P.O. Box 400, Grand View, ID 83624
P 800.274.1516 F 208.834.2919

May 17, 2019 *via hand delivery*

Ms. Natalie Creed
Hazardous Waste Bureau Chief
Waste Management and Remediation Division
Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

Re: US Ecology Idaho, Inc. (USEI) – IDD073114654
Class 3 Permit Modification to USEI's RCRA Part B Permit – Replacement of RESRAD Model with GoldSim Conceptual Site Model and Request to Increase Site Waste Acceptance Criteria (WAC) Limits

Dear Ms. Creed:

Attached is a *Notice of Class 3 Modification* to USEI's Site B HWMA Treatment, Storage, and Disposal Permit. This notice is being filed in accordance with IDAPA 58.01.05.012 (40 CFR §270.42). The mailing list used is on file with the State of Idaho as the official mailing list. The attached notification details the requirements for this modification and the effective date.

The purpose of this modification is to request approval to replace USEI's current radiological modeling platform RESRAD with a customized Site-Specific Performance Assessment created on the GoldSim modeling platform. In addition, USEI is requesting the following additional changes, outlined in the attached Safety Assessment document:

- Increase the allowable concentration for 226Ra+228Ra and 210Pb in Waste Acceptance Criteria (WAC) Table C.2 to 10,000 pCi/g for all received waste (regardless of packaging);
- Increase the allowable radionuclide concentrations in WAC Table C.4b and C.4c to 10,000 pCi/g;
- Update footnote language in WAC Tables C.4b and C.4c to be consistent with other proposed WAC changes;
- Remove radioactive liquids definition from permit as well as 40 microRoentgen per hour (μR/hr) dose rate limit on received radioactive liquids in procedures ERMP-01 and ERMP-05; and
- Clarify and simplify language throughout the ERMP procedures.

All other required information is included in the attached documents including the required certification statement and the applicable revised permit pages. In accordance with Permit Condition I.E.5, clean permit replacement pages will be provided within 45 days of the effective date of the permit modification.

Regards,

Jason Evens
General Manager

Attachments

cc: Garrett Bright – IDEQ
Barbara McCullough – USEPA Region X (Electronic Copy)

NOTIFICATION

OF

CLASS 3 PERMIT MODIFICATION

FOR

US ECOLOGY IDAHO, INC.

SITE B

RCRA PART B PERMIT

GoldSim Model and Waste Acceptance Criteria Updates

SUBMITTED

May 17, 2019

BY

US ECOLOGY IDAHO, INC.

FOR

USEI SITE B, GRAND VIEW, IDAHO • US EPA ID NUMBER IDD073114654

The following Class 3 Notice of Modification is submitted in accordance with the requirements of IDAPA 58.01.05.012 (40 CFR 270.42) as follows:

1. **40 CFR §270.42(c)(1)(i):** This notice of Permit Modification is to request approval for modification of the following items:
   - Replace the generic RESRAD radiological modeling platform with a customized Site-Specific Performance Assessment created on the GoldSim modeling platform;
   - Increase the allowable concentration for ^{226}Ra+^{228}Ra and ^{210}Pb in Waste Acceptance Criteria (WAC) Table C.2 to 10,000 pCi/g for all received waste (regardless of packaging);
   - Increase the allowable radionuclide concentrations in WAC Table C.4b and C.4c to 10,000 pCi/g;
   - Update footnote language in WAC Tables C.4b and C.4c to be consistent with other proposed WAC changes;
   - Remove radioactive liquids definition from permit as well as 40 microRoentgen per hour (μR/hr) dose rate limit on received radioactive liquids in procedures ERMP-01 and ERMP-05; and
   - Clarify and simplify language throughout ERMP procedures.

   The required revised permit pages to the Part B Permit are provided in Appendix A.

2. **40 CFR §270.42(c)(1)(ii):** This is a Class 3 Permit Modification as identified in 40 CFR Part 270, Appendix I, Section J.6.a.

3. **40 CFR § 270.42(c)(1)(iii):** This modification is needed to meet waste disposal requirements for both current and projected future business.

4. **40 CFR § 270.42(c)(1)(iv):** The following is to provide required information as applicable:

   - 270.13: No changes required by this modification request.
   - 270.14: Changes required by this section are identified as follows:
     - 270.14(a) – See below for signature and certification statement.
     - 270.14(b)(1) – No changes required by this modification request.

- 270.14(b)(2) – No changes required by this modification request.
- 270.14(b)(3) – Appendix A (Permit Attachment 2) provides the changes to the Waste Acceptance Criteria contained within the site *Waste Analysis Plan*. No other changes are required by this modification request.
- 270.14(b)(4) through (b)(19) –No changes required by this modification request.
- 270.14(b)(20), (21), and (22) – Not applicable.
- 270.14(c)(1) – Not applicable.
- 270.14(c)(2) through (c)(5) – No changes required by this modification.
- 270.14(c)(6) through (8) – Not applicable.
- 270.14(d) – No changes required by this modification.

- 270.15 – Not applicable.
- 270.16 - Not applicable.
- 270.17 – Not applicable.
- 270.18 – Not applicable.
- 270.19 – Not applicable.
- 270.20 – Not applicable.
- 270.21 – No changes required by this modification.
- 270.22 – Not applicable.
- 270.62 – Not applicable.
- 270.63 – Not applicable.
- 270.66 – Not applicable.

5. **40 CFR § 270.42(c)(2):** A copy of the receipts for the certified mailing to the required mailing list maintained by the Director and to the appropriate units of State and local governments under 40 CFR Part 124.10(c)(ix) will be forwarded upon completion for inclusion as Appendix B.

   The official Public Notice will be placed in the Idaho Statesman, the Owyhee Avalanche, and the Mountain Home News. Copies of the receipts for those Public Notices shall be forwarded to IDEQ to be included in this document as Appendix C.

6. **40 CFR § 270.42(c)(3):** A copy of this document has been placed at the local library in Grand View, Idaho. Copies are also available at the Idaho Department of Environmental Quality in Boise, Idaho.

7. **40 CFR § 270.42(c)(4):** The public meeting will be scheduled at Rimrock Jr.-Sr. High School in Grand View, Idaho.

8. **40 CFR § 270.42(c)(5):** The 60-day public comment period shall begin upon publication of the Public Notice in the Idaho Statesman as shown in Appendix C.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Date 5/17/19

Jason Evens, General Manager