

# US Ecology Nevada Compliance History

## **NDEP ANNUAL INSPECTION October 2019, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on October 15 and 16, 2019.

Results: A report of findings was issued November 26, 2019. No violations were found, and no responses were required. However, based on NDEP observations, US Ecology made several improvements to waste management processes.

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## **NDEP QUARTERLY INSPECTION May 2019, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on May 13-15, 2019. The inspection included groundwater and leachate sampling protocols, Trench 13 conditions, Trench 12 conditions, Trench 11 leachate sumps C4 and D4, and the progress at the intended aerosol can recycling area.

Results: In a letter of June 27, 2019, NDEP concluded the facility appeared to be in compliance with applicable Federal and State hazardous waste regulations, as well as specific conditions stipulated within the state-issued hazardous waste facility Permit NEVHW0025 (dated January 2019, Revision 4). No response was required from USEN.

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**NDEP ANNUAL INSPECTION  
October 2018, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on October 16-17, 2018. A report of findings is pending. No violations were indicated based on the post-inspection debriefing.

Results: A report of findings was issued November 7, 2019. No violations were found, and no responses were required. However, based on NDEP observations, US Ecology made several improvements to waste management processes.

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**NDEP QUARTERLY INSPECTION  
May 2018, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on May 22 - 24, 2018. The focus was on groundwater sampling protocols in conjunction with a Fee Audit.

Results: In a letter of June 10, 2018, NDEP concluded the facility appeared to be in compliance with applicable Federal and State hazardous waste regulations, as well as specific conditions stipulated within the state-issued hazardous waste facility Permit NEVHW0025 (dated June 13, 2016, Revision 2) related to groundwater monitoring and the leachate collection station at Phase A of Trench 13. No response was required from USEN.

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**NDEP ANNUAL INSPECTION  
March 2018, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on March 20-22, 2018. The CEI included a review of the following:

- Perimeter Road Overview and Groundwater Monitoring Wells
- DHWSA #3/CMU #17 (non-covered dry haz waste storage area)
- CMU #1 (PCB Building/Off-site RCRA Building)
- PCB Tanks T-4 thru T-7
- RCRA Staging Area-Closed LTDD Pad
- Soil Vapor Extraction System
- Stabilization Tanks T-1 (removed), T-2 and T-3

- WMU #5/CMU #7 (RCRA-TSCA Containment Area)
- CMU #16 Container Management Building)
- DHWSA #2 /CMU #6 (non-covered dry haz waste storage area)
- Stabilization Tanks T-18 and T-19 (Treatment Pans 4 and 5)
- Evaporation Tank T-11 (Truck Wash Pad)
- Vehicle Maintenance Building
- Laboratory
- Trench 11 (Leachate Sumps C4 and D4)
- Trench 12
- Trench 13, Phase I
- Records Review

Results: In a Verbal Warning at the time of the CEI, NDEP identified the following findings:

- Free liquid was present within the leak detection port of Treatment Pan 5.
- A 55 gallon drum of haz waste stored in WMU #5/CMU #17 had an illegible EPA Waste Code on the label.
- A fiber drum of haz waste stored in CMU#16 17 had an illegible EPA Waste Code on the label.
- Two 55 gallon drums of haz waste stored in DHWSA#2/CMU #6 had illegible haz waste labels where the accumulation start ate was not visible.
- A 55 gallon drum of haz waste stored in WMU #5/CMU #7 was not closed securely.
- A container of universal waste lamps stored in WMU #16 was not closed securely.
- A 55 gallon dented poly container was noted in WMU #5/CMU #7.

USEN responded to each finding with both immediate fixes and scheduled planned repairs, and documented the results.

In a May 1, 2018, letter, NDEP determined the response provided by USEN addressed the Findings, and no further response was required.

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**NDEP QUARTERLY INSPECTION  
November 2017, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a volume fee audit on November 1 and 14, to verify the accuracy of waste receipt records and the associated fees. The NDEP representative also viewed the purging and groundwater sampling protocol at MW-313.

Results: In a Memorandum of November 27, 2017, NDEP concluded that no adjustments were warranted in the quarterly volume fee submitted by US Ecology for the 4<sup>th</sup> quarter of 2016. No deficiencies were noted in the groundwater purging and sampling protocol.

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**NDEP QUARTERLY INSPECTION  
May 2017, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on May 9 and 10, 2017. The focus was on groundwater sampling protocols and the leachate and detection collection system of the new Trench 13.

Results: In a letter of June 12, 2017, NDEP concluded the facility appeared to be in compliance with applicable Federal and State hazardous waste regulations, as well as specific conditions stipulated within the state-issued hazardous waste facility Permit NEVHW0025 (dated June 13, 2016, Revision 2) related to groundwater and leachate monitoring.

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**NDEP ANNUAL INSPECTION**  
**February 2017, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on February 15-16, 2017. The CEI included a review of the following:

- Perimeter Road Overview and Groundwater Monitoring Wells
- Vehicle Maintenance Building
- Trench 13, Phase I
- DHWSA #3/CMU #17 (non-covered dry haz waste storage area)
- Trench 11 (Leachate Sumps C4 and D4)
- Trench 12
- CMU #1 (PCB Building/Off-site RCRA Building)
- PCB Tanks T-4 thru T-7
- Soil Vapor Extraction System
- Closed LTTD Pad (former Thermal Pad)
- WMU #5/CMU #7 (RCRA-TSCA Containment Area)
- CMU #16 Container Management Building)
- Stabilization Tanks T-18 and T-19 (Treatment Pans 4 and 5)
- DHWSA #2 /CMU #6 (non-covered dry haz waste storage area)
- Stabilization Tanks T-1 (removed), T-2 and T-3
- Evaporation Tank T-11 (Truck Wash Pad)
- Laboratory
- Records Review

Results: In a Warning Letter/Informal Enforcement Action of April 18, 2017, NDEP identified the following alleged violations:

- One illegible label
- One corroded drum with corrosive contents
- One cardboard container-stained, compromised
- Two unstable pallet stacks
- Three bulging container
- An under-sink stained pipe, lab
- A damaged protective sacrificial anode at treatment Pan 2
- Free liquid in the secondary containment inspection ports, Pans 2 and 5

USEN responded to each finding with both immediate fixes and scheduled planned repairs.

In a June 6, 2017, letter, NDEP determined the response provided by USEN fulfilled the requirements of the informal enforcement action.

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**NDEP QUARTERLY INSPECTION  
December 2016, OAM**

**Summary:** the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on December 6 and 7, 2016. The focus was on groundwater sampling protocols and the leachate and detection collection systems.

**Results:** In a letter of January 26, 2017, NDEP concluded the facility appeared to be in compliance with applicable Federal and State hazardous waste regulations, as well as specific conditions stipulated within the state-issued hazardous waste facility Permit NEVHW0025 (dated June 13, 2016, Revision 2) related to groundwater and leachate monitoring.

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**NDEP NON-FINANCIAL RECORD REVIEW  
March 2016**

**Summary:** :the Nevada Division of Environmental Protection (NDEP) conducted a non-financial record review to evaluate the US Ecology Nevada (USEN) facility's compliance with Biennial Reporting requirements. . The review found:

- The BR certifications signed by USEN for the 2015 Biennial Hazardous Waste Report were not submitted by March 1, 2016-they were submitted on March 11, 2016.

A Warning Letter was issued, March 23, 2016, but no formal enforcement action was implemented.

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**NDEP ANNUAL INSPECTION  
December 2015, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on December 7 to 9, 2015. The CEI included a review of the following:

- Disposal Trench 11, including leachate sumps
- Disposal Trench 12, including leachate sumps
- Road between Trench 11 and the Low Level Radioactive Waste Disposal site (closed)
- Groundwater monitoring wells
- Clay stockpile
- Treatment Pan #3
- CMU #7/Container Management Building
- CMU #16/ Container Management Building
- CMU #6/Dry Haz Waste Storage Area #2
- Stabilization Tanks T1, T2 and T3/Treatment Pan 1, 2 and 3
- CMU #1/PCB and Off-Site building
- PCB Tanks T-4 through T-7
- Soil Vapor Extraction system
- CMU #17/ Dry Haz Waste Storage Area #3
- Close LTTD Pad/former Thermal Pad
- Vehicle Maintenance Building
- Laboratory
- Evaporation tank T-11/truck wash pad
- Stabilization Tanks T-18 and T-19/Treatment Pans #4 and #5
- Record Review

Results: In a summary letter of September 21, 2016, NDEP identified the following alleged violations:

- The leak detection system for treatment Pan 1/ Tank T-1 was not properly checked for liquid

- Waste carbon was present on the ground outside its container, DWHSA #2
- A concrete divider berm was cracked in CMU #7
- A drum had an illegible label in CMU #16
- A drum was observed to be bulging in CMU #6
- A Satellite Accumulation Area (SAA) container at the lab did not have a Hazardous Waste label

USEN responded to each finding following the CEI with both immediate fixes and scheduled planned repairs, and documented the corrective measures in a January 12, 2016 letter. NDEP's September 21, 2016 letter acknowledged the appropriate responses and required no further responses to their letter.

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### **NDEP QUARTERLY INSPECTION September 2015, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on August 18 and 19. The NDEP inspection included a review of the following areas:

- Water Storage Pond (#6) and empty metal bins at north edge of property
- CMU #1 PCB Building
- Quarterly Groundwater Sampling (Feast Geosciences)
- Evaporation Pad (Truck Wash) T11
- Stabilization Tanks T18 and 19 (Treatment Pans 4 and5)
- SVE System

Results: No violations were noted during this inspection. In a letter of September 30, 2017, NDEP concluded the facility appeared to be in compliance with applicable Federal and State hazardous waste regulations, as well as specific conditions stipulated within the state-issued hazardous waste facility Permit NEVHW0025 (dated July 27, 2015, Revision 1).

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**NDEP ANNUAL INSPECTION**  
**December 2014, CEI**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA annual Compliance Evaluation Inspection (CEI) on December 3 to 4, 2014. The CEI included a review of the following:

- CMU #7, covered external bin storage area with secondary containment
- CMU #16, external Container Management Building, with secondary containment and air emissions control,
- Stabilization Pans T18 and 19 (Treatment Pans 4 and 5)
- CMU #6, external dry hazardous waste storage area, east side of facility
- Stabilization Tanks T-1, T-2 and T-3 (Treatment Pans 1, 2 and 3)
- CMU #1, PCB and RCRA waste building
- PCB Tanks T4 to T7, outside of CMU #1
- SVE system
- CMU #17 external dry hazardous waste storage area, northeast corner of treatment area
- Lysimeter and Leachate Sumps for Trench 11
- Vehicle Maintenance Building
- Trench 12
- Perimeter Road and Groundwater Monitoring Wells
- Evaporation Tank T-11 (Truck Wash) T11
- Laboratory
- Truck Scales/Sampling Station

Results: In a Warning Letter/ Informal Enforcement Action of February 17, 2015, NDEP identified the following alleged violations:

- The training records did not demonstrate completion of required training
- A list of the required training for each job position related to haz waste management was not being maintained at the facility.
- A container was damaged and observed to be leaking.
- A cardboard haz waste container was notably crushed
- A cardboard haz waste container had a damaged lid
- A metal container had a vertical crack with staining on the outside of the container.
- A metal container displayed signs of leakage on the container outside and on the underlying pallet.
- A container had a "Waste Pending" label which as dated 8/6/2014 and no indication that a haz waste determination had been completed.
- A SAA drum was almost full but had no start date on the label.

- Soil contaminated with oil was observed behind the Vehicle Maintenance Building.

USEN responded to each finding following the CEI with both immediate fixes and scheduled planned repairs. NDEP's April 22, 2015 letter acknowledged the appropriate responses and required no further responses to their letter.

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**NDEP QUARTERLY INSPECTION  
May 2014, OAM**

Summary: the Nevada Division of Environmental Protection (NDEP) conducted a RCRA quarterly Operations and Maintenance (OAM) inspection of the facility on May 20 and 21, 2014. The focus was on groundwater sampling protocols at a monitoring well and at leachate collection and detection sumps C1 and D1 of Trench 12 Phase.

Results: In a June 16, 2014 letter, NDEP concluded no violations were noted by the inspector.

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**NDEP QUARTERLY INSPECTION  
May 2014, Volume Fee Audit**

Summary: The NDEP conducted a Volume Fee Audit for the 2<sup>nd</sup> and 4<sup>th</sup> Quarters of 2013 on May 20 and 21, 2014. The Audit included a review of work order packets, manifest and truck scale receipt for work orders processed in the 2<sup>nd</sup> Quarter and the 4<sup>th</sup> Quarter. The onsite fee audits for the 2013 period were combined into a single site visit which was also coordinated with the USEN ground water monitoring and leachate sampling review.

Results: 2<sup>nd</sup> Quarter 2013: Discrepancies were identified in the actual weights for two work orders which resulted in an underpayment to NDEP of \$21.48. It was agreed that USEN would submit the additional fee in the next quarterly volume report, 2<sup>nd</sup> Quarter 2014.

4<sup>th</sup> Quarter 2013: No discrepancies were identified in the submitted fee amount for this period.

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**NDEP –INSPECTION**  
**April 2014, Bureau of Air Pollution Control**

Summary: The Nevada Division of Environmental Protection – Bureau of Air Pollution Control (BAPC) conducted an unannounced inspection of the facility on April 15, 2014. The inspection included a review of the air permit and all systems covered by the permit. NDEP-BAPC the required water sprays installed as additional photographic evidence was provided with the letter.

Results: NDEP-BAPC was able to verify that the units were in compliance with air pollution control requirements as specified in AEC’s air quality operating permit. AEC provided the NDEP-BAPC with a year’s worth of monitoring records and all appeared to be in compliance with requirements in the air quality operating permit.

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**NDEP QUARTERLY INSPECTION**  
**February 2014, CEI**

Summary: The NDEP conducted a Compliance Evaluation Inspection (CEI) February 26, 2014. The CEI included a review of the following areas:

- CMU17 (roll-off bin storage on top of closed Trench 10)
- CMU 1 PCB Building and 4 PCB Storage Tanks (PCB Tank Farm)
- T1, T2, T3 (Stabilization Pans 1, 2 and 3-outside) and T18 and 19 (Pans 4 and 5)
- SVE System
- CMU #6 Dry Hazardous Waste Storage Area, east side of facility
- CMU#7 Bin Storage Area (w/ secondary containment), with roof
- CMU#16 Container Storage Area, with roof
- Evaporation Pad (Truck Wash) T11
- Trench 12, phases 1, 2 and 3
- Laboratory, including laboratory waste collection system
- Vehicle Maintenance Shop

Results: In a Warning letter of May 7, 2014, NDEP identified the following alleged violations:

- In CMU 7 and 16, containers were stored without sufficient aisle space

- In the lab, one SAA container of haz waste was not closed
- In the PCB Tank Farm, some valves and piping on Tank T-4 and T-6 were not tagged

USEN responded to each finding following the CEI with both immediate fixes and scheduled planned repairs. All findings were addressed prior to issuance of NDEP's Warning letter.

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**NDEP QUARTERLY INSPECTION**  
**May 8-9, 2013**

Summary: The NDEP inspection included a review of the groundwater sampling event.

Results of the Audit (October 11, 2013): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**February 27, 2013**

No 1<sup>st</sup> quarter compliance inspection was conducted by NDEP.

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**NDEP QUARTERLY INSPECTION**  
**February 27, 2013**

Results of the Audit (February 27, 2013): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**November 5-6, 2012**

Summary: The NDEP inspection included a review of the following areas:

- CMU17 (roll-off bin storage on top of closed Trench 10)
- CMU 1 PCB Building and 5 PCB Storage Tanks (PCB Tank Farm)
- T1, T2, T3 (Stabilization Pans 1, 2 and 3-outside) and T18 and 19 (Pans 4 and 5)
- SVE System
- CMU #6 Dry Hazardous Waste Storage Area, east side of facility
- CMU#7 Bin Storage Area (w/ secondary containment), with roof
- CMU#16 Container Storage Area, with roof
- Evaporation Pad (Truck Wash) T11
- Trench 11
- Trench 12, phases 1 and 2
- Leachate Storage Tank T15
- Laboratory, including laboratory waste collection system
- Vehicle Maintenance Shop

Results of inspection on (May 6, 2013): The NDEP-SWM has determined that USEN has fulfilled all requirements of the formal enforcement action and settlement agreement. As such, the referenced enforcement action is hereby considered closed.

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**NDEP QUARTERLY INSPECTION**  
**August 22, 2012**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (August 28, 2012): The following discrepancy was found with respect to WO#12062104837:

A number of line items under the above WO did not match with the WO list used for the site audit, at least two line items showing 0 (zero) 55 gallon drums. However, the work order cover sheet subsequently emailed by USEN reconciled these items with respect to the fee paid; in other words no discrepancy was found with the previously submitted fee amount. The issue appears to be associated with data entry at the site.

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**NDEP QUARTERLY INSPECTION**  
**May 9, 2012**

Summary: The NDEP inspection included a review of the groundwater sampling event. The inspection included observation of the following:

- sampling event from start to finish at MW 320 & 322.
- Trench 12 Phase 2
- lean closed area previously occupied by the LTTD operations
- new improved SVE system and
- newly installed (not yet operational) radioactive material sensors at the entrance to the truck weigh scale.

Results of the Audit (May 23, 2012): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**March 1, 2012**

No 1<sup>st</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (March 5, 2012): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**December 13-14, 2011**

Summary: The NDEP inspection included a review of the following areas:

- T1, T2, T3 (Stabilization Pans 1, 2 and 3-outside) and T18 and 19 (Pans 4 and 5)
- CMU 1 PCB Building and 5 PCB Storage Tanks (PCB Tank Farm)
- CMU 17 (roll-off bin storage on top of closed Trench 10)
- SVE System
- LTTD area under closure
- CMU #6 Dry Hazardous Waste Storage Area, east side of facility

- CMU#7 Bin Storage Area (w/ secondary containment), with roof
- CMU#16 Container Storage Area, with roof
- Evaporation Pad (Truck Wash) T11
- Trench 11
- Trench 12, phases 1 and 2
- Leachate Storage Tank T15
- Laboratory, including laboratory waste collection system
- Vehicle Maintenance Shop

Summary: the inspection on (February 10, 2012): NDEP staff issued a Warning Letter for the alleged violations discovered at the time of the inspection.

Results of inspection, USEN Return to Compliance Letter was issued on March 26, 2012.

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**NDEP QUARTERLY INSPECTION**  
**August 10, 2011**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

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**NDEP SEMI-ANNUAL AUDIT**  
**September 14, 2011**

Results of the Audit (September 14, 2011): There were no discrepancies noted by the inspector.

\*NDEP had discovered an underpayment of \$18.19 with the initial submittal of the 1<sup>st</sup> quarter 2011 volume fee. USEN properly included this amount with the 2<sup>nd</sup> quarter 2011 volume fee submittal per NDEP's instructions.

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**NDEP QUARTERLY INSPECTION**  
**June 9, 2011**

Summary: The NDEP inspection included a review of the groundwater sampling event.

Results of the Audit (August 19, 2011): There were no violations noted by the inspector.

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**U.S. EPA INSPECTION**  
**April 26 – May 6, 2011**

Summary: On April 26<sup>th</sup>, 2011, U.S. EPA representatives conducted an unannounced TSCA CEI of the USEN facility. The purpose of the inspection was to determine USEN's compliance with the PCB regulations.

EPA Region 9 led the TSCA CEI and NDEP was also present during the inspection. The PCB inspectors conducted a physical inspection of the facility and reviewed records related to USEN's PCB management practices. In addition, EPA Region 9 also collected PCB wipe and soil samples to verify compliance with the disposal requirements. Results of inspection (November 17-18): NDEP staff issued a Verbal Warning Letter for the alleged violations discovered at the time of the inspection.

On the day of the PCB inspection, NEIC representatives conducted a separate CEI under the Resource Conservation and Recovery Act on behalf of EPA Region 9. The RCRA CEI was conducted from April 26-May 5, 2011. A separate RCRA CEI inspection report will be drafted and finalized by NEIC related to those findings.

Results/Findings (July 20, 2011): The U.S. EPA Region IX issued a Notice of Noncompliance/Certification of Violation Correction dated July 20, 2011 stating USEN's activities during the inspection adequately addressed the violations noted in the inspection report, and documented the facility's return to compliance with the PCB regulations.

USEN has not received a finding's report for the RCRA portion of the inspection. We have submitted a letter to the EPA Region IX and EPA NEIC of our understanding of the concerns expressed by the EPA, presented to USEN follow-up actions to address the concerns and/or provided additional information for EPA consideration the EPA's review process.

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**NDEP QUARTERLY INSPECTION**  
**February 24, 2011**

No 1st quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (March 7, 2011): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**November 17-18, 2010**

Summary: The NDEP inspection included a review of the following areas:

- T1, T2, T3, Stabilization Pans 1, 2 and 3 (observed from outside) and T18 and 19, the indoor pans 4 and 5
- CMU 1 PCB Building and Storage Tanks
- CMU 17 (new roll-off bin area) & CMU 6
- CMU 7 Bin Storage Area (w/ secondary containment)
- CMU16 Container & Tank Management Building
- T11 Evaporation Pad (Truck Wash)
- Trench 11 (observed from below)
- Trench 12, Phase 1 (observed from east end of Phase 1 from above) & Phase 2 under construction
- Laboratory
- Maintenance Shop

Results of inspection (November 17-18): NDEP staff issued a Verbal Warning Letter for the alleged violations discovered at the time of the inspection. All matters returned to compliance as of July 20, 2011.

Return to Compliance Letter was issued on July 20, 2011.

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**NDEP QUARTERLY INSPECTION**  
**August 11, 2010**

No 3rd quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (August 16<sup>th</sup>, 2010): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**May 13, 2010**

Summary: The NDEP inspection included a review of the groundwater sampling event. The inspection included observation of the following:

- Observed sampling event from start to finish at MW 324; observed closing off well MW 320 after sampling; observed pre-shipment procedures for shipping samples from wells MW 320, 322 & 324 to Analysis Inc., observed set up and purging of MW 327.

Results of the Audit (May 21, 2010): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**February 25, 2010**

No 1st quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (March 25, 2010): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**November 17-18, 2009**

Summary: The NDEP inspection included a review of the following areas:

- Stabilization Pans 1, 2 and 3 (observed from outside) and the newer pans 4 & 5
- CMU 1 PCB Building and Storage Tanks
- CMU 5 (roll-off bin area) and CMU 6
- CMU 7 Bin Storage Area (w/ secondary containment)
- CMU16 Container & Tank Management Building
- Evaporation Pad (Truck Wash)
- Trench 11 (observed from edges and top)
- Trench 12, Phase 1 (observed from east end of Phase 1 from above)
- LTTD
- Laboratory
- Maintenance Shop

Results of inspection (November 17-18): NDEP staff issued a Verbal Warning for the alleged violations discovered at the time of the inspection. These related to a hazardous waste container (bag) in CMU 5 area containing tank bottoms had leaked (through the fabric) causing a stain on the soil. NDEP-BWM staff observed the next day that this bag was over-packed in a poly-liner bag and the stained area was remediated.

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**NDEP QUARTERLY INSPECTION**  
**August 26-27, 2009**

No 3rd quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (August 26-27, 2009): There were no discrepancies noted by the inspector.

NDEP noted that the fee code on several work order packets had been changed by hand and that on at least one WO packet, the listed fee code did not match that on the submitted quarterly fee report. USEN staff explained that at the end of each quarter, they manually review the entire fee report (approx. 1200 pages) to ensure the proper fee codes have been assigned to each waste. When errors are identified, the changes are handwritten on the report and then sent to the corporate office for correction in the company's computerized tracking system. The facility also tries to make all of the handwritten corrections on the original WO packets at the site. Discussion was provided of possible options within the computer system to prevent initial data entry errors for the respective fee codes and potentially reduce the reliance on the manual review currently being conducted at the end of each quarter. Additional efforts or measures may be considered towards ensuring that all fee code changes made at the end of the quarter, just prior to the fee report submittal, are appropriate and applicable.

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**NDEP QUARTERLY INSPECTION**  
**May 14, 2009**

Summary: The NDEP inspection included a review of the groundwater sampling event. The inspection included observation of the following:

- MW 320 & 322: Observed sampling event from start to finish (purging of the wells had been done the previous day).

Results of the Audit (May 14, 2009): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**March 12, 2009**

No 1st quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (March 12, 2008): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**December 17-18, 2008**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2 and 3 (observed from outside) and new pans 4 and 5
- CMU 16 Container & Tank Management building
- DHWSA 1 (roll-off bin area) and DHWSA 2.
- CMU 1 PCB Building and Storage Tanks
- CMU 7 Bin Storage Area (with secondary containment)
- Trench 11 (observed from side and top)
- Trench 12 (observed from top and north edge of Phase 1)
- LTTD
- Records Review

Results of inspection (February 18, 2009): NDEP staff issued a Verbal Warning for the alleged violations discovered at the time of the inspection. These related to several containers which needed to be over packed or covered. The issues were addressed as soon as the problem was identified.

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**NDEP QUARTERLY INSPECTION**  
**September 4, 2008**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (September 4, 2008): There were no discrepancies noted by the inspector.

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**U.S. EPA Region IX & NDEP RCRA/TSCA INSPECTION  
JUNE 24-25, 2008**

Summary: The inspection included a review of the air permit, operations of the Low Temperature Thermal Desorption Units (LTTD) and the PCB management areas. Inspectors collected wipe samples and soil samples for PCB analysis.

Results: US EPA requested additional information in March 2009 and provided notice of potential violations relating to record keeping, inspections and operations of the LTTD unit.

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**NDEP QUARTERLY INSPECTION  
April 22, 2008**

Summary: The NDEP inspection included a review of the groundwater sampling event. The inspection included observation of the following:

- Purging and sampling
- Testing of pH
- Conductivity and Temperature in 4 samples taken after purging.
- Leachate collection sump C3-south end of Trench 11.

Results of the Audit (April 22, 2008): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION  
February 27, 2008**

No 1<sup>st</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (February 27, 2008): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**December 19-20, 2007**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2 and 3 (observed from outside) and the new pans 4 &5
- DHWSA 1 (roll-off bin area) and 2
- CMU 1 PCB Building Storage
- CMU 7 Bin storage area (w/secondary containment)
- Trench 11 (observed from outside)
- LTTD
- Laboratory
- Maintenance Building
- Records Review

Results of inspection (February 14, 2008): No violations were noted as a result of the CEI.

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**NDEP QUARTERLY INSPECTION**  
**September 19, 2007**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (September 21, 2007): There were no discrepancies noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**May 2, 2007**

Summary: The NDEP inspection included a review of the following event:  
Inspection of groundwater sampling event (calibration, well depth, measurement, purging, and sampling)

Results of the Audit (May 2, 2007): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**February 14, 2007**

No 1st quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (February 15, 2007): There were no discrepancies noted by the inspector

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**NDEP QUARTERLY INSPECTION**  
**December 20-21, 2006**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2 and 3 (observed from outside)
- DHWSA 1 and 2
- PCB Building Storage
- CMU 7 (w/secondary containment)
- Trench 11 (observed from outside)
- Laboratory
- Maintenance Building
- Records Review

Results of inspection (Jan17, 2007): No violations were noted as a result of the CEI.

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**NDEP QUARTERLY INSPECTION**  
**September 14, 2006**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (November 6, 2006): There were no discrepancies noted by the inspector.

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**REGION IX INSPECTION**  
**July 11, 2006**

Summary: Information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act as amended {42 U.S.C. § 6927(a)} to determine US Ecology's compliance with applicable federal environmental statutes and regulations.

Report Date: August 7, 2006; Request for information pursuant to 3007(a) of the Resource Conservation and Recovery Act.

Results of the inspection (December 19, 2006): Warning Letter and Certification of Violation Correction.

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**NDEP QUARTERLY INSPECTION**  
**April 25-26, 2006**

Summary: The NDEP inspection included a review of the following event:  
The Inspection of Groundwater Sampling Event for (calibration, well depth, measurement, purging and sampling).

Results of the inspection (May 18, 2006): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**March 1, 2006**

No 1<sup>st</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit.

Results of the Audit (No information sent): No discrepancies were noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**December 14-15, 2005**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2, and 3
- DHWSA 2
- PCB Storage
- WCSA #1 and 2
- Trench 11 (observed from outside)
- Laboratory
- Records Review

Results of Inspection (January 25, 2006): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**September 28, 2005**

No 3<sup>rd</sup> quarter compliance inspection was conducted by NDEP.

Subject: US Ecology Fee Semi-Annual Audit

Results of the Audit (September 30, 2005): No discrepancies were noted by the inspector

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**NDEP QUARTERLY INSPECTION**  
**June 8, 2005**

Summary: The NDEP inspection included a review of the following areas:

- Groundwater Sampling Event
- Operating Records
- Sudden/Non Sudden Occurrence Liability Insurance Documents

Results of this Inspection (July 12, 2005): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**March 22-23, 2005**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2 and 3
- DHWSA 1 and 2
- PCB Storage
- Waste Consolidation Storage Area (WCSA)
- Trench 11
- Laboratory
- Records Review

Results of this Inspection (April 7, 2005): There were no violations noted by the inspector.

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**NDEP SWPPP INSPECTION**  
**February 28, 2005**

Summary: The NDEP Bureau of Water Pollution Control Stormwater Program Inspection included a review of the following areas:

- SWPPP in Permit Binder
- Weekly Inspections forms for deficiency resolutions
- Maintenance Requests forms for deficiency resolutions

Results of the Inspection (February 28, 2005): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**December 14, 2004**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pan 1, 2, and 3
- DHWSA 1 and 2
- PCB Storage
- Waste Consolidation Storage Area (WCSA)
- Trench 11

- Laboratory
- GW Sampling Well #325
- Records Review

Results of this Inspection (January 4, 2005): There were no areas of concern noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**August 25 and 26, 2004**

Summary: The NDEP inspection included a review of the following areas:  
Groundwater Monitoring System

Results of this Inspection (September 15, 2004): There were no violations noted by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**May 26 and 27, 2004**

Summary: The NDEP inspection included a review of the following areas:

- Treatment Pans 1, 2, and 3
- DHWSA 1 and 2
- PCB Storage
- Waste Consolidation Storage Area (WCSA)
- Trench 11
- Review of Waste Acceptance paperwork and records

Results of this Inspection (June 8, 2004): There were no areas of concern noted by the inspector.

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**OSHA INSPECTION**  
**March 10, 11, and 12, 2004**

Summary: The OSHA inspection included a review of the following areas:

- Shop
- Lab
- Landfill
- Air Monitoring on site
- Health and Safety Plan

Results of this Inspection (June 4, 2004): There were no serious citations issued by the inspector.

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**NDEP QUARTERLY INSPECTION**  
**February 18 and 19, 2004**

Summary: The NDEP inspection included a review of the following areas:

- Permitted Storage Areas and Treatment Units
- Personnel Training Requirements
- Contingency Plan Implementation Records and Drills
- Waste Acceptance Procedure

Results of this Inspection (March 15, 2004): Notice of Alleged Violation.

All Alleged Violations were rectified to the satisfaction of the agency.

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**BUREAU OF AIR POLLUTION CONTROL INSPECTION**  
**February 4, 2004**

Results of Inspection (February 4, 2004): No violations or concerns noted.