



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
Curt Fransen, Director

December 13, 2013

Terry Geis, General Manager
U S Ecology of Idaho, Inc.
P. O. Box 400
Grandview, Idaho 83624

RE: Compliance Evaluation Inspection, US Ecology Idaho, Inc. (USEI) Site B
EPA ID No: IDD073114654

Dear Mr. Geis:

On October 15-16, 2013, the Idaho Department of Environmental Quality (DEQ) conducted a routine Compliance Evaluation Inspection (CEI) at the USEI Site B facility.

The report for the CEI has been completed, and a copy is enclosed. At the time of the inspection, one alleged violation of the Idaho Hazardous Waste Management Act (HWMA)/Federal Resource Conservation and Recovery Act (RCRA)/Part B Permit, dated November 12, 2004, was observed.


The alleged violation pertained to the release of US Antimony waste debris stored in Container Storage Area 1 (CSA 1). The waste containers in question and associated cleanup material were removed from CSA 1 on October 16, 2013, and treated for disposal. Refresher training was provided to the operators on October 18, 2013 to enhance the effectiveness of their weekly container management unit inspections.

Owing to USEI's timely and appropriate response to address the non-compliant situation, DEQ considers this violation resolved.

This letter, however, does not relieve your facility from future compliance with the HWMA/RCRA Part B Permit and the Idaho Rules and Standards for Hazardous Waste.

Thank you for the courtesies and cooperation extended to DEQ during the CEI. Noel Bailey's assistance with the inspection was greatly appreciated. If you have any questions, please contact me at (208) 373-0566, or Eileen Loerch at (208) 373-0469.

Sincerely,


Brian Gaber
Senior Hazardous Waste Inspector
State Office of Technical Services
brian.gaber@deq.idaho.gov

BG:ls
Enclosure
c: COF

HWMA/RCRA COMPLIANCE INSPECTION REPORT

Date of Inspection: October 15 – 16, 2013

Facility: U.S. Ecology of Idaho – Site B (USEI-B)

EPA Identification Number: IDD073114654

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Grand View, ID 83624

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Report Prepared By: Brian Gaber
Senior Hazardous Waste Inspector
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Inspection Participants: Brian Gaber
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DEQ – Waste Management & Remediation Division

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Staff Engineer
DEQ – Technical Services Division

Terry A. Geis
General Manager
USEI-B

Noel Bailey
Technical Manager
USEI-B

Grae Harper, EIT
Environmental Engineer
USEI-B

Karlita Simper
Environmental Assistant
USEI-B

Background Information:

U.S. Ecology Idaho Site B (USEI-B) owns and operates a 160-acre treatment, storage, and disposal facility near the town of Grand View, Owyhee County, Idaho. The facility is located at the end of Lemley Road, approximately 10 miles west of Grand View, Idaho.

The site has been used for non-hazardous waste, hazardous waste activities, and PCB waste disposal under a separate TSCA permit. Throughout the 1970's, the facility was operated by Wes-Con, Inc., as an industrial waste landfill and received wastes for disposal in the abandoned on-site Titan missile silos and active chemical waste landfill in trenches. In 1980, Wes-Con, Inc. obtained interim status under RCRA for disposal of approved hazardous wastes. In addition to landfill disposal, U.S. EPA Region 10 granted interim status for storage and treatment of solids, sludges, and liquids at the facility. EnviroSAFE Services of Idaho, Inc. (ESII) purchased the site in 1981 and was granted a RCRA Part B Permit (Permit) for the site in 1988.

On February 2, 2001, American Ecology Corporation acquired ESII and continues to operate the site as U.S. Ecology Idaho Inc. In February 2010, American Ecology changed their name to US Ecology, Inc. Currently, the majority of waste disposal activities occur in landfill Cell 15 Phase IV. In 2013, the first two subcells of a new landfill, Cell 16, were completed. Waste has yet to be disposed in Cell 16 as of the date of this report. The HWMA/RCRA Part B Permit was renewed for an additional ten years as of November 12, 2004. Current operations include:

- 1) Waste treatment in the following units: Stabilization Facility, Surface Impoundments, Containment Building, Container Storage Areas, and RCRA Waste Water Tanks and Mixing Bin Tanks.
- 2) Waste storage at the following units: Stabilization Facility, Surface Impoundments, Containment Building with associated truck unloading areas, Container Storage Areas, and RCRA Waste Water Tanks and Mixing Bin Tanks.
- 3) Waste disposal in the following units: Landfill Cell 14, Landfill Cell 15.

In addition to the Annual Compliance Evaluation Inspection of USEI-B, DEQ personnel conduct monthly inspections of the USEI-B facility and the USEI Rail Transfer Facility located on Simco Road.

The last Compliance Evaluation Inspection of USEI-B was conducted on October 30 through October 31, 2012. On July 12, 2012, a Warning Letter was issued to USEI-B for violations observed during the inspection. On August 9, 2012, the issues in the Warning Letter were resolved.

Phase 1 of the newest landfill, Cell 16, was completed in October 2012, and will be available for disposal after DEQ approval of the Construction Quality Assurance report and the updated financial assurance.

For additional background information, compliance history, process descriptions, past inspections, and facility history regarding USEI-B please refer to previous inspection reports and enforcement actions contained in the Idaho Department of Environmental Quality (DEQ) files.

Purpose:

The purpose of the routine annual inspection was to determine the USEI-B's compliance with the Resource Conservation and Recovery Act (RCRA), the Idaho Hazardous Waste Management Act (HWMA), the Idaho Rules and Standards for Hazardous Waste, and the Treatment, Storage and Disposal Facility Permit (Permit).

Inspection:

At the conclusion of the inspection, a Preliminary Inspection Findings (PIF) form was completed to document alleged violations or potential violations observed. The completed PIF form is included in this report as Attachment 1. Photographs taken during the inspection are included in this report as Attachment 7. DEQ has developed facility and Permit-specific checklists to aid inspectors. The completed checklists are included as Attachment 2. Inspection item headings include checklist page numbers.

The DEQ facility checklist is divided into four parts:

| | | |
|----------|------------------------------|---------------|
| Part I | General Facility Information | Pages 2 - 5 |
| Part II | DEQ Office Inspection | Pages 7 - 19 |
| Part III | Facility File Inspection | Pages 21 - 46 |
| Part IV | Overall facility Inspection | Pages 48 - 69 |

Part II: DEQ Office Inspection – Document Review – Pages 7 – 19

Kim Custer completed this portion of the inspection. All documents submitted by USEI-B are reviewed at the time of receipt by Ms. Custer or other DEQ staff. DEQ either issues a letter documenting the review or places a note in the file.

On May 22, 2012, DEQ approved a Class 3 Permit Modification for a new landfill, Cell 16. On October 3, 2012, DEQ approved a Class 2 Permit Modification to add a concrete floor to the PCB/RCRA Storage Building to create an enclosed and covered container storage unit, Pad 7.

Part III: USEI-B On-site Record Review and Part IV: Walk-Around Inspection

The inspection team arrived at USEI-B at approximately 9:30 a.m. on October 15, 2013. Prior to our arrival, we reviewed the DEQ Health and Safety Plan for the inspection (Attachment 3). We presented our DEQ identification to Terry Geis, General Manager, and Mr. Geis granted us access to perform the inspection. We explained the purpose of our inspection during the opening conference. A list of opening and closing conference attendees is included in this report as Attachment 4. We were provided with a copy of the October 15, 2013 waste receipt schedule. Documents requested during the inspection are listed on page 7 of the Preliminary Inspection Findings in Attachment 1 of this report.

Module I - Standard Conditions – Pages 7- 9, 21 and 48

A review of files at DEQ and USEI-B revealed that the Permittee appears to be in compliance with Permit Conditions I.A. through I.AA, or the Permit Conditions were not applicable at the time of the inspection. Any violations observed during the inspection will be addressed by reference to the specific Permit Condition violated.

Module II – General Facility Conditions – Waste Analysis Plan Pages 22–31

To determine USEI-B's compliance with the Waste Analysis Plan, Ms. Loerch reviewed manifests, Land Disposal Restriction (LDR) notifications or certifications, work orders, profiles, and analytical and hazardous waste determinations from specific generators. Several of the generators were selected during the walk-around inspection of Storage Area 1, Pad 4, Pad 5, Pad 7 and the Containment Building from information on containers stored on the pads.

Additionally, Ms. Loerch reviewed manifests, Land Disposal Restriction (LDR) notifications or certifications, work orders, profiles, and analytical and hazardous waste determinations during monthly inspections of USEI-B.

A summary table of the information Ms. Loerch reviewed during the inspection is included in Attachment 6 of this report. Ms. Loerch's review indicated USEI-B was requesting analytical data, verifying the regulatory status of Conditionally Exempt Small Quantity Generators and rejecting waste, where appropriate. No discrepancies were observed during the WAP review.

Module II - Inspection Logs and Inspections – Page 31

The following area inspection logs were reviewed by DEQ.

Landfill Areas

- Trenches 10 & 11 – Weekly
- Cell 14 Phase I – Daily
- Cell 14 Phase II – Daily
- Cell 14 – Weekly
- Cell 15 Phases 1, 2, & 3 – Daily
- Cell 15 – Weekly
- Cell 5 – Daily
- Cell 5 – Weekly

Leachate System Piping – Daily

Tank Storage and Treatment

Roads, Drainage, Runon-runoff systems – Weekly

Past Practice Units – Weekly

Post Cover – Monthly

Container Management Units - Weekly

Containment Building (debris side) – Daily & Weekly

Containment Building (stabilization side) – Daily & weekly

HEPA filter at Containment Building – annual (pressure check daily)

Surface Impoundments – Weekly & after 0.5 inches in a 24-hour storm (daily)

Gates/Fence - Monthly

Yard and Truck Scale Areas - Daily

Staging/Unloading/Loading - Daily

Groundwater Monitoring Wells - Monthly

Contingency Plan - Monthly

Ms. Custer reviewed inspection logs for the following areas and specific time periods:

| | |
|-----------------------------|--------------------|
| Past Practice Units | 4/23/13 - 7/24/13 |
| Contingency Plan | 5/02/13 - 9/24/13 |
| Security Area (gates/fence) | 3/25/13 - 9/13/13 |
| Waste Staging | 9/27/13 - 10/11/13 |

| | |
|------------------|--------------------|
| Scale Area | 7/22/13 - 9/03/13 |
| Vehicle Wash | 8/12/13 - 10/07/13 |
| Monitoring Wells | 3/20/13 - 9/13/13 |

Ms. Loerch and I reviewed inspection logs for selected months between November 2012 and October 2013 which corresponded to the time period between DEQ's previous and current RCRA inspections, respectively. We reviewed the following area inspection logs:

- Container Management Units (Storage Area 1 and 2, Pads 4, 5 and 7)
- Tank Storage and Treatment
- Landfill Areas (Cells 5, 14 and 15) (Trenches 10 and 11)
- Toads, drainage, runoff-runoff systems
- Stabilization Facility
- Containment Building (stabilization side)
 - Mixing Bin Tanks
- Containment Building (debris side)

One apparent violation and one issue of concern were observed with these logs.

The apparent violation concerns an inspection conducted by Rickey Pollard on October 14, 2013 at Container Storage Area (CSA) 1. According to the inspection log form, USEI personnel are required to inspect containers for "Leakage", "Damage (enough to compromise integrity)" and other criteria. However, the log sheet was marked "None" for "Discrepancy" observed. The operator failed to observe that three of the super sack containers of US Antimony debris waste were damaged which allowed a small amount of salt-like waste precipitate to leach from the containers onto support pallets, and in two instances onto the underlying soil (Photos 1-8). This apparent violation is further discussed in the *Module III Container Storage and Treatment* section of this report. A copy of the October 2013, month-to-date, container inspection logs for CSA 1 are included in this report as Attachment 5.

The issue of concern observed pertained to the failure of an operator, Mae Beaver, to consistently record her title while conducting inspections of the Containment Building. Ms. Beaver had failed to record her title on inspection logs during January, August and October 2013. USEI-B agreed to discuss this issue with staff, and ensure the title of the staff was included on future inspection logs.

Module II – Training Requirements - Page 32

Ms. Loerch reviewed facility training records for James Anderson and Jack Birmingham, Operators. No discrepancies were noted.

Module II – Preparedness & Prevention and Contingency Plan – Pages 33 - 34

Ms. Custer verified USEI-B maintains and operates all emergency equipment as required by this section, and that the Contingency Plan had not been activated in the past twelve months. However, one issue of concern was observed. One of the fire extinguisher boxes, located on the south outside wall of the vehicle truck wash, was precariously mounted and difficult to open (Photo 9). However, the extinguisher was observed in good condition. Nate Lundquist, Health & Safety Manager, was informed as to the potential unsafe condition of the box.

Module II – Recordkeeping and Reporting – Pages 34 – 36

Ms. Custer verified USEI-B maintains all records required by this section.

Module II – Closure & Post-Closure – Pages 36 – 37

The current Closure and Post-Closure plans, insurance certificates, and closure estimates were on-site and available for review by Ms. Custer. There were not any discrepancies noted.

Module II – General Facility Conditions - Security (Permit Attachment 3) – Page 49

Ms. Custer verified USEI-B maintains all Security Provisions required by the section.

Module II – General Facility Conditions – Hazard Prevention (Permit Attachment 6) – Pages 49-52

During the walk-around inspection, Ms. Custer, Ms. Loerch and I questioned USEI-B personnel or observed the actions of personnel to determine compliance with these requirements. We verified USEI-B staff was aware of Permit-required processes for safely unloading and processing waste. These observations are addressed in unit-specific portions of this report. Additionally, DEQ observes waste processing during monthly inspections.

Comments concerning specific observations are included in the unit-specific portions of this report.

Module III – Container Storage and Treatment – Pages 38 & 55-58

Container Storage Area 1 (CSA 1)

At the time of the inspection, Ms. Loerch and I observed 40 “super sack” containers of hazardous waste debris (D004, D008) generated by US Antimony (WO # 1310208696) (Photos 1 and 2). Three of the super sacks were observed to have leached a salt-like precipitate through the containers’ liner onto support pallets (Photos 3, 4, 6 and 7). Two of these containers were observed to have released waste onto the underlying ground surface (Photos 5 and 8) as well. We questioned whether inspection records indicated a discrepancy regarding packaging failure and what steps would be taken to address container integrity and waste releases.

On November 19, 2013, I received requested copies of weekly inspection logs performed at CSA 1 during October 2013. Following my review of the logs I contacted Mr. Bailey via telephone. I questioned why the inspection log, dated October 25, 2013, had not observed any discrepancies. Mr. Bailey said that the US Antimony waste and associated cleanup material were transferred from CSA 1 to the outdoor Stabilization Facility and treated for disposal on October 17, 2013.

Pad 4

USEI-B personnel were processing two loads of containers from Burlington Environmental. The containers were received late the previous day. Personnel were conducting “fingerprint” testing of multiple waste streams. Ms. Loerch selected two generators’ waste streams (WO#s 13091908266 and 13100808958) for her subsequent review of Waste Analysis Plan (WAP) compliance.

All drums were assigned to the appropriate compatibility group, and each subcell was signed with the appropriate compatibility group. The drums were stored in separate subcells, based on the compatibility group and each subcell was signed with the appropriate compatibility group. Ms. Loerch and I spot checked containers for storage timeframes, and of the containers checked, none had been in storage for longer than one year.

The pad was clean and sumps were dry. Cracks or other deterioration of the storage pad surface were not observed. No discrepancies were observed at Pad 4.

Pad 5

All containers were assigned to appropriate compatibility group. The containers were stored in separate subcells, based on the compatibility group and each subcell was signed with the appropriate compatibility group. Ms. Loerch spot checked the dates on containers. No containers had been in storage greater than one year.

While inspecting the secondary containment, I observed one minor crack in the coating of the sub-cell located in the northeast portion of Pad 5. I showed the cracking to Mr. Harper. Closer examination revealed that the crack did not penetrate the coating, but owing to its close proximity to the outer berm, I suggested that future inspections should track the progress of the crack. Overall, the secondary containment appeared in good condition and did not show signs of deterioration. No discrepancies were observed at Pad 5.

Pad 7 – RCRA/PCB Building

At the time of the inspection, the building was storing both solid and liquid waste streams. We observed that the secondary containment coating appeared in good condition. Ms. Loerch observed that one container marked "Pressed, Treated WWT Sludge" appeared to have released a minor volume of liquid onto the containment floor (Photos 10 and 11). We informed Mr. Bailey whom in turn notified facility personnel to address the release. As facility personnel had not yet conducted the weekly inspection of this container storage area, no apparent violation occurred.

Module IV – Tank Storage and Treatment – Pages 39 & 59-60

On October 16th, Ms. Loerch inspected the tank farm, which includes Tanks T-1, 2, 3, & 4. USEI-B manages the collection, storage, and on-site treatment of leachate generated from operating several landfill cells and surface impoundments. Ms. Loerch observed that the tanks appeared in good condition, marked with the words "Hazardous Waste" and no accumulated precipitation was observed within the secondary containment system. She observed recent patches to the containment area that corrected minor cracks. The secondary containment area appeared in good condition, the area was swept clean. She inspected the leachate treatment room and no issues of concern were observed. No discrepancies were observed with the operation of the tank farm or generator treatment of leachate.

Module V – Surface Impoundment Storage, Treatment & Disposal – Pages 40- 41 & 59-60

On October 15th, accompanied by Mr. Bailey, I inspected Collection Ponds 1 and 3 and the Evaporation Pond. The following observations were noted during the inspection of the Surface Impoundments. All freeboard observations were within Permit limits.

Pond # 1 – 13 feet of freeboard. No discrepancies were observed.

Pond # 3 – eight feet of freeboard. No discrepancies were observed.

Evaporation Pond – 11 feet of freeboard. No discrepancies were observed.

Module VI – Landfill Disposal – Pages 41- 43 & 60– 63

Mr. Bailey and I conducted a drive-around/walk-around inspection of Trenches 10 and 11 and Cells 14 and 15, to observe maintenance of trench cover and disposal activity, respectively.

We walked across several sections of Trenches 10 and 11 to observe effects, if any, of recent rainfall events, and to verify the growth of vegetation on the cover. The trench covers appeared in good condition; erosion rills were not observed along the flanks; and vegetation appeared moderate. No discrepancies were observed.

At the time of the inspection, one post-treatment (Interim Processing) load was observed in Phase 6 of Cell 14. The majority of interim loads were placed in Phase 2 of Cell 15 where 36 were observed. I randomly selected three of the loads to verify compliance with the 10-day working day holding time. There were not any discrepancies observed.

At the time of the inspection, Cell 16 had not been placed into service, and consequently, was not inspected.

Module VII – Surface Water Management Plan – Pages 45 & 64

The surface water management system was updated to include the addition of Cell 16. Ms. Custer verified that USEI-B complies with the applicable Permit Conditions.

Module VIII – Past Practice Units – Page 44

Ms. Custer observed that all of the Past Practice Units which includes the Radar Silo, Power Dome and Silos 1, 2 and 3 all appeared in good condition and did not exhibit erosional issues from the recent rain events; the carbon absorption units appropriately connected; and the access doors locked. No discrepancies were observed.

Module IX – Groundwater Monitoring Program – Pages 44 & 65

Accompanied by Mr. Bailey, I conducted a drive-around inspection of several groundwater monitoring well locations on October 15th. Subsequently, during a scheduled and routine Operations and Maintenance (O&M) inspection on October 28, 2013, I observed sampling activities associated with the facility's monitoring well network. During both occasions I observed that the wells' concrete aprons and protective bollards were in good condition. For further information, see the report for the O&M.

Module X – Containment Building, Indoor Stabilization, & Debris Storage and Treatment - Pages 45-46 & 66-67

Indoor Stabilization Building

Ms. Loerch and I inspected the stabilization tanks and ancillary equipment. At the time of the inspection, personnel were pumping liquid from the Tank #1 LDCRS. The mixing tanks appeared in good condition. No discrepancies were observed.

Containment Building (Debris Floor)

The Debris Floor side of the Containment Building contained only Group E waste, and the area was appropriately signed as Group E. All containers were closed, and had been in storage less than one year. Aisle space was adequate for inspection and to respond to a release. I spot checked the dates on containers. No containers had been in storage greater than one year.

One of the sort floors contained a shipment of cupels and other assay waste debris. I selected one of containers (WO#13100108664, WSID# 22506-0) for Ms. Loerch to include in her WAP review. Ms. Loerch reviewed the manifest and LDR, both of which appeared to accurately reflect this Burlington Environmental waste stream (Attachment 6). No discrepancies were observed.

Module XI – Outdoor Stabilization Operations – Page 45 & Pages 67-68

Ms. Loerch and I performed a walk-around of the Outdoor Stabilization facility during a hiatus of treatment activities. USEI-B appeared to adequately maintain the area. No discrepancies were observed.

Module XII – Miscellaneous Units under Subpart X – Pages 46 & 68-69

The only Miscellaneous Unit at USEI-B was the crusher. At the time of the inspection, the crusher was partially dismantled and non-functional.

Module XIII – Corrective Action – Page 46

At the time of the inspection, USEI-B was not subject to Corrective Action.

90-Day Generator Requirements

The USEI-B laboratory generates waste from analysis of samples of incoming and stabilized waste. These wastes are collected in Satellite Accumulation Area (SAA) containers prior to transfer to the less than 90-day storage area located behind the laboratory.

Ms. Loerch inspected the Lab and observed the various testing instrumentation and points of waste generation. All of the SAA containers observed were at the point of generation, labeled, closed, in good condition, compatible with the waste, and under the control of lab personnel. Less than 55-gallon total were in storage.

Four 55-gallon containers were observed elevated on a pallet; one of the 55-gallon containers held hazardous waste. The waste containers were closed, labeled with the words "hazardous waste," and marked with the accumulation start date, which was less than 90-days. No discrepancies were observed.

Radioactive Waste

USEI-B accepts and disposes of specific types of radioactive waste as addressed in Rules Regulating the Disposal of Radioactive Materials the Atomic Energy Act of 1954, as Amended, and Attachment 23 of the Permit.

Documents received by DEQ, from USEI-B, related to radioactive waste are registered into DEQ's electronic records management system and reviewed as they are received. A letter to USEI-B is prepared documenting DEQ's review findings.

The radioactive waste portion of the permit covers portions of the Rail Transfer Facility and was inspected.

To evaluate the requirements of this Section, DEQ developed the *Part B Permit Inspection Checklist for Exempt Radiological Materials* (Attachment 2).

This DEQ facility checklist is divided into three parts:

Part I – General Facility Information – Pages 1-3

Part II – DEQ & Facility Office Inspection – Pages 4-7

Part III – Overall Facility Inspection – Pages 8-9

Module I – Standard Conditions – Pages 4-5

Mr. Meier verified USEI-B complies with Standard Conditions requirements of this Section.

Module 2 – General Facility Conditions – Pages 6-7

Mr. Meier and I verified USEI-B complies with General Facility Condition requirements of this Section.

Part III – Overall Facility Inspection – Pages 8-9

Modules I & II

Mr. Meier verified USEI-B complies with the Overall Facility Inspection requirements of this Section. Mr. Meier verified that periodic contamination surveys are conducted in worker areas, such as the employee break room.

No discrepancies were observed during the radiological portion of the October 15, 2013 inspection.

CEI Summary:

During the walk-around portion of the inspection one apparent violation and two issues of concern were observed.

Apparent violation: hazardous waste released from one US Antimony container onto ground surface in Container Storage Area 1(CSA 1) and failure to record the release on weekly CSA 1 inspection logs.

Issues of concern: failure of operator, Mae Beaver, to consistently record her title on inspection logs and a precariously mounted and difficult to open fire extinguisher cabinet at vehicle wash.

Closing Conference

Following the inspection Ms. Loerch held a close-out meeting during which she discussed potential violations and issues of concern. Mr. Bailey and Mr. Geis attended the conference. I explained the DEQ Enforcement Response Policy, obtained the signature of Mr. Geis on the *Preliminary Inspection Findings* form. The facility was provided and accepted the opportunity to photocopy this document. The meeting concluded at approximately 1:00 p.m.; after which she surrendered her site badge at the security gate and left the facility.

At the time of the October 15-16, 2013 inspection, the following violation of the HWMA Treatment, Storage, and Disposal Permit and the Idaho Rules and Standards for Hazardous Waste was observed but was corrected immediately subsequent to the inspection and is considered resolved:

Violation No. 1

Legal Provision Violated:

Permit Conditions III.A.7 and III.A.9, Container Storage and Treatment; Attachment 3 D.1.b (2) (a) and Attachment 4 F.2.b (1) of the Permit

Permit Condition III.A.7 states in relevant part:

"If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition, or otherwise manage the waste in compliance with the conditions of this Permit..."

Permit Condition III.A.9 states in relevant part:

"The Permittee shall inspect the Container Management Units weekly, in accordance with IDAPA 58.01.05.008 [40 CFR §264.174] and the inspection schedules in Attachment 4 of this Permit, to detect leaking containers and deterioration of containers..."

Attachment 3 D.1.b (2) (a) states in relevant part:

"...if a container's integrity is compromised the waste container, residue, and any spilled cleanup material generated are transferred to an intact container or over-pack, or the waste and the damaged container are expeditiously processed..."


Attachment 4 F.2.b (1) states in relevant part:

"...the CMUs are inspected for the presence of spilled material, leaking containers..."

At the time of the October 15-16, 2013 inspection, DEQ's review of inspection records indicated that on October 14, 2013 USEI failed to document the breaching of three super sack containers (US Antimony waste) which allowed waste to leach onto underlying soils. The suspect

containers were not repackaged; the supporting pallets and underlying soils impacted by the release of material from the containers were not cleaned up; and the waste was not appropriately contained or processed. Rather, the containers and the released material remained within CSA 1.

Immediately following the inspection on October 16, 2013, the facility began transferring the suspect US Antimony waste containers and associated cleanup material from CSA 1 to the Stabilization Building for treatment. According to Mr. Bailey, all of the US Antimony waste previously stored in CSA 1 was treated and disposed by November 1, 2013. Additionally, facility personnel responsible for conducting inspections at CSA 1 were provided refresher training on October 18, 2013.




Date 12-5-13
Brian Gaber
Senior Hazardous Waste Inspector
Technical Services Division



Date 12-5-13
Eileen Loerch
Hazardous Waste Science Officer
Boise Regional Office



Date 12-5-13
Kim Custer
Hazardous Waste Permit Officer
Waste Management & Remediation Division



Date 12/5/2013
Dennis Meier
Staff Engineer
DEQ - Technical Services

LIST OF ATTACHMENTS

| | |
|--------------|--|
| Attachment 1 | Preliminary Inspection Findings format |
| Attachment 2 | USEI-B Permit-specific Checklists and Inspector Field Notes |
| Attachment 3 | Inspector Health and Safety Plan |
| Attachment 4 | Opening conference sign in sheet |
| Attachment 5 | Waste Profile 28136- US Antimony and CSA 1 October 2013 Inspection Logs |
| Attachment 6 | Waste Analysis Plan, LDR and Manifest Review |
| Attachment 7 | Photographs taken of US Antimony waste at CSA 1, Fire Extinguisher Box at Vehicle Wash and Burlington Environmental waste container at Pad 7 |



Photo 1

View to S. Super sack containers of waste debris stored in Container Storage Area 1.

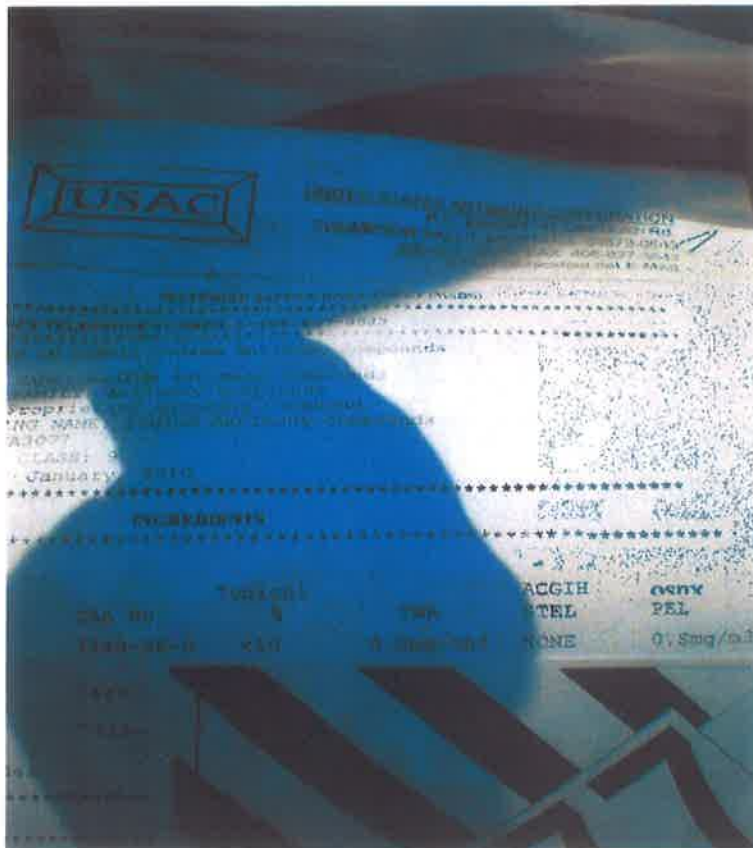


Photo 2

US Antimony (generator) waste label



Photo 3

First container - leached waste (white, salt-like) formed on exterior of container and onto pallet.



Photo 4

First container (alternate view) - leached waste through container liner onto pallet.



Photo 5

First container – leached waste through container liner onto soil.



Photo 6

Second container – leached waste through container liner onto pallet.



Photo 7
Third container – leached waste through container liner onto pallet.



Photo 8
Third container (alternate view) - leached waste through container liner onto soil.



Photo 9

View to N. Fire extinguisher box, mounted at southeast corner of vehicle truck wash.



Photo 10

Waste liquid released from super sack container located in Pad 7



Photo 11
Waste container label of leaking container