membrane Liner: 60 or 80-mil high density polyethylene.
- Primary Leachate Collection Zone: Composite layer consisting of a synthetic drainage net, geotextile fabric, 12-inches of sand, and a second geotextile fabric.
- Protective Layer: 12-inches of compacted soil.

Hazardous Waste Cell 15 Design

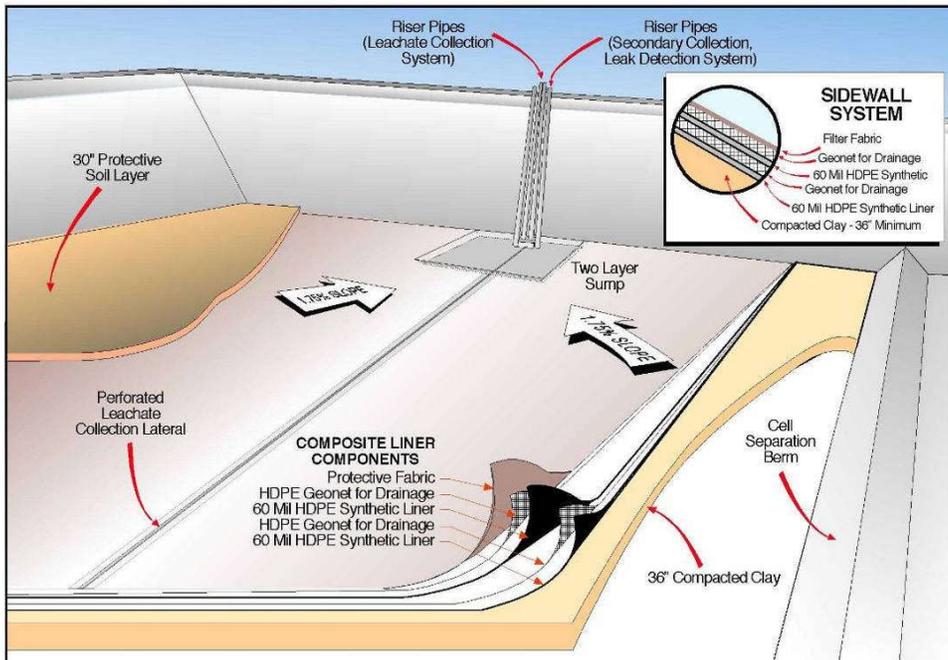


Figure 2 - Liner design detail

Construction of Cell 15 was initiated on March 1, 2003 and the cell was in operation by October 2003. Cell 15 is designed to contain over 4.8 million cubic yards of materials. Construction took place in four phases with completion of phase four happening in 2009.



Figure 3 - Cell 15 Liner Installation

Construction of Cell 16 was initiated on April 2, 2012. Following the successful format of Cell 15, construction of Cell 16 will take place in phases. The first phase of construction was completed in October of 2012, and the second phase is scheduled for construction in 2022. Cell 16 is designed to contain approximately 10 million cubic yards of materials.

7.3 Containers and Tanks

USEI has existing container storage areas with a collective capacity of over 12,000 fifty-five gallon drums. Containers received at USEI are off-loaded at a permitted storage area and opened. All containers are visually inspected for confirmation of contents. Samples are taken, when possible, from 10% of the containers on each manifest line item. After approval from the laboratory the containers may be landfilled, sent to stabilization, or segregated by compatibility group for storage.

Containers are normally off-loaded for sampling and inspection on Container Storage Pad (CSP) 4. Minor processing may occur within the drums (i.e., solidification, repackaging, etc.). Pad 4 is a sealed, curbed (12 inches) pad with sub cells segregated by berms. Pad 5 is used as an additional storage area for containers and is constructed in a similar fashion. CSP's are also used for wastes that have two or more compatibility characteristics or are being held for on-site treatment. Only compatible materials (determined through testing or process knowledge) are stored in a single containment sub cell.

Containers are kept closed except when adding or removing waste. Containers vary in size from 5-gallon pails to cubic yard boxes or other Department of Transportation (DOT) approved shipping containers. Each container is labeled with a unique receipt number during off-loading. Each container is labeled with a compatibility group prior to storage. Each storage bay is marked with a compatibility grouping. Containers are placed so that the compatibility markings are visible for inspection.

Containers accepted for disposal must meet the following standards:

- Each container must display markings and/or labels required under 40 CFR Part 262.31 and 262.32(a)(b), if applicable.
- All containers must be compatible with the contents.
- Containers must be in good condition.
- Containers weighing greater than 800 pounds must be approved by USEI prior to receipt.

USEI has four above ground RCRA-permitted wastewater storage tanks.

The wastewater treatment tanks are equipped with a 16- or 24-inch manhole, conservation vent, liquid level indicator, inlet, outlet, and spare nozzles. The tanks are insulated from freezing by 4 inches of RT3040 Series spray foam, a coating of Diathon (United Coatings), and a sheet of stainless steel for fire protection. Tanks are constructed of welded carbon steel and emptied at least once every three years for inspection and certification. All wastewater tanks have an activated carbon filter system to contain vapors. All equipment is anchored in accordance with manufacturers' recommendations. Tanks meet API 650 or UL 142 standards.

Ancillary equipment, such as pumps and pipes for the RCRA tanks, are aboveground and available for inspection. RCRA tanks have secondary containment meeting the requirements of 40 CFR Part 264.193. Tank containment is provided by above-grade concrete pads and dikes. Cracks, gaps, spills, and system integrity are readily observable in the open containment areas. The concrete pads and dikes have the capacity to contain 100% of the largest tank's contents and rainfall from a 25-year, 24-hour rainfall event.

8. Laboratory

USEI houses an on-site laboratory. USEI provides waste confirmation testing to generators, but does not typically provide characterization testing.

USEI has an inorganic metals laboratory equipped with the newest generation instruments. The laboratory has an ICP, automated mercury analyzer, one microwave sample digester, and numerous other minor instruments (i.e. flashpoint, pH, etc.).

All analyses are performed in accordance with EPA Manual SW-846, ASTM and Standard Methods, or proprietary USEI permit approved methods. USEI follows a stringent quality assurance/quality control (QA/QC) program. All required calibration checks, matrix spiked samples, duplicates and other QA/QC samples are analyzed. All QA/QC data is tracked to ensure that the laboratory is operating at a high level of accuracy and precision.

The Lab's Chemical Hygiene plan ensures that USEI is operating its laboratory in compliance with all OSHA regulations.

9. Waste Treatment Capabilities

Chemical fixation and stabilization are proven methods for treating inorganic and certain organic contaminated waste, which reduce the solubility of these contaminants as measured by the Toxicity Characteristic Leaching Procedure (TCLP).

USEI typically performs pilot studies on waste requiring chemical fixation and stabilization. These studies may be performed on a pre-acceptance sample, sample of a bulk waste load, or a representative sample of batched waste. The stabilization mix design is developed using a combination of information supplied by the customer on a Waste Profile Form (WPF), on-site testing data, and USEI's knowledge of chemical fixation of various waste streams. Pilot studies are repeated until the mix design meets characteristic, LDR, de-listing standards, or passes the paint filter test.

Mix design sheets are then issued to the Operations Department. When the waste arrives, reagents are added in precise amounts, and the waste is thoroughly mixed to allow reactions to occur. Field technicians inspect the treated waste, and collect samples as needed for confirmation testing.

9.1 Chemical Stabilization

Chemical Stabilization is a proven treatment technology that irreversibly bonds target elements and molecules into an environmentally inert material that reduces the leachability of the contaminants of concern. Chemical Stabilization uses lime-bearing material such as Portland Cement or other lime sources. Stabilization results from the chemical reaction of the lime, waste, and water. A number of reactions can occur:

- Crystalline structures form which trap target molecules.
- Molecules are adsorbed in the pores of the solid matrix that forms.
- Metal hydroxides form that are insoluble or have greatly reduced solubility in the TCLP solution.

All of these reactions contribute to the reduced leachability of the constituents of concern.

9.2 Chemical Fixation (Oxidation/Reduction)

USEI also uses other chemical reagents which, when used in conjunction with stabilization, reduce the leachability of inorganic and organic constituents. Reducing reactions, oxidation reactions, and competing reactions may all occur during the use of these reagents. These reactions allow the formation of compounds which are insoluble or have greatly reduced solubility in the TCLP solution. Chemical fixation is used as needed to achieve the LDR standards required by EPA.

9.3 Debris Management

Debris may be managed by micro-encapsulation or macro-encapsulation. Micro-encapsulation stabilizes debris using chemical fixation/stabilization reagents to reduce the leachability of hazardous constituents. Ignitable, corrosive, or reactive (ICR) debris is treated for those characteristics prior to encapsulation for toxics.

Requirements for micro-encapsulation of debris:

- The waste must meet the definition of debris in accordance with 40 CFR Part 268.2(h).
- Meets Subpart CC VOC requirements.
- No intact containers capable of containing >75% of original volume.
- No process residuals (i.e. slag).
- No wastes with specific treatment standards (i.e. intact lead acid batteries).
- Waste must not be tightly bound or bagged since this interferes with the treatment of contaminated surfaces.
- Waste must not have internally contaminated surfaces that are not conducive to micro encapsulation (i.e. pipes).

- Waste with highly complex shapes (i.e. pumps, motors) are not suitable for micro encapsulation.
- Porous debris such as wood, brick, cement, pavement, and porous rock is normally less than 1' x 3' x 6' (contact Customer Service for details).

Macro-encapsulation uses a jacket of inert inorganic materials to substantially reduce surface exposure to potential leaching media. Macro-encapsulation depends on the encapsulant to create a barrier around hazardous debris and thereby reduce exposure to potential leaching media. USEI utilizes a variety of jacketing materials, which are effective for most types of debris contaminants.

Requirements for macro-encapsulation of debris:

- The waste must meet the definition of debris in accordance with 40 CFR Part 268.2(h).
- No free liquids may be present.
- Macro-encapsulation may be suitable for treatment of both inorganic and organic contaminants.
- No intact containers capable of containing >75% of original volume.
- No process residuals (i.e. slag).
- No wastes with specific treatment standards (i.e. intact lead acid batteries).
- Waste must be of a size and weight that is suitable for physical handling and placement in the encapsulating containers (contact Customer Service for details).

9.4 Waste Disposal Operations

USEI's three operating landfills were constructed with both a leachate collection system and leak detection system.

The leachate collection system drains and traps moisture and liquids percolating through the landfill. The leachate collection system is protected from clogging by a geotextile filter and protected from physical disturbance by 6-inches of soil. Cells are graded so that liquids drain towards the leachate collection system. The sumps are pumped according to a Leachate Management Schedule outlined in USEI's operating permit.

Leachate levels are checked weekly in the primary leachate systems and daily in the secondary leak detection collection and removal system in Cells 14 and 15. The primary leachate system in Cell 16 is inspected daily. Both sumps are checked in the event the facility receives more than ½ inches of rainfall in a 24-hour period. Leachate is pumped and removed in accordance with action levels established in the Part B Permit. Records are maintained for each pumping event. Pumping records indicate leachate levels before and after pumping, the volume pumped, and the on-site dispensation of the leachate.

The leachate is managed in accordance with 40 CFR Part 268.7, using a carbon absorption system. The treated leachate is stored until the required testing is completed. Upon passing the required parameters, the leachate is disposed in the Evaporation Pond.

The Evaporation Pond liner system is constructed as a RCRA Surface Impoundment:

- Subgrade: In-situ compacted silty, sandy soil.
- Secondary Flexible Membrane Liner: 40-mil Medium Density Polyethylene.
- Leak Detection Zone: Composite layer consisting of a geotextile fabric, 12 inches of sand, and a collection pipe.
- Primary Soil Liner: 12 inches of compacted clay with permeability of less than 1×10^{-6} cm/sec.
- Primary Flexible Membrane Liner: 80-mil High Density Polyethylene.

9.5 Processing Containerized Waste

Waste streams with similar waste codes, characteristics, and compatibility are typically consolidated for batch treatment. For example:

- F006, 7, 8, 9, 11, 12, 19 waste streams are usually combined.
- D004-011 waste streams are usually combined.

Batches are analyzed after treatment to ensure that all treatment standards for all waste codes in the batch have been met. Containers of debris are also consolidated for treatment; however, there are no concentration-based standards for encapsulation. Instead, the requirements of 40 CFR Part 268.45 and USEI's permit must be met to ensure that debris was treated for each contaminant subject to treatment.

Containers of waste that do not require further treatment are placed directly into the landfill based upon compatibility. The coordinates of the containerized wastes are recorded, if for any reason the container must be retrieved.

9.6 Processing Bulk Wastes

Bulk wastes requiring treatment may be off-loaded into 50-cubic yard stabilization bins at the Stabilization Facility. Alternatively, containerized bulk waste may be stored in one of USEI's RCRA storage areas. Waste off-loaded directly into bins or tanks can be treated immediately. Downsizing, sorting, crushing, and other handling may be required prior to treatment.

Bulk wastes destined for direct landfill are directed to the landfill cell specified on the WPF summary sheet after inspection and approval for receipt. Waste locations in the landfill are based upon compatibility, and disposal locations are recorded.

10. Waste Acceptance Procedures

The Waste Analysis Plan (WAP) outlines protocols for waste treatment, storage, and disposal in accordance with USEI's operating permits. The plan provides a framework for waste management beginning with pre-acceptance review and continuing through waste receipt and disposal. Referenced forms are available on the US Ecology Idaho, Inc. web page.

Table C-8 of the RCRA Part B permit identifies wastes that are not acceptable for treatment or disposal at USEI:

- Highly water reactive wastes
- Explosive, pyrophoric, or shock sensitive wastes
- Etiological Wastes (medical or biological wastes)
- Compressed Gases

10.1 Pre-Acceptance Protocol

The pre-acceptance protocol evaluates waste streams prior to acceptance and on-site receipt. The protocol identifies waste streams that can be properly treated, stored, and disposed at USEI. The pre-acceptance protocol begins with a completed Waste Profile Form (WPF).

The WPF contains a physical and chemical characterization and a description of the process generating the waste. The generator signs the WPF and certifies the following:

- Characterization was performed on a representative waste sample in accordance with RCRA
- All known or suspected constituents have been identified in the WPF
- Waste subject to the Land Disposal Restriction (LDR) Standards either meet treatment standards, require treatment, or are subject to a variance
- All information submitted in the WPF is true and accurate

The WPF is initially reviewed for completeness and may undergo further review by Laboratory, Regulatory, and Safety personnel. Waste streams that are being sent for stabilization (usually bulk shipped wastes) normally require a sample for analysis, mix design development, and physical review.

10.2 Waste Receipt Summary

A summary sheet of the WPF is produced after all reviews are complete. The summary establishes laboratory fingerprint testing parameters for waste acceptance, identifies appropriate personal protective equipment (PPE), additional inspection requirements, and any process testing parameters (treatment wastes). The parameters, in part, are determined by the information given on the WPF.

Process parameters are determined by the treatment design developed by the laboratory. Percent solids, metals concentrations, and other physical characteristics have an effect on stabilization and chemical fixation, and these process parameters are monitored by laboratory testing as needed or required.

10.3 WPF Terms and Conditions and Contract Addendums and Amendments

After WPF approval, the waste stream is priced and contracted. A list of terms and conditions for the receipt of the waste at USEI is issued. Any special requirements are also listed with these conditions. An addendum and/or amendment is issued for the waste stream along with the terms and conditions. The addenda and amendments reference the Waste Disposal Agreement Contract number. A Waste Disposal Agreement with the customer must be on file at USEI prior to scheduling or approval of any waste stream.

10.4 Approval Letters

When a WPF has been approved, an approval letter is sent to the customer informing them that USEI has all the permits required to receive the waste stream listed on the letter. The customer may then schedule waste shipments.

10.5 Waste Receipt Protocol

Waste Receipt is controlled through scheduling, receiving, sampling, and fingerprint analysis. The waste receipt protocol is used to verify that waste streams received are within acceptance criteria. During scheduling, the generator provides the expected date of arrival, waste stream identification number, shipment mode, number of containers, and transporter. The transportation associate will verify the waste approval and confirm that the waste can be received on the date requested.

When the shipment arrives, USEI's Receiving Department verifies accuracy of the manifest, shipping papers, and LDR certification. A computerized work order (WO) is generated at this time. This form is used to track waste acceptance, processing, and disposal. The WO contains information specific to the generator, broker, waste stream, and unique load number. The WO tracks the waste through laboratory analysis, treatment, and finally disposal.

The Receiving Department enters all waste management information into the Company's Standard Operating Platform (AESOP) and (EQAI) systems (i.e. weights, reagents, disposal locations, etc.). Upon final waste placement, three-dimensional disposal coordinates are recorded on a Work Order Supplement and in the associated electronic database (AESOP and/or EQAI).

Field Technicians deliver load samples to the laboratory. The internal control form (or work order) is used as the sample chain of custody. Laboratory staff conducts fingerprint testing parameters and records the results in the associated electronic database. Samples may include tests for water reactivity, pH (50:50 slurry with water for solid samples), cyanide and sulfides screening test (if applicable), flammability for liquids, and any process parameter testing. Samples must pass receipt parameters for waste acceptance.

Each bulk load and 100% of all containers are uncovered/opened and inspected. Samples are collected from a minimum of 10% of containers and 10% of each waste stream for bulk loads. Large direct bulk disposal waste streams shipped over a short period of time are 10% sampled. TSCA wastes are sampled in only a few circumstances.

Samples are analyzed for the fingerprint parameters established during the WPF review. If the inspection and fingerprint results match the waste profile data, the waste is approved for receipt and the next waste management step.

All discrepancies noted during waste receipt are resolved prior to waste management. If the discrepancies cannot be resolved through re-analysis and consultation with the generator, the shipment is rejected. In most cases, the transporter is not released until all discrepancies are resolved.

10.6 Waste Process Controls

When receipt, sampling, inspection, and testing have been completed and approved the Operations Department directs the waste to the next waste management step. Waste may be directly land-filled, sent to the stabilization unit, processed for TSCA management (direct-landfill only), or placed in temporary storage. Waste is tracked through the system on the WO generated during receipt.

10.7 Post Treatment Testing Requirements

All wastes that are stabilized have specific post treatment sampling and testing requirements. Wastes that only require solidification have to meet the paint filter test. Debris waste which has been microencapsulated must be visually inspected for coating and must pass paint filter test. Wastes that have been stabilized have several different sampling and testing regimens based on whether it's a characteristic waste, a process waste subject to LDR requirements, or a specialized waste subject to de-listing.

Larger individual waste streams that are treated require post treatment testing on receipt of the first load and once a year there after. In addition, each new stabilization process design has to be tested after treatment in the same manner. Mixtures of different waste streams (i.e. consolidated waste shipments) are tested each time after treatment.

10.8 Final Document Package

All documents for each waste shipment are packaged and filed together. These documents are stored on-site (3 years from receipt date) and in an off-site storage facility. The following is a list of documents that can be included in the final package:

- Finalized WO
- Tracking WO
- Weight Ticket
- Bill of Lading
- Copy of the Original Signed Manifest
- TSDf copy of the Manifest
- Copy of the Certificate of Disposal (CD)
- Other items that may be included if required or applicable:
 - Manifest Notification (LDR Form)
 - Stabilization Field Sheet
 - Discrepancy Reports

10.9 Procedures for PCB Wastes

USEI can only accept PCB solid waste for direct-landfill. Before a PCB waste stream may be accepted by US Ecology Idaho, all generators shall submit a completed PCB Waste Profile Form (WPF).

Customers who generate, transport, store or dispose of PCB wastes must notify EPA of their activities and obtain an EPA identification number (40 CFR 761.205). The regulations allow the generic identification number “40 CFR Part 761” for a RCRA identification number if a timely notification has been submitted, but an identification number has not yet been issued by EPA.

- All generators of PCB’s with concentrations greater than or equal to 50 ppm must manifest their waste. There is no small quantity generator exemption.
- The RCRA Uniform Hazardous Waste Manifest must be used to track all shipments of PCBs from the generator to the disposal facility.
- Generators are required to indicate on the first page of the manifest the total number of pages in that manifest.
- The manifest or an attached inventory must include the date of removal from service for disposal, unique identification number, and the PCB waste code number. This may require additional pages to the manifest.
- The generator must sign the manifest certification, which includes a certification of waste minimization efforts.
- The unit of measure must be in kilograms.
- A One-Year Exception Report must be filed by US Ecology with EPA if a customer fails to send a PCB waste for disposal within nine (9) months from the date of removal from service for disposal.
- The customer will receive a signed return copy of the manifest within thirty (30) days from the time the shipment arrives at the facility.
- The customer will receive a Certificate of Disposal from US Ecology when their waste has been disposed of.

In addition to existing requirements for the packaging of PCB waste, the following are also required:

- The “Date of removal from Service for Disposal” must be indicated clearly and indelibly on the top and side of each container.
- PCB articles, PCB containers, and PCB article containers must be marked clearly and indelibly with the EPA identification number, and the unique identification number.

11. Groundwater Monitoring

Currently, USEI has fourteen (14) piezometers and forty (41) monitoring wells screened within two saturated zones designated as aquifers below the site.

Specific Conductivity, pH, and a custom list of 28 VOCs are sampled semi-annually in accordance with USEI Part B RCRA and TSCA Permits. Sampling for PCB analysis is performed each year. Groundwater sampling is performed in accordance with the requirements of USEI's current operating permit. Analysis is completed by a certified contract laboratory.

The results of the semi-annual groundwater sampling and analysis activities are submitted to the IDEQ semi-annually, in accordance with the requirements of USEI's RCRA Part B Permit, and to U.S. EPA Region 10 each year, in accordance with the requirements of USEI's TSCA Permit.

As a result of the acceptance, treatment (if applicable), and disposal of low activity radiological materials environmental media (i.e. soil, air, and groundwater) are sampled, and analysis is performed for an appropriate list of isotopes. Radon and passive gamma are also monitored at the facility fence line to demonstrate compliance with appropriate regulations.

12. Surface Water Controls

Run-off due to rain is managed through an engineered drainage collection and containment system. The system directs runoff from the interior of the site into one of two on-site RCRA Surface Impoundments. A run-on diversion system prevents run-on from entering the facility.

Site drainage and run-off controls are designed to contain and control run-off from a 25-year, 24-hour storm (1.75 inches of precipitation). Active waste disposal, storage, and treatment operations are segregated from uncontaminated areas by a series of diversion berms and channels. The control system consists of drainage swales, engineered grades, drainage conduits, flumes, riprap, and surface impoundments.

A system of interceptor channels collects and conveys run-off from the active waste handling areas to the rain water Surface Impoundments/Collection Ponds. Runoff from clean areas to the active area is prevented by a series of dikes and channels around active units. Run-off may be transferred from Collection Ponds 1 and 3 and routed to the Evaporation Pond for solar evaporation.

Run-off from the active areas of Cells 14, 15, and 16 are collected within the unit and transferred to storage tanks and treated as multi-source leachate. Once the leachate has been treated to below LDR's, leachate is routed to the primary Evaporation Pond (also a RCRA Surface Impoundment) for solar evaporation.

USEI has two RCRA-permitted Surface Impoundments for the collection of storm water runoff (Rainwater Collection Ponds 1 and 3). A third RCRA-permitted impoundment is primarily used for solar evaporation (Evaporation Pond).

USEI's Surface Impoundments are constructed with dual synthetic liner systems and associated leak detection capabilities. The storm-water pond liner systems are constructed as indicated from bottom to top:

- Subgrade: In-situ compacted silty, sandy soil.
- Secondary Flexible Membrane Liner: 40-mil Medium Density Polyethylene.
- Leak Detection Zone: Composite layer consisting of a geotextile fabric, 12 inches of sand, and a collection pipe.

- Primary Flexible Membrane Liner: 60-mil High Density Polyethylene.
- Protective layer: 12 inches of sand, geotextile fabric and 6 inches of stone.

13.1 Closure/Post-Closure

Closure and Post-Closure plans are maintained in accordance with USEI's RCRA and TSCA permits. Plans are available for inspection on site. Costs for closure and post-closure are covered by insurance policies approved the state of Idaho. Closure costs are reviewed and adjusted annually per the facility permit.

USEI Compliance History



Compliance History 2017-2022

US Ecology Idaho, Inc.
20400 Lemley Road
PO Box 400
Grand View, ID 83624

(800) 274-1516
(208) 834-2275
FAX (208) 834-2919

18 August 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

25 July 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

15 June 2022

Type of Inspection: Compliance Evaluation Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following apparent violations were noted in a warning letter to USEI on 09/01/2022:

1. Failure to properly label/mark containers. One (1) 55-gallon container was observed at Pad 8 with no label or markings. USEI corrected the deficiency at the time of inspection.
 2. Failure to properly label/mark containers. One (1) 5-gallon container was missing the compatibility group and waste codes. USEI corrected the deficiency at the time of inspection.
 3. Failure to properly label/mark containers. One (1) 55-gallon container was observed missing the words “Hazardous Waste”, compatibility group, and waste codes. USEI corrected the deficiency at the time of inspection.
 4. Failure to comply with security procedures for gates. At the time of the inspection, Gate A was observed open and unattended. USEI is allowed to leave gates open for certain activities. In this instance, the gate was left open for trucks hauling clay for the construction of Phase II of Cell 16.
 5. Failure to comply with post closure care requirements. One shrub was observed growing on top of closed landfill Cell 5. USEI removed the shrub following the inspection.
-

10 May 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: One 55-gallon container of hazardous waste was missing the compatibility group. USEI corrected the deficiency at the time of inspection.

Return to Compliance: 08/10/2022

14 April 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

09 March 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

08 February 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

20 January 2022

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

20 December 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

23 November 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

01 November 2021

Type of Inspection: Operation & Maintenance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No Violations or Compliance Issues Were Found

12 October 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

22 September 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

11 August 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

15 July 2021

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Undetermined, Agency May Still be Determining

14 June 2021

Type of Inspection: Compliance Evaluation Inspection (CEI) On-Site
Regulatory Agency: Idaho Department of Environmental Quality
Results: Undetermined, Agency May Still be Determining

9 June 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

12 May 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

13 April 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

16 March 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

23 February 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

22 January 2021

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

17 December 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

20 November 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

27 October 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

08 September 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

25 August 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

22 July 2020

Type of Inspection: Compliance Evaluation Inspection On-Site
Regulatory Agency: Idaho Department of Environmental Quality
Results: Undetermined, Agency May Still be Determining

01 July 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

18 June 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

19 May 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

28 April 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

16 March 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

28 February 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No Violations or Compliance Issues Were Found

27 January 2020

Type of Inspection: Follow-Up Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: Undetermined, Agency May Still be Determining

22 January 2020

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: Undetermined, Agency May Still be Determining

30 December 2019

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: Undetermined, Agency May Still be Determining

05 December 2019

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: The following violation was observed:

1. Failure to comply with LDR storage prohibition and manifest discrepancy procedures. USEI received four extra containers of hazardous waste but failed to document the manifest discrepancy, failed to contact the generator, and failed to submit the required report to the IDEQ. The containers were not noted in inventory, and as a result, were stored over the one-year storage deadline.

An initial penalty of \$3,199 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to comply with container storage area inspection requirements. USEI was storing waste at the Containment Building and conducting a weekly inspection of the area rather than the required daily inspection. No penalty was assessed.
-

13 November 2019

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: The following violation was observed:

1. Failure to comply with LDR storage prohibition. Thirty-eight containers of hazardous waste were stored over the one-year deadline.

An initial penalty of \$3,800 was assessed on July 30, 2021. This penalty includes other self-reported instances of non-compliance following the November 17, 2018 Incident. USEI is currently working with the IDEQ to resolve the violation.

4 November 2019

Type: IDEQ issued an NOV regarding financial assurance.

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were noted:

#1-3: Failure to Provide Adequate Financial Assurance for Facility Closure and Post-Closure Care – Insurance Assignment Clause

#4-6: Failure to Provide Adequate Financial Assurance for Facility Closure and Post-Closure Care – Automatic Renewal of Insurance Policy

#7: Failure to Provide Adequate Financial Assurance for Liability Coverage – Aggregate Coverage for Accidental Occurrences

#8: Failure to Provide Adequate Financial Assurance for Liability Coverage – Insurance Policy Cancellation Language

Violations #4-6 were dropped by IDEQ. \$22,800 civil penalty paid 07/22/2020.

Return to Compliance 07/29/2020.

23 October 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No Violations of Compliance Issues were Found

18 September 2019

Type of Inspection: Operation & Maintenance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No Violations or Compliance Issues Were Found

05 September 2019

Type of Inspection: Compliance Evaluation Inspection On-Site

Regulatory Agency: Idaho Department of Environmental Quality

Results: No Violations or Compliance Issues Were Found

19 & 20 August 2019

Type of Inspection: Compliance Evaluation Inspection (CEI) On-Site

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were observed:

1. Failure to maintain adequate aisle space at Pad 5.

An initial penalty of \$1,200 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to maintain secondary containment. Curbing at Pad 4 was identified as cracked during the inspection.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

3. Failure to keep containers closed. Four roll-off mixing bins at CSA #1 were observed partially open.

An initial penalty of \$3,800 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

4. Failure to post “No Smoking” signage. USEI failed to post “No Smoking” signage at the

entrance to the active yard area.

An initial penalty of \$199 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

5. Failure to maintain eyewash station at container storage area pad 4.

An initial penalty of \$3,800 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

01 August 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following observation was observed:

1. Failure to maintain secondary containment. The coating on the top of secondary containment curbing at Pad 5 was compromised.

An initial penalty of \$1,200 was assessed on July 30, 2021. This penalty also reflects the finding from the July 15, 2019 inspection. USEI is currently working with the IDEQ to resolve the violation.

15 July 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violation was observed:

1. Failure to maintain secondary containment. The coating on the top of secondary containment curbing at Pad 5 was compromised.

An initial penalty of \$1,200 was assessed on July 30, 2021. This penalty also reflects the finding from the August 1, 2019 inspection. USEI is currently working with the IDEQ to resolve the violation.

18 June 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were observed:

1. Failure to label one pallet of shrink-wrapped hazardous waste boxes stored at Pad 5.

An initial penalty of \$2,000 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to maintain container integrity. A leaking 250-gallon tote was observed at Pad 5.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

05 June 2019

Type of Inspection: Case Development Inspection (CDI)

Regulatory Agency: Idaho Department of Environmental Quality

Results: The CDI was conducted following the November 17, 2018 Incident. USEI received the results from the CDI Report on July 30, 2021. The results of the report were included in the July 30, 2021 NOV.

30 May 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following observation was observed:

1. Failure to maintain container integrity. A fiber container at the Outdoor Stabilization Facility had become compromised due to precipitation.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to keep containers closed. The lid on a one cubic-yard container of hazardous waste was not secured.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

29 April 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violation was observed:

1. Failure to keep containers closed. The lid on a 1-gallon container of hazardous waste was not secured.

An initial penalty of \$2,000 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

11 March 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were observed:

1. Failure to comply with container stacking requirements. Containers at Pad 4 were stacked more than three high.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to comply with container stacking requirements. Containers at Pad 4 were stacked more than two high.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

3. Failure to comply with container stacking requirements. Containers at Pad 5 were stacked more than two high.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

4. Failure to comply with container stacking requirements. Containers at Pad 5 were stacked more than two high.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

5. Failure to comply with container stacking requirements. Containers at Pad 4 were stacked more than two high.

An initial penalty of \$1,200 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

14 February 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

05 February 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were observed:

1. Failure to maintain container integrity. A leaking 55-gallon container of hazardous waste was observed at Pad 7.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to keep containers closed. Two roll-off mixing bins at the Outdoor Stabilization Facility containing hazardous waste were uncovered. The bins had been in use during the November 17, 2018 Incident.

An initial penalty of \$3,800 was assessed. This penalty also reflects the finding from the December 20, 2018 monthly inspection. USEI is currently working with the IDEQ to resolve the violation.

3. Failure to keep containers closed. The lid on a 5-gallon container of hazardous waste was not secured.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

4. Failure to comply with container stacking requirements. A grouping of hazardous waste containers was observed stacked three-pallets high at Pad 4.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

15 January 2019

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violation was observed:

1. Failure to keep containers closed. The lid on an 85-gallon overpack container at Pad 5 was not secured.

An initial penalty of \$1,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

20 December 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violations were observed:

1. Failure to remove accumulated precipitation from secondary containment systems in a timely manner. Precipitation was not removed within 48-hours at the Outdoor Stabilization Facility.

An initial penalty of \$3,800 was assessed on July 30, 2021. USEI is currently working with the

IDEQ to resolve the violation.

2. Failure to remove accumulated precipitation from secondary containment systems in a timely manner. Precipitation was not removed within 48-hours at Pad 7.

An initial penalty of \$3,800 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

3. Failure to maintain container integrity. A fiber box at CSA #1 was observed to have a hole punctured in it at the time of inspection.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

4. Failure to maintain container integrity. A one-yard cubic supersack container at CSA #1 had staining on the outside and adjacent soil.

An initial penalty of \$2,600 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

5. Failure to keep containers closed. Two roll-off mixing bins at the Outdoor Stabilization Facility containing hazardous waste were uncovered. The bins had been in use during the November 17, 2018 Incident.

An initial penalty of \$3,800 was assessed. This penalty also reflects the finding from the February 5, 2019 monthly inspection. USEI is currently working with the IDEQ to resolve the violation.

26 November 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following violation was observed:

1. Failure to comply with Large Quantity Generator 90-day accumulation time limit. USEI failed to move four containers of hazardous waste to a permitted storage area within the 90-day timeframe.

An initial penalty of \$2,000 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

17 November 2018

Regulatory Agency: Idaho Department of Environmental Quality

Results:

1. Failure to minimize the possibility of a fire, explosion, or release.

An initial penalty of \$10,000 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

2. Failure to control site access during an emergency.

An initial penalty of \$3,199 was assessed on July 30, 2021. USEI is currently working with the IDEQ to resolve the violation.

14 November 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

09 October 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

24 September 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

13 August 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

18 July 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: IDEQ noted two boxes at Pad 7 that appeared to be leaking. Upon further inspection of the containers it was noted the boxes did not contain free liquids and may have been stained in transit to USEI. No further action required.

14 June 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following apparent violation was observed:

1. USEI failed to maintain the interior coating on the secondary containment walls of Tank 1-4.

Corrective Action:

1. USEI personnel patched the interior coating.

Warning Letter Issued 07/31/2018. The inspection results were reported along with the April 03, 2018 and May 17, 2018 monthly and April 24-25, 2018 CEI results.

Return to Compliance: 08/24/2018

17 May 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: The following apparent violation was observed:

1. The aisle space at Pad 7 was noted to be inadequate.

Corrective Action:

1. The issue was immediately resolved by USEI personnel.

Warning Letter Issued 07/31/2018. The inspection results were reported along with the April 03, 2018 monthly and April 24-25, 2018 CEI results.

Return to Compliance: 08/24/2018

24-25 April 2018

Type of Inspection: Compliance Evaluation Inspection (CEI)

Regulatory Agency: Environmental Protection Agency (EPA) & Idaho Department of Environmental Quality (IDEQ)

Results: The following apparent violations were noted by the IDEQ in the July 31, 2018 Warning Letter:

1. Failure to dispose of hazardous waste within the regulatory time frame. Self-reported by USEI in the 2017 Fourth Quarter Discrepancy Report.
2. Failure to maintain correct aisle space. Observed during the April 03, 2018 and May 17, 2018 monthly focused compliance inspections.
3. Failure to maintain a secondary containment system. Self-reported by USEI in the 2017 Fourth Quarter Discrepancy Report.
4. Failure to manage a leaking hazardous waste container. Observed during the April 24-25, 2018 CEI.
5. Failure to submit an unmanifested waste report. Observed during the April 24-25, 2018 CEI.
6. Failure to maintain a secondary containment system. Observed during the June 14, 2018 monthly focused compliance inspection.

Corrective Action:

1. The issue is resolved by the implementation of USEI's updated electronic waste tracking platform, EQAI.
2. Aisle space immediately corrected during the monthly focused compliance inspections.
3. Training performed with USEI staff on the removal of liquids from sumps within the required timeframes.
4. Container integrity remedied, and leaking material cleaned up at the time of the CEI.
5. Required unmanifested report submitted on April 30, 2018.
6. USEI personnel patched the interior coating of the secondary containment.

Warning Letter Issued 07/31/2018. The warning letter summarized violations noted during the CEI and the April 03, May 17, and June 14, 2018 monthly focused compliance inspections.

Return to Compliance: 08/24/2018

03 April 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: Apparent Violations or Compliance Issues Were Found. The aisle space at Pad 7 was noted to be inadequate.

Corrective Action:

1. The issue was immediately resolved by USEI personnel.

Warning Letter Issued 07/31/2018. The inspection results were reported along with the May 17, 2018 and June 14, 2018 monthly and April 24-25, 2018 CEI results.

Return to Compliance: 08/24/2018

08 March 2018

Type of Inspection: Focused Compliance Inspection

Regulatory Agency: Idaho Department of Environmental Quality

Results: No violations or compliance issues were found.

14 February 2018

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

10 January 2018

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

07 December 2017

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

15 November 2017

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

31 October 2017

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

31 October 2017

Type of Inspection: Operation & Maintenance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

13 September 2017

Type of Inspection: Focused Compliance Inspection
Regulatory Agency: Idaho Department of Environmental Quality
Results: No violations or compliance issues were found.

USEI Permit Signature Pages

- RCRA Permit
- TSCA Permit
- Air Permit to Construct (PTC)
- USDA Soil Permit

Permittee: U.S. Ecology Idaho Inc.

Facility Identification/Permit Number: IDD073114654

INTRODUCTION AND SIGNATURE PAGE

Pursuant to the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, Idaho Code 39-4401 et seq., and the *Rules and Standards for Hazardous Waste*, as amended, IDAPA 58.01.05.000 et seq., a Hazardous Waste Treatment, Storage, and Disposal Permit is hereby issued to U.S. Ecology Idaho Inc. (USEI or Permittee) for operation of USEI's Site B facility, located in Owyhee county near Grand View, Idaho, on Lemley Road, at latitude 43° 03' 056" North and longitude 116° 15' 044" West.

The Permittee shall comply with all terms and conditions of this Permit, including Attachments 1 through 26. The Permittee must comply with all applicable state and federal regulations, including IDAPA 58.01.05.004 through 58.01.05.008 and 58.01.05.010 through 58.01.05.013 [40 Code of Federal Regulations (CFR), Parts 260 through 266, 268, 270, and 124] and as specified in this Permit. Any reference in this Permit to the Resource Conservation and Recovery Act (RCRA) or the Hazardous and Solid Waste Amendments of 1984 (HSWA), or federal regulations promulgated thereunder in 40 CFR, shall be deemed to include the equivalent HWMA statute or state regulation promulgated thereunder.

Applicable state and federal regulations are those that are in effect on the date of final administrative action on this Permit and any self implementing statutory provisions and related regulations that, according to the requirements of HWMA and/or HSWA, as amended, are automatically applicable to the Permittee's hazardous waste management activities, notwithstanding the conditions of this Permit.

This Permit is based upon the Administrative Record, as required by IDAPA 58.01.05.013 [40 CFR § 124.9]. The Permittee's failure, in the application or during the permit issuance process, to disclose fully all relevant facts, or the Permittee's misrepresentation of any relevant facts, at any time, shall be grounds for the termination or modification of this Permit and/or initiation of an enforcement action. To the extent there are inconsistencies between the Permit and the attachments, the language of the Permit shall prevail. The Permittee must inform the Director of the Idaho Department of Environmental Quality (Director) of any deviation from the permit conditions, or changes in the information on which the application is based that would affect the Permittee's ability to comply, or actual compliance with the applicable regulations or permit conditions, or which alters any permit condition in any way.

The Director shall enforce all conditions of this Permit. Any challenges of any permit condition shall be appealed to the Idaho Board of Environmental Quality, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.19], and in accordance with the Idaho Department of Environmental Quality "Rules Governing Declaratory Rulings and Contested Case Proceedings," IDAPA 58.01.23.043.

The United States Environmental Protection Agency (EPA) shall maintain an oversight role of the state-authorized program, and in such capacity, shall enforce any permit condition based on state requirements if, in the Agency's judgement, the Director should fail to enforce that permit condition. Any challenges to the Agency-enforced conditions shall be appealed to the Agency, in accordance with 40 CFR § 124.19.

This Permit is effective as of July 28, 2016 and shall remain in effect until July 28, 2026, unless, in accordance with IDAPA 58.01.05.012, the Permit is: revoked and reissued [40 CFR § 270.41], terminated [40 CFR § 270.43], modified [40 CFR § 270.42 Appendix I.A.6], or continued [40 CFR § 270.51].

July 28, 2016
Date


John H. Tippetts, Director
Department of Environmental Quality

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NOTICE OF ISSUANCE OF A FINAL DETERMINATION
ON ENVIROSAFE SERVICES OF IDAHO, INCORPORATED'S
APPLICATION FOR APPROVAL FOR DISPOSAL
AND COMMERCIAL STORAGE OF POLYCHLORINATED BIPHENYLS

The U.S. Environmental Protection Agency (EPA) would like to express our appreciation for your interest and comments on EPA's August 30, 1988, Draft Polychlorinated Biphenyls (PCB) Approval at the EnviroSafe Services of Idaho, Inc.'s (ESII) facility in Grandview, Idaho. A copy of EPA's response to all comments received on the Draft Approval is enclosed.

EPA is hereby issuing a final determination on ESII's application for a PCB Approval. The final determination is for issuance of an Approval to ESII for the Disposal and Commercial Storage of PCBs.

If you should have any questions concerning the Final Approval or the Response to Comments, please do not hesitate to contact either Catherine Massimino at (206) 553-4153 or Christina Colt at (206) 553-8577.

Charles E. Findley

Charles E. Findley, Director
Hazardous Waste Division

Date *Sept 20, 1991*

Page 1 of 244, Revision 0
Permit No. IDD073-114654
Expiration Date: December 15, 1998

Approval For Disposal and Commercial Storage of
Polychlorinated Biphenyl (PCB) Wastes

U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, AT-083
Seattle, Washington 98101
Telephone: (206) 553-1270

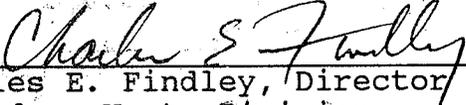
Issued in accordance with the provisions of Section 6(e)(1) of the Toxic Substances Control Act of 1976, 15 USC §2605(e)(1), and the Federal PCB Regulations, 40 CFR §§761.65(d) and 761.75(c).

ISSUED TO:

Envirosafe Services of Idaho, Inc.
Missile Base Road
Grandview, Idaho 83624
Telephone: (208) 384-1500

This approval is effective as of November 29, 1991, and shall remain in effect until December 15, 1998, unless rescinded for failure to comply with the terms and conditions herein, failure to disclose all relevant facts or for any other reasons which the Regional Administrator of Environmental Protection Agency (EPA) Region 10 deems necessary to protect human health and the environment. This approval on its effective date supersedes, replaces and renders void the March 10, 1982, PCB Landfill Approval (including any subsequent revisions), and the May 22, 1987, Temporary PCB Landfill Approval (including any subsequent revisions).

ISSUED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 10


Charles E. Findley, Director
Hazardous Waste Division
Environmental Protection Agency
Date Sept 20, 1991

Air Quality

PERMIT TO CONSTRUCT

Permittee US Ecology Idaho, Inc.
Permit Number P-2008.0162
Project ID 62611
Facility ID 073-00004
Facility Location 20400 Lemley Road
Grand View, ID 83624

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued May 4, 2022



Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Bureau Chief

United States Department of Agriculture
Animal and Plant Health Inspection Service
Plant Protection & Quarantine
4700 River Road
Riverdale, MD 20737

**Permit to Receive Soil
Regulated by 7 CFR 330**

This permit was generated electronically via the ePermits system.

<p>PERMITTEE NAME: Ms. Rebecca Hogaboam COMPANY: US Ecology Idaho, Inc. ADDRESS: 20400 Lemley Rd. Grand View, ID 83624 MAILING ADDRESS: P.O. Box 400 Grand View, ID 83624 PHONE: (208) 834-2275 Ext. 2344 ALT. PHONE: EMAIL: rebecca.hogaboam@usecology.com FAX: (208) 834-2919</p>	<p>PERMIT NUMBER: P330-21-00141 APPLICATION NUMBER: P525-210210-002 DATE ISSUED: 06/29/2021 EXPIRES: 06/29/2024 HAND CARRY: No FACILITY NUMBER: 5719 FACILITY ACCOUNT: US Ecology Idaho, Inc. RESEARCH CENTER: FACILITY NAME: FACILITY ADDRESS: 20400 Lemley Rd. Grand View, Idaho 83624 FACILITY GPS: MAIL ADDRESS: P.O. Box 400 Grand View, Idaho 83624 Rebecca Hogaboam FACILITY CONTACT: PHONE: 208-834-2275 ext. 2344 ALT. PHONE: FAX: EMAIL: rebecca.hogaboam@usecology.com</p>
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PORTS OF ARRIVAL/PLANT INSPECTION STATIONS: AK, Anchorage; AL, Huntsville; AL, Mobile; AZ, Douglas; AZ, Lukeville; AZ, Naco; AZ, Nogales; AZ, Phoenix; AZ, San Luis; AZ, Tucson; CA, Calexico; CA, El Segundo; CA, Fresno; CA, Long Beach; CA, Oakland; CA, Ontario; CA, Otay Mesa; CA, Port Hueneme; CA, Sacramento; CA, San Diego; CA, San Jose; CA, San Ysidro; CA, South San Francisco; CA, Tecate; CO, Denver; CT, Hartford; CT, New Haven; DE, Dover; DE, Wilmington; FL, Ft. Lauderdale; FL, Ft. Myers; FL, Ft. Pierce; FL, Jacksonville; FL, Key West; FL, Miami; FL, Miami (Cargo, DHL, Fed Ex, UPS, etc.); FL, Orlando; FL, Pensacola; FL, Port Canaveral; FL, Port Everglades; FL, Sanford; FL, Tampa; FL, West Palm Beach; GA, Atlanta; GA, Savannah; GU, Agana; HI, Hilo; HI, Honolulu; HI, Kahului; HI, Kailua-Kona; HI, Lihue; ID, Eastport; IL, Chicago; IN, Indianapolis; KY, Louisville; MA, South Boston; MD, Baltimore; MD, Laurel; ME, Bangor; ME, Calais; ME, Houlton; ME, Portland; MI, Detroit; MI, Port Huron; MI, Romulus; MI, Sault Saint Marie; MN, Duluth; MN, Grand Portage; MN, International Falls; MN, Minneapolis; MO, Kansas City; MO, St. Louis; MP, Commonwealth of the Northern Mariana Islands; MS, Gulfport; MS, Port Bienville; MT, Raymond; MT, Roosville; MT, Sweetgrass; NC, Raleigh; NC, Wilmington; ND, Dunseith; ND, Pembina; ND, Portal; NJ, Linden; NM, Albuquerque; NM, Columbus; NM, SantaTeresa; NV, Las Vegas; NY, Albany; NY, Alexandria Bay; NY, Brooklyn; NY, Buffalo; NY, Champlain, Rouses Point; NY, Jamaica; NY, Newburgh; OH, Ashtabula; OH, Cincinnati; OH, Cleveland; OH, Columbus; OH, Toledo; OH, Wilmington; OK, Oklahoma City; OR, Portland; PA, Allentown; PA, Harrisburg; PA, Philadelphia; PA, Pittsburgh; PA, Scranton; PR, Aguadilla; PR, Carolina; PR, Fajardo; PR, Mayaguez; PR, Ponce; RI, Warwick/Providence; SC, Charleston; TN, Memphis; TN, Nashville; TX, Austin; TX,

Permit Number P330-21-00141

<p>THIS PERMIT HAS BEEN APPROVED ELECTRONICALLY BY THE FOLLOWING PPQ HEADQUARTER OFFICIAL VIA EPERMITS.</p>  <p>Gibbs Smith</p>	<p>DATE</p> <p>06/29/2021</p>
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WARNING: Any alteration, forgery or unauthorized use of this Federal Form is subject to civil penalties of up to \$250,000 (7 U.S.C.s 7734(b)) or punishable by a fine of not more than \$10,000, or imprisonment of not more than 5 years, or both (18 U.S.C.s 1001)

USEI Insurance Documents

- Closure/Post-Closure Insurance Certificate
 - Certificate of Liability Insurance

CERTIFICATE OF INSURANCE FOR CLOSURE OR POST-CLOSURE CARE

NAME AND ADDRESS OF INSURER: Great American Insurance Company,
(HEREIN CALLED THE "INSURER") 301 E. 4th Street, Cincinnati Ohio 45202

NAME AND ADDRESS OF INSURED: US Ecology, Inc.
(HEREIN CALLED THE "INSURED") 101 S. Capitol Blvd., Suite 1000
Boise, ID 83702

Facilities Covered:

	<u>Closure Amount</u>	<u>Post Closure Amount</u>	<u>Total</u>
EPA ID NO.: IDD073114654			
Name: US Ecology Idaho, Inc.	\$24,512,074	\$11,073,968	\$35,586,042
Address: 20400 Lemley Road			
City: Grand View, ID 83624			
TSCA	\$16,337	\$0	\$16,337
EPA ID NO.: IDD000773952			
Name: US Ecology Idaho, Inc.	\$0	\$434,321	\$434,321
Address: Highway 51, Mile Marker 55			
City: Bruneau, ID 83604			

Face Amount: \$36,036,701

Policy Number: CPC 1827641 08

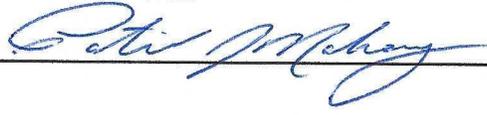
Effective Date: December 19, 2021

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure and post-closure care for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of IDAPA 58.01.05.008 and 58.01.05.009 (40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d)), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Director of the Idaho Department of Environmental Quality, herein called IDEQ, the Insurer agrees to furnish to the IDEQ a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in IDAPA 58.01.05.008 (40 CFR 264.151(e)) as such regulations were constituted on the date shown immediately below.

Name: (Authorized signature for Insurer): 
 Typed Name: Rick Ringenwald
 Title: Divisional Vice President, Executive Underwriter

Signature of Witness or Notary: 
 Date: 1/14/2022

Commonwealth of Pennsylvania - Notary Seal Patrick J. Mahoney, Notary Public Chester County My commission expires September 27, 2025 Commission number 1320671 Member, Pennsylvania Association of Notaries
--



ADDITIONAL REMARKS SCHEDULE

AGENCY Willis Towers Watson Insurance Services West, Inc.		NAMED INSURED US Ecology, Inc. 101 S Capitol Blvd Suite 1000 Boise, ID 83702	
POLICY NUMBER See Page 1		EFFECTIVE DATE: See Page 1	
CARRIER See Page 1	NAIC CODE See Page 1		

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
 FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

Additional Insured as per written contract.

Waiver of Subrogation applies in favor of Additional Insured with respects to General Liability, Auto Liability, Excess Liability, Workers Compensation, Contractors Pollution Liability and Professional Liability as permitted by law.

The Excess Policy is follow form and in excess of liability coverage, with the exception of the pollution liability policy evidenced.

Stop Gap Coverage is included for ND, OH, WA, and WY.

INSURER AFFORDING COVERAGE: Tokio Marine Specialty Insurance Company NAIC#: 23850
 POLICY NUMBER: PPK2012582 EFF DATE: 08/01/2019 EXP DATE: 08/01/2022

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Pollution & Remediation Legal Liability	Each Condition	\$25,000,000
	Aggregate:	\$25,000,000
	SIR:	\$250,000

INSURER AFFORDING COVERAGE: Aspen Specialty Insurance Company NAIC#: 10717
 POLICY NUMBER: ERAFKTK21 EFF DATE: 08/01/2021 EXP DATE: 08/01/2022

ADDITIONAL INSURED: Y
 SUBROGATION WAIVED: Y

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Contractors Pollution & Professional Liability	Each Incident	\$15,000,000
	Aggregate	\$15,000,000
Retro Date: 08/1/96	Ded: Per Incident	\$250,000



ADDITIONAL REMARKS SCHEDULE

AGENCY Willis Towers Watson Insurance Services West, Inc.		NAMED INSURED US Ecology, Inc. 101 S Capitol Blvd Suite 1000 Boise, ID 83702	
POLICY NUMBER See Page 1		NAIC CODE See Page 1	
CARRIER See Page 1		EFFECTIVE DATE: See Page 1	

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 **FORM TITLE:** Certificate of Liability Insurance

INSURER AFFORDING COVERAGE: Allied World Assurance Company US Inc **NAIC#:** 19489
POLICY NUMBER: 0313-0024 **EFF DATE:** 08/01/2021 **EXP DATE:** 08/01/2022

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Excess Contractors Pollution & Professional Liability	Each Incident Aggregate	\$10,000,000 \$10,000,000

ADDITIONAL REMARKS:

The Excess Contractors Pollution and Professional Liability Policy is follow form and in excess of underlying Contractors Pollution and Professional Liability coverage.

INSURER AFFORDING COVERAGE: Everest Indemnity Insurance Company **NAIC#:** 10851
POLICY NUMBER: EF2CU00057-191 **EFF DATE:** 08/01/2019 **EXP DATE:** 08/01/2022

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Excess Pollution Legal Liability	Each Claim Aggregate	\$10,000,000 \$10,000,000

INSURER AFFORDING COVERAGE: Evanston Insurance Company **NAIC#:** 35378
POLICY NUMBER: MKLV5EFX100432 **EFF DATE:** 08/01/2019 **EXP DATE:** 08/01/2022

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Excess Pollution Legal Liability	Each Claim Aggregate	\$15,000,000 \$15,000,000

INSURER AFFORDING COVERAGE: Great American Insurance Company **NAIC#:** 16691
POLICY NUMBER: IMP 4105624-06 **EFF DATE:** 08/01/2021 **EXP DATE:** 08/01/2022

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Truck Cargo Coverage	Any One Truck Catastrophe Limit Deductible:	\$250,000 \$250,000 \$500



ADDITIONAL REMARKS SCHEDULE

AGENCY Willis Towers Watson Insurance Services West, Inc.		NAMED INSURED US Ecology, Inc. 101 S Capitol Blvd Suite 1000 Boise, ID 83702	
POLICY NUMBER See Page 1		EFFECTIVE DATE: See Page 1	
CARRIER See Page 1	NAIC CODE See Page 1		

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 **FORM TITLE:** Certificate of Liability Insurance

INSURER AFFORDING COVERAGE: Interstate Fire & Casualty Company NAIC#: 22829
 POLICY NUMBER: USZ00030320 EFF DATE: 08/01/2020 EXP DATE: 05/01/2024

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Contractor's Equipment	Limit	\$5,000,000
Leased/Rented	Limit:	\$5,000,000

ADDITIONAL REMARKS:
 Deductible (Including Crane Deductible) - \$2,500,000
 All Risk of Direct Loss or Damage subject to a \$5,000,000 Catastrophe Limit

INSURER AFFORDING COVERAGE: ACE Property & Casualty Insurance Company NAIC#: 20699
 POLICY NUMBER: G71792869 003 EFF DATE: 05/01/2022 EXP DATE: 05/01/2023

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Excess Liability	\$10,000,000 xs of	\$10,000,000

INSURER AFFORDING COVERAGE: Westchester Surplus Lines Insurance Company NAIC#: 10172
 POLICY NUMBER: G71800520003 EFF DATE: 05/01/2022 EXP DATE: 05/01/2023

TYPE OF INSURANCE:	LIMIT DESCRIPTION:	LIMIT AMOUNT:
Excess Liability	\$5,000,000 xs of	\$20,000,000

Additional Named Insured Listing

US ECOLOGY, INC.	NRC Group Holdings Corp is now US Ecology Group Holdings Corp
EQ PARENT COMPANY, INC.	NRC Group Holdings, LLC is now US Ecology Group Holdings, LLC
EQ HOLDINGS, INC.	Specialized Response Solutions, L.P.
US ECOLOGY LIVONIA, INC. (Formerly EQ The Environmental Quality Company)	LP OSRV Holdings, Inc.
MICHIGAN DISPOSAL, INC.	NRC NY Environmental Services, Inc.
WAYNE DISPOSAL, INC.	NRC Payroll Management LLC
US ECOLOGY ROMULUS, INC. (EQ Resource Recovery, Inc.)	NRC Environmental Services Inc
EQ INDUSTRIAL SERVICES, INC.	NRC Alaska LLC changed 7/1/21 to US Ecology Alaska, LLC
EQ INDUSTRIAL SERVICES, INC. (Detroit Service Center)	National Response Corporation of Puerto Rico
EQ INDUSTRIAL SERVICES, INC. (Atlanta)	National Response Corporation
EQ INDUSTRIAL SERVICES, INC. (Indianapolis)	NRC Intermediate Int. Holding Company LLC
EQ INDUSTRIAL SERVICES, INC. (Ohio)	TMC Services, Inc. dba TMC Environmental TMC Services, Inc.
EQ NORTHEAST, INC.	TMC Holdings & Development, LLC
EQ DETROIT, INC.	Right Wing Realty, LLC
EQ DETROIT, INC. (Transfer & Processing)	
US ECOLOGY TAMPA, INC. (Formerly EQ Florida Inc.)	Plum Island, LLC
EQ MOBILE RECYCLING, INC.	NRC East Environmental Services, Inc.
ENVIRITE OF OHIO, INC. (DBA - EQ Ohio)	ENPRO Services of Vermont, Inc. is now US Ecology Burlington, Inc.
EQ METALS RECOVERY LLC	NRC Environmental of Maine, Inc.
ENVIRITE OF ILLINOIS, INC. (DBA - EQ Illinois)	DAC, LLC
ENVIRITE OF PENNSYLVANIA, INC. (DBA - EQ Pennsylvania)	DAC III, LLC
US ECOLOGY TULSA, INC. (Formerly EQ Oklahoma, Inc.)	DAC II, LLC
ENVIRITE TRANSPORTATION LLC	BRUDAC, LLC
RTF ROMULUS LLC	Terralink Systems, Inc.
US ECOLOGY SULLIGENT, INC. (Formerly known as EQ Alabama, Inc.)	Old Blackstone Realty, LLC
US ECOLOGY TAYLOR, INC. (Formerly Vac-All Services, Inc.)	
US ECOLOGY MICHIGAN, INC. (Formerly Dynelcol)	
US ECOLOGY VERNON, INC.	OP-TECH Environmental Services, Inc. dba NRC Environmental Services
US ECOLOGY HOUSTON, INC.	Progressive Environmental Services, Inc.
US ECOLOGY TRANSPORTATION SOLUTIONS, INC.	
US ECOLOGY IDAHO, INC.	Progressive Environmental Services, Inc. dba SWS Environmental Services
US ECOLOGY NEVADA, INC.	Progressive Environmental Services, Inc. dba Eagle SWS
US ECOLOGY TEXAS, INC.	
US ECOLOGY WASHINGTON, INC.	Southern Waste Services, Inc. dba SWS First Response
US ECOLOGY ILLINOIS, INC.	Eagle Construction and Environmental Services, LLC
US ECOLOGY WINNIE, LLC	US Ecology Energy Waste Disposal Services, LLC
US ECOLOGY HOLDINGS, INC.	US Ecology Karnes County Disposal, LLC
US Ecology Thermal Services, Inc	Quail Run Services, LLC
NRC Gulf Environmental Services, Inc.	NRC US Holding Company, LLC is now US Ecology US Holding Company, LLC
JFL-NRC Holdings, LLC is now US Ecology Holdings, LLC	

CANADA: USE Canada Holdings, Inc.
CANADA: US Ecology Stablex Holdings, Inc.
CANADA: E.S.I. (Environmental Services Inc)
CANADA:US Ecology Canada Inc fka W.I.S.E.EnvironmentalSolutions,Inc
GEORGIA: NRC International Services Ltd
ANGOLA: National Response Corporation (Angola) Lda
MEXICO: NATIONAL RESPONSE CORPORATION MEXICO NRC, S. DE R.L. DE C.V EQ de Mexico, Inc.
TURKEY: NRC Environmental Protection Waste Management & Remediation Services AS
UAE: National Response Corporation (NRC) Environmental Services UAE LLC
UK: NRC Environmental Services (UK) Limited NRC WWS (UK) Limited

USEI OSHA 300A Logs

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2020



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>1</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>14</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	<u>1</u>
(2) Skin Disorder	<u>0</u>
(3) Respiratory Condition	<u>0</u>
(4) Poisoning	<u>0</u>
(5) Hearing Loss	<u>0</u>
(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name US Ecology Idaho, Inc.
 Street 20400 Lemley Rd.
 City Grand View State ID Zip 83624
 Industry description (e.g., Manufacture of motor truck trailers)
Treatment, Storage, and Disposal of Hazardous Waste
 Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3
 OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1

Employment information

Annual average number of employees 48
 Total hours worked by all employees last year 94,671

Sign here 

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Erica Bartlett
Company executive

(208) 834-2275
Phone

General Manager
Title

1/29/2021
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2020



U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	<u>0</u>
(2) Skin Disorder	<u>0</u>
(3) Respiratory Condition	<u>0</u>
(4) Poisoning	<u>0</u>
(5) Hearing Loss	<u>0</u>
(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name US Ecology Idaho
 Street 17355 NW US Ecology Rd.
 City Mayfield State Idaho Zip 83716
 Industry description (e.g., Manufacture of motor truck trailers)
Waste Transfer Facility
 Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3
 OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1

Employment information

Annual average number of employees 6
 Total hours worked by all employees last year 11,538.00

Sign here

Erica Bartlett

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Erica Bartlett
 Company executive
(208) 834-2275
 Phone

General Manager
 Title
1/29/2021
 Date

Summary of Work-Related Injuries and Illnesses



All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	1
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	1	0		0	0	0

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Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name US Ecology Idaho, Inc.

Street 20400 Lemley Rd.

City Grand View State ID Zip 83624

Industry description (e.g., Manufacture of motor truck trailers)
Treatment, Storage, and Disposal of Hazardous Waste

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1

Employment information

Annual average number of employees 43

Total hours worked by all employees last year 75,296

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Jason Evens
Company executive

(208) 834-2275
Phone

General Manager
Title

Jan 06, 2020
Date

Summary of Work-Related Injuries and Illnesses



All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>1</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

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Establishment information

Your establishment name US Ecology Idaho

Street 17355 NW US Ecology Rd.

City Mayfield State Idaho Zip 83716

Industry description (e.g., Manufacture of motor truck trailers)
Waste Transfer Facility

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 5 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
5 6 2 2 1

Employment information

Annual average number of employees 6

Total hours worked by all employees last year 10,921.00

Sign here

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I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Jason Evans
Company executive

General Manager
Title

(208) 834-2275
Phone

Jan 06, 2020
Date

USEI Agency Point of Contact (POC) List

US ECOLOGY IDAHO INC
EPA ID NO. IDD073114654
Environmental Regulatory Agency Contacts

Agency	Point of Contact	Title	Mailing Address	Telephone
Idaho Department of Environmental Quality	Natalie Walker	Hazardous Waste Bureau Chief	1410 North Hilton Boise, ID 83706	(208) 373-0506
Idaho Department of Environmental Quality	Michael Mitchell	Hazardous Waste Compliance Officer	1410 North Hilton Boise, ID 83706	(208) 373-0589
Idaho Department of Environmental Quality	Daryl Sawyer	Hazardous Waste Permit Writer	1410 North Hilton Boise, ID 83706	(208) 373-0547
US EPA Region 10	Michelle Mullin	Regional PCB Coordinator	1200 Sixth Ave. Suite 900 OCE-084 Seattle, WA 98101	(206) 553-1616