

Appendix B-1
Facility Operations Plan

Appendix A
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TSCA Renewal Application

US ECOLOGY NEVADA

FACILITY OPERATION PLAN

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ATTACHMENTS

Attachment 1	Facility Job Descriptions / Management Resumes
Attachment 2	Facility Map
Attachment 3	Waste Disposal Information Forms (Sample only)
Attachment 4	Spill Prevention Control and Countermeasures Plan
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1.0 FACILITY DESCRIPTION

US Ecology Nevada operates a Hazardous Waste Management Facility (Facility) in Nye County, Nevada, approximately 11 miles south of Beatty, in the Amargosa Desert. The Facility is owned by the State of Nevada, and is leased to and operated by US Ecology Nevada.

Operations at the site began in October 1962 on the Low Level Radioactive Waste Disposal Facility (LLRWDF). The Facility is approximately 80 acres in size and has been permitted for chemical waste disposal since 1971. The original lease to the Company covers 80 acres. However, since the transfer of the LLRWDF to the State of Nevada for custodial control and care, only two-thirds of the original lease is currently leased for the disposal of hazardous waste by the Company. The remaining portion of the original lease includes the closed LLRWDF. On December 30, 1997, the Nevada Department of Health (NDOH) accepted custodial care for the LLRWDF under terms of the 1977 lease, conditions of a 1993 settlement agreement, and provision of the NAC. Effective December 30, 1997, the Company is no longer the lessee, licensee, or operator of the LLRWDF.

The surrounding land is federally owned and administered by the Bureau of Land Management (BLM) as rangeland. BLM leases the sections bordering the Facility boundaries to the State of Nevada as a buffer zone (approximately 1320 feet).

The Facility stores, manages and disposes polychlorinated biphenyl (PCB) wastes. This Facility Operations Plan sets forth standards and procedures implemented to ensure that these wastes will not present a threat to human health or the environment. The standards and requirements in this plan meet or exceed the requirements established by the U.S. Environmental Protection Agency (EPA) under the Toxic Substance control Act (TSCA).

Responsibility for the overall operation of the Facility resides with the Facility General Manager and the support of a team of individuals responsible for the safe and environmentally sound operation of the Facility, in compliance with federal, state and local laws, regulations and permits. The Facility General Manager is supported by the management staff. Job descriptions identifying the technical qualifications for these individuals are included in Attachment 1.

2.0 FACILITY SECURITY

The Facility undergoes daily surveillance by Facility management and all employees in general during the normal course of their duties. Any deviation from established security measures will be promptly brought to the attention of Facility management for corrective action.

Unauthorized access to the Facility is prevented by means of a chain link fence approximately six feet (6') in height surrounding the Facility. The integrity of the perimeter fence is evaluated during the weekly inspection, and any problems noted are corrected in an expeditious manner.

Controlled access to the Facility is through the main gate (see attachment 2 – Site Map), which is located north of the office compound. The Main gate serves as the main entrance for Facility personnel, visitors, and waste transporters. This gate generally remains open during normal working hours under close supervision by Facility Personnel. Unauthorized access to the Facility during non-operational hours is controlled by maintaining the Facility gates closed and locked. During off hours, night shift and weekend shift workers will patrol the facility a minimum of every 4 hours to ensure the site remains secure.

Visitors to the Facility must register at the main office. Waste transporting drivers are required to register at the Receiving office. After registration, waste transporter vehicles are subject to required inspection and paperwork review procedures and are then directed to the appropriate waste management unit for further inspection, sampling (if necessary), unloading, processing (as required) storage or disposal.

Other gates in the perimeter fence (see Attachment 2) remain locked and are used for the delivery of construction materials and equipment under proper supervision.

Warning signs are posted at each entrance to the active portion of the Facility and at other locations around the perimeter of the Facility such that they may be visible from any approach to the active portion of the Facility. Warning signs bear the legend "Danger – Unauthorized Personnel Keep Out" and are of sufficient size to be legible from a distance of twenty-five feet (25').

3.0 WASTE DISPOSAL, CHARACTERIZATION, INSPECTION, AND VERIFICATION PROCEDURES

3.1 PCB Waste Accepted for Disposal

The following PCB wastes are approved for disposal at the Facility [per 40 CFR 761.60 (b) and (c)]:

- **Non-Liquid PCBs:** Non-liquid PCB in the form of contaminated soil, rags, or other debris.
- **Dredged materials and municipal sewage treatment sludge that contain PCBs:** These materials shall be dewatered so as to pass the Paint Filter Liquid Test described in the most current approved version of SW-846, "Test Method for Evaluating Solid Wastes, Method 9095", prior to landfilling.
- **Drained PCB Transformers (≥ 500 ppm PCB):** PCB transformers shall be drained of all free-flowing liquids, filled with a PCB-soluble solvent, allowed to stand for at least 18 hours, and then drained thoroughly. The transformer carcass shall then be disposed of.
- **PCB Electrical Equipment:** All PCB electrical equipment except capacitors shall be drained of all free-flowing liquids prior to landfill.
- **PCB contaminated Capacitors (containing between 50-500 ppm PCBs)**
- **PCB-Free Capacitors:** Any Capacitor determined to be PCB free as indicated by label, nameplate information, manufacturer's literature, or chemical analysis.

- **PCB Small Capacitors not owned by manufacturer:** PCB small capacitors owned by a person who did not manufacture or at any time manufacturer PCB capacitors or PCB equipment.
- **PCB Hydraulic Machines:** PCB hydraulic machines must be drained of all free-flowing liquids prior to landfill. If the liquid contains 1000 ppm PCBs or greater, the machine must be flushed with a PCB-soluble solvent containing less than 50 ppm PCBs prior to landfill.
- **PCB Articles at 500 ppm PCBs or greater:** PCB Articles containing PCBs at 500 ppm or greater shall be thoroughly drained of all free-flowing PCB liquids prior to landfill.
- **PCB Articles between 50 – 500 ppm PCBs:** PCB Articles containing between 50 and less than 500 ppm shall be thoroughly drained of all free-flowing PCB liquids prior to landfill.
- **Fluorescent Light Ballasts:** Fluorescent light ballasts containing PCBs in their potting material.
- **Undecontaminated PCB Containers:** PCB containers which have been used to contain PCB liquids 500 ppm or greater and which have not been decontaminated must be drained of any liquids prior to landfill.
- **PCB Containers exposed to less than 500 ppm PCBs:** Containers used to contain PCB liquids at less than 500 ppm can be:
 - (1) Drained off any liquids prior to landfill or
 - (2) The container of liquid PCBs with a concentration less than 500 ppm PCB may be disposed of if each container is surrounded by an amount of inert sorbent material capable of absorbing all of the liquid contents of the container [per 40 CFR 761.75(b)(8)(ii)] and providing that the total

amount of liquid per 55 gallon drum is equal to or less than 15 gallons.

- **Combined TSCA/RCRA Waste Streams:** PCB-containing wastes may be treated in an appropriate stabilization unit when the presence of RCRA hazardous constituents in combined RCRA/TSCA waste requires treatment prior to land disposal.

In addition the following wastes are approved for disposal at the Facility:

- **PCB Remediation waste** [per 40 CFR 761.61]
- **PCB Bulk Product waste** [per 40 CFR 761.62]
- **PCB Household waste** [per 40 CFR 761.63]

All liquid PCBs (which cannot be appropriately landfilled) shall be transported off-site for disposal at an EPA-approved PCB disposal facility in accordance with 40 CFR 761.60(a).

3.2 Waste Characterization

The goal of US Ecology Nevada's waste characterization program is to obtain the necessary information on every potential waste stream to allow a determination as to the acceptability of the waste and to ensure the use of proper waste management practices upon acceptance. The information required for waste characterization may be provided by the waste generator or obtained by US Ecology Nevada through analysis of a representative sample of the waste.

US Ecology Nevada requires that all waste generators supply a description of the process generating the waste and a detailed description of the waste components using a Waste Product Questionnaire form or

commonly referred to as a profile (see Attachment 3). The generator may also be asked to certify that the waste is not prohibited from land disposal by federal and state regulations, that any samples of the waste provided to US Ecology Nevada were collected in accordance with US EPA approved methods and constitute representative samples of the waste or other information. Facility personnel review the information provided for technical adequacy. All waste streams for disposal at the Facility are co-approved by US Ecology Nevada personnel and the Nevada Division of Environmental Protection (NDEP). For further details on waste characterization and acceptance see the US Ecology Waste Analysis Plan (WAP) in Attachment 11.

3.3 Waste Inspection and Verification

The US Ecology Nevada waste stream verification program has been developed to inspect each waste shipment received at the facility to determine its acceptability and conformity to the waste profile developed during the approval process. All verification procedures are performed under the direction of General Manager/Designee.

The verification program includes procedures for inspection of the waste shipment upon arrival at the facility, and for sampling and analysis of the waste prior to processing. Minor discrepancies may be resolved through communication with the generator. If they are significant, analysis and/or investigation may be necessary. An unresolved discrepancy will result in shipment rejection. Discrepancies are documented on the manifest. Discrepancies, which may cause rejection of the waste, are also documented on the Unusual Occurrences Report, see section 4.7.

The manifest and/or shipping papers accompanying the waste shipment is reviewed prior to inspecting the load, to verify the following:

- The manifest has been properly completed and corresponds to the waste described on the profile.
- The amount of waste received is equivalent to the amount recorded on the manifest. A variation greater than $\pm 10\%$ bulk weight (or a piece count in containerized shipments) is considered a discrepancy.
- A complete Land Disposal Restriction (LDR) form or equivalent is included with the shipping papers of waste streams subject to 40 CFR 268 LDR standards, if appropriate.

Preliminary inspections of each waste shipment are conducted upon arrival at the facility, and prior to any off-loading. Upon unloading, every container in a containerized waste shipment must be opened and visually inspected. The Receiving Technician or operator will compare the load with the description of the waste previously provided by the generator, and contained on the profile. This description may include, but may not be limited to, the waste stream name, the generating process, odor, color, waste stream components and percentages, and any other relevant information. If during the shipment inspection it is determined that the waste received does not match the profile's description, the shipment will be subject to further investigation or verification testing and analysis.

During the shipment inspection, the presence or absence of free liquids and any potential dusting problems are visually determined. If a sorbent material has been used in a containerized shipment, US Ecology Nevada will visually evaluate the sorbent to ensure that the generator employed the non-biodegradable sorbent (or equivalent) specified in the component's breakdown section of the profile.

Shipment inspections are conducted by personnel who are provided with training in proper waste inspection procedures.

US Ecology Nevada conducts verification sampling and analysis on incoming waste shipments to ensure that the waste conforms to the waste stream profile developed during the approval process, and to the description on the accompanying manifest and/or shipping papers. This sampling and analysis effort is not intended to characterize the waste stream; any sampling and analysis necessary for waste characterization is performed during the waste stream approval process.

The sampling and analytical requirements may be waived if the waste cannot be appropriately sampled and analyzed (e.g., glass, used safety equipment, debris, crushed or empty containers). If the chemical and physical nature of the waste is known in sufficient detail, such as in lab packs, outdated commercial chemical products or single source spills, sampling may not be necessary or appropriate.

Incoming waste shipments are subject to the following analysis:

- Paint Filter Liquid Test is used to determine the presence of free liquids.
- pH Screen (1% solution) indicates the pH range and the general corrosive nature of the waste. PH screen may not apply to certain waste types, e.g., organic waste, or insoluble solid waste.
- Water Reactivity is used to determine whether the waste has a potential to vigorously react with water to form gases or other products, or generate significant heat. This test does not apply to wastes for which sufficient analytical data exist that indicate no potential reactivity with water.

- Sulfide Screen (ASTM Method D 4978-89) is used to identify the presence or absence of sulfides in the incoming waste to determine the potential for changes in the waste's physical and chemical properties. If the presence of sulfides has not been previously identified by the generator, a positive result may be indicative of changes in the waste properties, and will require further evaluation of the wastestream prior to acceptance.
- Cyanide Screen (ASTM Method D 5049-90) is used to identify the presence or absence of cyanides in the incoming waste to determine the potential for changes in the waste's physical and chemical properties. If the generator as part of the waste profile has not previously identified the presence of cyanides, a positive test result may be indicative of changes in the waste properties, and will require further evaluation of the wastestream prior to acceptance.

Bulk waste loads are sampled and analyzed, except where large volumes of a single waste stream are received from a single source, (e.g.; a site cleanup, a large volume generator, etc.). In such cases, all shipments are inspected and at least 10% of such loads are sampled and analyzed. Bulk waste may also be sampled in an original bulk container (e.g., rail tanker, gondola car, etc.).

4.0 LANDFILL OPERATIONS

Hazardous solid wastes are disposed of at the facility by burial in landfill Trenches. These trenches are divided into subcells in order to manage wastes of different compatibilities. Normally these disposal operations will include inspection and acceptance of the waste, preparation of burial instructions, burial operations, and vehicle release. This section describes specific procedures to follow in conducting these operations. Non-liquid wastes or liquid wastes that have been stabilized and pass the Paint Filter test that are chemically compatible with PCB wastes may be disposed of in the same subcell within the active Trench. In addition, lab packed liquid wastes that are chemically compatible with PCB wastes may be disposed of in the same subcell. All wastestreams are evaluated during the approval process for potential incompatibility. Non-compatible materials may be placed in the same subcell provided that they are adequately separated, i.e., an approximately three-foot barrier of soil or compatible material is placed between them.

Personnel will wear appropriate personal protective equipment to protect against dermal contact with or inhalation of PCBs or materials containing PCBs during all storage, treatment and disposal operations [per 40 CR 761.60(b)(8)].

4.1 Disposal of Containerized Waste

Normally, containerized waste will be removed from the transportation vehicle with a forklift equipped with drum-handling mechanisms. After the container is inspected, verified that it is at least 90% full, and sampled if required, the container is placed into the landfill in the appropriately indicated subcell. In the event that the receipt inspection reveals that the containers are less than 90% full, the void space is filled with site soil or suitable absorbent. Filling of the void spaces may be

accomplished by hand or using a front-end loader or other equipment. Empty containers are crushed inside the cell to remove the void space with heavy equipment. Waste placement is performed to minimize void space and care will be taken during placement and backfill operations to avoid dropping, breaking or otherwise careless handling of containers. Clean Facility soil or suitable waste material, i.e., free of debris or large rocks will be placed directly against the synthetic liner.

Containers of PCB liquid with a concentration of less than 500 ppm and with a volume of less than 15 gallons of liquid will be placed in the landfill and surrounded by an amount of inert sorbent material, i.e., soil, which is capable of absorbing all of the liquid contents of the container.

4.2 Bulk Solids Disposal

The disposal of bulk solid waste will normally require that the transport vehicle be taken to the disposal cell to offload the waste. Special attention will be taken to prevent dusting during the off-loading operation. Waste streams are carefully evaluated to determine the potential for particulate emissions, odor, or dust generation. Waste streams, which pose a potential for excessive emissions, may be rejected, or special packaging or handling arrangements made to manage them in a protective manner.

Clean Facility soil or suitable waste material, i.e., free of debris or large rocks will be placed directly against the synthetic liner.

4.3 Wind Dispersal Control

As a measure to control the potential for wind dispersal of particulates during landfill operations, US Ecology Nevada conducts in-depth evaluation of waste streams during the approval process to determine the waste stream's potential to generate excessive dust during off-loading. Special packaging and handling arrangements are made as necessary to contain the dust during off-loading or disposal.

Wind dispersal is further controlled by placing a minimum of six-inch soil cover, compatible non-hazardous waste or an alternate cover material at the end of each operating day.

4.4 PCB Management Procedures

In addition to PCB wastes received for direct disposal, US Ecology Nevada accepts a variety of PCB-containing materials (e.g., transformers, bushings) that require draining and flushing to remove PCB liquids contained in these materials prior to disposal. The PCB processing system currently consists of the PCB Processing Building, where storage, handling, draining, and flushing of transformers and capacitors takes place, and four (4) storage tanks located outside the PCB Processing Building for the temporary storage of drained liquid PCB and flushate. A smaller PCB holding tank is used to transfer liquids from the original containers to the storage tanks. PCB liquids are transported to an off-site incinerator for disposal.

4.4.1 PCB Storage, Draining and Flushing

The PCB Draining and Flushing Area includes the PCB building and pad which have berms that rise three feet above the subgrade to prevent run-on. The building has a sealed concrete floor and is underlain by a 4-mil vapor barrier, and two sand-bedded 30-mil HDPE synthetic liners.

The draining and flushing of PCB items are performed in the PCB building. After inspection and acceptance by Facility personnel, PCB items are unloaded from trucks, using a suitable crane or other lifting device. Items are then placed on the concrete apron at the west end of the building and transported by forklift into the building for draining or draining and flushing.

Prior to beginning draining operations, the liquid level indicators on the PCB liquid storage tanks are inspected for sufficient volume capacity to conduct the draining operations. In addition to this initial inspection, the pump operator periodically checks the tank liquid level indicator gauges during draining operations to ensure tanks are not overfilled. Draining is accomplished by inserting the pump hose with a tube attachment into the item and pumping out the liquid. The PCB items are drained, one at a time, to one of the PCB holding tanks.

All storage holding tanks are equipped with audible liquid level alarms. The alarms are inspected routinely to ensure good working order. In addition, the secondary containment for the PCB storage tanks is sized to contain twice the volume of the

largest PCB tank plus the volume of a one hundred (100) year, 24-hour rain event.

Upon completion of the draining phase, all PCB transformers that contained PCB liquid less than 500 parts per million (ppm), all PCB-contaminated electrical equipment, and all other PCB articles and containers, are removed from the building for disposal in the designated disposal trench. All remaining transformers that contained PCB liquid in excess of 500 ppm, and all PCB hydraulic machines which contained PCB liquid in excess of 1000 ppm, are filled with No. 2 diesel fuel or another suitable solvent in which PCBs are soluble. At the end of an 18-hour flushing period, the solvent is drained and treated as PCB liquid.

Flushate can either be stored in the PCB storage tanks and sent off for incineration or it can be stored for reuse as long as it contains less than 50 ppm of PCBs.

All PCB liquids contained in the holding tank are transferred to the appropriate storage tank until transported off-site for incineration or treatment in accordance with all applicable state and federal regulations.

When the transformers or related items have been drained of flushing solvent, they are stored or removed for disposal in the designated disposal area. At the end of the operation, the Facility personnel will clean up all incidental spills, per the PCB Processing Facility Spill Prevention Control and Countermeasures Plan, see Attachment 4.

4.4.2 Commercial Storage of PCBs

PCB liquids generated from draining and flushing operations are containerized and stored in the PCB building or transferred to the PCB tank farm, pending transportation to an authorized disposal facility. Daily inspections (when operating) are conducted of the PCB storage building and the PCB tank farm to ensure that all facilities are operated in a manner that is protective of human health and the environment. The inspection includes assessing the storage tanks and containment structures for signs of corrosion, erosion or leaking fixtures or seams. The area immediately surrounding each tank is inspected for any obvious signs of leakage. A work order will be promptly initiated to repair any leaking equipment. The repair will be completed as soon as practicable.

4.4.3 PCB Disposal

Disposal of PCB-contaminated material is conducted in the specifically designated disposal areas. Other wastes not chemically compatible with PCBs are segregated from the PCBs throughout the waste handling and disposal process. PCB wastes are typically compatible with other PCB wastes when stored, blended in tanks or placed in contact in a landfill trench. PCB wastes will be co-disposed in the landfill with non-PCB wastes (this includes both RCRA and non-RCRA). PCBs are incompatible with strong oxidizers and strong acids but are generally chemically inert under normal conditions. Liquids containing PCBs will only be store in steel drums as PCBs have been know to attack some plastics.

USEN's approach is to categorize a waste by its reactive characteristics. USEN will use EPA-600/2-80-076, "*A Method for Determining the Compatibility of Hazardous Wastes*", as a guide to group PCB and other wastes into the different reactivity groups established. Additional information can be found in the USEN Waste Analysis Plan.

Drained, and flushed if required, transformers or related items that were removed from the building are disposed in the designated disposal area. The transformers or related items are placed in the landfill in a manner that will prevent damage to the articles, [per 40 CFR 761.75(b)(8)(i)]. At the end of the operation, the Facility personnel will clean up all incidental spills, per the PCB Processing Facility Spill Prevention Control and Countermeasures Plan, see Attachment 4. The cleanup material is treated as contaminated and disposed of in the active disposal area. All contaminated personal protective clothing is also properly collected, macro-encapsulated if required and disposed in the active disposal trench.

4.4.4 PCB Stabilization

Leachate generated by the facility can be solidified provided the PCB concentration is less than 2 ppm.

Liquids with concentrations of less than 50 ppm can be solidified providing that the source of the PCB liquid is less than 50 ppm.

PCB waste (non-soils) at concentrations less than 50 ppm may be placed in the treatment pans when RCRA hazardous constituents in combined RCRA/TSCA waste require treatment prior to land disposal. Soils that are determined to be characteristic under RCRA and are TSCA regulated may be treated in the pans provided that PCBs less than 1000 ppm. PCBs will be required to meet the land disposal restrictions outlined in 40 CFR §268.48.

The Facility determines PCB concentrations prior to stabilization of any liquid waste. The solidification process will reduce the liquid content or increase the solid content so that a non-flowing consistency is achieved to eliminate the presence of free liquids prior to final disposal in the specifically designated disposal areas.

When PCBs are being treated in any of the 5 permitted stabilization pans water will be used to keep dust emissions to a minimum.

The stabilization process will reduce the liquid content or increase the solid content so that a non-flowing consistency is achieved to eliminate the presence of free liquids prior to final disposal in the specifically designated disposal areas. Liquid waste will be stabilized by the addition of a chemical additive or with a dry inert absorbent. The waste must pass the Paint Filter Test, as identified in SW-846, prior to disposal.

Stabilization of liquids with concentrations of less than 50 ppm PCB can also be achieved by placing the waste in the Facility's evaporation tank.

The evaporation tank is inspected on a daily basis (when operating) to allow detection of a release within 24 hours, or at the earliest practicable time and to ensure that a minimum of six-inch freeboard is maintained in the tank to prevent overtopping due to wind action.

As a measure to prevent spills, facility personnel are trained in proper waste management procedures, including the observance of caution while unloading waste into the tank to avoid splashing or tank overfilling.

4.5 Vehicle Inspection and Cleaning Procedure

Any material spilled during off-loading activities will be collected and properly disposed of. The vehicle's floor will be swept clean of any remaining residue and spill absorbent material used, and the sweepings collected for further disposal, as appropriate.

After completion of the off-loading procedure, the trailer must be inspected for contamination and additional decontamination activities performed if needed.

Tailgates and tires of vehicles entering the disposal cell will be inspected prior to leaving the area and any residue present is removed with a scraper or broom. If this procedure is not effective in removing all residue, the vehicles are directed to the truck washing area for decontamination.

4.5.1 Vehicle Decontamination

Vehicle decontamination takes place at the truck washing facility. The contaminated portion of the vehicle is placed on the drain pad portion of the wash pad in such a way that all contaminated wash water is directed into the holding basin. High-pressure steam or water is then used to clean the contaminated portions of the vehicle. The steam is directed so that the contaminated wastewater is then held in the evaporation tank until evaporation of the water is complete, or it may be sent off-site for disposal. The remaining solids are then collected and deposited in the disposal cell.

There is very little chance for adverse reaction because of the low concentrations of contamination in the wash water. Therefore, no segregation of material in the evaporation tank is planned.

4.6 Operational Backfill

Normally, at the end of each working day, all waste placed in the cell is covered with at least six (6) inches of soil, compatible non-hazardous waste or alternate cover material. However, the end of the drums, transformers, or other containers in the outermost row may remain exposed, to facilitate close placement of the next day's waste.

4.7 Unusual Occurrences

It is the responsibility of the General Manager/Designee to ensure that the reporting and recording of unusual occurrences are properly completed, and that all appropriate mitigating activities have been concluded.

An unusual occurrence will be defined as:

- Fire
- Explosion
- Spill or leak (as defined by the Facility Contingency Plan)
- Airborne waste release
- Major manifest discrepancy (e.g., piece count, unmanifested load)
- WDI discrepancy (e.g., unauthorized liquids)
- On-site motor vehicle accident
- Personnel exposure or reportable injury
- Any event which results in the implementation of the Facility Contingency Plan

Unusual occurrences shall be reported to the General Manager/Designee as soon as possible. The Unusual Occurrence will be investigated and attempt made to resolve the occurrence. If the Unusual Occurrence involves waste stream material, the customer may be notified and the information obtained from the customer considered in developing the incident resolution.

All unusual occurrences shall be documented according to the Record Keeping and Reporting Plan, see Attachment 5.

5.0 LOCATION OF WASTES

The Facility will maintain records of waste location within the disposal cell using a grid coordinate system. The system requires division of the disposal cell into rectangular grid blocks by a competent surveyor using appropriate surveying techniques.

The dimensions of the landfill grid blocks will be 50 feet long, 50 feet wide and 10 feet in depth. The grid blocks shall be described by elevation and horizontal coordinates to the nearest whole foot, maintaining accuracy within ten feet (10'). The grid system will be established in reference to elevation (of the waste) and horizontal benchmarks. Diagrams illustrating the grid system for Trench 11 and Trench 12 are contained in Attachment 6. To simplify the recording of coordinates, each grid is designated by a number and a letter. When the grid system is used in conjunction with waste elevation an accurate location of waste placement can be maintained.

The grid system in Trench 11 also includes segregated areas for different waste compatibilities. The "A" section is for solid acidic material, the "B" section is for solid caustic material, The "D" section is for everything else. Trench 12 utilizes segregated areas for both solid acids and bases but these areas are dynamic and may move as the landfill fills. Dirt berms will be utilized to segregate these areas.

Grid markers will be weatherproof, distinctively identifiable from the next marker in any direction, oriented with and tied to the Facility grid.

The location of waste within the cell will be reported as follows:

- Grid coordinates (e.g., N8, EH) south and west of the waste location
- Distance of the load north from the north grid named above

- Distance of the load east from the east grid named above
- Distance the load extends north in even feet
- Distance the load extends east in even feet
- Top elevation
- Depth of load

On a daily basis the Landfill Supervisor will determine the daily coordinates being used and communicate those coordinates to USEN operations staff (example of daily sheet included in Attachment 6). The disposal grid coordinates including the elevation are hand written on the work order when the waste is disposed of. It is important the operator disposing the waste record both the X and Y coordinates from the grid system and the waste elevation to accurately reflect waste placement.

Irregularly shaped loads and bulk loads will be defined by the smallest grid block that completely encloses them. Shipments containing more than one waste stream of compatible waste may be buried and located in the same area and identified as such.

Waste location information will be recorded in the Workorder Supplement sheet (see the Record Keeping and Recording Plan included in Attachment 5).

6.0 SURFACE AND GROUNDWATER PROTECTION

There are no perennial streams within 10 miles of the Facility. The Facility is not located on a floodplain, shoreline, or a groundwater recharge area, and there is no known hydraulic connection between the site and potential standing or flowing surface water. The site is not subject to concentrated stormwater flows resulting from extreme rainfall events. Sheet flow, which might result from such a storm, is diverted away from the site by drainage ditches north and east of the site. These existing diversion features prevent off-site run-on from entering the Facility. Within the disposal area, any runoff, which might be generated by incidental precipitation, is retained within the disposal unit. Any future waste management area will be similarly protected.

The 100-year, 24-hour point rainfall is 2.6 inches with a runoff over the watershed of 0.43 inches. It was found that the 100-year, 24-hour storm peak flow of 2,056 cfs would be carried into the six channels of the Amargosa River with a flow depth of 0.13 feet. Since the site is at least four feet above the nearest channel, it would not be impacted by the 100-year, 24-hour flow in the Amargosa River. Therefore, the site is not within a 100-year floodplain. The Flood Insurance Rate Map of the area also shows the area does not fall within the 100-year flood boundary.

6.1 Run-On Control

Run-on control minimizes the erosion of Facility containment structures, the surface discharge of waste constituents, and the downward percolation of liquid through wastes. This protection is provided in several ways. The area surrounding an operational disposal cell will be graded so that surface waters, if any, will be directed away from the

active disposal area. The earthen covers of inactive disposal cells will be graded to provide good drainage away from the active disposal area.

The run-on control ditches are inspected weekly and after every storm to ensure that the design capacity is maintained. Necessary maintenance activities are conducted to ensure that accumulated debris or obstructions do not reduce the system's capacity.

6.2 Run-Off Control

With the run-on control measures in-place at the facility, the only water expected to come in contact with the waste in the disposal unit is rainfall. No run-off is expected from the disposal unit since precipitation run-off is contained within the active disposal area and collected by the cell's leachate collection and removal system. All liquids collected will be managed properly and will not be discharged.

7.0 FACILITY INSPECTION

US Ecology Nevada's inspection Plan (Attachment 7) provides for the overall inspection of the Facility operations on a daily, weekly, monthly and quarterly basis. The inspection schedule has been established to ensure that the areas with the highest potential for deterioration or malfunction are inspected most frequently. The schedules combine inspection of general aspects of the Facility operation, such as emergency and safety equipment and perimeter fence integrity, with process specific inspection requirements, such as inspection of the active disposal cell.

Attachment 7 contains samples of the Facility Inspection Forms used to document each type of inspection. Each form identifies the areas subject to inspection and the type of problems to look for during the inspection. All forms are provided for example purposes only, and may be substituted by equivalent forms.

Any malfunction or deterioration of equipment or a structure identified during an inspection is promptly brought to the attention of the General Manager/Designee. The deficiency is evaluated for environmental or human health hazard potential, taking into consideration the location and nature of the problem, the potential for waste migration and human exposure, and the availability of control mechanisms such as secondary containment. Appropriate response times, interim measures, and corrective actions are determined based on the hazard evaluation.

Remedial activities are prioritized according to the nature or seriousness of the problem and are conducted in an expeditious manner.

The Facility Inspection Report corresponding to each type of inspection (daily, weekly, monthly and quarterly) is completed to document performance of the inspection. The designated inspector must include his or her name, the date and time of the inspection, and a notation of any observations made during the inspection. When corrective measures are necessary, the inspector must complete and sign the Inspection Deficiency and Corrective Action report (also included in example form in Attachment 7), indicating the nature of the deficiency and the date and type of corrective action undertaken. Inspection reports are compiled and maintained as part of the Facility operating record. Records are to be maintained at the Facility for at least three (3) years.

8.0 PERSONNEL TRAINING PROGRAM

The US Ecology Training program is in compliance with 29 CFR §1910.120 which covers hazardous waste operations and emergency response. The training program implementation is the responsibility of the General Manager/Designee. The General Manager/Designee functions as Training Coordinator, responsible for selecting qualified instructors, planning and organizing the training sessions, and ensuring proper adherence to documentation and record keeping procedures. The identification of training needs of each job position and development of the training program's content will ensure adequate instruction relevant to each position is provided.

Training on new environmental regulations pertaining to Facility operations and compliance with environmental standards will also be provided. Training lesson plans will be developed to address specific areas of the regulations for which personnel training is required. Training may first be provided to key Facility management personnel who may be responsible, once trained, for training other personnel.

8.1 Trainer's Credentials / Instructor Qualifications

US Ecology shall ensure that a person trained (as described in 29 CFR §1910.120(p)(7)(iii)) in hazardous waste management procedures of 29 CFR §1910.120(p) shall direct the training program, and shall teach facility personnel hazardous waste management procedures relevant to their employment position.

The required qualifications for the individuals responsible for training implementation include knowledge of state, federal, and local regulations pertinent to hazardous waste management and disposal.

8.2 Training Program Description

US Ecology Nevada's training program is designed to ensure that the amount and type of training offered to Facility personnel is adequate to allow efficient and safe performance of the tasks associated with each job position. The training program focuses on the training needs of the Hazardous Material Workers. This classification includes all job positions assigned to work in the active areas of the Facility where hazardous wastes are received, stored, handled or disposed. The program incorporates additional levels of training to fulfill the needs of employees requiring specialized training (i.e., Heavy Equipment Operator), and of those whose job positions do not have primary waste management responsibilities, but need a general understanding of the Facility's operations and procedures to react properly in an emergency situation.

All new employees who fall under the general category of Hazardous Material Worker will be given an initial 24 hour training as defined by 29 CFR §1910.(e)(3)(iii), which is for hazardous material workers regularly on site who work in areas which have been monitored and fully characterized. Only workers who have completed their initial 24 hour training may have un-supervised access to the areas in which hazard waste operations are being performed. These areas include but not limited to Trench 11 and 12, CMS building, Stabilization (both indoor and outdoor) and the PCB processing building. Those workers who have yet to completed the initial 24 hour training will be required to be supervised at all times.

8.2.1 Waste Receiving Technician

The Waste Receiving Technicians are required, upon hiring, to participate in an in-house training program intended to familiarize them with environmental regulations pertinent to the Facility's waste stream evaluation and approval procedures, Facility environmental permits, company policies regarding waste acceptance, and relevant aspects of Facility operations. Employees which may show by documentation and/or certification that their work experience and/or previous training has resulted in training equivalent to the one required to perform the duties associated with their job description, may be exempt from environmental regulations training, as appropriate. The in-house training provided to such employees will be focused on Facility-specific permits and procedures, and company policies. Completion of the qualification training shall be documented.

The requirement for annual review of the initial training is satisfied through the in-house training program intended to keep the Receiving Technician up to date with newly promulgated regulations. The Receiving Technician may also participate in training courses or seminars offered by independent organizations.

8.2.2 Hazardous Materials Worker

Newly hired employees, who will be assigned to work in the active areas where hazardous wastes are received, stored, handled or disposed, will be required to undergo initial 24 hour

qualification training as Hazardous Materials Worker Trainees. The initial qualification training addresses the following subjects:

- Respirator Training
- Basic Facility Safety Requirements
- Facility Tour – Explanation of Operations
- Emergency Contingency Plan
 - Location and use of emergency equipment
 - Various contingencies (i.e., fire, spill, gas release) and appropriate responses
 - Agreements with off-site response agencies
- Use and Location of Self-Contained Breathing Apparatus (SCBA)
- Fire Extinguishers Locations, Use, Limitations
- Location and Use of Emergency Eye Wash/Shower
- General Overview of EPA/DOT Markings and Labeling
- General Overview of RCRA and TSCA Permits
- Hazard Communication
- Personal Protective Equipment – Locations, Use, Limitations
- Medical Surveillance Requirements
- Decontamination Procedures
- Other

The employee's completion of the qualification training shall be documented. No employee will be allowed to work in active areas of the facility without direct supervision of a qualified Hazardous Material Worker until all initial qualification training is complete.

As part of the qualification process, each new employee receives a complete medical evaluation and is properly fitted for respirator use prior to being allowed direct handling of waste materials or

access to the active disposal area. Any employee assigned a job position requiring operation of heavy equipment will receive specific training on the operation of each piece of equipment he or she will operate.

8.2.3 Specialized Training

Specialized training is required for several job positions where specific skills are necessary to fulfill the responsibilities and duties of the position. The employee may initiate the specialized training during or after the initial qualification process.

8.2.3.1 Heavy Equipment Operator

In addition to the 24-hours of initial training, qualification of Heavy Equipment Operators (HEO's) includes a period of supervised on-the-job training and performance evaluation by the immediate supervisor in conjunction with the General Manager/Designee.

The training program is designed to produce an HEO who is proficient in the operation of all Facility heavy equipment. A qualified operator is expected to demonstrate the ability to use the equipment as designed, and to have working knowledge of preventative maintenance and equipment safety practices. At a minimum, a HEO must be able to demonstrate:

- Knowledge of operational controls, pinch points, lifting or load limits, load charts, steering, and brake mechanisms.
- Ability to perform routine checks and servicing of equipment to the degree that the person understands all operational functions.
- Working knowledge of specific operational features of the equipment to be operated.

Once these skills are demonstrated, the supervisor indicates in the employee training record all heavy equipment on which the employee has obtained qualification. The HEO is then qualified as a replacement operator and may be allowed to begin unsupervised operation of the particular units for which training was completed.

8.2.4 General Training

Facility employees who do not work in active areas (for example, secretarial personnel, accountants, security guards, etc.) will receive sufficient instructions so as to understand the posting of active areas, the general operations conducted in those areas, and the restrictions imposed on their entrance and access to such areas. This generalized training program will be offered to each employee during the first six months of employment, and includes training on basic Facility safety requirements, the Facility's emergency preparedness program and contingency plans.

Visitors and contractors whose functions at the Facility require access to active areas of the Facility for extended periods of time may be subject to some level of training, if determined necessary. Visitors and contractors will be required to read and sign the Visitor/Contractor On-Site Authorization Record, see Attachment 8, which contains general guidelines to follow in case of an emergency. When additional training is provided, training shall be documented.

8.3 Training Techniques

The Facility training program combines orientation meetings and classroom instruction with on-the-job training and other teaching aids, e.g. videotape presentations. Training Lesson Plans (TLP's) may be used to aid instructors in the presentation of employee training. These lesson plans will be developed, and updated as necessary by Facility and/or corporate personnel, to cover both general and Facility specific subjects. All TLP's are to be approved by the General Manager/Designee prior to use at the Facility. Written examinations may be incorporated as part of the TLP, and when used, are entered into the individual's training records. When a TLP is used for employee training, it is noted in the individual's training records.

Emergency drills are employed as another training tool. Drills involving the implementation of the contingency plan will be conducted at least twice per year. A record of all personnel who participate in the drill will be made and noted in the employee's training record.

8.4 Continuous Training Program

On an annual basis all employees will complete an 8 hour OSHA/HAZWOPR refresher training course. The course involves subjects addressed during the initial training as well as other topics related to hazardous waste management and the Facility's industrial hygiene and safety program. Employee participation in these sessions is documented on the Sign-In form (see Attachment 9)

Subjects addressed during the continuous training program will include, at a minimum, the following:

- Review of basic chemistry as it relates to hazardous materials
- General Facility safety and security procedures, practices and requirements
- Contamination Control
- Physical and chemical hazards associated with waste materials
- U.S. DOT packaging, manifesting, labeling, and placarding requirements for hazardous waste
- Proper use of respiratory protection including emergency use equipment
- Proper use of personal protective equipment
- Proper equipment and personnel decontamination procedures
- Proper procedures for receipt, inspection, handling, disposal and location of waste material
- Review of the Facility Emergency Preparedness and Contingency Plan requirements
- Review of emergency response equipment, communication equipment and operational procedures necessary to carry out the Contingency Plan emergency response operations

- Proper use of Facility fire extinguishers
- Basic first aid procedures
- Review of Facility Hazard Communication Program
- Review of Facility Hearing Conservation Program
- Review of Facility Medical Evaluation Program
- Review of applicable RCRA and TSCA regulations governing the storage and disposal of waste materials
- Review of permit requirements governing Facility operations

8.5 Documentation and Recordkeeping

The responsibility for maintenance of training records at the Facility relies on the General Manager/Designee. Training records for current employees will be retained at the Facility as long as the Facility is in operation; on former employees, records will be retained at least three (3) years after termination of company employment.

The documents that will be retained as constituents of the training record include:

- Job titles and description for each position related to hazardous waste management and name of employee filling the position.
- Written job description for each position related to waste management, describing the required qualifications, duties of the position, and the type and amount of introductory and continuing training required for every position.
- Training documentation records for each employee, which may include:
 - Hazardous Materials Worker Trainee Qualification Record and 24-hour Training Certificate

- Hazardous Materials Worker Qualification Record
- Written Examinations (if any)
- Hazard Communications Training Certification
- Medical Evaluation Clearance

9.0 GROUNDWATER MONITORING PROGRAM

Groundwater monitoring has been performed at the facility pursuant to federal and state hazardous waste (RCRA) regulations since 1984.

The current facility groundwater monitoring network was designed to comply with 40 CFR Subpart F regulations. The groundwater monitoring system consists of 18 wells in the upper aquifer and 5 wells in the lower aquifer. There are 15 point of compliance wells in the upper aquifer and 5 supplementary wells in the lower aquifer. The upper aquifer wells are generally 280 feet deep and the lower aquifer wells are 380 to 480 feet deep. The 600-series wells are monitored as supplemental wells. The supplemental wells are used to monitor the water quality of the lower regional aquifer and consists of one up-gradient well, MW-600, and 4 down gradient wells. These wells are "supplemental" to the detection monitoring network required by the RCRA regulations for the upper aquifer.

The existing up-gradient wells are wells 313, 318 and 319 in the upper aquifer and well 600 in the lower aquifer. The existing detection monitoring system is designed to monitor landfill Trenches 10, 11, 12 and the Pre-RCRA Trenches 1-9.

Detailed descriptions of sampling methods, analytical procedures, and data recording and analysis requirements are described in the Groundwater Monitoring Plan which is included in the USEN RCRA Part B Application. USEN will notify US EPA Region IX in writing within 7 days after discovering the presence of PCBs in any groundwater monitoring well.

Monitoring Well Designations		
Well Identification	Designation	Aquifer
001	Point of Compliance	Upper
002	Point of Compliance	Upper
308	Point of Compliance	Upper
309	Point of Compliance	Upper
310	Point of Compliance	Upper
311	Point of Compliance	Upper
313	Background	Upper
315A	Point of Compliance	Upper
316	Point of Compliance	Upper
317	Point of Compliance	Upper
318	Background	Upper
319	Background	Upper
320	Point of Compliance	Upper
322	Point of Compliance	Upper
324	Point of Compliance	Upper
325	Point of Compliance	Upper
326	Point of Compliance	Upper
327	Point of Compliance	Upper
600	Background-Supplemental	Lower
601	Supplemental	Lower
603	Supplemental	Lower
604	Supplemental	Lower
605	Supplemental	Lower

10.0 LEACHATE COLLECTION AND REMOVAL SYSTEM

The Trench 11 and Trench 12 double liner systems incorporate primary and a secondary leachate collection/ detection and removal systems (LCRS). The system meets the requirements of 40 CFR §761.75(b)(7)(ii).

US Ecology Nevada will monitor and evaluate the Leachate Collection and Detection systems as specified in the Facility Response Action Plans (RAP).

On a Quarterly basis at least one leachate collection sump from Trench 11 and at least one leachate collection sump from Trench 12 will be collected and analyzed for the following parameters:

- Inorganic constituents including, metals, cyanide, fluoride, chloride, nitrite-nitrate, and sulfate
- pH, total organic carbon (TOC), total organic halides (TOX)
- Specific Conductance
- Pesticides and PCBs
- Radioisotopes; Gross Alpha, Gross Beta, Radium 226 & 228, and Tritium.
- Volatile Organic Compounds (VOCs).

Samples collected Trench 11 sumps will alternate quarterly. For example odd quarters (1st and 3rd) sump C-3 will be collected and even quarters (2nd and 4th) sump C-4 will be collected. Upon completion Trench 12 will consist of 3 leachate sumps identified as T12-C1, T12-C2, and T12-C3. At least one sump will be sampled and analyzed quarterly.

Any instance of a confirmed detection of PCBs greater than 2 ppm at any of the leachate collection sumps will be reported in writing to EPA Region IX.

Collected leachate will be stored in totes in the landfill and a representative sample will be analyzed for PCBs. Leachate can be recycled and used for dust suppression in the active landfill if PCB concentrations are $< 0.5 \mu\text{g/L}$. Leachate with PCBs $> 0.5 \mu\text{g/L}$ will be treated to remove PCBs (i.e., processed through a carbon bed filter and re-analyzed for PCBs) or disposed in the evaporation tank.

11.0 USE OF ROAWAYS AND VEHICLE AND EQUIPMENT MOVEMENT

The site is surrounded by an approximately six 6 foot chain-link fence topped by three 3 strands of barbed wire. Unauthorized access to the facility during non-operational hours is controlled by maintaining the facility gates closed and locked.

The only public road in the vicinity of the Beatty facility is US Highway 95, which is a two-lane, all-weather, hard-surfaced road bordered by BLM range fence (which is a deterrent to off-road vehicle travel). The facility entrance off the southwest side of US Highway 95 is a one hundred (100) foot wide asphaltic concrete apron transitioning into a two-lane unimproved-surface road.

The entrance road, which is well crowned and has graded shoulders and ditches, continues westward for one-half a mile across land leased by the State of Nevada from the BLM. It enters the facility property at the north end of the buffer zone and administration area through a security gate. This gate remains open during normal business hours under the surveillance of facility personnel.

The soils of the bajada on which the facility is built are consolidated, lightly cemented sands and gravels, and covered with a thin, unconsolidated layer of approximately the same material. When a few inches of the top material have been graded off, the underlying material forms a firm, trafficable surface. Continual traffic, grading, and an occasional application of water as a dust suppressant or application of a dust suppression chemical improves the road's stability. Although the load-bearing capacity of the roads and parking areas has not been tested quantitatively, a conservative estimate of its capacity would be about 230 to 380 pounds per cubic inch, which is the site soil bearing capacity as determined from a geotechnical evaluation conducted during construction of other waste management units at the facility.

After entering the facility, vehicles proceed to the truck holding area, where they remain until the shipment and accompanying documentation are reviewed to confirm their acceptability. Once the shipment's acceptability is confirmed, the transporting vehicle is directed to the designated waste management unit for processing or storage.

Although the entire facility surface is stable enough to drive or park on, roadways that will accommodate two-way traffic to and from disposal units are defined by grading and use. Roads built to accommodate future facility development will be similar to existing roads.

REDNESS AND CONTINGENCY PLAN

icy n include in Attachment 10 will be implemented
m to personnel, facilities, or the environment. Specific
r the implementation of the Contingency Plan, include:

c activity that causes damage to the disposal cell
is waste or hazardous constituents to the air; soil,
groundwater, which could threaten human health or the

[ASP) addresses potential hazards
ied at the US Ecology facility. Site
ge, treatment, and disposal of hazardous
tion Agency (EPA) has established
tivities. These regulations are found in
1264 and overseen by the EPA, under the
Act (RCRA). Nevada has received
RCRA program and has promulgated
tivities. The facility's HASP establishes
1 safety standards as required by 29 CFR
disposal Facilities (TSDF) and RCRA and
lity operations involving hazardous
id safe manner.

nce with the regulations and guidelines

Administration (OSHA) Title 29 CFR
ations for General Industry"

ety and Health Regulations for

'Hazardous Waste Operations and

e of US Ecology, its employees, visitors,
logy does not guarantee the health or

y guidelines set forth herein will reduce
e health and safety guidelines in the HASP
and should not be used on any other site
h and safety professionals.

11.0 USE OF ROAWAYS AND VEHICLE AND EQUIPMENT MOVEMENT

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The soils of the bajada on which the facility is built are consolidated, lightly cemented sands and gravels, and covered with a thin, unconsolidated layer of approximately the same material. When a few inches of the top material have been graded off, the underlying material forms a firm, trafficable surface. Continual traffic, grading, and an occasional application of water as a dust suppressant or application of a dust suppression chemical improves the road's stability. Although the load-bearing capacity of the roads and parking areas has not been tested quantitatively, a conservative estimate of its capacity would be about 230 to 380 pounds per cubic inch, which is the site soil bearing capacity as determined from a geotechnical evaluation conducted during construction of other waste management units at the facility.

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Although the entire facility surface is stable enough to drive or park on, roadways that will accommodate two-way traffic to and from disposal units are defined by grading and use. Roads built to accommodate future facility development will be similar to existing roads.

12.0 RECORDKEEPING AND REPORTING

The Recordkeeping and Reporting Plan included in Attachment 5 describes the recordkeeping and reporting procedures in place at the Facility to comply with all applicable provisions of the Facility's TSCA approval and RCRA permit.

13.0 EMERGENCY PREPAREDNESS AND CONTINGENCY PLAN

The Facility's Contingency Plan include in Attachment 10 will be implemented as needed to prevent harm to personnel, facilities, or the environment. Specific events, which may trigger the implementation of the Contingency Plan, include:

- Fire
- Explosion
- Earthquake or seismic activity that causes damage to the disposal cell
- Release of hazardous waste or hazardous constituents to the air; soil, surface, water, or groundwater, which could threaten human health or the environment.

14.0 Facility Health and Safety

The Facility Health and Safety Plan (HASP) addresses potential hazards associated with activities to be performed at the US Ecology facility. Site operations include the transport, storage, treatment, and disposal of hazardous waste. The U.S. Environmental Protection Agency (EPA) has established regulations governing these types of activities. These regulations are found in 40 CFR (Code of Federal Regulations) 264 and overseen by the EPA, under the Resource Conservation and Recovery Act (RCRA). Nevada has received primacy in the implementation of the RCRA program and has promulgated regulations governing these types of activities. The facility's HASP establishes the general chemical safety criteria and safety standards as required by 29 CFR 1910.120 for Treatment Storage and Disposal Facilities (TSDF) and RCRA and state regulations, to ensure that all facility operations involving hazardous wastes are conducted in a consistent and safe manner.

All work will be performed in accordance with the regulations and guidelines outlined in:

- Occupational Safety and Health Administration (OSHA) Title 29 CFR 1910 "Safety and Health Regulations for General Industry"
- OSHA Title 29 CFR 1926 "Safety and Health Regulations for Construction"
- OSHA Title 29 CFR 1926.65 "Hazardous Waste Operations and Emergency Response"
- 40 CFR 264

The HASP has been written for the use of US Ecology, its employees, visitors, and subcontractors. However, US Ecology does not guarantee the health or safety of any person entering this site.

Strict adherence to the health and safety guidelines set forth herein will reduce the potential for injury at this site. The health and safety guidelines in the HASP were prepared specifically for this site and should not be used on any other site without prior research by trained health and safety professionals.