

FACT SHEET

DRAFT HWMA/RCRA HAZARDOUS WASTE FACILITY PERMIT U.S. ECOLOGY OF IDAHO INC. – SITE B EPA ID No. IDD073114654

This fact sheet sets forth the principal facts pertaining to a draft permit (Permit) that the Idaho Department of Environmental Quality (DEQ) is proposing to approve and issue to U.S. Ecology of Idaho, Inc. (USEI), the Permittee, to operate a hazardous waste treatment, storage, and disposal facility. A draft Permit incorporating portions of the Permit Renewal Application has been prepared to specify the design, construction, operation, monitoring, and closure of the USEI Site B facility (EPA ID No. IDD073114654) located near Grandview, Idaho.

In accordance with the Idaho Administrative Procedures Act (IDAPA) 58.01.05.012 [40 CFR § 270.10(h)], the Permittee has submitted an application to renew Parts A and B of their Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) permit. In response to their request, the DEQ has prepared a draft Hazardous Waste Treatment, Storage and Disposal Permit which sets forth the applicable administrative and operational requirements DEQ intends to require of USEI.

The regulatory basis for the conditions and requirements of the draft Permit can be found in the Rules and Standards for Hazardous Waste, IDAPA 58.01.05.004 through 58.01.05.013 [40 CFR Parts 124, 260 through 266, 268, and 270]. This fact sheet was prepared in accordance with the requirements of IDAPA 58.01.05.013 [40 CFR § 124.8].

A. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to design specific administrative and procedural requirements, under which the Permittee will operate, for the purpose of complying with the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, and regulations promulgated thereunder by DEQ.

DEQ prepares a draft permit that sets forth, in one concise document, all the applicable requirements which the Permittee must comply with during the ten-year duration of the Permit. The public is given forty-five (45) calendar days to review and comment on the draft permit conditions prior to DEQ taking any final action (issue or deny) on the Permit.

This draft Permit was prepared based upon the ten-year Permit Renewal Application submitted by USEI and the regulatory requirements required for a treatment, storage and disposal facility. The draft Permit, and all other documents retained by DEQ in support of the draft Permit are available for review. DEQ hereby proposes to approve the draft Permit.

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA 58.01.05.013 [40 CFR § 124.10] requires that the public be given forty-five (45) calendar days to comment on each draft Permit prepared under the HWMA. The comment period on DEQ's decision to approve the draft Permit begins on March 2, 2016 and ends on April 18, 2016. Any person interested in commenting on the draft Permit must do so within this forty-five (45) day period. The entire draft Permit is open for public comment per IDAPA 58.01.05.013 [40 CFR § 124.5].

All persons wishing to comment on the proposed draft Permit modifications should submit comments in writing to:

Mr. Robert Bullock
c/o Ms. Jennifer Shafer
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255
(208) 373-0502

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Comments may also be submitted through the comment form on the DEQ website at <http://www.deq.idaho.gov/news-public-comments-events/public-comment-opportunities.aspx>. Comments should include all reasonable references, factual grounds, and supporting material.

Opportunity for a public hearing may be provided if signed, written requests for a hearing in accordance with IDAPA 58.01.05.013 [40 CFR § 124.11] are properly submitted to DEQ and received on or before April 18, 2016. If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held. The decision on whether there is sufficient public interest in holding a hearing will be based on the receipt of written comments and requests for a public hearing.

When making the final determination regarding the approval of this draft Permit, the Department will consider all written comments received during the public comment period, comments received during the public hearing (if held), and the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 *et seq.*, and all other applicable federal, state, or local laws.

C. FACILITY DESCRIPTION

USEI Site B is a 328-acre facility that manages on- and off-site-generated hazardous and non-hazardous wastes. The facility is located in Owyhee County on Lemley Road, 10 miles west of Grand View, Idaho. No residences or agricultural crops are located within 1,000 feet of the USEI facility. The present facility consists of operating and closed landfill disposal cells, surface impoundments, a containment building, treatment areas, and storage areas. Currently permitted operations include the treatment and disposal of low-activity radioactive material exempted from regulation under the Atomic Energy Act of 1954, as amended.

Envirosafe Services of Idaho (ESII) received a Resource Conservation and Recovery Act (RCRA) Part B Permit on November 8, 1988, issued jointly by the U.S. EPA and the Idaho Department of Health and Welfare. The facility was originally constructed as an Air Force Titan Missile Base in the late 1950s. From 1973 to 1981, Wes-Con, Inc. operated the facility as a hazardous waste disposal site. ESII acquired the facility from Wes-Con in August of 1981 and continued to treat, store, and dispose of hazardous waste under RCRA interim status regulations. USEI acquired Site B from ESII in February 2001. A renewal permit was issued to USEI effective November 12, 2004.

D. CHRONOLOGY OF REGULATORY ACTIONS

USEI submitted a Permit renewal application for its RCRA treatment, storage, and disposal facility Permit in May 2014. DEQ reviewed the permit application in accordance with IDAPA 58.01.05.012 [40 CFR § 270.14] and issued a Notice of Deficiency (NOD) on April 21, 2015. In response to the NOD, revisions were made to the Permit renewal application and received by DEQ in August 2015. In accordance with IDAPA 58.01.05.013 [40 CFR § 124.3], DEQ determined that the Permit renewal application was technically complete on October 1, 2015.

E. DRAFT PERMIT ORGANIZATION

The draft Permit consists of 13 Modules that contain the Permit Conditions and 29 Attachments as listed below:

| MODULE | TITLE |
|---------------|--|
| I | STANDARD PERMIT CONDITIONS |
| II | GENERAL FACILITY CONDITIONS |
| III | CONTAINER STORAGE AND TREATMENT |
| IV | TANK STORAGE AND TREATMENT |
| V | SURFACE IMPOUNDMENT STORAGE, TREATMENT, AND DISPOSAL |
| VI | LANDFILL DISPOSAL |
| VII | SURFACE WATER MANAGEMENT PLAN |
| VIII | PAST PRACTICE UNITS |
| IX | GROUND WATER MONITORING |
| X | CONTAINMENT BUILDING AND DEBRIS TREATMENT |
| XI | STABILIZATION OPERATIONS |
| XII | MISCELLANEOUS UNITS UNDER SUBPART X |
| XIII | CORRECTIVE ACTION |

| ATTACHMENT | TOPIC |
|-------------------|---|
| 1 | FACILITY LEGAL DESCRIPTION & MAP OF FACILITY LOCATION |
| 2 | WASTE ANALYSIS PLAN |
| 3 | SECURITY PROCEDURES |
| 4 | INSPECTION PLAN |
| 5 | TRAINING PLAN |
| 6 | HAZARDS PREVENTION PLAN |
| 7 | CONTINGENCY PLAN |
| 8 | RESPONSE ACTION PLAN |
| 9 | CLOSURE AND POST-CLOSURE PLANS |
| 9a | FINAL COVER DESIGN FOR CELLS 14 AND 15 |
| 9b | FINAL COVER DESIGN FOR CELL 16 |
| 10 | SURFACE WATER MANAGEMENT PLAN |
| 11 | GROUND WATER MONITORING PLAN |
| 12 | PART A PERMIT APPLICATION |
| 13 | CONTAINER MANAGEMENT UNITS |
| 14 | BULK MATERIAL TANK SYSTEMS |
| 14a | DEBRIS BUILDING PROCESS TREATMENT SYSTEM |
| 15 | OUTDOOR STABILIZATION FACILITY |
| 16 | Reserved for future use |
| 17 | SURFACE IMPOUNDMENT UNITS |
| 18 | LANDFILL ENGINEERING REPORT FOR CELL 16, PHASE ONE |
| 19 | LANDFILL UNITS |
| 20 | MASTER BOOK OF DRAWINGS |
| 21 | Reserved for future use |
| 22 | PAST PRACTICE UNITS |
| 23 | EXEMPT RADIOLOGICAL MATERIALS PROCEDURES MANUAL |
| 24 | CONTAINMENT BUILDING AND DEBRIS TREATMENT |
| 25 | TREATMENT PROCESSES DESCRIPTION |
| 26 | LIST OF PERMIT MODIFICATIONS |