

US Ecology Beatty, Nevada Compliance History

2020

No compliance inspections by regulatory agencies occurred in 2020 due to COVID 19-related travel restrictions.

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.

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.

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.

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.

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 LTTD 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.

**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 4th quarter of 2016. No deficiencies were noted in the groundwater purging and sampling protocol.

**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.

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.

**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.

**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.