

Attachment 1

Facility Job Descriptions / Management Resumes



JOB DESCRIPTION

Job Title: Facility Manager
Department: Administration
Reports to: Director of Hazardous Waste

Job Group:
AEC Job Group:
Census Code:

SUMMARY

Plans and directs all aspects of business and operations activities at our waste disposal facility. Ensures all projects, initiatives, and processes are in conformance with organization's established policies and objectives and in compliance with federal, state, and local regulations and practices. Performs the following duties personally or through subordinate managers and supervisors.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Directs and coordinates organizational activities to obtain optimum efficiency and economy of operations to maximize profits.
- Develops and recommends business plans and engineering alterations to the facility.
- Coordinates activities with sales and operations to achieve revenue generation, cost and quality control. Ensures maximum sales and service with the region or division.
- Coordinates activities of divisions or departments such as operating, environmental, personnel, engineering, planning, sales, and compliance to effect operational efficiency and economy.
- Coordinates, develops and implements organization's policies and procedures in all aspects of business administration and field operations.
- Ensures compliance with federal, state, and local regulations and practices.
- Monitors operations to ensure efficiency and profitability.
- Develops operating and capital expenditure budgets and reports. Analyzes division or department budget requests to identify areas in which reductions can be made, and allocates operating budget.
- Confers with management, reviews activities and operations to determine changes in programs or operations required.
- Plans and develops long objectives and goals.
- Promotes organization in industry and trade associations.

Performs other, related duties as assigned. These are duties which may not be specifically listed in the class specification or position description, but which are within the general occupational series and responsibility level typically associated with the employee's class of work.

Supervisory Responsibilities: Directly supervises employees and departments per organization chart. Carries out supervisory responsibilities in accordance with the organization's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

SKILLS/KNOWLEDGE/ABILITIES (SKA):

Language Skills

Ability to read, analyze, and interpret common scientific and technical journals, financial reports, and legal documents. Ability to respond to inquiries or complaints from customers, regulatory agencies, or members of the business community. Ability to write speeches and articles for publications that conform to prescribed style and format. Ability to effectively present information to top management, public groups and/or boards of directors.

Mathematical Skills

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plan and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations. Ability to understand and apply exponents and logarithms, linear equations, quadratic equations, mathematical induction, the binomial theorem and permutations. Ability to understand the concepts of analytic geometry, differentiations and the integration of algebraic functions with applications. Ability to understand mathematical operations to frequency distributions, the reliability and validity of tests, the normal curve, analysis of variance, correlation techniques, chi-square applications, sampling theory and factor analysis.

Reasoning Ability

Ability to apply common sense understanding to carry out detailed written or oral instructions. Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form. Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables. Ability to comprehend the consequences of various problem situations and to make sound decisions or to refer problems to appropriate people for decision-making.

EDUCATION AND/OR EXPERIENCE

Fifth year college or university program certificate; or related experience and/or training; or equivalent combination of education and experience.

Certificate, Licenses, Registrations

None required

PERSONAL DEMANDS

The personal demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee may work alone, work extended hours or special shifts, with frequent interruptions and repetitious operations. This work requires high concentration with a moderate level of stress.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions. Must be able to lift up to 25 lbs.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Generally an office environment. While performing the duties of this job, the employee is occasionally exposed to fumes or airborne particles, toxic or caustic chemicals, and risk of radiation. The noise level in the work environment is usually moderate.



Job Description

Job Title: Environmental , Health and Safety Manager
Department: Administration
Reports To: Facility Manager
FLSA Status: Exempt

EEO Group: 1 – Officials & Managers
Job Group: 002 Senior Managers
Census Code :

SUMMARY

Responsible for an environmental compliance program to ensure compliance with legal standards. Plans, directs, and implements safety and health programs for the site. Establishes and promotes the maintenance of a safe, accident free, and healthy work environment by training managers, supervisors and site workers.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Plans and directs environmental compliance practices. Ensures, directly or through subordinates, that the company is in compliance with all pertinent federal, state and local regulations.
- Provides regular reports as required by governmental agencies and senior management.
- Participates with management personnel in establishing procedures for administering regulatory compliance programs.
- Review reports and records of control sites quality assurance records
- Conducts site surveillance and facility over sight functions. Directs environmental monitoring program to determine necessary changes in levels.
- Reviews environmental legislative developments to determine changes in legal requirements and probable effects on company activities. Keeps all professionals and managers informed of changes in compliance requirements.
- Maintains current all site permits and interacts with regulatory agencies. Prepares permit applications and modifications. Prepares for and testifies in permit proceedings.
- Directs retention of data and preparation of documents for use by self or other company personnel during inquiries concerning problem areas.
- Interfaces with environmental auditing activities to ensure conformance to departmental standards and company environmental policies and guidelines.
- Inspects or tours facilities to detect existing or potential accident and health hazards, and recommend corrective or preventative measures where indicated.
- Ensures compliance with OSHA, QA/QC and other rules, permits, and regulatory requirements.
- Ensures that effective occupational health, safety, and hygiene programs are in effect and effective.
- Develops and delivers health and safety training to employees.
- Devises, supervises, and coordinates training programs or media which will increase proficiency in safe practices and promote safety consciousness.
- Monitors all accidents to determine corrective actions required.
- Coordinates with Human Resources the reporting of workers compensation issues.

- Responsible for safety files and safety records as required by regulation and management.
- Coordinates with Health and Safety and HR the medical surveillance process, monitoring, industrial hygiene and DOT programs.

Performs other, related duties as assigned. These are duties which may not be specifically listed in the class specification or position description, but which are within the general occupational series and responsibility level typically associated with the employee's class of work.

Supervisory Responsibilities: Directly supervises employees and departments per organization chart. Carries out supervisory responsibilities in accordance with the organization's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

JOB LEVELS

One level

SKILLS/KNOWLEDGE/ABILITIES (SKA)

Language Skills

Ability to read, analyze, and interpret common scientific and technical journals, financial reports, and legal documents. Ability to respond to common inquiries or complaints from customers, regulatory agencies, or members of the business community. Ability to write speeches and articles for publication that conform to prescribed style and format. Ability to effectively present information to top management, public groups, and/or boards of directors.

Mathematical Skills

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions, to practical situations.

Reasoning Ability

Ability to apply common sense understanding to carry out detailed written or oral instructions. Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form. Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables.

EDUCATION AND/OR EXPERIENCE

Bachelor's degree (B.S.) from four-year college or university with a degree in a scientific field and regulatory and management experience; or equivalent combination of education and experience.

Certificate, Licenses, Registrations

None required

PERSONAL DEMANDS

The personal demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee may work alone, work extended hours or special shifts, with frequent interruptions and repetitious operations. This work requires high concentration with a moderate level of stress.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job the employee is frequently required to walk. The employee is occasionally required to use hands to handle, feel, reach and grasp, hands and arms are used to reach; the employee is required to climb or balance; talk, hear and smell. The employee must occasionally lift and/or move up to 75 pounds. Specific vision abilities required by this job include close vision, color vision, depth perception and the ability to adjust focus. Must also be able to work in Level A PPE for extended periods of time.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently exposed to hot surface, moving mechanical parts; fumes, or airborne particles; toxic or caustic chemicals, outside weather conditions, including extreme heat and cold. The noise level in the work environment is usually loud.



Job Description

Job Title: Operations Manager
Department: Operations
Reports To: Facility General Manager
FLSA Status: Exempt

EEO Group: 1 Officials & Managers
AEC Job Code: 002 Senior Managers
Census Code: 22 – Salaried Managers

SUMMARY

1. Manages facility operations to ensure safe, regulatory compliant and expeditious processing of hazardous wastes. Supervises and coordinates operation activities. Oversees the daily operations schedules and activities to ensure that production and quality meet requirements. Responsible for making recommendations on plant finance, materials, human resources and efficiency of operations.
2. Supervises and coordinates activities of workers engaged in all phases of waste site operations. Oversees the daily operations schedules and activities to ensure that production and quality meet requirements. Responsible for coordinating and making recommendations on plant finance, materials, human resources and efficiency of operations.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Manages the facility operating budget and ensures that the operations of the site are accomplished within budget and to company, regulatory and industry standards.
- Oversees the daily administration, construction, operations, regulatory compliance, quality assurance, and safety of the facility.
- Manage programs to efficiently process and treat wastes in compliance with WAP (Waste Analysis Plan) and good safety practices.
- Manage departmental interaction with clients and other organizational units to maximize overall company effectiveness and profitability.
- Provides technical support to management and subordinates.
- Makes recommendations for improvement in workflow and project management.
- Ensures compliance with health, safety, environmental, and other regulatory standards.
- Works with governmental and regulatory agencies and maintains community relations.
- Responsible for staffing and training personnel for site; implements personnel programs.
- Forecast and control department resources.

Performs other, related duties as assigned. These are duties which may not be specifically listed in the class specification or position description, but which are within the general occupational series and responsibility level typically associated with the employee's class of work.

Supervisory Responsibilities: Directly supervises 3-4 Supervisors and/or leadmen for Operations. Carries out supervisory responsibility in accordance with the organization's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees, planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

JOB LEVELS

One Level: Manages the operation activities of the facility. Ensures through subordinate supervisors that operational activities are completed on time and according to company and industry standards. Typically has an BA in chemistry and 8-10 yrs of experience.

SKILLS/KNOWLEDGE/ABILITIES (SKA):**Language Skills**

Must have strong written and verbal communication skills. Ability to write procedures and documentation. Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine reports and correspondence. Ability to speak effectively and present information in one-on-one and small group situations to customers, clients, and other employees of the organization.

Mathematical Skills

Ability to apply advanced mathematical concepts such as exponents, logarithms, quadratic equations, and permutations. Ability to add, subtract, multiply, and divide in all units of measure, using whole numbers, common fractions, and decimals. Ability to compute rate, ratio, and percent and to draw and interpret graphs. Ability to apply mathematical operations to such tasks as frequency distribution, determination of test reliability and validity, analysis of variance, correlation techniques, sampling theory, and factor analysis.

Reasoning Ability

Ability to apply common sense understanding to carry out detailed written or oral instructions. Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables. Ability to apply principles of logical or scientific thinking to a wide range of intellectual and practical problems. Ability to deal with nonverbal symbolism (formulas, scientific equations, graphs, etc.) in its most difficult phases.

EDUCATION AND/OR EXPERIENCE

Bachelor's degree (B.A.) from four-year college or university, and related experience and/or training; or equivalent combination of education and experience.

Certificate, Licenses, Registrations

None required

PERSONAL DEMANDS

The personal demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee may work alone, may have to travel, work extended hours or special shifts, with frequent interruptions and repetitious operations. This work requires high concentration with a moderate level of stress. Frequent contact with customers, clients, and visitors.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job the employee is frequently required to walk. The employee is occasionally required to use hands to handle, feel, reach and grasp, hands and arms are used to reach; the employee is required to climb or balance; talk, hear and smell. The employee must occasionally lift and/or move up to 25 pounds. Specific vision abilities required by this job include close vision, color vision, depth perception and the ability to adjust focus.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently exposed to hot surface, moving mechanical parts; fumes, or airborne particles; toxic or corrosive chemicals, outside weather conditions, including extreme heat and cold. The noise level in the work environment is usually loud.



JOB DESCRIPTION

Job Title: Supervisor - PCB & Trench
Department: Operations
Reports To: Facility Manager
FLSA Status: Non-exempt

Job Group:
AEC Job Group:
Census Code:

SUMMARY

Supervises the operation in the storage and transfer of non-disposal waste. Manage RCRA waste accepted for storage and shipment off site, maintaining a tracking log of both.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Off-loads trucks and unloads transformers and capacitors containing PCBs.
- Manager RCRA waste accepted for storage and shipment off site, maintaining a tracking log of both.
- Supervise and train equipment operators assigned to the PCB building in the proper handling of PCB liquids and RCRA waste.
- Supervise and train equipment operators assigned to the Trench area.
- Responsible for loading stored PCB liquids into bulk tanker trucks for off site disposal.
- Preparing stored RCRA waste for offsite shipment.
- Operates equipment to handle waste.
- Manage daily workload in conjunction with receiving office.
- Receives written or oral instruction from operations manager regarding material to move or excavate.
- May act as waste transfer agent. Involved in decontamination and cleaning to control contamination.
- Operates assigned equipment in a safe manner, preventing its misuse or damage.

Performs other, related duties as assigned. These are duties which may not be specifically listed in the class specification or position description, but which are within the general occupational series and responsibility level typically associated with the employee's class of work.

Supervisory Responsibilities: Supervises 1 – 3 employees per organization chart. Carries out supervisory responsibilities in accordance with the organization's policies and applicable laws. Responsibilities may include: interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance, rewarding and disciplining employees; addressing complaints and resolving problems.

JOB LEVELS

One level

SKILLS/KNOWLEDGE/ABILITIES (SKA)

Language Skills

Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine reports and correspondence. Ability to speak effectively and present information in one-on-one and small group situations to customers, clients, and other employees of the organization.

Mathematical Skills

Ability to add, subtract, multiply, and divide in all units of measure, using whole numbers, common fractions, and decimals. Ability to compute rate, ratio, and percent and to draw and interpret graphs. Ability to perform these operations using units of American money and weight measurement, volume, and distance

Reasoning Ability

Ability to apply common sense understanding to carry out detailed written or oral instructions. Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form. Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables.

EDUCATION AND/OR EXPERIENCE

High school diploma plus certificate from technical school or college and 4 – 7 years of related experience and/or training; or equivalent combination of education and experience. Familiar with a variety of the field's concepts, practices, and procedures. Relies on experience and judgment to plan and accomplish goals.

Certificates/Licenses/Registrations

24 hours of Hazwopper training.

24-Hour Qualification Training as described in Personnel Training Plan

Site training program.

Annual review of initial training consisting of weekly sessions

PERSONAL DEMANDS

The personal demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee may work alone, work extended hours or special shifts, with frequent interruptions and repetitious operations. This work requires high concentration with a moderate level of stress.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job.

While performing the duties of this job, the employee is frequently required to stand; walk; use hands to finger, handle, or feel; reach with hands and arms; climb or balance; stoop, kneel, crouch, or crawl; and talk or hear. The employee is occasionally required to sit. The employee must occasionally lift and/or move up to 50 pounds. Subject to repetitious operations and frequent interruptions. Could work extended hours or shift work. Deals with confidential information. Specific vision abilities required by this job include depth perception, and ability to adjust focus. Subject to repetitious operations and frequent interruptions. Could work extended hours or shift work. Deals with confidential information.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently exposed to moving mechanical parts. The employee is frequently exposed to fumes or airborne particles and toxic or caustic chemicals; exposed to extreme heat, cold, wind, and dust conditions; risk of electrical shock; risk of radiation; and vibration. The noise level in the work environment is usually loud.



JOB DESCRIPTION

Job Title: Operator Heavy Equipment PCBS / Trench
Department: Operations
Reports To: Supervisor Trench
FLSA Status: Non-Exempt

EEO Job Group: 007 - Operative
AEC Job Code: 009 - Semi-Skilled Crafts
Census Code: 859 - Miscellaneous Material Moving Equip Oper

SUMMARY

Treat hazardous waste to stabilize and prepare for disposal. Operate earth-moving equipment as needed. Assist in off-loading trucks. Receive and interpret information for waste treatment. Operate scales to measure re-agents.

ESSENTIAL DUTIES AND RESPONSIBILITIES

- Assist in off-loading trucks and unloading waste. Operates equipment to stabilize and handle waste.
- Receives written or oral instructions from supervisor regarding material to move or excavate.
- Homogenize hazardous waste using a variety of re-agents to stabilize and prepare for disposal.
- Sample and store hazardous waste pending analysis from lab.
- Operate scales to measure re-agents.
- General housekeeping and daily maintenance and operation of equipment.
- Assist in the coordination of operations as needed.
- Receive and interpret written or oral instructions for waste treatment.
- May act as waste transfer agent. Involved in deconing and cleaning to control contamination.
- Pushes levers, depresses pedals, etc. to move equipment.
- May dump contents of shovel into truck, car, or onto conveyor, hopper, or stockpile.
- Observes markings on ground, hand signals, or grade stakes to remove material, when operating machine at excavation site.

Performs other, related duties as assigned. These are duties which may not be specifically listed in the class specification or position description, but which are within the general occupational series and responsibility level typically associated with the employee's class of work.

Supervisory Responsibilities: This job has no supervisory responsibilities.

JOB LEVELS

Level I: Entry-level position.

Level II: Top level position. At this level, is the most qualified person to handle equipment in the most demanding situations

SKILLS/KNOWLEDGE/ABILITIES (SKA)

Language Skills

Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine reports and correspondence. Ability to speak effectively and present information in one-on-one and small group situations to customers, clients, and other employees of the organization.

Mathematical Skills

Ability to add, subtract, multiply, and divide in all units of measure, using whole numbers, common fractions, and decimals. Ability to compute rate, ratio, and percent and to draw and interpret graphs. Ability to perform these operations using units of American money and weight measurement, volume, and distance.

Reasoning Ability

Ability to apply common sense understanding to carry out detailed written or oral instructions. Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form. Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables.

EDUCATION AND/OR EXPERIENCE

High school diploma or equivalent.

One-year certificate from college or technical school or related experience and/or training or equivalent combination of education and experience.

Certificates/Licenses/Registrations

Certificate or license as required by state law..

PERSONAL DEMANDS

The personal demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee may work alone, work extended hours or special shifts, with frequent interruptions and repetitious operations. This work requires high concentration with a moderate level of stress.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job.

While performing the duties of this job, the employee is regularly required to sit; use hands to finger, handle, or feel; and reach with hands and arms. The employee is occasionally required to climb or balance. The employee must occasionally lift and/or move up to 90 pounds. Specific vision abilities required by this job include distance vision, peripheral vision, and depth perception. Subject to repetitious operations and frequent interruptions. Could work extended hours or shift work.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently exposed to moving mechanical parts. The employee is frequently exposed to fumes or airborne particles and toxic or caustic chemicals; exposed to extreme heat, cold, wind, and dust conditions; risk of electrical shock; risk of radiation; and vibration. The noise level in the work environment is usually loud.

Work Experience of
Robert L. Marchand

Qualifications Summary

Over twenty-two years experience in the processing and disposal of hazardous and low-level radioactive wastes. Mr. Marchand has held progressively responsible positions resulting in experience in virtually every aspect of the waste disposal business, including equipment operations, administration and implementation of hazardous and radioactive waste management and compliance programs, as well as having had direct profit and loss responsibility for multiple hazardous waste management facilities.

Professional Experience

General Manager, USEcology, Inc., - Beatty, Nevada

10/02 - Present

Responsible for the operations conducted at the USEcology hazardous waste treatment and landfill facility located near Beatty, Nevada. Responsibilities include conducting facility operations in compliance with corporate policies and procedures as well as applicable state and federal permits, rules and regulations. Responsible for the direct management of all facility personnel, customer satisfaction, permitting of facility operations, supervision of the receipt and safe handling, processing, storage and disposal of hazardous wastes, preparation of facility budgets, facility profitability, and supervision of facility environmental and safety programs.

Assistant Vice President of Operations, Hulcher Services, Inc., - Denton, Texas

5/97 - 10/02

Responsible for environmental, construction, and emergency response operations conducted by Hulcher Services, Inc. Responsible for business line profitability, management of division personnel, customer satisfaction, preparation of budgets, monitoring of safety programs, and increasing revenues and profits. Held direct management responsibility for the successful startup and operations of a new service line for the Company in the area of Railroad Construction. Responsible for startup and operation of an expansion of the Company's core business into Mexico. Acted as on-site Emergency Coordinator for the Company's response activities in the State of Florida during 1999, when the State experienced forest fires of historic proportions. Acted as on-site Emergency Coordinator for the Company's response activities in Del Rio, TX during 1999, when the city experienced flash flooding that destroyed over 500 homes and businesses. Acted as on-site Emergency Coordinator for the Company's response activities in Eunice, LA during 2000, associated with a catastrophic train derailment and subsequent fire and chemical release resulting in the evacuation of approximately 5,000 people.

Vice President and General Manager, American Ecology Environmental Services Corporation (AEESC) - Winona, Texas (American Ecology Corp.)

1995 - 1997

Responsible for operations conducted at AEESC's hazardous waste deepwell, waste derived fuels blending, and solvent recovery facility located near Winona, Texas. Responsibilities included ensuring operations were conducted in compliance with applicable state and federal permits, rules, and regulations. Responsible for facility profitability, management of facility personnel, supervision of the receipt, processing, storage, and disposal of hazardous wastes, preparation of budgets, monitoring and safety programs, and interfacing with the media, the public, and regulatory authorities regarding facility activities. Also responsible for the operation of two subsidiary locations in El Paso and Laredo, Texas.

Vice President and General Manager, Texas Ecologists, Inc., - Robstown, Texas (American Ecology Corp.)

1992 - 1994

Responsible for the operations conducted at the Texas Ecologists hazardous waste treatment and landfill facility located near Robstown, Texas. Responsibilities included conducting facility operations in compliance with corporate policies and procedures as well as applicable state and federal permits, rules and regulations. Responsible for the direct management of all facility personnel, supervision of the receipt and safe handling, processing, storage and disposal of hazardous wastes, preparation of facility budgets, facility profitability, and supervision of facility environmental monitoring and safety programs.

Robert L. Marchand
Professional Experience Continued

Assistant Facility Manager, USEcology, Inc., - Beatty, Nevada (American Ecology Corp.)

1987 - 1989

Acted as the direct representative of the Facility Manager and assumed the Manager's duties in his absence. Responsibilities included direct supervision of all disposal site personnel, supervision of environmental monitoring programs, assisting in the preparation of facility budgets, maintaining regulatory compliance of the waste operations, implementation of the facility Part B RCRA and TSCA operating permits, construction of RCRA disposal cells and monitoring wells, and design and startup of the facility laboratory.

Chemical Safety Officer, USEcology, Inc., - Beatty, Nevada

1986 - 1987

Responsible for implementation of the facility Chemical Safety and Quality Assurance Programs, including responsibility for the inspection of all incoming hazardous and PCB waste shipments, surveillance of work involving hazardous waste operations, assuring that all chemical safety and emergency equipment was readily available and properly maintained, assuring that all facility personnel had the appropriate hazardous waste training and qualifications, assuring that an effective occupational safety program was implemented for hazardous operations, working daily with corporate personnel, the public, customers, and regulatory authorities regarding facility operations, and supervising the facility environmental monitoring programs.

Radiological Controls and Safety Technician, USEcology, Inc., - Beatty, Nevada

1985 - 1986

Responsible for quality assurance and control of all radiological areas, including receiving shipments, Department of Transportation and Nuclear Regulatory Commission shipping and handling regulations and procedures, environmental monitoring, instrumentation, personnel dosimetry issue and receipt, and decontamination operations.

Assistant Site Supervisor, USEcology, Inc., - Beatty, Nevada

1984 - 1985

Responsibilities included working closely with the Site Supervisor in all areas of heavy equipment operator training, equipment maintenance, hazardous and low-level radioactive waste handling procedures, disposal cell construction and utilization, orientation of new employees and working daily with the facility Chemical Safety Officer and Radiological Controls and Safety Officer to maintain a safe working environment.

Heavy Equipment Operator/Radiological - Chemical Worker, USEcology, Inc., - Beatty, Nevada

1980 - 1984

Involved in all aspects of hazardous and low-level radioactive waste handling procedures.

Education

Certified Hazardous Materials Manager.

Registered Environmental Professional

40-Hour OSHA Certification; Hazardous Materials Handling

8 - Hour OSHA Supervisor Training

Previously trained as an Emergency Medical Technician Instructor/Firefighter

Professional Organizations

Institute of Hazardous Materials Management - Member

Robert L. Marchand
Professional Experience Continued

Facility Manager, USEcology, Inc., - Beatty, Nevada (American Ecology Corp.)
1989 - 1992

Responsible for the operations conducted at USEcology's hazardous and low-level radioactive waste disposal facilities located near Beatty, Nevada. Responsibilities included conducting facility operations in compliance with corporate policies and procedures as well as applicable state and federal permits, rules and regulations. Responsible for the direct management of all facility personnel, supervision of the receipt and safe handling, processing, storage and disposal of hazardous and low-level radioactive wastes, preparation of budgets, facility profitability, and the supervision of monitoring and safety programs.

Scott Wisniewski

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Summary 14 years experience working in both research and analytical laboratories, including 8 years working in the environmental industry.

Education **Cleveland State University, Cleveland, Ohio**
Bachelor of Science in Chemistry 1998

University of Denver, Denver, Colorado
Certificate in Geographic Information Systems (GIS) 2002

Professional **US Ecology, Beatty, Nevada** 4/07 to present
Experience *Environmental, Health & Safety Manager*

- Conduct formal and systematic reviews of the facility to ensure compliance with federal and state regulations for environmental affairs and health and safety
- Prepare reports and documents as required by regulatory agencies and corporate and facility management
- Apply for original permits and maintains a schedule for renewals, reporting and provisions of all required environmentally related permits.
- Ensure accurate waste approval over-site by reviewing customer/client submitted profiles
- Provide environmental compliance and safety training to all employees, including new hire 24 hr HAZWOPR training
- Assist and advise site management and sales group in evaluating chemical analysis to determine if waste is acceptable for disposal under RCRA rules

US Ecology, Beatty, Nevada 6/05 to 7/06
Chemist / Lab Manager

- Main responsibility is to provide on-site analytical support using various instrumentation for a RCRA permitted hazardous waste landfill.
- Develop effective, cost efficient recipes for the treatment of a variety of waste streams.
- Ensure accurate waste approval over-site by reviewing customer/client submitted profiles.
- Provide training for laboratory personnel.
- Assist and advise site management and sales group in evaluating chemical analysis to determine if waste is acceptable for disposal under RCRA rules.

ILS / Lockheed-Martin, Golden, Colorado 10/99 to 06/05
Chemist

- Coordinated analytical activities for sample preparation and instrumental analysis for superfund projects.

- Operated and maintained the following instrumentation: Perkin-Elmer ICP-OE, ICP-MS, CVAA mercury analyzer, TJA ICP-OE, Dionex IC, Mettler auto-titrator, Tekmar TOC analyzer and OI analytical auto-analyzer for cyanide analysis.
- Reviewed analytical data to ensure compliance with methods and QC requirements.
- Performed reviews and revisions of standard operating procedures.
- Maintained written and verbal contact with clients to provide project status reports.
- Certified by the EPA as a PM2.5 field scientist. Traveled to sites and set up portable air samplers to measure 2.5um particulate matter.

Bicron, Solon, Ohio

6/97 to 9/98

Analytical Technician

- Responsible for trace elemental analysis for both production and R&D using ICP-AES.
- Contributed to a decrease in turn around time for several product lines.
- Assisted Chemists with new method development using both ICP-AES and ICP-MS.
- Generated statistical process control (spc) charts to guarantee quality results.
- Other duties included instrument calibration, instrument maintenance, and writing standard operating procedures for ISO certification.

Gould Electronics, Eastlake, Ohio

3/96 to 6/97

Research Technician

- Assisted Engineers and Chemists with the research and development of rechargeable lithium ion batteries.
- Prepared polymer films and electrolyte solutions for battery construction.
- Analyzed and interpreted data from test cells.
- Instruments used; Karl Fisher titrator and particle size analyzer.

The Lubrizol Corporation, Wickliffe, Ohio

6/95 to 3/96

Coatings Additives Laboratory Technician (co-op position)

- Assisted Chemists with the research and development of new products.
- Implemented a computerized inventory system for Coatings Additives group.
- Was responsible for following RCRA rules for waste characterization, tracking and disposal.

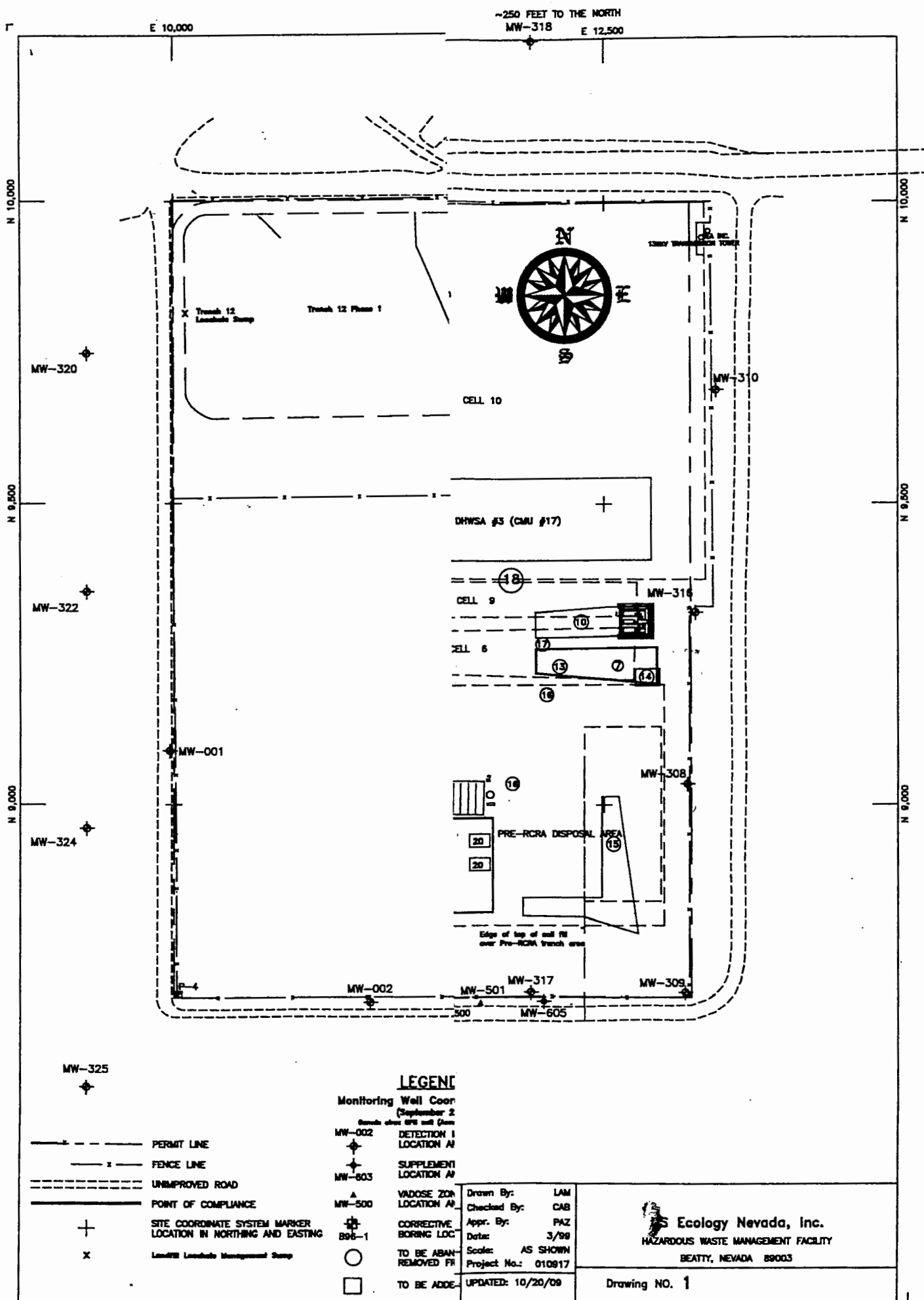
Computer Skills Proficient with all Microsoft Windows operating systems and Office applications. Experienced with several Laboratory Information Management Systems (LIMS).

References Available upon request.

Other Lion Technology – 2 day DOT Hazard Materials, Las Vegas, NV 2008
Princeton Groundwater 5-day course. San Francisco, CA 2007
McCoy's 2 day RCRA refresher course, Las Vegas, NV 2007
McCoy's 5 day RCRA course, Las Vegas, NV 2005

Attachment 2

Facility Map



Attachment 3

Waste Disposal Information Forms (Sample Only)

American Ecology Corporation

GENERATOR PCB WASTE PRODUCT QUESTIONNAIRE

☐ US Ecology Idaho, Inc.
 P.O. Box 400
 10.5 Miles NW on Hwy 78, Lemley Rd
 Grand View, Idaho 83624
 (800) 274-1516, (208) 834-2275
 Fax: (208) 834-2919
 EPA ID#: IDD073114654

☐ US Ecology (Beatty, NV)
 P.O. Box 578
 Highway 95, 11 miles South of Beatty
 Beatty, NV 89003
 (800) 239-3943, (775) 553-2203
 Fax: (775) 553-2125
 EPA ID#: NVT330010000

SECTION A - GENERATOR INFORMATION

1 a. Generator _____
 Mailing Address _____ City/State _____ ZIP _____
 Shipping Address _____ City/State _____ ZIP _____
 1.b. Tech./Off-Spec. Contact _____ TEL _____ FAX _____
 (WHEN TRUCK ARRIVES AT FACILITY)
 24 HR. 7 Day/Week Contact _____ TEL _____ FAX _____
 Email _____

U.S. EPA IDENTIFICATION NUMBER									

STATE IDENTIFICATION NUMBER (if applicable)									

2. Billing/Broker _____
 Address _____ City/State _____ ZIP _____
 Billing Contact _____ TEL _____ FAX _____
 Email _____

SECTION B - WASTE CHARACTERIZATION

GRAND VIEW, ID

PCB Solids <input type="checkbox"/> Dirt - Soil <input type="checkbox"/> Debris (PPE, Rags, Etc.) <input type="checkbox"/> Mixed soil/debris	<input type="checkbox"/> Non-Liquid dredged materials and municipal sewage treatment sludge containing PCB
Transformer <input type="checkbox"/> 50-500 PPM <input type="checkbox"/> Above 500 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained <input type="checkbox"/> Drained and Flushed	Transformer less than or equal to 50 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained
PCB Liquids <input type="checkbox"/> Below 50 PPM <input type="checkbox"/> Above 50 PPM <input type="checkbox"/> Landfill <input type="checkbox"/> Incinerate	<input type="checkbox"/> PCB spill clean up material from a source greater than 50 PPM
<input type="checkbox"/> Capacitors - Large (over 3 lbs of Liquid or 100 cu. in.) All Large Capacitors Are Incinerated	Capacitors - Small (Less than 3 lbs of Liquid or 100 cu. in.) includes ballast <input type="checkbox"/> Incineration <input type="checkbox"/> Landfill
PCB hydraulic machine <input type="checkbox"/> Full <input type="checkbox"/> Drained of all free flowing liquids	<input type="checkbox"/> Articles (regulators, switches, conductors) drained of all free liquid
Articles - Liquids Below 50 PPM <input type="checkbox"/> Drain <input type="checkbox"/> Landfill	Articles - Liquids <input type="checkbox"/> 50-500 PPM <input type="checkbox"/> Above 500 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained <input type="checkbox"/> Drained and Flushed

BEATTY, NV

Note: Using Beatty's attached Waste/Services Description please select appropriate category (not required for Grand View Customers)

Transformers/Articles Categories: <input type="checkbox"/> C <input type="checkbox"/> C-1 <input type="checkbox"/> C-2 <input type="checkbox"/> D <input type="checkbox"/> D-1 <input type="checkbox"/> G <input type="checkbox"/> J <input type="checkbox"/> J-1 <input type="checkbox"/> M-1	Bulk Clean Up Material Categories: <input type="checkbox"/> A-1 <input type="checkbox"/> A-2 <input type="checkbox"/> M
Drummed Containerized Materials Categories: <input type="checkbox"/> A-1 <input type="checkbox"/> A-2 <input type="checkbox"/> F <input type="checkbox"/> M <input type="checkbox"/> M-1	Other Materials Categories: <input type="checkbox"/> E <input type="checkbox"/> I <input type="checkbox"/> X <input type="checkbox"/> K <input type="checkbox"/> Z <input type="checkbox"/> Z/K <input type="checkbox"/> Z/L
<input type="checkbox"/> Check to indicate all categories may be shipped.	

SECTION C—PHYSICAL PROPERTIES & GENERAL INFORMATION (Not applicable to Beatty)

1. Process generating this waste _____
2. Does this material contain radioactive, pyrophoric, shock sensitive, or explosive materials? ☐ Yes ☐ No
3. Are any of the materials RCRA regulated? ☐ Yes ☐ No Note: If yes, please submit a RCRA WPQ.
4. Flash Point: 1. ☐ <100° F 2. ☐ 101-140° F 3. ☐ 141-200° F 4. ☐ >200° F Comments: _____
5. Does this waste pass the EPA specified Paint Filter Test? ☐ Yes ☐ No Comments: _____
6. Has material been solidified/stabilized: ☐ Yes ☐ No If yes list additives: _____

SECTION D—SHIPPING AND HANDLING INFORMATION

PCB MATERIALS MUST BE PACKAGED AND SHIPPED IN ACCORDANCE WITH D.O.T. REGULATIONS AS SPECIFIED IN 49 CFR 100-177, AND ALSO PACKAGED IN ACCORDANCE WITH EPA REGULATIONS AS SPECIFIED IN 40 CFR PART 761.

1. D.O.T. Hazardous Material? ☐ Yes ☐ No
2. D.O.T. RQ Required: ☐ Yes ☐ No ☐ N/A
3. Proper D.O.T. Shipping Name: _____
4. D.O.T. Hazard Class: _____
5. D.O.T. ID Number: _____
6. D.O.T. Packing Group: _____
7. Additional D.O.T. Description(s): _____
8. Type of Container: ☐ Drum ☐ Bulk Truck
Other (specify): _____
9. Projected Volume: _____ Tons _____ Gallons _____ Cubic _____ Yards _____ Drum(s) _____ Other _____
Per: ☐ One Time ☐ Week ☐ Month ☐ Quarter ☐ Year
10. Comments/Special Handling: _____

SECTION E—GENERATOR CERTIFICATION**CERTIFICATION OF LIQUIDS TREATMENT (for all non-liquid bulk wastes)**

1. If greater than 50 ppm PCB—a PCB Control Sheet is required. (A PCB control sheet must accompany TSCA regulated waste)
2. Solids for Direct Burial.
☐ generated as a solid material containing no free liquids

☐ generated as a bulk liquid or hazardous waste containing free liquids which has been treated to eliminate free liquids in compliance with Section 3004 (c) of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, and the treatment process utilized did not employ the addition of absorbents to the waste (unless used in a stabilization process), and the materials used in the treatment process do not biodegrade or release liquids when compressed.

I hereby certify that as an authorized representative of the generator named above, all information submitted in this and all the attached documents is true and accurate. To the best of my knowledge, all known and suspected hazardous components have been included in this document. All material and packaging will comply with all current regulations and any material profiled under B.9 and being shipped for direct landfill has been determined to be legal for placement in a TSCA permitted landfill.

Signature: _____ Title: _____ Date: _____

Name: _____

(Please Type or Print)

US ECOLOGY USE ONLY

Initial Review: _____ Technical Review: _____ Final Review: _____

Date Approved: _____ Date Denied: _____ Compatibility: _____

Treatment/Disposal Routing: _____

WASTE/SERVICES DESCRIPTION

The following PCB categories indicate the type of waste and services to be performed by US Ecology and final disposal for a particular type of waste (i.e., landfilling on site, or transfer to a permitted treatment/incineration facility). Should you have any difficulty determining which of the below categories accurately describes your PCB wastes, please feel free to call 1-800-239-3943.

CATEGORIES

- A. (1) Any non-liquid PCB, non-reportable spill material in the form of soil, rags, or other debris. Please give a detailed description of debris (i.e. tools, tree branches, rags, or soil).
- A. (2) Any non-liquid PCB, reportable spill material in the form of soil, rags, or other debris. Please give a detailed description of debris (i.e. tools, tree branches, rags, or soil).
- B. Non-liquid dredged materials and municipal sewage treatment sludges that contain PCBs.
- C. PCB transformers (≥ 500 ppm) which have been drained of all free-flowing liquids, filled with a PCB soluble solvent, allowed to stand for at least 18 hours, then drained thoroughly.
- C. (1) PCB transformers (≥ 500 ppm) accepted at US Ecology, which require the draining of all free flowing liquids and the flushing with a PCB soluble solvent in accordance with all, permit requirements and applicable regulations prior to disposal. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- C. (2) PCB transformers (≥ 500 ppm) accepted at US Ecology which have been drained of all free flowing liquids, but require flushing with a PCB soluble solvent in accordance with all permit requirements and applicable regulations prior to disposal. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- D. PCB-contaminated transformers (< 500 ppm) which have been drained of all free-flowing liquids.
- D. (1) PCB-contaminated transformers (< 500 ppm) accepted at US Ecology which require the draining of all free flowing liquids. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- E. Capacitors which have been determined not to contain PCBs as indicated by label or nameplate information, manufacturer's literature, or chemical analysis and have been packaged in containers with sufficient absorbent added.
- F. PCB small capacitors (as defined in 40 CFR 761.3) not owned by any person who manufactures or at any time manufactured PCB capacitors or PCB equipment and acquired the PCB capacitors in the course of such manufacturing and have been packaged in containers with sufficient absorbent added.
- G. Compound transformers and bushings that do not require draining and/or flushing.
- I. PCB hydraulic machines which have been drained of all free-flowing liquids. If the PCB liquid contains 1000 ppm PCBs, then the hydraulic machine must be flushed with PCB soluble solvent prior to acceptance by US Ecology.
- J. Articles (regulators, switches, conductors) drained of all free liquid.
- J. (1) Articles accepted at US Ecology which require draining. PCB liquids removed from the articles shall be disposed of in accordance with Section 761.60
- K. Empty PCB containers.
- M. Any non-liquid, non-regulated PCB spill material (< 50 ppm) from a known source less than 50 ppm PCB. Please give a detailed description of the material (i.e., tools, rags, or soil).
- M.(1) PCB oils & water > 2 ppm, < 50 ppm.
- X. Large PCB capacitors (as defined in 40 CFR 761.3) – require incineration.
- Z. Non-RCRA PCB bulk liquids – require incineration.
- Z/K. Drums which contain non-RCRA PCB liquid > 500 ppm – require incineration.
- Z/L. Drums which contain non-RCRA PCB liquid < 500 ppm – require incineration.

American Ecology Corporation
PCB Control Sheet

Generator: _____

Site Address: _____

City, State: _____

EPA ID #: _____

Page: _____ of _____

Manifest #: _____

For American Ecology Use-Only

Load #:

Received: _____

[illegible]

Explanation:

1. **WSID#:** US Ecology approved waste stream ID#.
2. **Qty:** Enter quantity. **(Idaho Only)**
3. **PKG:** Enter Packaging type-same as container type on manifest.
4. **Type of Material:** Enter description of material. Be specific.
5. **D/F:** Specify if the transformer or article is full (F), drained (D), or drained and flushed (D/F).
6. **Manuf:** Enter the manufacturer. **(Idaho Only)**
7. **Manifest Line#:** For each item, indicate which line # of the manifest it is shipped on.
8. **Serial#/Unique#:** Enter the nameplate serial number for transformers or articles or a unique number for each container.

8. (Note: If there is no nameplate serial#, you must assign a unique number to each container.)
9. **KVA:** Enter the nameplate KVA rating of the transformer or article.
10. **Weight K:** Enter the weight in kilograms.
11. **Dielect Vol:** Enter the nameplate dielectric volume of the transformer or article.
12. **PPM:** Enter the parts per million PCB contained in the material.
13. **OSD:** Enter the date the material was removed from service and designated for disposal [761.65(a), 761.180(a), 761.207(a)].
14. **Category:** Specify US Ecology Beatty Category (see attachment). **(Beatty Only)**
15. **Absorbents Added:** Specify non-biodegradable absorbents added. **(Beatty Only)**

Certification: In order for US Ecology to accept the waste material specified at the US Ecology-Grand View, Idaho or Beatty, Nevada facility the undersigned as an authorized employee of the generating company hereby warrants and certifies to US Ecology that the waste material listed above, delivered to and accepted for disposal by US Ecology shall conform to the above description and that all waste material and packaging shall comply with all current state and federal regulations.

Signature: _____ Title: _____ Date: _____

Note: A completed PCB Control Sheet, including generator's signature, must accompany each shipment of regulated PCB waste.

*Waste as shipped will be: ☐ Industrial ☐ NON - Industrial *(Texas customers only)

Generator:

Facility Address:
(No PO Box)

Mailing Address

City/State/Zip:

Technical Contact:

Phone:

Fax:

NAICS#

☐ CESQG

☐ SQG

☐ LQG

EPA ID#

State ID#

☐ Check if Billing is Same

Billing Company:

Billing Address:

City/State/Zip:

Billing Contact:

Phone No.:

Fax No.:

Email:

1. US DOT Shipping Name

2. Hazard Class

3. UN/NA #

4. Packaging Group

5. RQ

6. Container Type: ☐ Bulk ☐ Totes ☐ Pallet

Size

7. Frequency:

☐ Year

☐ QTR

☐ Month

☐ Boxes

☐ Bags

☐ Drums

☐ Other

Quantity

☐ 1 Time

☐ Other

1. Common name for this waste

2. Process generating the material

(include additional sheets as necessary)

3. Describe Physical Appearance of Waste

4. Describe odor of waste: ☐ None ☐ Slight ☐ Strong Describe:

5. Knowledge is from: ☐ Lab Analysis ☐ MSDS ☐ Process/Generator knowledge ☐ Other (specify)

☐ Yes ☐ No Is the material <500 PPMW VOC as generated

☐ Yes ☐ No Is the waste restricted under EPA Land Disposal Restrictions

☐ Yes ☐ No Waste Subject to Benzene NESHAP regulations

(40 CFR 268), if yes please complete LDR form

☐ Yes ☐ No State waste codes

☐ Wastewater ☐ Non-wastewater ☐ Debris

☐ Yes ☐ No CERCLA Regulated (Superfund) Waste

☐ Yes ☐ No Exempt Waste: If yes, list ref. 40 CFR

☐ Yes ☐ No EPA Haz. Waste (list codes)

☐ Yes ☐ No Contains UHCs/Constituents of Concern: List in section D

☐ Yes ☐ No Has the waste been treated after the initial point of generation?

☐ Yes ☐ No Subpart XX

☐ Yes ☐ No Alternative standards for Soil?

Source Code G

Form Code W

Mgt. Method H

(Range Total > or = 100%) Values are ☐ TCLP ☐ TOTALS

(include additional sheets as necessary)

typical value

unit

range

☐ Yes ☐ No Oxidizer

☐ Yes ☐ No React. Sulfides ppm

☐ Yes ☐ No Explosive

☐ Yes ☐ No React. Cyanides ppm

☐ Yes ☐ No Organic Peroxide

☐ Yes ☐ No Water/Air (Pyrophoric) React

☐ Yes ☐ No Shock Sensitive

☐ Yes ☐ No Thermally Unstable

☐ Yes ☐ No Tires

☐ Yes ☐ No TSCA Regulated PCB Waste

☐ Yes ☐ No Pyrophoric

☐ Yes ☐ No Regulated Medical/Infectious Waste

☐ Yes ☐ No Radioactive**

☐ Yes ☐ No Compressed Gasses

☐ Yes ☐ No Exempt RAD**

**Additional Radiological info is provided in USEI's WAC Addendum

☐ Yes ☐ No Halogenated Organic Compounds? (per 40 CFR 268, Appendix III)

1. Flash Point

°F (if <140°F)

2. Typical pH:

pH Range: ☐ ≤ 2

☐ Yes ☐ No Possibility of incidental liquids from transportation?

☐ >2, <12.50

☐ Yes ☐ No Does waste pass the EPA specified paint filter test?

☐ ≥ 12.5

☐ Yes ☐ No I certify this material may be disposed of without further treatment.

Certification Statement: I certify under penalty of law that I am familiar with this waste stream through analysis and/or process knowledge, and that all information provided is true, accurate, representative and complete, and that all known or suspected hazards have been disclosed.

Furthermore, I certify that this form was completed in accordance with the instructions provided.

Print Name:

Title:

Date:

American Ecology Corporation Land Disposal Restriction Form

GENERATOR: _____ EPA I.D. NUMBER: _____
WASTE STREAM or PROFILE NUMBER: _____ MANIFEST DOC. NO. _____ LINE NO. _____
WASTE IS A: ☐ WASTEWATER ☐ NON-WASTEWATER ☐ DEBRIS
NOTIFICATION FREQUENCY: ☐ ONE TIME ☐ REQUIRED WITH EACH SHIPMENT
EPA WASTE CODES (from 40 CFR 268.40): _____
UNDERLYING HAZARDOUS CONSTITUENTS (from 40 CFR 268.48): _____

A. ☐ **Restricted Waste Meets Treatment Standards (40 CFR 268.7(a) (3))**

The restricted waste identified above meets the treatment standards in 40 CFR 268.40 or Alternative LDR treatment standards for contaminated soil 40CFR268.49 and can be landfill disposed without further treatment. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

B. ☐ **Restricted Waste Treated To Treatment Standards (40 CFR 268.7(b) (1) & 268.7 (b) (2))**

The treatment residue, or extract of such residue, or the restricted waste identified above has been tested to assure that the treatment residues or extract meet all applicable treatment standards in 40 CFR 268.40 and/or performance standards in 40 CFR 268.45. I have attached all supporting analytical data, where available.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

C. ☐ **Restricted Waste With Technology Based Treatment Standards (40 CFR 268.7(b) (4))**

I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40, without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

D. ☐ **Restricted Waste Decharacterized But Requires Treatment For UHC (40 CFR 268.9)**

I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains Underlying Hazardous Constituents (UHC) that require further treatment to meet the universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

E. ☐ **Restricted Waste Subject To Treatment (40 CFR 268.7(a) (2))**

The restricted waste identified above must be treated to the applicable treatment standards in 40 CFR 268.40, or treated to comply with applicable prohibitions set forth in Part 268.32 or RCRA Section 3004(d). I have attached all supporting analytical data, where available.

F. ☐ **Hazardous Debris Subject To Treatment (40 CFR 268.45)**

This hazardous debris identified above must be treated to the alternative treatment standards in 40 CFR 268.45.

G. ☐ **Restricted Waste Subject To A Variance or Extension (40 CFR 268.7(a) (4))**

This restricted waste identified above is subject to a case by case exemption under 40 CFR 268.5, an exemption under 40 CFR 268.6 or a nationwide capacity variance under Subpart C of 40 CFR 268, and is not prohibited from land disposal. LDR prohibitions become effective on _____ (date) for this restricted waste. The corresponding treatment standard(s) are promulgated in 40 CFR 268.40. I have attached all supporting analytical data, where available.

H. ☐ **Restricted Waste Managed In A "Lab Pack" (40 CFR 268.7(a) (9))**

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only waste that have been excluded under appendix IV to 40 CFR Part 268 and that this lab pack may be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

I certify and warrant that the information that appears on this form, and appended documents, is true and correct. I have correctly indicated how my waste is to be managed in accordance with 40 CFR 268. My certification is based on personal examination of the information submitted, or is based on my inquiries of those individuals responsible for obtaining the information.

Authorized Signature _____ Title _____ Date _____

UHC list from 40 CFR Part 268.48 available upon request

Attachment 4

Spill Prevention Control and Countermeasures Plan



US Ecology Nevada

US ECOLOGY NEVADA, INC.

BEATTY, NEVADA

EPA ID#: NVT 330 010 000

PCB PROCESSING FACILITY SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

April 2010

**US ECOLOGY NEVADA, INC.
PCB PROCESSING FACILITY SPCC PLAN**

SPCC Plan Certification Sheet

Facility Name:

US Ecology Nevada, Inc. PCB Processing Facility, Beatty, Nevada

Facility Location:

US Ecology Nevada, Inc.
US 95, 12 miles South of Beatty
Beatty, Nevada 89003

Owner Mailing Address:

US Ecology Nevada, Inc.
P.O. Box 578
Beatty, Nevada 89003

Designated Person Responsible for Spill Prevention:

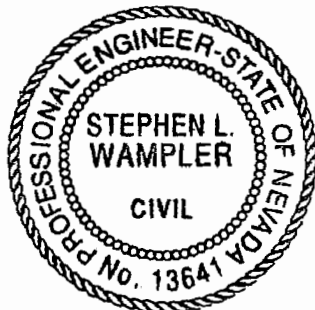
Environmental, Health and Safety Manager

Facility Manager

Name: Scott Wisniewski
Address: US 95, 12 miles South of Beatty
Office Phone: 800-239-3943
Emergency Phone: 775-553-2203

Bob Marchand
US 95, 12 miles South of Beatty
800-239-3943
702-280-2596

Certification: I hereby certify that I have examined the facility and being familiar with the provisions of 40 CFR, Part 112 attest that this SPCC Plan, dated April 2010, has been prepared in accordance with good engineering practices. Any modifications to this plan should be reviewed by a professional engineer, and this title sheet updated to reflect the modifications.



Name Stephen L. Wampler

Date: 19 April 2010

Registration # 13641 / Nevada

**US ECOLOGY NEVADA, INC.
PCB PROCESSING FACILITY SPCC PLAN**

Purpose

This SPCC Plan has been prepared in accordance with 40 CFR 112 as required by 40 CFR 761.65(c)(7)(ii) and establishes the facility procedure methods and equipment necessary to prevent the discharge of PCB-contaminated liquids and oil from the US Ecology Nevada, Inc. PCB processing facility.

Introduction

US Ecology Nevada, Inc. operates a PCB processing facility located on US Highway 95, 12 miles south of Beatty, Nevada. Facility operations consist of draining transformers and other electrical equipment of PCB oil and, if required, flushing the equipment with approved solvents, thereby reducing the PCB concentration within the equipment to levels mandated by Federal law as acceptable for disposal. The Facility also receives drummed PCB-contaminated solids that are stored prior to disposal.

PCB-contaminated liquids are stored inside the fully enclosed PCB Containment Building (PCB Building) or within the uncovered PCB Holding Storage Tank Area (PCB Tank Area) for transportation off-site to an approved destruction facility. All electrical transformers and other equipment upon being drained and/or flushed is disposed on-site or sent to an approved off-site disposal or destruction facility.

The PCB processing facility consists of 1 building and associated outside tank storage area. All operational areas are contained within the facility chain-link security fence. All PCB liquids are handled and stored within this controlled area.

The person responsible for PCB processing facility operation, including spill prevention and response, is the Facility Manager (FM).

US ECOLOGY NEVADA, INC.
PCB PROCESSING FACILITY SPCC PLAN

Personnel Training

The FM or his designee will ensure that all operational personnel are properly trained. Training shall include, but not be limited to the following:

- Operation and maintenance of all equipment associated with PCB operations.
- Location and operation sequence of all waste feed and flushate feed systems.
- Proper use of respiratory and personnel protective equipment.
- A review of contamination control and decontamination procedures.
- A review of proper spill control and response measures as related to this SPCC Plan.

An annual safety meeting on the requirements of the SPCC Plan will be conducted with facility personnel and documented per the Facility Training Plan.

The FM or his designee will ensure that no employee is allowed to take part in PCB operations unsupervised without having the above training.

The FM or his designee will ensure that no employee is allowed to take part in PCB operation without proper respiratory and personal protective equipment.

At all times, personnel will take full precautionary measures to minimize contact with PCB materials.

Process Area Entry and Egress

Upon arrival at the facility compound, all PCB Building employees will change from their street clothes to their work clothes and safety shoes and proceed to the PCB Building.

Prior to entering the processing area of the PCB Building or PCB Storage Tank Area, all employees will don required respiratory and personal protective equipment.

Prior to egressing the PCB processing area, employees will remove their Tyvek® protection equipment and dispose of them in the designated container. They then will remove their

US ECOLOGY NEVADA, INC.
PCB PROCESSING FACILITY SPCC PLAN

chemical gloves and dispose of them in the designated container. Finally they will remove their respiratory protection. They will immediately egress the operational area.

Chemical resistant suits, if not ready for disposal, will remain in the process area for reuse until the end of the service life.

No contaminated equipment will be taken out of the controlled area or outside the building without first being decontaminated. For non-routine entrance and egress of vehicles, plastic sheeting may be used under the direction of the Building Supervisor or his/her designee with concurrence of site management.

Employees will change from their work clothes to their street clothes prior to leaving the facility for the day.

Plan Modifications

This SPCC Plan will be subject to modification whenever there is a change in facility design, construction, operation or maintenance which affects the facility's potential for discharge. Modifications will be under the guidance of the FM or his designee with engineering review and will be implemented no later than 6 months after the review.

A review of this plan for evaluation of effectiveness will be made at a minimum every 5 years. Modifications of the plan based on this evaluation will be implemented within 6 months of the review.

To the extent required by 40 CFR 761.65 and 40 CFR 112, SPCC Plan modifications will be evaluated and certified by a Professional Engineer registered in the State of Nevada.

Facility Drainage/Containment/Storage

The land on which the facility is constructed is located in the Amargosa Desert with no possibility of drainage to flowing surface-water bodies, navigable or otherwise, except under

US ECOLOGY NEVADA, INC.
PCB PROCESSING FACILITY SPCC PLAN

extreme precipitation conditions greatly exceeding the design storm (i.e., 25-year, 24-hour storm).

All PCBs are processed within a fully enclosed and contained area and all outside PCB liquid storage tanks are located within a contained area. PCB operations normally are conducted during daylight hours.

All PCB Articles and Containers are processed within a controlled containment area inside a metal building. PCB Articles and Containers housed within the PCB Tank Area are within a contained area that prevents contact between PCB-contaminated liquids and area surface water. PCB-contaminated liquids are kept separate from the facility surface-water drainage system. The run-off of precipitation from the PCB Building roof and facility grounds drains to areas outside of the PCB containment areas. This run-off water does not come in contact with PCB Articles or Containers.

All containers, piping, and containment system components (tanks, liners, sealants, concrete, etc.) are compatible with the PCB materials and are not degraded by contact with those materials.

PCB Bulk Liquid Storage

The PCB Bulk Liquid Storage Area (PCB Tank Farm) consists of 5 tanks, all horizontally mounted on raised concrete cradles or footings, as shown in the drawings in **Appendix 2**. The tanks are located in a 45-feet by 45-feet containment area with a 1.5-feet high containment wall. The containment area floor and walls are constructed of reinforced concrete. The concrete floor and walls are not penetrated by pipes, conduits, or drains. The concrete floor of the PCB Tank Farm is sloped to a 48-inch by 48-inch by 18-inch deep sump pit. There is no drain or other penetration of the sump pit floor or walls. Liquids collecting in the sump pit will be removed by pumping for proper management.

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All of the containment system components (e.g., tanks, pipes, and concrete and joint sealants) in contact with PCB-contaminated liquids are compatible with the waste that is stored within the PCB Tank Farm and are not degraded by contact with those materials.

The precipitation event considered in the design of the PCB Tank Farm is the 25-year, 24-hour storm. At the facility location, the 25-year, 24-hour storm event is a 2-inch rainfall. This rainfall amount was considered in the design of the PCB Tank Farm containment structure should the design storm occur during a tank failure.

Containment Capacity (as required by 40 CFR 761.65(b)(1)(ii))

Capacities of tanks within the PCB Tank Area:	2 tanks (5,000 gal. each)
	2 tanks (7,500 gal. each)
	1 tank (3,000 gal. each)
Total volume =	28,000 gallons

Containment capacity required is the larger of:

25% of total liquid storage capacity = 25% of 28,000 gallons = 7,000 gallons

200% of liquid storage capacity of largest tank = 2 x 7,500 gallons = 15,000 gallons

Containment capacity required by 40 CFR 761.65(b)(1)(ii) = 15,000 gallons

USEN conservative determination of PCB Tank Farm containment holding capacity

= 15,000 gallons + design storm precipitation

Design Storm precipitation volume = $[2 \text{ in} / 12 \text{ in/ft}] \times 45 \text{ ft} \times 45 \text{ ft} \times 7.48 \text{ gal/cu ft} = 2,524.5 \text{ gals}$

Minimum containment capacity required = 17,524.5 gallons

Containment capacity available = 45 ft wide by 45 ft long by 1.5 ft deep
= 3,038 cu ft x 7.48 gal/cu ft
= 22,720.5 gallons*

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- * Actual total capacity is somewhat greater since containment depth at low point (sump pit) actually is 23 inches.

22,721 gallons > 17,582 gallons, liquid holding capacity satisfies 40 CFR 761.65(b)(1)(ii)

Excess capacity is $22,721 - 17,525$ gallons = 5,196 gallons

5,196 gallons is equivalent to 4.1 inches of freeboard above the design liquid height

The PCB bulk storage tanks are equipped with visible liquid level gauges that are integrated into an audible alarm system inside of the process building to indicate when tanks are approaching maximum holding capacity. The alarms are tested every 2 months.

All storage tanks, including the vacuum tank, are equipped with manual cut-off valves at the tank intakes.

PCB Storage Area

The process and storage area inside the PCB Building is positioned over a liner system that, from bottom to top, consists of a minimum of 6-inches of clean sand cushion, 2 30-mil HDPE liners separated by 6 inches of clean sand, a protective 125-mil polyester filter fabric layer, and a final 1.0-foot thick sand layer.

The floor of the PCB Building contains no drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to escape. The epoxy-coated, non-porous concrete floor contains continuous 6-inch high curbing to prevent PCB-laden liquids from escaping. The following calculations document that the liquid holding capacity of the PCB Building floor and curbing.

Building berm containment capacity:

Capacity required is the larger of: 1) 25% of total liquid holding capacity of PCB Articles and Containers housed or temporarily storage inside the PCB Building, or 2) 200% of the liquid holding capacity of the largest PCB tank or container housed or stored inside the PCB Building.

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$$\begin{aligned}\text{Capacity available:} &= 48 \text{ ft wide} \times 100 \text{ ft long} \times 0.5 \text{ ft high containment curb} \\ &= 2,400 \text{ cu. ft.} \times 7.48 \text{ gal/cu. ft.} \\ &= 17,952 \text{ gal}\end{aligned}$$

There are no large tanks or containers permanently or temporarily housed in the PCB Building. Therefore, the containment volume defines the maximum total capacity of PCB liquid containers that can be stored in the building. Based on the containment capacity of 17,952 gallons, the allowable total liquid storage capacity in all containers containing PCB is 4 times 17,952 gallons, or 71,808 gallons liquids. USEN will operate the PCB processing and storage area in a manner such that the total liquid holding capacity of PCB Articles and Containers permanently or temporarily housed inside the PCB Building never exceeds a maximum volume of 71,808 gallons.

The PCB Building contains 5 drain and flush stations, each equipped with separate segregated piping (see **Figure 1**). There is a vacuum line for draining and 1 feed line for the addition of flushing liquid. The PCB liquid flows first to the vacuum tank and then is pumped to 1 of the 4 temporary storage tanks. The flush line flows directly from the diesel storage tank to the station. There is no possibility of cross-over contamination between PCB liquids and clean flushate.

Each PCB drain and flush station is equipped with high pressure, oil resistant vacuum hose with cam lock quick disconnects for draining. Valves/lines are closed/capped when not in use for extended periods of time. The stingers are made of PVC to allow quick length modifications. The lines that contain PCBs are located out of the way of traffic patterns to prevent possible damage by vehicles.

Manual cut-off valves are located at the stinger/hose connection, hose/mainline connection, inlet to the vacuum tank and at all inlets to the 4 storage tanks.

All of the containment system components (e.g., tanks, pipes, concrete sealant, and HDPE liners) are compatible with the waste that is stored within the PCB Building.

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All small incidental spills that occur during draining, and flushing operations will be cleaned up at the end of each operating day. All small spills will be cleaned up with "floor-dri" material and placed in a drum for subsequent disposal. Collection of incidental spill material will be performed with shovels, brooms, and spill pillows or other absorbent material. Spill kits are maintained within the PCB Building and available for use by PCB operations personnel.

In the event that a larger spill occurs within the PCB Building, all feed lines to the storage tanks will be closed, if required, and all processing operations will cease. Immediate clean-up measures will be conducted under the supervision of the FM or his designee. The FM or his designee will ensure that all personnel involved in any spill clean-up procedures are properly outfitted with the necessary personal protective equipment.

The spilled liquid will be bermed and confined to as small an area as possible prior to clean-up. As much of the liquid as practical will be removed in liquid form and placed in the appropriate PCB tanks. Solidification will be performed on only the liquid volume that cannot be practically transferred into the tanks.

If the spill or leak involves a PCB bulk storage tank, or associated piping, the feedline cut-off will be isolated, and the tank or line will be immediately patched and emptied until permanent corrective action can be completed.

If the volume of standing liquid is too great for drumming, a contractor will be summoned to remove the liquid for approved off-site processing.

The FM or his designee will continually monitor the incident by observation for signs of further release.

When the spill has been stabilized, the FM or his designee will immediately notify all other site management who will ensure that the appropriate state and federal authorities are contacted.

When remedial clean-up operations are completed, all contaminated materials and equipment that are not suitable for decontamination will be placed in DOT-approved containers for disposal.

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Equipment that is suitable for decontamination will be decontaminated in accordance with standard facility procedures before being released for reuse.

PCB Storage

All storage holding tanks are equipped with liquid level gauges, and audible maximum gallonage alarms.

Prior to the initiation of the draining and flushing operation, the liquid levels of the storage tanks will be checked for sufficient available volume.

All PCB Articles and Containers placed in storage for disposal will be marked with the date the items were first placed into storage.

No PCB will be stored for more than 1 year under any circumstances.

An annual tank thickness test will be performed on all outside PCB storage holding tanks

PCB Tank Truck Loading

All loading of PCB-contaminated liquids for off-site disposal or destruction will be done on the PCB Tank Truck Loading Pad (Truck Pad). The Truck Pad is a 12-feet wide by 56-feet long reinforced concrete pad. All portions of the Truck Pad are sloped to drain to a 48-inch by 48-inch by 18-inch deep sump pit. There is no drain or other penetration of the sump pit floor or walls. Liquids collecting in the sump pit as a result of drips or spills occurring during tanker truck loading operations, or from precipitation, will be transferred by pump to the appropriate PCB liquid holding tank for appropriate management.

The Truck Pad is designed for loading tanker trucks up to 10,000 gallons in capacity. The Truck Pad and sump pit provide a liquid holding capacity of about 1,175 gallons. For the purposes of spill prevention, the loading of tanker trucks will be under the direction of the PCB building supervisor or designee. Since the truck unloading operation always will be conducted and monitored by trained US Ecology operations personnel, the pad will be expected to contain only

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incidental drips and spills. In the event of larger spillage, tanker loading operations will be terminated immediately by the operator(s) present. Also, loading operations will be conducted during daylight hours and not during significant rainfall events. Since the Truck Pad will be intended to contain only minor drips and spills, the 1,175 gallon holding capacity is judged to be sufficient.

The Truck Pad and sump pit are designed to contain the water volume that would be collected during the design storm (25-year, 24-hour storm). The 2-inch design storm would generate approximately 840 gallons of water.

All tanker trucks receiving PCB waste at the facility will meet applicable DOT requirements.

When tank trucks are positioned for loading they will be barricaded to prevent departure before complete disconnect of transfer lines. Facility personnel will be present during transfer operations. Transfer lines will be capped, and appropriate valves secured after the transfer has been completed.

All small incidental spills which may occur during tank truck loading will be immediately cleaned-up and placed in appropriate DOT approved containers.

All large spills of PCB will be addressed according to Section 3.2 of the Facility Contingency Plan and remediated per the requirements of 40 CFR 761.125

Security

The facility is fully enclosed by a 6-feet high chain-link fence that surrounds the entire US Ecology facility. All gates are closed and locked during non-operational hours.

Inspection and Recordkeeping

The processing area, all PCB Articles and Containers in storage and all storage tanks will be inspected biweekly (every 2 weeks). See example Biweekly Inspection Form (**Appendix 1**).

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This form will be maintained in a binder for recordkeeping reference by the Facility Manager or his designee. All inspection items which are found to be deficient will have corrective action taken immediately and this action will be so noted on the inspection form.

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FIGURE 1

PCB BUILDING AND DRAIN AND FLUSH STATION LAYOUT

April 2010

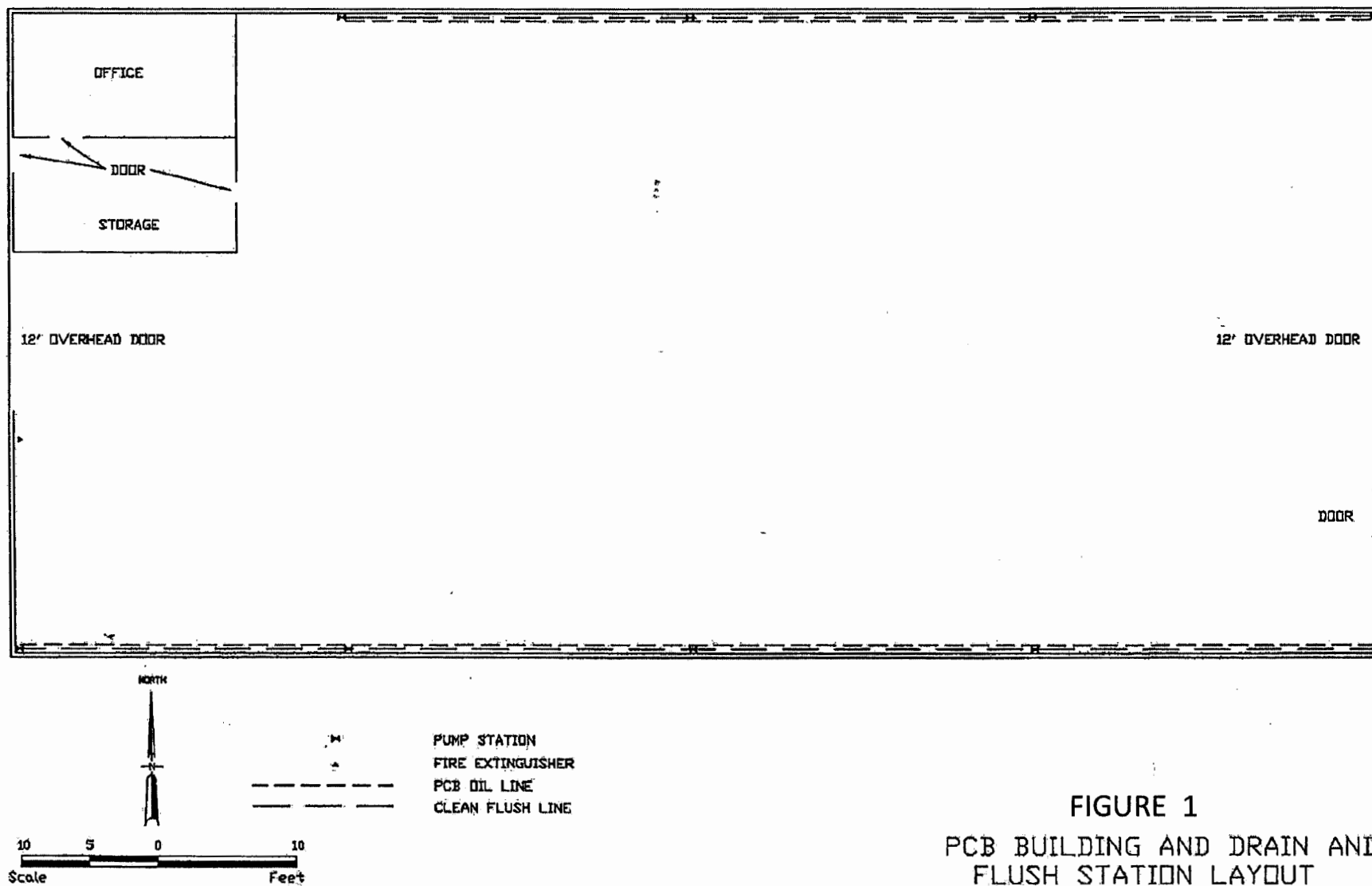


FIGURE 1
PCB BUILDING AND DRAIN AND
FLUSH STATION LAYOUT

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APPENDIX 1

BIWEEKLY PCB BUILDING INSPECTION REPORT

April 2010

US ECOLOGY NEVADA, INC.

BIWEEKLY PCB BUILDING INSPECTION REPORT

DATE: _____

TIME: _____

INSPECTOR: _____

INSPECTED ITEMS		SATISFACTORY	
		YES	NO
A. PCB PROCESSING AND STORAGE			
1	Audible alarms (in working order)		
2	Storage tanks (corrosion, erosion, or leaks)		
3	Valves, lines, and fittings (corrosion, erosion, or leaks)		
4	PCB processing/storage area (Signs of spills, leaks, or deteriorated/damaged containers)		
5	All PCB items, articles, and containers in storage are properly labeled and identified		
6	All PCB containers in storage are within seven months of their accumulation start date		
B. RCRA STORAGE			
1	RCRA container storage (signs of leaks, spills, or damaged/deteriorated containers, open containers in storage)		
2	All RCRA waste in storage is compatible with stored PCB waste		
3	All RCRA containers in storage are properly labeled, marked, and identified		
4	All RCRA containers in storage are within seven months of their accumulation start date		
C. GENERAL			
1	General housekeeping (trash, debris, etc.)		
2	Run-on/run-off controls (sloughing or erosion of berms)		
3	Concrete flooring and containment for expansion cracks, corrosion, and other signs of deterioration		
4	All required safety equipment present in proper working condition and properly stored		
5	All RCRA/PCB containers palletized and stored with a minimum three-foot wide aisle space		
6	Emergency shower/eyewash functional		

Any items which have been determined as "Unsatisfactory" shall be noted in the remarks section with an explanation and corrective action to be taken.

***Remarks/Corrective Action:**

* If corrective action is taken, include action taken, date completed and name of individual taking the action.

Reviewed By: _____

Date: _____

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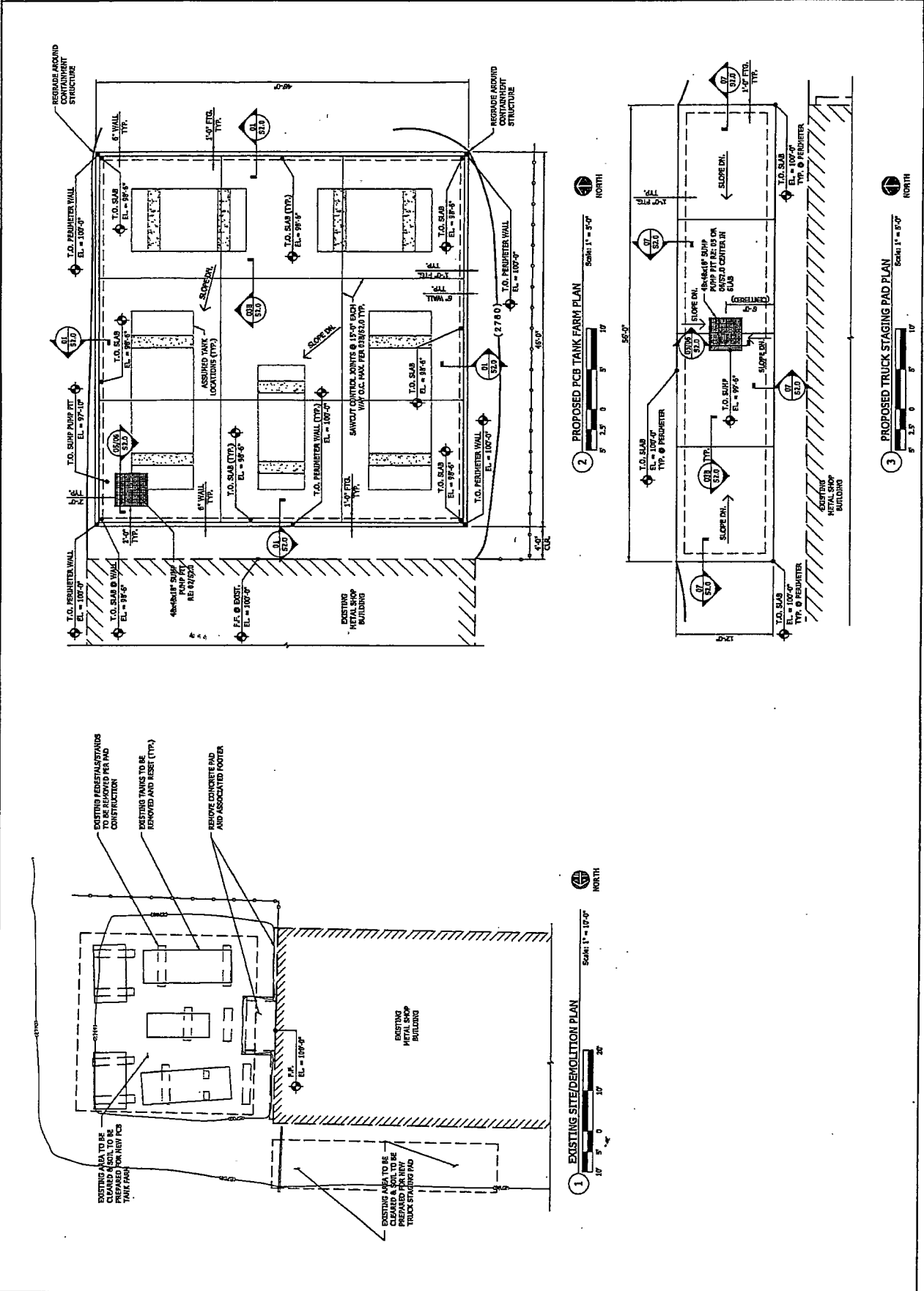
APPENDIX 2

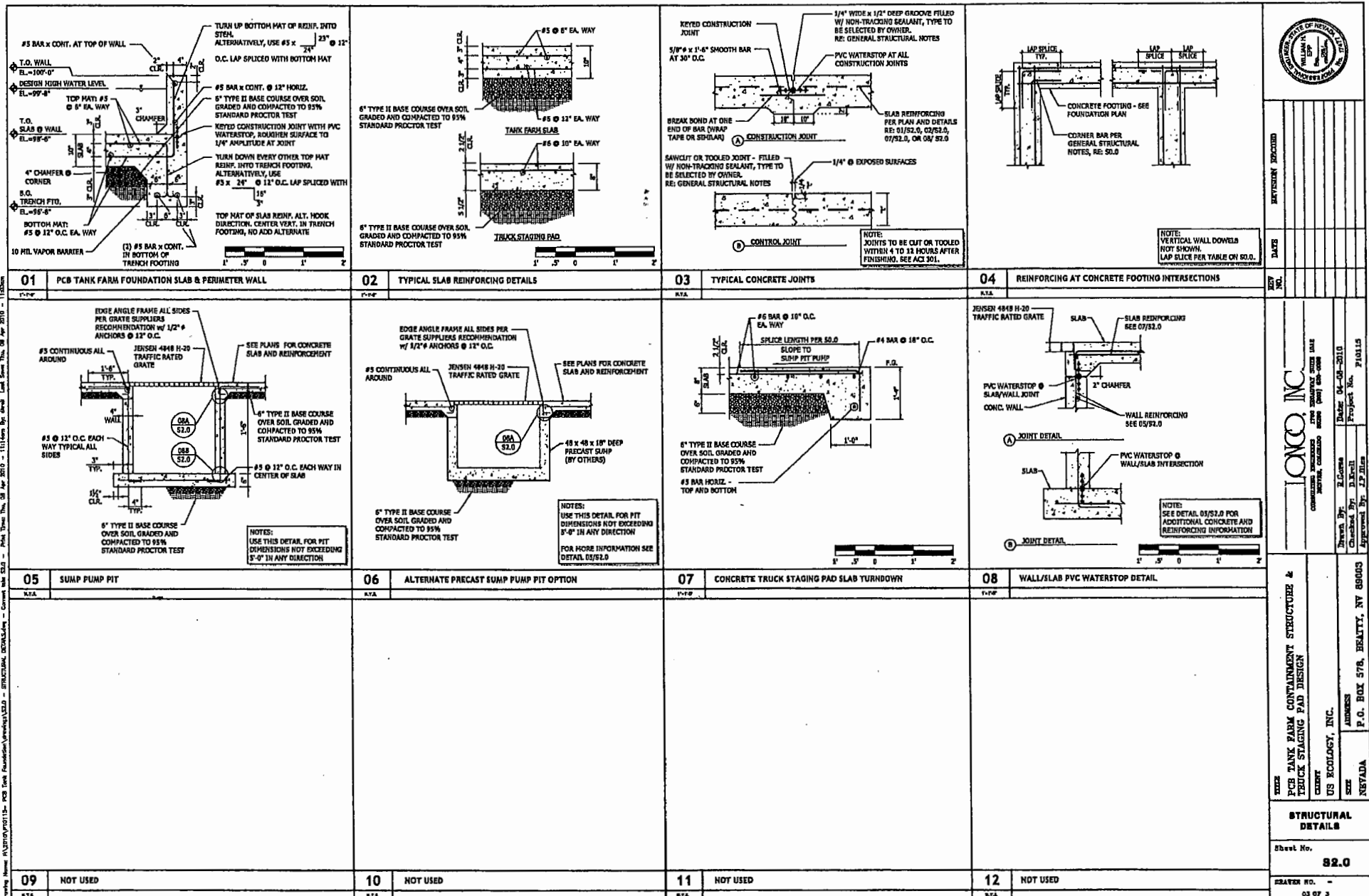
PCB STORAGE TANK AREA DESIGN DRAWINGS

April 2010

Test No. **80.0**

SAVER NO. -
01 OF 3





Attachment 5

Recordkeeping and Reporting Plan

US ECOLOGY NEVADA

**RECORDKEEPING AND REPORTING
PLAN**

Revision 3
February 2011

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Appendix 1 – US Ecology Reporting Summary Table

RECORDKEEPING AND REPORTING PLAN

This plan describes the procedures and mechanisms that US Ecology Nevada (USEN) has established to comply with the recordkeeping and reporting requirements of 40 CFR 761 Subparts J and K. Unless otherwise specified, US Ecology will maintain copies of the records or reports described in this section for at least 20 years after the chemical waste landfill is no longer used for the disposal of PCBs

1.0 MANIFEST SYSTEM

All incoming hazardous waste receipts are to be accompanied by a hazardous waste manifest, signed and dated by the generator or broker. The shipment and manifest will be inspected in accordance with the verification inspection procedures described in the Waste Analysis Plan to ensure that the waste received matches the manifest description, and to identify significant discrepancies, if any. All weight variations greater than ten (10) percent (for bulk waste) or in a piece count (for containerized shipments) are considered a significant discrepancy, and will be noted on each copy of the manifest. Obvious differences in waste type (color, presence of liquids in shipments expected to be solid, etc.) are also considered discrepancies, and will be noted.

Upon discovery of a significant discrepancy, the facility will complete the Unusual Occurrence Report. The facility will attempt to reconcile the discrepancy by contacting the waste generator by telephone. If the discrepancy cannot be resolved, the waste will be returned to the generator.

If no discrepancy is noted during the waste verification process, each copy of the manifest will be signed and dated, acknowledging waste receipt. A copy of the signed manifest will be given to the waste transporter prior to departure from the facility, and a copy will be mailed to the generator within thirty (30) days after the delivery. The facility will retain a copy of each manifest for at least three (3) years from waste shipment delivery.

Outgoing shipments of hazardous waste (i.e., on-site generated wastes, or wastes brokered to off-site hazardous waste management facilities) will also be accompanied by a manifest. Completion of the manifest will be conducted following the instructions specified in the Appendix to 40 CFR 262, or 40 CFR §761.207 - §761.208 of the TSCA Regulations. US Ecology will designate on the manifest the facility which is permitted to handle the waste described on the manifest and an alternate facility in the event that an emergency prevents

delivery to the primary designated facility. If the transporter is unable to deliver the waste to the designated or alternate facility, the transporter will be instructed to deliver the waste to another designated facility or to return the waste.

The manifest will be signed at the time of shipment, and a handwritten signature of the initial transporter (with date of acceptance) obtained. A copy of the signed manifest will be retained for three years, or until the signed copy from the designated off-site facility is received. This signed copy will be retained as a record for at least three years from the date the waste was accepted by the initial transporter. USEN will contact the initial transporter and/or the designated facility inquiring about the status of the shipment if a copy of the manifest signed by the off-site facility is not received within 35 days of the date the waste was accepted by the initial transporter. An Exception Report will be submitted to the NDEP Administrator if the copy of the signed manifest is not received within 45 days.

2.0 WORK ORDER SYSTEM

Prior to acceptance of any hazardous waste shipment received at the facility, a hazardous Waste Work Order, or equivalent, will be initiated. The following is a discussion of the Work Order system and a description of all the items that constitute the Work Order package.

2.1 Work Order Log Book

The Work Order Log Book will be used to track each hazardous shipment arriving at the facility, and to ensure that all required attachments of the Work Order Paperwork Package are included. Each approved waste shipment is assigned a Work Order Number upon their arrival at the facility. The Work Order Log Book will contain a column for the Work Order Number, customer/generator name, date of verification analysis receipt, dates of PCB destruction certificates

receipt, date the Work Order was completed, and initials of the Work Order data entry person.

2.2 Work Order

The Work Order is the central document of the paperwork package and will be utilized for each shipment that arrives at the facility, or in the case of multiple daily shipments of the same waste stream, a single Work Order Number can be assigned on a daily basis. The Work Order is a one (1) page document which may be used for a variety of functions, including:

- Scheduling receipt of a waste shipment;
- Exchange, placement or removal of waste containers;
- Inspecting a waste shipment manifest for completeness and errors
- Recording the disposal location of the waste;
- Noting that the waste data was entered on the computer and the individual responsible for entering the data;
- Noting that the customer was billed for disposal and/or other services, and the amounts invoiced;
- Noting the initial inspection of the waste and containers prior to unloading, and the individual performing the inspection;
- Verifying that sampling and analysis of the waste was performed, and the individual who conducted it;
- Noting any unusual occurrences, and recording actions taken;
- Identifying any special safety or disposal requirements;

2.3 Work Order Supplement

The Work Order Supplement is a one (1) page document used to record or verify functions such as:

- Weighing in and out of waste transport vehicles;
- Inspection of vehicle and waste during unloading;
- Sampling of waste and type of samples to be obtained;
- Cell or storage area in which the waste is to be placed;
- Cell coordinates for waste location (for disposal operations);
- Disposal of waste
- Decontamination of waste transport vehicle.

2.4 Waste Stream Approval

Prior to scheduling a waste shipment, the facility will verify by accessing the information system that the waste stream has been approved for acceptance. A copy of the approval page and waste characteristics will be printed and attached to the Work Order. This will assist in preventing the accidental scheduling of expired or unapproved waste streams, and allows the Compliance Manager and/or Receiving Technician review of the waste properties prior to arrival.

2.5 Uniform Hazardous Waste Manifest

The Uniform Hazardous Waste Manifest is required by federal and state regulations to accompany waste shipments arriving or leaving the facility. The Receiving Technician (or designee) will thoroughly review the manifest for proper completion. Information on incoming manifests will be compared with the waste characteristics printout prior to accepting the waste.

2.6 PCB Log Book

The PCB log book provides a method of tracking the off-site destruction of PCB material. The PCB Log Book will include the Work Order, quantity of solids generated on each Work Order, the date the material

material is shipped off-site for destruction, outgoing manifest number, and name of the off-site destruction facility. The Work Order Number will be recorded in the space provided for each shipment.

2.7 Waste Produce Questionnaire Form

The customer/generator will provide the technical review staff with a completed Waste Product Questionnaire form (commonly referred to as a profile) for review and approval prior to shipment to the facility. A copy of the profile completed by the customer/generator must be attached to the manifest received with the waste shipment. Upon receipt of the shipment, the profile approved by the technical review staff will be compared to the copy attached to the manifest to ensure that no unapproved waste is received

2.8 Unusual Occurrences Report

The Unusual Occurrences Report form is used to describe any unusual occurrence or problems which may occur at the facility and to document any follow-up actions. The completed report will be attached to the Work Order package.

2.9 Chain-of Custody Record/Laboratory Request

All waste stream samples shipped to an off-site laboratory for further verification analysis will be accompanied by the Chain of Custody. This triplicate form provides proper documentation concerning the sampling and shipment of waste samples to the laboratory. The original copy will be returned to the facility laboratory, for inclusion into the Work Order package and a copy will be retained at the facility laboratory.

2.10 Record of PCB Building Operations

This form will be used to record the information necessary for accurate recordkeeping, as required by state and federal regulations. The form is designed to record the required information by Work Order Number, and can be used when more than one waste stream number arrives with the shipment. Upon completion, the form will be incorporated to the Work Order package.

2.11 Work Order PCB Destruction Certification Form

This form provides documentation to the Work Order Log coordinator that the PCB waste shipped off-site has been destroyed. This form will be completed by the individual responsible for the draining and flushing operation. Upon receipt of the Certificate of Destruction from the PCB destruction facility, one form will be completed for all applicable Work Orders. A copy of the Certificate of Destruction will be attached to the Work Order package.

3.0 OPERATING RECORD

The facility will maintain or have available the following information as part of the operating record:

- Description of each hazardous waste received at the facility, quantity, method(s) and date(s) of treatment, storage, or disposal. The waste description will include all applicable EPA hazardous waste numbers.
- Work Order System paperwork - The Work Order System is the mechanism employed by USEN to document the movement of each hazardous waste shipment received at the facility and its final disposition.
- Map of the facility identifying the location and size of each disposal cell included. The location of waste within the disposal unit will be described with respect to permanently surveyed benchmarks
- Records and results of waste characterization and analysis required, as described in the Waste Analysis Plan.
- Summary reports and details of incidents that require implementation of the Contingency Plan. Implementation of the Contingency Plan is documented using the Unusual Occurrence Report.
- Generator notification/certification forms, as required by 40 CFR 268, on every Land Disposal Restricted (LDR) waste stream accepted at the facility for treatment, storage, or disposal. These notification forms will be maintained at the facility for a minimum of five (5) years after waste receipt.

- Copies of 40 CFR 268 notification/certification forms for every on-site generated waste subject to the Land Disposal Restrictions. Copies of these notifications will be maintained as part of the operating record for at least five (5) years.
- All signed manifests generated or received at the facility during the calendar year.
- All Certificates of Disposal that have been generated or received by the facility during the calendar year. For each shipment of manifested RCRA or PCB waste that is received at USEN a Certificate of Disposal (CD) will be prepared. The information included on the CD will include the identify of the disposal facility, the identity of the waste affected by the CD including reference to the manifest it was shipped on, dates of disposal and disposal process used and lastly a certification statement.
- Records and results of facility inspections, as described in the Facility Inspection Plan.
- Training records on current and former employees, as described in the Training Plan. Records on current employees will be maintained until closure of the facility.
- For all hazardous debris treated by any extraction technology that does not exhibit any hazardous waste characteristic and is therefore excluded from further regulation under the RCRA program, the facility will maintain documentation of all inspections, evaluations, and analysis employed in determining compliance with the treatment standards, along with any data or information obtained during treatment that identifies key operating parameters of the treatment unit. A signed certification of compliance with the treatment standards will also be prepared

be prepared and placed in the operating record for each shipment of treated debris.

- Records of the precautions observed to prevent violent reactions and/or extreme heat generation, toxic mists, fumes or gases while managing ignitable, reactive or potentially incompatible waste streams.
- Monitoring, testing and analytical data obtained in compliance with 40 CFR 264, Subpart F requirements, as described in the Groundwater Monitoring Plan.
- Notices to generators that the facility has appropriate permits required to accept their waste for treatment, storage and/or disposal.
- Current closure and post closure cost estimates as required by 40 CFR 264.144.
- Annual certification that the proposed method of treatment, storage, and disposal is the practicable method currently available that minimizes present and future threat to human health or safety, and to the environment.
- Annual certification that the facility has a program in place to reduce the volume and toxicity of on-site generated hazardous wastes to an economically practicable degree.
- A copy of the procedure used to determine that containers with a capacity of 119 gallons or greater which do not meet applicable DOT regulations as specified in 264.1086(f), are not managing hazardous waste in light service. This procedure shall be written prior to any waste being handled in a container as described above.

- For waste streams, managed in a container subject to 40 CFR 264 Subpart CC regulations, which do not require the use of air emission control equipment, documentation shall be recorded and maintained in the operating record that includes the information that was used by the Permittee for each waste determination (e.g. test or certification by the generator). If analysis results for waste samples are used for the waste determination, then the Permittee shall record the date, time, and location that each waste sample is collected in accordance with applicable requirements in 40 CFR 264.1083.
- For containers used at the facility to manage hazardous wastes subject to 40 CFR 264 Subpart CC regulations, sufficient information shall be provided to describe:
 - (1) A facility identification number for the container or group of containers;
 - (2) The purpose and placement of this container, or group of containers, in the management train of the hazardous waste;
 - (3) The procedures used to ultimately dispose of the hazardous waste handled in the containers.

4.0 REPORTING MECHANISMS

Attachment 1 includes a summary table of reports submitted to either NDEP or EPA.

4.1 Monthly Reports

A chemical and PCB waste disposal activity report will be prepared and submitted to the Nevada Division of Environmental Protection on the last working day of each month covering activities during the previous month. The report will include the following information:

- total quantity and type of chemical and PCB waste disposed during the month (in tons and cubic feet)
- waste classification and corresponding fee category
- remaining capacity left in the active cell
- name and address of each generator
- a description of any unusual events related to chemical waste disposal which occurred during the month

4.2 Annual Reports and Logs

Annual RCRA Report

By March 1st of every year, the facility will submit an annual report describing facility activities during the previous calendar year. This report will include the following information:

- EPA identification number of each hazardous waste generator from which the facility received hazardous waste,
- a description and quantity of all waste received (in tons and cubic feet),
- the method of treatment, storage or disposal,
- unusual occurrence reports and summaries of their quarterly reviews,
- the most recent closure and post-closure cost estimate (including complete cost itemization), and
- signed certification.

Annual PCB Document Log

By July 1st of every year, the facility will submit an annual PCB

document log for the previous calendar year. This report will include the following information from 40 CFR § 761.180(b):

- Name, address and EPA ID number of the facility
- For each manifest generated or received by the facility, the unique manifest number and the name/address of the facility that generated the manifest
- For bulk PCB waste, its weight in kilograms, date it was placed into container or removed from service, received date, date it was placed in transport for off-site disposal (if applicable), and the date of disposal (if known).
- For non-bulk PCB material, the serial number or other unique identifier of each PCB article or container, the weight in kilograms, out of service date, received date, date it was placed in transport for off-site disposal (if applicable) and the date of disposal (if known).

Annual PCB Report

By July 15th of every year, the facility will submit an annual PCB report for the previous calendar year. This report will include the following information from 40 CFR § 761.180(b)(3):

- The name, address, and EPA ID number of the facility covered by the annual report.
- A list of the numbers of all signed manifests of PCB waste initiated or received by the facility.
- The total weight in kilograms of bulk PCB waste, PCB waste in transformers, PCB waste in capacitors, PCB waste in PCB articles and PCB waste in PCB containers, in storage at the facility at the beginning of the year, received, transferred and disposed of at the facility during the calendar year.
- The total number of PCB transformers, PCB capacitors, PCB articles, and PCB containers, in storage at the facility at the beginning of the year, received, transferred and disposed of at the facility during the calendar year.

- The total weight in kilograms of bulk PCB waste, PCB waste in transformers, PCB waste in capacitors, PCB waste in PCB articles and PCB waste in PCB containers, in storage at the facility at the end of the year.
- The total number of PCB transformers, PCB capacitors, PCB articles, and PCB containers, in storage at the facility at the end of the year.

4.3 Manifest Discrepancy Reports

A manifest discrepancy report will be submitted to the NDEP Administrator (EPA Region IX if PCBs) in the event that a manifest discrepancy is not resolved within fifteen (15) days. The report will describe the discrepancy and attempts to reconcile it, and will include a copy of the manifest or shipping paper at issue.

4.4 Un-manifested Waste Report

In the event that a hazardous waste shipment be accepted without an accompanying manifest or shipping papers, an un-manifested waste report will be submitted to the NDEP Administrator within fifteen (15) days after receiving the waste. The report will include the facility and transporter information (EPA identification number, address), a description and quantity of un-manifested waste received, the method of treatment, storage or disposal, a brief explanation of why the waste was un-manifested, and required certification.

4.5 Exception Reports

Manifest Exception Reports

USEN will submit an Exception Report to the NDEP Administrator (and EPA Region IX if PCBs) if a copy of the manifest from the designated off-site facility (confirming acceptance of an outgoing shipment of

hazardous waste) is not received within forty-five (45) days from the date the waste was accepted by the initial transporter. The report will include:

- a legible copy of the manifest for which no confirmation of delivery has been provided, with
- a cover letter signed by an authorized company representative explaining the efforts taken to locate the waste, and the results of such efforts.

PCB One Year Exception Report

USEN will submit a 'One-Year Exception Report' to EPA Region IX no later than 45 days from the end of the 1-year storage for disposal date when the following occurs:

- USEN receives PCBs or PCB Items on a date more than 9 months from the date the PCBs or PCB items were removed from service, as indicated on the manifest or continuation sheet.
- Because of contractual or commitments or other factors affecting the facilities disposal capacity, the disposer of PCB waste could not dispose of the affected PCBs or PCB Items within 1 year of the date of removal from service for disposal.

Per 40 CFR §761.215 (e) the exception reports will include:

- A legible copy of any manifest or other relevant written communication.
- A cover letter signed by the submitter or authorized representative
- The date(s) when the PCBs or PCB items were removed from service.
- The date(s) when the PCBs or PCB items were received.
- The date(s) when the affected PCBs or PCB items were transferred to the disposal facility,

- The identity of the transporters, commercial storers or disposers known to be involved with the transaction.
- The reason, if known, for the delay in bringing about the disposal of the affected PCBs or PCB items within one year from the out of service date.

4.6 Emergency Occurrences Reports

A report will be submitted to the NDEP within fifteen (15) days of any release, fire or explosion which required implementation of the Contingency Plan, providing a detailed description of the incident, including:

- name, address and telephone number of the facility operator
- date, time and type of incident
- name and quantity of materials involved
- the extent of injuries, if any
- an assessment of the actual or potential hazards to human health or the environment
- estimated quantity and disposition of recovered materials that resulted from the incident.

USEN will orally report to the NDEP Administrator any incident requiring implementation of the Contingency Plan. The Nevada Division of Emergency Management and the National Response Center will be notified of any incident involving a release to the environment of hazardous waste, pollutant or contaminant in a quantity equal to, or greater than the reportable quantity specified by 40 CFR 302.

The oral reports described above will be provided as soon as possible after becoming aware of the release, but no later than the end of the first working day.

If the release originated from a tank system or secondary containment, USEN will follow-up with a written report to the NDEP Administrator within thirty (30) days of detection of the release, describing:

- likely route of migration of the waste
- characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate, etc.)
- results of any monitoring or sampling conducted in connection with the release (if available)
- proximity to downgradient drinking water, surface water, and populated areas
- descriptions of response actions taken or planned.

If the release originates from the Containment Building, the Administrator will be notified within seven (7) days after the discovery. A follow-up written plan will be submitted within 14 days describing the steps taken to repair the unit and the schedule for accomplishing the work.

5.0 RECORDS RETENTION

In addition to the records outlined in Section 3 the following records will be maintained at the facility:

- All documents, correspondence and data that have been provided to the operator of the facility by any State or local government agency that pertain to the storage of disposal of PCBs and PCB items at the facility.
- All documents, correspondence and data that have been provided by the operator of the facility to any State or local government agency that pertain to the storage of disposal of PCBs and PCB items at the facility.
- Any applications and related correspondence sent by the operator of the facility to any local, State or Federal authorities in regard to waste water discharge permits, solid waste permits,

building permits, or other permits or authorizations such as those required by 40 CFR §761.70(d) and §761.75(c).

ATTACHMENT 1

US Ecology Reporting Summary Table

<u>Date of Report</u>	<u>Report Name</u>	<u>Description</u>	<u>Agency</u>
Monthly	PCB Disposal Operations Report	Monthly summary of PCB activities	EPA
March 1	Tier II Chemical Reporting Report	On-site chemical inventory. Used for emergency planning purposes.	NDEP / Local Emergency Planning Committee / State Emergency Planning Committee / State Fire Marshal
March 1	Annual Report	Per 40 CFR 264.71. RCRA Permit Requirement	NDEP / EPA
March 1	Actual Production / Emission Report	Includes the actual emission emitted from the facility	NDEP
March 31 & September 30	Environmental Monitor Report	Includes summary of groundwater monitoring, leachate collection and SVE well activities	NDEP / EPA
May 1	Annual Closure/Post Closure Inflation Cost Adjustment	Annual update of the Closure/Post Closure estimate	NDEP
July 1	Toxic Release Inventory Report (TRI)	Per 313 of the Emergency Planning and Community Right to Know Act. Inventory of TRI chemicals disposed at the facility	EPA / TRI Data Response Center / Nevada Emergency Response Center
July 15	Annual PCB Report	Per 40 CFR 761.180 (b)	EPA
As Needed	Manifest Discrepancy Reports	Per 40 CFR 761.210. If a manifest discrepancy can not be resolved in 15 days this report must be filed.	NDEP or EPA (if PCBs)
As Needed	PCB One Year Exception Report	Per 40 CFR 761.215. If PCB waste was recieved at the facility after 1 year of being taken out of service this report	EPA

Attachment 6

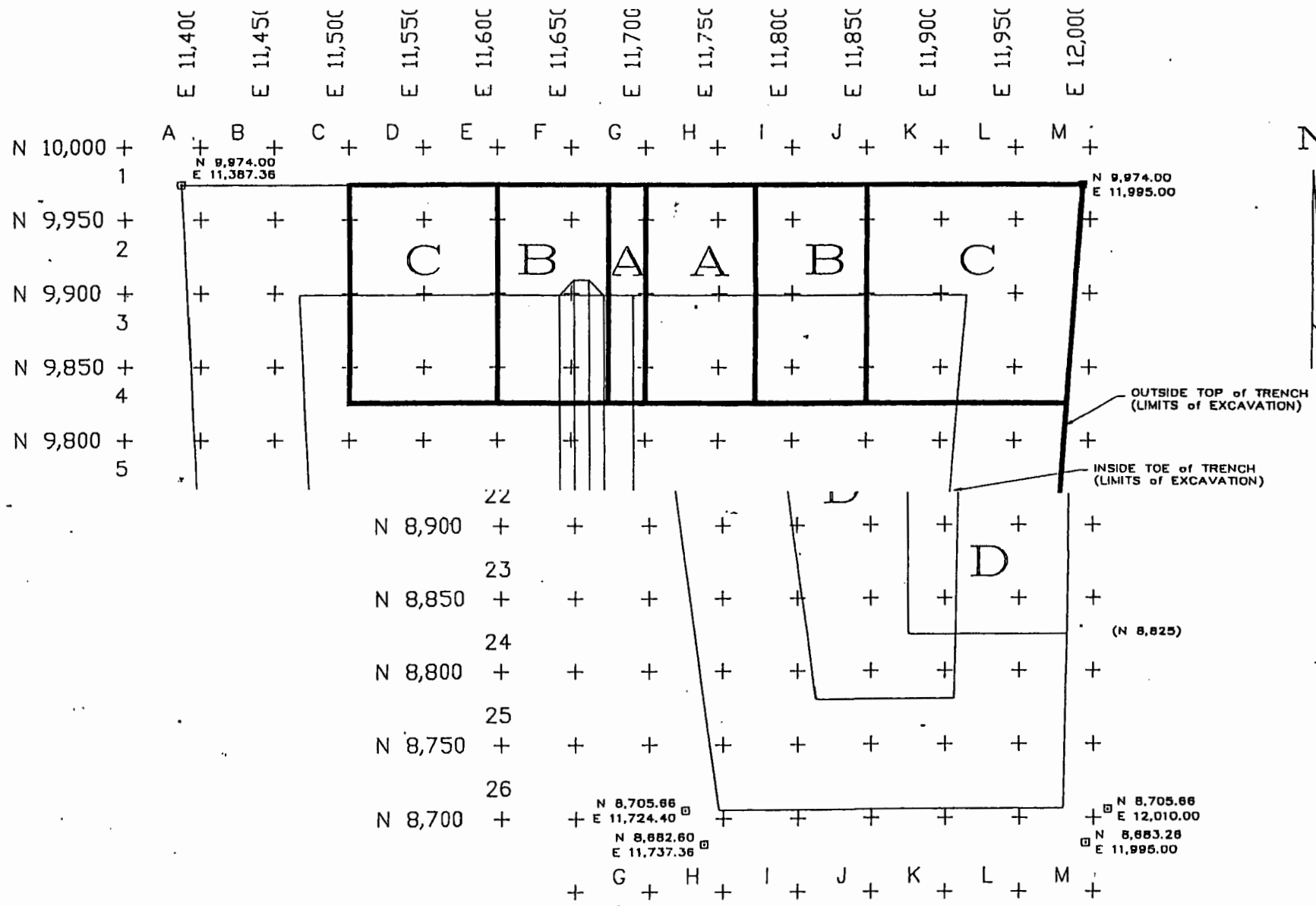
Active Trench Disposal Grid

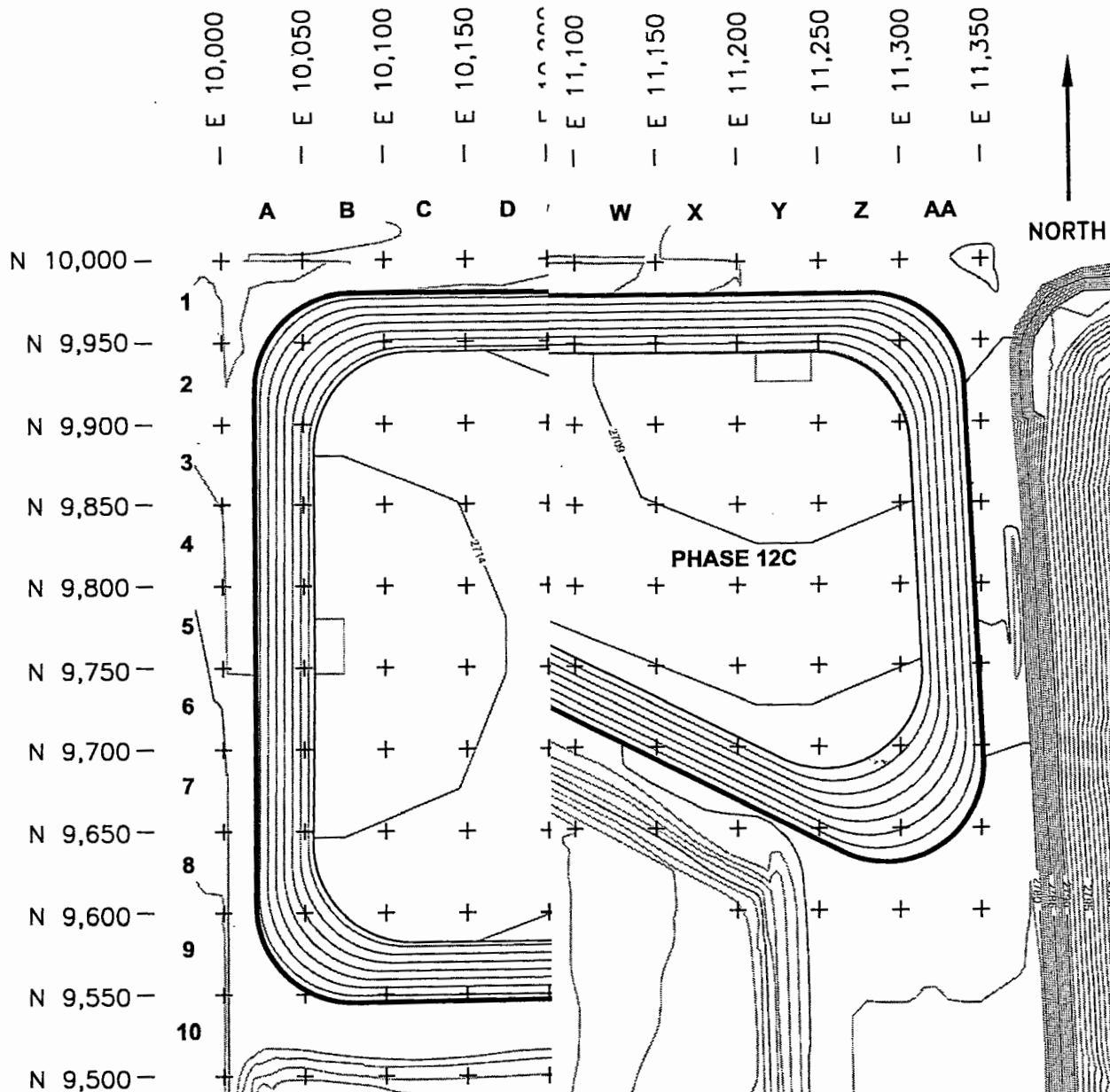
LANDFILLS DISPOSAL COORDINATES

DATE: 12-14-2010

Type of Waste	Trench	Cell	Grid North	Grid East	Distance N Grid	Distance E Grid	Top Elevation	Load Ext N	Load Ext E	Depth of Load
Soil / Filtercake	12	D	5	F	0	15	2784	50	50	4
Debris	12	D	5	F	0	15	2784	50	50	4
Macro	12	D	5	F	0	15	2784	50	50	4
Cell A	12	A								
Cell B	12	B								
PCB's Trench 11	11	D	8	F	30	0	2857	10	10	3
Projects: El Monte			5	F	0	15	2784	50	50	4
Western Area.			5	F	0	15	2784	50	50	4

Signature: 





DRWN BY	DSGN BY	CHECK BY	APP'D BY	DATE
LAM	CAB		SLW	8/26/08

USEcology Nevada

an American Ecology company

PROJECT NUMBER: 073113 DATE: 8/26/08

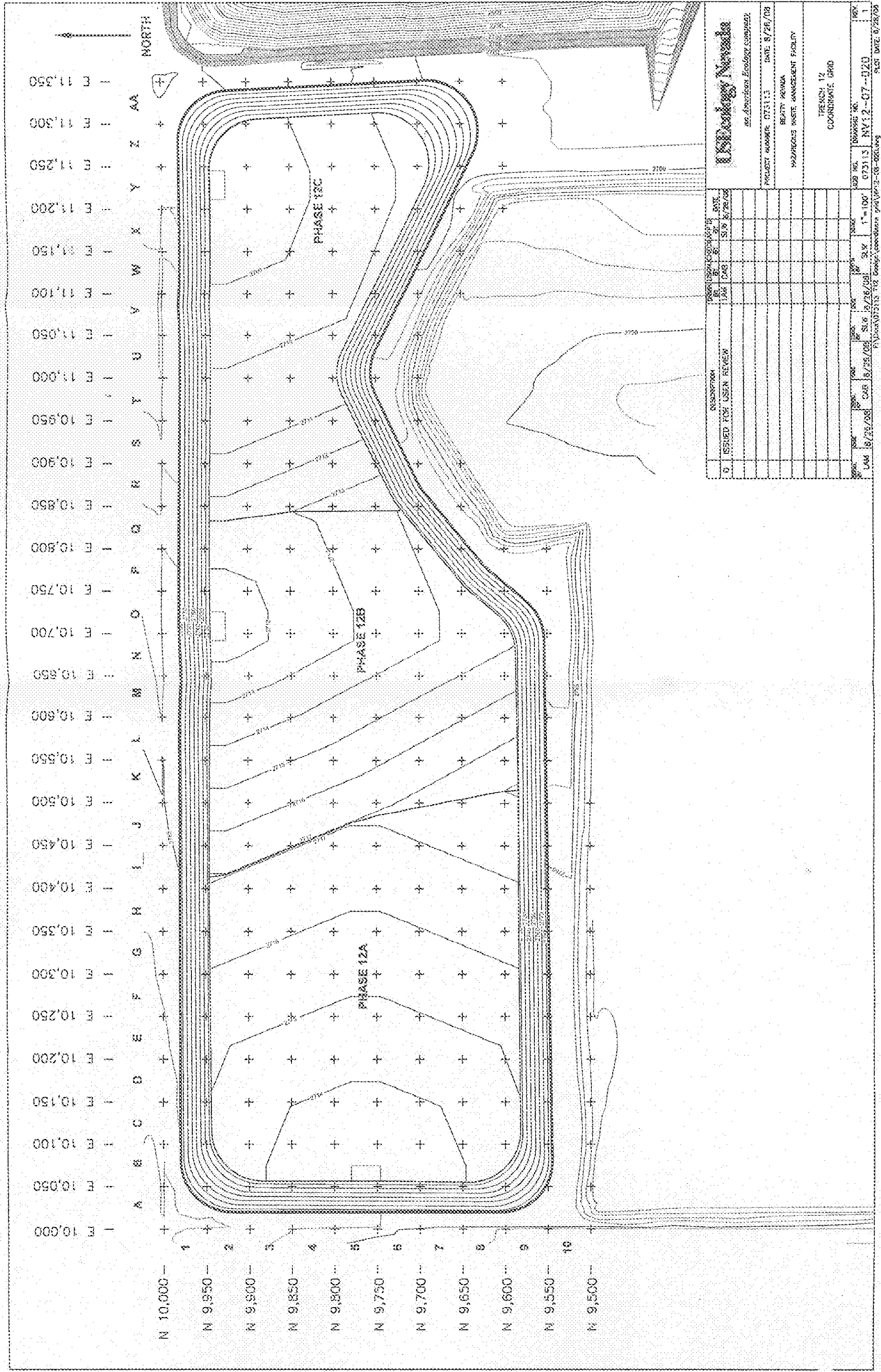
BEATTY NEVADA
HAZARDOUS WASTE MANAGEMENT FACILITY

TRENCH 12
COORDINATE GRID

DATE	APP'D BY	SCALE
8/26/08	SLW	1"=100'

JOB NO.	DRAWING NO.
073113	NV12-07-020

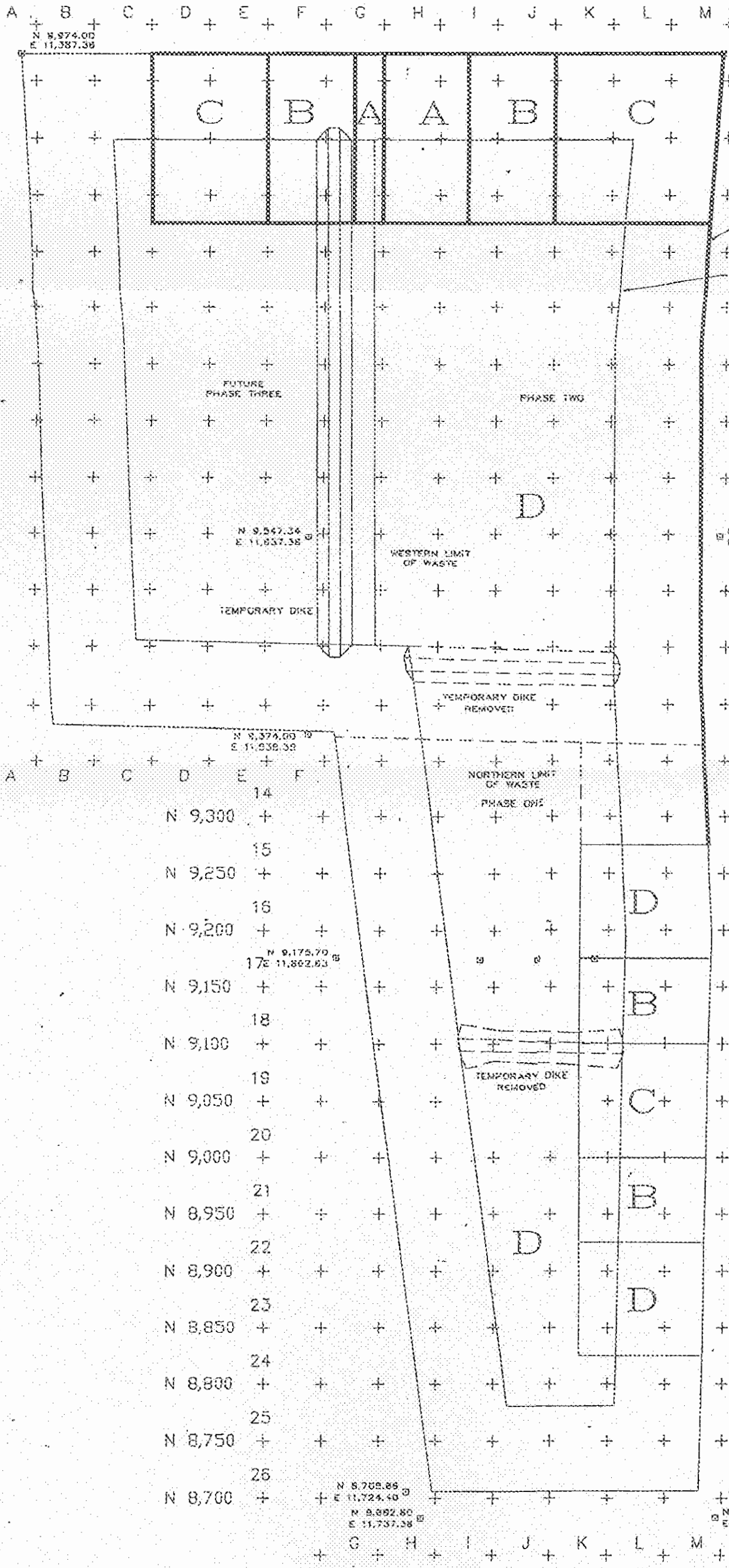
REV.
1



F:\Data\372113_712_Usdgr\coordinates grid\NW2-08-020.dwg

E 11,400 E 11,450 E 11,500 E 11,550 E 11,600 E 11,650 E 11,700 E 11,750 E 11,800 E 11,850 E 11,900 E 11,950 E 12,000

N 10,000 +
1
N 9,950 +
2
N 9,900 +
3
N 9,850 +
4
N 9,800 +
5
N 9,750 +
6
N 9,700 +
7
N 9,650 +
8
N 9,600 +
9
N 9,550 +
10
N 9,500 +
11
N 9,450 +
12
N 9,400 +
13
N 9,350 +



Trench II - Grid System



Attachment 7

Facility Inspection Forms (Sample Only)

FACILITY INSPECTION PLAN

US ECOLOGY NEVADA

March 2010

Revised May 2011

SECTION 5
FACILITY INSPECTION PLAN
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Appendix 5 A Daily Facility Inspection Reports

INSPECTION PLAN

This Inspection Plan outlines the schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that prevent, detect, or respond to environmental or human health hazards in accordance with 40 CFR §§270.14(b)(5), and 264.15, and 264.33. The chapter also addresses specific inspection areas in detail and contains examples of the inspection forms used at the facility. Table 1 outlines inspection frequencies for each area of the facility.

5.1.0 General Inspection Requirements

The following paragraphs identify facility equipment and operating areas, identify potential problems, and outline measures to prevent the occurrence of these problems. A copy of the completed inspection forms and the inspection schedule are kept at the facility at least three (3) years from the date of inspection.

The format of the inspection forms may be modified from time to time to address ongoing inspection assignments. Changes to the inspection format do not require Nevada Department of Environmental Protection (NvDEP) notification or a permit modification since the content of the inspection forms/procedures or the minimum inspection frequency will not be altered. Content of inspection forms may be changed through a Class 1 permit modification. Additionally, non-RCRA required inspections might be added and removed from time to time for convenience.

5.1.1 Types of Problems

Regular inspections are conducted to identify equipment malfunctions, structural deterioration, operator errors, uncontrolled run-off, leachate generation, or other discharges that could cause or lead to the release of hazardous waste constituents or that would threaten human health or the environment. Inspections are intended to detect potential problems in time to correct them before they result in a release of hazardous waste constituents and/or cause harm to human health or the environment.

Appendix A presents the schedule of routine inspections for the various components/units critical to the proper operation of the facility. Specific inspection items and potential problems associated with each inspection area are referenced in the following paragraphs as well as on each individual inspection form.

5.1.2 Frequency of Inspections

The facility's inspection schedule was developed based on applicable regulatory requirements, estimated rate of potential equipment deterioration, and the probability of an environmental or human health incident if any equipment deterioration, malfunction or operator error were to go undetected between inspections. Table 1 identifies the inspection frequency for each of the various facility components/units. The frequency of the scheduled inspections is based on a probability of an occurrence of an incident or malfunctions and is designed to minimize the need to implement the facility's Contingency Plan. In addition to the daily inspections all permitted units are inspected weekly by facility management or their designee and documented on a weekly inspection form. Daily and weekly inspections forms are included in Appendix A.

All facility units in which waste is actively being handled are under surveillance for spills, malfunctions, and operator error during active operations. The activities discussed in the following paragraphs are more formal, documented procedures to support and verify these operational inspections.

In all active waste handling areas, a daily inspection is performed when the area is in use (i.e.; each operating day). Other areas are subject to weekly or monthly inspections.

For specified areas, identified in Table 1, inspections are also performed after storm events of 0.25" of precipitation in 24 hours.

In accordance with 40 CFR §264.15, any deterioration or malfunction of equipment or structures that could cause or lead to the release of hazardous waste constituents or threaten the environment or human health will be corrected utilizing interim and final corrective measures. Where a hazard is imminent or has already occurred, action is taken expeditiously. Response actions for contingency procedures are provided in detail in the Contingency Plan.

5.2.0 Unit Specific Inspection Requirements

5.2.1 Container Management Unit Inspections [40 CFR §264.174]

At least weekly, areas where containers are stored are inspected for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. If any of these conditions exist, corrective activities are instituted to clean up and limit the spread of material, and/or restore the integrity of the container or containment system. The CMUs and their associated containment systems are also visually inspected for the presence of cracks and gaps that could result in loss of containment effectiveness, where appropriate. Should structural problems occur that would allow leakage out of the unit or between compatibility segregation areas, or that may develop into a major failure, repair activity will be initiated. CMU #1 and #7 are inspected for proper drainage controls. During scheduled inspections, the CMUs and their associated waste staging loading and unloading areas are visually inspected to determine that adequate aisle space is maintained. Individual containers are also randomly inspected to ensure proper segregation is being maintained. Individual containers in the CMUs, subject to Subpart CC requirements, are inspected for Level 1 compliance.

The CMUs (including containment systems) are inspected for the presence of liquids/solids. Spilled solids are removed in accordance with the requirements of the Contingency Plan, if necessary, and the residues managed in accordance with the Waste Analysis Plan. Liquids discovered in the collection trenches on the truck unloading areas are removed within 48 hours of discovery or within 48 hours of cessation of the rain event. If necessary, absorbent materials are utilized to absorb standing liquid for proper disposal.

5.2.2 Tank System Inspections [40 CFR §264.195]

The following items must be inspected at least once each operating day:

- (1) Any aboveground portions of the tank system to detect corrosion or releases of waste;
- (2) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g.; dikes) to detect erosion or signs of releases of hazardous waste (e.g.; wet spots, dead vegetation).

In addition, cathodic protection systems, if present, must be inspected according to the following schedule to ensure they are functioning properly:

- (1) the proper operation of the cathodic protection system must be confirmed within six (6) months after initial installation and annually thereafter; and
- (2) all sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e.; every other month).

Tank systems must also be inspected for the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours, or at the earliest practicable time. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours, or in as timely a manner as is possible to prevent harm to human health and the environment. Additionally, aboveground piping (exclusive of flanges, joints, valves, and other connections); welded flanges, welded joints, and welded connections; seal-less or magnetic coupling pumps and seal-less valves; and pressurized aboveground piping systems which do not have secondary containment must be visually inspected daily when in operation.

5.2.2.1 Tank System External Corrosion and Releases

All permitted hazardous waste tanks, piping, valves, and connections are visually inspected for signs of leakage, corrosion, or structural deterioration.

5.2.2.2 Tank System Construction Materials and Surrounding Area

The area immediately surrounding the externally accessible portion of the tanks, including the secondary containment, is visually inspected to detect any erosion or releases.

5.2.2.3 Tank System Overfill Control Equipment

With the exception of the PCB Storage Tanks (T4-T8) all tanks rely on visual inspections to make certain the tanks are not overfilled. All 5 stabilization tanks rely on the equipment operators to monitor the tanks through out the day to ensure the tanks do not overfill. In these tanks waste is treated in batches as to minimize the risk of overflow. The leachate tank (T-15) and evaporation tank (T-11) are visually inspected daily to prevent overflow. If the tanks are near capacity no additional liquids will be added. The PCB storage tanks are equipped with high level alarms to indicate when the tanks are nearing capacity. The alarms are tested daily using the control panel

located inside the office of the PCB building. When testing the alarms if the red indicator light comes on the alarm is working correctly.

5.2.2.4 Tank System Monitoring and Leak Detection Equipment

All tanks and piping are aboveground and are visually inspected each operating day for spills, leaks and accumulated precipitation.

5.2.2.5 Tank System Cathodic Protection

Cathodic protection systems are installed on Stabilization Tanks #1, #2, and #3 and are visually inspected for excessive deterioration bimonthly. USEN welds sacrificial cathodes to the inside of the stabilization tanks (T1-T3) to prevent steel deterioration. A sacrificial anode is used in cathodic protection where it is intended to be dissolved to protect other metallic components. The more active metal is more easily oxidized than the protected metal and corrodes first. The cathode must oxidize nearly completely before the less active metal will corrode, thus acting as a barrier against corrosion for the protected metal. On a bimonthly basis the inspector visually inspects the cathode for deterioration. Once the cathode deteriorates to approximately 50% of its original size it is replaced.

5.2.2.6 Additional Tank System Inspection

The structural condition of the tanks and their associated piping are visually inspected monthly.

5.2.3 Surface Impoundment Inspection [40 CFR §264.226]

Not Applicable. The facility does not have any hazardous waste surface impoundments.

5.2.4 Waste Pile Inspection [40 CFR §264.254]

Not Applicable. The facility does not have any hazardous waste piles.

5.2.5 Land Treatment Inspection [40 CFR §264.278]

Not Applicable. The facility does not have any hazardous waste land treatment units.

5.2.6 Landfill Inspection [40 CFR §264.303]

While landfills are in operation, they must be inspected weekly and after storms to detect evidence of any of the following:

- (1) deterioration, malfunctions, or improper operation of run-on and run-off control systems;
- (2) proper functioning of wind dispersal control systems, where present; and
- (3) the presence of leachate in and proper functioning of leachate collection and removal systems, where present

Where leak detection systems are present, the amount of liquids removed from each leak detection system sump must be recorded during the active life and closure period. After the final cover is installed, the amount of liquids removed must be recorded at least monthly. If the liquid level stays below the pump operating level¹ for two (2) consecutive months, the amount of liquids must be recorded at least quarterly. If the liquid level stays below the pump operating level for two (2) consecutive quarters, the amount of liquids must be recorded at least semi-annually. If at any time during the post-closure care period the pump operating level is exceeded on a quarterly or semi-annual recording schedule, recording must return to monthly recording until the liquid level again stays below the pump operating level for two (2) consecutive months.

5.2.6.1 Run-On and Run-Off Control System

During landfill inspections, the landfill run-on/run-off control systems are inspected for evidence of deterioration, malfunction, or improper operation. Particular attention is given to the integrity of containment dikes (where present) and to any blockage of the drainage channels, swales, culverts, and other drainage structures.

5.2.6.2 Wind Dispersal Control System

Wind dispersal/dust control measures at the facility are inspected for adequacy and effectiveness. This activity includes both a visual inspection and determination of whether the condition of any exposed hazardous waste is a wind dispersal issue.

5.2.6.3 Leachate Collection and Removal System

Leachate collection and removal systems (LCRS) and secondary leak detection, collection, and removal systems (LDCRS) of Landfill Cells are inspected for the presence of liquids. In the event the quantity of liquid detected in the LDCRS exceeds the Allowable Leakage Rate, then the procedures defined in the Response Action Plan (RAP) will be implemented. The RAP for Trench 11 and Trench 12 can be found in Appendix 11-B and 11-C respectively.

5.2.7 Incinerator Inspection [40 CFR §264.347]

Not Applicable. The facility does not have any hazardous waste incinerators.

5.2.8 Security, Safety & Emergency Response Equipment

Security fences and gates and safety and emergency response equipment listed in the Contingency Plan are inspected monthly to ensure the equipment is operable and available, as appropriate.

5.2.9 Monitoring Well Inspections

Wells are inspected to verify they are locked, undamaged, and free from apparent tampering on a quarterly basis.

¹ "Pump operating level" is a liquid level based on pump activation level, sump dimensions, and level that avoids backup into the drainage layer and minimizes head in the sump.

Table 1

FACILITY INSPECTION SCHEDULE

US Ecology Nevada
TABLE 1 – INSPECTION SCHEDULE

Unit	Location/Description	Frequency	Form
CMU #1	PCB/RCRA Building	Daily	PCB Building
CMU #6	Dry Hazardous Waste Storage Area #2 (DHWSA #2)	Daily	DHWSA #2
CMU #7	Bin Storage Area (Secondary containment)	Daily	Truck Parking Area
CMU #8	Lab Waste Storage Area	Weekly	Lab Waste Water Accumulation Containers
CMU #16	Container Management and Stabilization Building	Daily	Container Management and Stabilization Building
CMU #17	Dry Hazardous Waste Storage Area #3	Daily	DHWSA #3
Tank #1	Stabilization Tank (Pan 1)	Daily	Batch Stabilization Tank
Tank #2	Stabilization Tank (Pan 2)	Daily	Batch Stabilization Tank
Tank #3	Stabilization Tank (Pan 3)	Daily	Batch Stabilization Tank
Tank #4	PCB Storage	Daily	PCB Processing and Storage
Tank #5	PCB Storage	Daily	PCB Processing and Storage
Tank #6	PCB Storage	Daily	PCB Processing and Storage
Tank #7	PCB Storage	Daily	PCB Processing and Storage
Tank #8	PCB Storage	Daily	PCB Processing and Storage
Tank #9	PCB Storage (Reserved)	NA	NA
Tank #10	PCB Storage (Reserved)	NA	NA
Tank #11	Evaporation Tank	Daily	Daily Facility (Evaporation Pad)
Tank #18	Stabilization Tank (Pan 4)	Daily	NA
Tank #19	Stabilization Tank (Pan 5)	Daily	NA
NA	Landfill	Daily	Daily Landfill Inspection
NA	Closed Cells	Weekly	Weekly Inspection
NA	Two-way Radios and Claxon Horn System	Weekly	Weekly Inspection
NA	Portable Water Tank	Weekly	Weekly Inspection
NA	Truck Parking Area	Weekly	Weekly Inspection
NA	Safety Shed/Unloading Dock Inventory	Weekly	Weekly Inspection
NA	Security Fence and Warning Signs	Weekly	Weekly Inspection
NA	Dry Hazardous Waste Storage Area	Weekly	Weekly Inspection
NA	Various Safety Shower /Eyewash equipment	Weekly	Weekly Inspection

NA	Fire Hydrant/Fire Hose	Monthly	Monthly Fire Hydrant/Fire Hose Inspection
NA	First-Aid Kits	Monthly	Monthly First-Aid Inspection
NA	Full Face Respirator	Monthly	Monthly Full Face Respirator Inspection
NA	Emergency Respiratory Equipment	Monthly	Emergency Respiratory Equipment
NA	Spill Control Equipment	Monthly	Monthly Spill Control Equipment Inspection
NA	General Safety and Tool/Equipment	Monthly	Monthly Safety & Equipment Inspection
NA	Fire Extinguishers	Monthly	Monthly Fire Extinguisher Inspection
NA	Impressed Current/Cathodic Protection System	Bi-monthly	Stabilization Impressed Current Inspection & Test on Cathodic Protection System
NA	SWPPP Inspection (Storm Water Pollution Prevention Plan)	Quarterly	SWPPP Quarterly Inspection
NA	Annual Pollution Plan Inspection	Annual	Beatty Annual Pollution Plan Inspection Report

APPENDIX A

DAILY AND WEEKLY FACILITY INSPECTION REPORTS

DAILY ACTIVE DISPOSAL CELL 11 and UNBURIED WASTE INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

ACTIVE DISPOSAL CELL 11: Inspect active disposal trench for the following:	Satisfactory	Unsatisfactory
Daily cover for erosion, wind dispersal		
Standing water present		
All drums and bulk materials covered properly		
Dust emissions		
Safety and fire control equipment readily available		
Equipment utilized during unloading is stored inside the disposal area during non-working hours		
**Signs of spillage/litter at unloading dock (when in service)		
Signs of tears/damage to synthetic liners		
Compatibility cells (A & B) are clearly marked		
UNBURIED WASTE:		
Signs of materials leakage		
AFTER STORM EVENT INSPECTION: (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2))		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY

CMU #7 DAILY INSPECTION

Truck Parking Pad Area

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

TRUCK PARKING AREA	Satisfactory	Unsatisfactory
Inspect for signs of damage, leakage or fugitive odors from trailers/containers		
Inspect for liquids in TPP Area		
Inspect loading / unloading areas for presence of spillage		
Stored containers are closed		
Containers properly labeled		
Adequate aisle space maintained		
TPP total volume of waste stored does not exceed 20 roll-offs or a cumulative volume of 400 cu yd		
Containers are stored within indicated boundaries		
If >500 VOC - are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Drainage controls in place (Slide gates in place), pad is in good working condition, etc.		
Unloading dock structurally sound		
Signs of spillage/litter at unloading dock		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

TANKS T-1, T-2 & T-3 DAILY INSPECTION

Treatment Pans 1, 2 & 3

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

BATCH STABILIZATION TANK	Satisfactory	Unsatisfactory
Inspect treatment pans for excessive damage that might cause unit failure		
Inspect unit's secondary containment for the presence of liquids		
Inspect surrounding area for presence of spillage/odor		
Ensure good general housekeeping is maintained		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY

CMU #6 DAILY INSPECTION

Dry Hazardous Waste Storage Area #2

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected. And submit completed form to the Compliance department.

DRY HAZARDOUS WASTE STORAGE AREA II	Satisfactory	Unsatisfactory
Inspect for liquids and / or standing water in DHWSA II		
Inspect loading / unloading areas for presence of spillage		
Adequate aisle space maintained and area properly marked and roped		
Stored containers are DOT approved, closed and / or tarped		
Wastes excluded by Permit condition 3.4.4 (Liquids, PCBs, F020, F021, F022, F026) are not present		
Containers properly labeled		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Total Volume of Waste stored does not exceed 840 cu yd (approximately 42 20-yd roll-offs)		
Inspect empty roll-off bins / containers to verify that they do not contain any residue waste and meet the definition of "RCRA empty" (40 CFR 261.7) and labels are removed.		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report form".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

DAILY FACILITY HOUSEKEEPING and EVAPORATION PAD (Tank T-11) INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

FACILITY HOUSEKEEPING	Satisfactory	Unsatisfactory
Overall facility appearance		
Trash on site or other signs of un-orderly facility maintenance		
Evaluate dust condition of facility roadways		
Miscellaneous tools are stored in an orderly fashion		
EVAPORATION PAD		
Cracks or signs of deterioration (inspect if unit is empty)		
Presence of spills on pad		
General housekeeping in the area		
Inspect secondary containment for presence of liquids (if present, depth = _____ inches)		
Ensure that a minimum of six-inch freeload is maintained		
Maintenance Area		
Check integrity of gasoline, diesel and used oil tanks. Verify tanks and hoses connected to tanks are not leaking.		
AFTER STORMS INSPECTIONS (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2))		
Amount of Rainfall recorded: _____ inches		
Ensure proper functioning of leachate collection and removal systems		
Inspect landfill run-off control ditches to ensure they are not obstructed by the presence of sediment or debris		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report form".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date complete, and individual performing corrective action.

CMU #17 DAILY INSPECTION

Dry Hazardous Waste Storage Area #3

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

DRY HAZARDOUS WASTE STORAGE AREA 3	Satisfactory	Unsatisfactory
Inspect for liquids and / or Standing Water in DHWSA 3. If recent rain event check tarps for standing liquids.		
Inspect all areas for presence of spillage / waste on the ground		
Adequate aisle space maintained (3 feet)		
Stored containers are DOT approved, closed and / or tarped		
Wastes excluded by Permit condition 3.4.4 (Liquids, PCBs, F020, F021, F022, F026) are not present		
Containers properly labeled		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
Total volume of waste stored does not exceed 3,438 cu yd (Approx. 172 20-yd roll-offs)		
Inspect empty roll-off bins / containers to verify that they do not contain any residue waste and meet the definition of "RCRA empty" (40 CFR 261.7).		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

** 40 CFR Part 264.1086 I

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

CMU #1, Tanks T-4, T-5, T-6, T-7 and T-8 Daily Inspection

PCB Building

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

INSPECTED ITEMS	SATISFACTORY	
	YES	NO
PCB PROCESSING AND STORAGE		
PCB PROCESSING AND STORAGE: Audible Alarms (insure working order)		
Storage Tanks (corrosion, erosion or leaks)		
Valves, lines, and fittings (corrosion, erosion or leaks)		
PCB processing: Storage Area (signs of spills, leaks, deteriorated/damaged containers)		
PCB Items, articles, and containers in storage are properly labeled and identified.		
PCB containers in storage are within seven months of their accumulation start date		
RCRA STORAGE : RCRA container storage (signs of leaks, spills, damaged/deteriorated containers, open containers in storage)		
RCRA waste in storage is compatible with stored PCB waste		
RCRA containers in storage are properly labeled, marked, and identified		
RCRA containers in storage are within seven months of their accumulation start date		
GENERAL : General Housekeeping (trash, debris, etc.)		
Run-on/Run-off controls (dikes, berms sloughing or erosion)		
Concrete flooring and containment for expansion cracks, corrosion and other signs of deterioration		
Safety equipment present in proper working condition and properly stored. Chains on walkways on PCB storage tanks in 'closed' position.		
RCRA/PCB containers palletized and stored with a minimum three foot aisle space		
Emergency shower/eyewash functional		
If >500 VOC – are containers managed per Subpart CC requirements: Meet Level 1 Standards (**)		
AFTER STORMS INSPECTIONS (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect tank containment for standing liquid or erosion		
FLOOR CONDITION (40 CFR Part 761)		
The epoxy coating is in tact and in good condition		
The colored undercoat is not exposed		
There is no evidence of spills and/or contamination		
The floor/building is maintained in a clean and orderly manner		

*Any items which have determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is taken: include action taken, date completed and name of individual taking the action.

** 40 CFR Part 264.1086 (c)

- (1)
 - i DOT approved container.
 - ii Adequate cover with no holes, gaps, or open spaces
 - iii Hazardous waste is not exposed to the atmosphere
- (2) Adequate closure device
- (3) Maintained in closed position

BEATTY

CMU #16, Tanks T-18 and T-19 Daily Inspection

Container Management and Stabilization Building

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

INSPECTED ITEMS

STABILIZATION TANKS		SAT	UNSAT
Inspect tank for excessive damage that might cause unit failure			
Inspect unit's secondary containment for the presence of liquids			
Inspect surrounding area for presence of spillage/odor			
Ensure good housekeeping is maintained			

BUILDING/AUXILARY EQUIPMENT		SAT	UNSAT
Reagent Storage System (corrosion, erosion or leaks)			
Valves, lines, and fittings (corrosion, erosion or leaks)			

CONTAINER STORAGE AREA		SAT	UNSAT
Signs of leaks and spills			
All containers in storage are properly labeled, marked, and identified			
All containers stored with a minimum two foot isle space			
All containers are closed and in good condition			

Temporary Dock		SAT	UNSAT
Signs of spillage/litter at portable ramp/dock			
Insure safety rails are secure			
Cleanliness around dock (stains, spills, trash, debris, etc.)			
Other			

GENERAL		SAT	UNSAT
General Housekeeping (trash, debris, etc.)			
Concrete flooring and containment-expansion cracks, corrosion or other signs of deterioration			
All required safety equipment present in proper working condition and properly stored.			
Emergency shower/eyewash functional			
Control room is clean & well maintained			
Unloading dock structurally sound			

*Any items which have determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is taken: include action taken, date completed and name of individual taking the action.

BEATTY

DAILY ACTIVE DISPOSAL CELL 12 and UNBURIED WASTE INSPECTION REPORT

DATE (m/d/y): _____

TIME: _____

INSPECTOR (Full Name): _____

Please include inspectors' full name and full date of inspection.

A Daily Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection and subsequent report. Please check satisfactory or unsatisfactory for each item inspected and submit completed form to the Compliance department.

ACTIVE DISPOSAL CELL 12: Inspect active disposal trench for the following:	Satisfactory	Unsatisfactory
Daily cover for erosion, wind dispersal		
Standing water present		
All drums and bulk materials covered properly		
Dust emissions		
Safety and fire control equipment readily available		
Equipment utilized during unloading is stored inside the disposal area during non-working hours		
**Signs of spillage/litter at unloading dock (when in service)		
Signs of tears/damage to synthetic liners		
Compatibility cells (A & B) are clearly marked		
UNBURIED WASTE: ***		
Signs of materials leakage		
AFTER STORM EVENT INSPECTION: (complete only after storm event of 0.25" or greater (Facility Inspection Plan Section 5.1.2)		
Inspect landfill above grade dikes for signs of instability or erosion		
Inspect the daily cover applied for wind dispersal control for erosion and areas with exposed waste		

Any items which have been determined to be "Unsatisfactory" shall be noted below. Corrective Action will be tracked on this form or the "Inspection Deficiency and Corrective Action Report".

*Remarks/Corrective Action:

*If corrective action is performed, include type of action taken, date completed, and individual performing corrective action.

BEATTY
WEEKLY FACILITY INSPECTION REPORT

DATE: _____

TIME: _____

EMPLOYEE PERFORMING INSPECTION: _____

A Weekly Facility Inspection Report shall be completed and shall include any deficiencies noted and corrective action taken. The following items shall be addressed in the inspection. Please check satisfactory or unsatisfactory for each item inspected.

LANDFILL- CELL 11	<i>Sat.</i>	<i>Unsat.</i>	TRUCK PARKING PAD	<i>Sat.</i>	<i>Unsat.</i>
Inspect run-on control ditches for signs of erosion or sand, silt, or other deposits which might impede storm water flow.			Inspect for signs of damaged or leaking drums.		
Inspect run-off control mechanisms to ensure proper performance, ie: Inspect above-grade dikes for signs of instability erosion, or other problems and ensure waste placement elevations are maintained at a minimum of one foot below crest elevation.			Inspect all containers for proper labeling.		
Inspect leak detection/collection system for presence of leachate.			Remove any accumulated liquid.		
Inspect wind dispersal control systems for proper functioning.			Inspect for sign of spillage on pad.		
LANDFILL- CELL 12	<i>Sat.</i>	<i>Unsat.</i>			
Inspect run-on control ditches for signs of erosion or sand, silt, or other deposits which might impede storm water flow.			LAB WASTE WATER ACCUMULATION CONTAINERS	<i>Sat.</i>	<i>Unsat.</i>
Inspect run-off control mechanisms to ensure proper performance, ie: Inspect above-grade dikes for signs of instability erosion, or other problems and ensure waste placement elevations are maintained at a minimum of one foot below crest elevation.			Ensure proper functioning of overfill control equipment.		
Inspect leak detection/collection system for presence of Leachate.			Inspect all piping for evidence of damage or leakage.		
Inspect wind dispersal control systems for proper functioning.			Inspect accumulation container for signs of leakage / check accumulation start date.		
Ensure emergency response radios are operational and readily available.			Inspect containment structure for presence of spills, standing liquid and signs of cracks or other damage.		
Test Claxon warning system			Perform a lab eyewash alarm test		
PORTABLE WATER TANK	<i>Sat.</i>	<i>Unsat.</i>	SAFETY SHED/TRENCH 12	<i>Sat.</i>	<i>Unsat.</i>
Ensure the water truck is full and available for fire control.			Ensure that safety and fire control equipment is readily available.		

SECURITY FENCE AND WARNING SIGNS	<i>Sat.</i>	<i>Unsat.</i>	CLOSED CELLS	<i>Sat.</i>	<i>Unsat.</i>
Inspect fence and barriers surrounding the facility for damage/vandalism.			Inspect for signs of erosion, cracks, and integrity		
Inspect the outside perimeter for indication of unauthorized entry.					
DHWSA 2	<i>Sat</i>	<i>Unsat</i>	CONTAINER MANAGEMENT BUILDING	<i>Sat.</i>	<i>Unsat.</i>
Inspect for signs of damage, leakage or fugitive odors from roll-offs.			Inspect for liquids in secondary containment		
Inspect all containers for proper labels and identification.			Inspect containment structure for cracks, damage or structural defects that could cause failure.		
Inspect for signs of spillage on pad.			Ensure stored containers are closed.		
			Ensure proper container labeling and adequate aisle space.		
DHWSA 3	<i>Sat.</i>	<i>Unsat.</i>	Inspect containers for leakage, severe rusting or structural defects.		
Inspect for signs of damage, leakage or fugitive odors from roll-offs.					
Inspect all containers for proper labels and identification.			MAINTENANCE AREA	<i>Sat</i>	<i>Unsat.</i>
Inspect for signs of spillage on pad.			Inspect Empty roll-off bins (waiting for repairs) for residual waste		

Any item which had been determined as "Unsatisfactory" shall be noted in remarks with an explanation and "Corrective Action" to be taken.

Attachment 8

Visitor/Contractor On-Site Authorization Record (Sample Only)

AMERICAN ECOLOGY CORPORATION

VISITOR/CONTRACTOR ON - SITE AUTHORIZATION

As a visitor/contractor to an American Ecology Corporation subsidiary facility, you are required to adhere to operational safety policies and procedures. Therefore, carefully read the following important information:

FACILITY SECURITY

- **Visitors/contractors must sign in upon arrival and sign out upon exiting the facility.**
- **Obey all traffic and informational signs including posted speed limits. All drivers and passengers in operating vehicles must wear seatbelts while at the facility.**
- **Visitors/contractors will be escorted at all times while at the facility unless otherwise authorized by the Facility Manager, Health and Safety Officer, or facility sponsor. If authorization is given to proceed unaccompanied, you must strictly limit yourself to those areas you are authorized to enter.**

FACILITY EQUIPMENT

- **Equipment at the facility such as ladders, sampling racks, etc. may be available for your use. American Ecology Corporation and its subsidiaries assume no liability for the misuse of any equipment on the premises by any visitor/contractor.**

SMOKING

- **Smoking is prohibited at all times within the facility except for areas designated as "Authorized Smoking" areas.**

FOOD AND BEVERAGE

- **The possession and/or consumption of food, beverages and tobacco products is prohibited in waste-handling areas.**

ILLEGAL DRUGS

- **Possession of illegal drugs will result in immediate expulsion from the facility. Persons expelled from the facility due to possession of drugs may be refused reentry into the facility.**

MOBILE PHONE USE

- **Do not use a mobile phone while operating a vehicle or other mobile equipment. Radio communication is allowed only as a means to communicate operating instructions with on-site personnel.**

SAFETY EQUIPMENT

- **Visitors/contractors entering the site must have the proper personal protective equipment (PPE), including a respirator, if needed, in certain areas of the facility. Typical PPE includes hard-hat, safety glasses, steel-toed work boots, gloves, and disposable coveralls.**
- **Safety equipment such as a hard hat and safety glasses may be issued, if available, but must be returned prior to leaving the site.**

Attachment 9

Training Sign-In Form (Sample Only)

TOPIC: _____

INSTRUCTOR: _____

DATE: _____

DURATION: _____

ATTENDANCE

PRINT NAME

DEPT

SIGNATURE

[illegible]