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US ecology

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

Ms. Natalie Creed
Hazardous Waste Bureau Chief
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

March 31, 2021

RE: US Ecology Idaho (USEI) Site B – IDD073114654
March 2021 Monthly Progress Report on Recovery Actions Related to the November 17, 2018 Explosion at the USEI Site B Facility ("Incident")

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for March 2021. This report details the activities undertaken in the recovery process from February 22, 2021 through March 26, 2021. The next report will cover activities from March 29, 2021 through April 23, 2021.

USEI has performed various operations to evaluate the facility and bring it back to a state equivalent to that prior to the Incident. The actions taken during the reporting period are outlined below.

Waste Treatment, Storage and Disposal - USEI continues to receive both containers and bulk loads of waste for treatment, storage and disposal.

Inspections – Inspections have been performed and documented as required; any area that could not be inspected due to demolition activities or other safety factors was noted on the inspection form. At this time, all areas have been placed into a safe configuration.

Leachate Management – USEI has completed leachate inspections in all areas of the facility, as required by permit, and has removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas continue to be in keeping with levels associated with normal operations.

Precipitation – Collected precipitation has been monitored and removed from container storage and RCRA tank areas as needed. All precipitation removed from these areas is discharged to the site surface impoundments for evaporation.

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Container Management – Twenty-six (26) containers remain in inventory that were onsite at the time of the Incident. The remaining twenty-six (26) containers are comprised of metal fines (excluding those currently held as evidence) that will need to be shipped off-site for incineration. These materials require packaging in accordance with receiving facility requirements prior to shipment. Five containers will need to be re-packaged to meet the criteria of the receiving facility, which include that the waste be shipped saturated with oil and contained in a steel drum. USEI submitted a work plan to the Department on January 9, 2020 requesting approval to perform the required treatment. USEI has completed the required steps in the OSHA settlement response and will be submitting an updated work plan to the Department. The submittal will include copies of USEI's correspondence with OSHA.

Evidence Material – Evidence from the Incident remains in secure storage at Container Storage Area 1 (CSA 1) at this time. The fencing surrounding the secured area remains intact. This includes tagged debris pieces, various split samples that have been collected, empty drums from the back of the haul truck at the Containment Building, containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0), and drums of material retrieved from the bottom of MBT 1 prior to decontamination of the Containment Building. All remaining containers of magnesium material from Reade Manufacturing Company, the company whose waste stream was being treated when the explosion occurred, remain on site at this time.

On January 29, 2019, USEI received a Preservation Request Letter from Ex. 6 PP / Ex. 7(C) Special Agent, US EPA-CID. As the analyses of the Incident by outside agencies remain ongoing, the timeframe for storage of these materials is unknown at this time.

Baker Risk received analytics for all samples collected, and determined the cause of the Incident. The final investigation report was completed July 22, 2019, and a full copy of the report was provided to DEQ on July 31, 2019. USEI has requested that this information remain confidential until external investigations being conducted by various agencies are complete.

Cleanup Material – USEI has continued monitoring the area outside the fence for additional foam material generated during the de-construction of the Containment Building. No additional material was identified during the last inspection of the fence. USEI personnel will continue monitoring the fence line on a monthly basis to ensure material is not exiting the facility.

Facility Structures – Construction of the new Indoor Stabilization Building began on June 24, 2020. At this time, construction is complete. The Construction Quality Assurance (CQA) Report was submitted to the IDEQ on March 08, 2021, and IDEQ representatives

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inspected the building on March 16, 2021. Use of the building will not begin until USEI completes the items requested by IDEQ in a letter dated March 22, 2021.
Also at this time, permanent wiring to the pump house is complete.

The former guardhouse was moved to the active yard area to serve as an office for operations. The trailer has not been put into service as an operations office at this time.

Facility Personnel – Since the last report, two employees have left USEI and two have been hired. An updated employee list has been included as an attachment to this letter.

If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,

Erica Bartlett

Erica Bartlett
General Manager

Attachment

ec: Margaret Olson, EPA Region 10
Albert Crawshaw, IDEQ
Brian Gaber, IDEQ
Daryl Sawyer, IDEQ
Jeremiah Thomas, IDEQ
Andrew Marshall, USE

	Team Member	Hire Date	Title
	Treatment, Storage, Disposal Facility		
	ADMIN		
1	BAILEY, NOEL	12/29/2003	Technical Manager
2	BARTLETT, ERICA	3/6/2017	General Manager
3	CERECERES, TINO	5/15/2006	Approvals Coordinator
4	CLARK, DAVID	4/8/2013	Customer Service Specialist
5	GREENFIELD, NAOMIE	2/15/2021	Administrative Assistant
6	GRINDE-ASH, SHARON	6/24/2019	Lab Tech
7	HALL, STEPHANIE	6/1/2006	Lab Supervisor
8	HARLAN, RACHEL	9/4/2018	Receiving Coordinator
9	HOGABOAM, REBECCA	6/1/2015	EH&S Compliance Manager
10	JENSEN, JUSTIN	2/16/2015	Rad Safety Specialist
11	LIERCKE, LINDSEY	3/8/2021	Receiving Coordinator
12	LIVINGSTON, SOPHIE	7/21/2008	Scheduling Coordinator
13	LUTRELL, JENNIFER	12/8/2014	Customer Support Supervisor
14	MAGERS, JUDITH	6/14/2006	Office Manager
15	MARTINDALE, CHRISTY	8/16/2019	Lab Tech
16	OTTAWAY, SHILO	9/17/2018	Receiving Coordinator
17	RESNER, JACKIE	3/9/2020	Lab Tech
18	REYNOLDS, ALLISYN	3/8/2021	Receiving Coordinator
19	RICHARDSON, SAVANNAH	11/4/2019	Receiving Coordinator
20	SCHMITZ, CORIAN	2/28/2005	Receiving Lead
21	SIMPER, KARLITA	6/13/2011	Env. Compliance Specialist
	OPERATIONS		
22	BIRMINGHAM, JACK	5/12/2003	Operations Supervisor
23	BORGEN, SHANDA	7/15/2019	Operator
24	BYBEE, BRIGHAM	7/8/2003	Operator
25	CHRISTIANSEN, RICK	8/2/1992	Senior Operator
26	COBOS, JESSE	10/7/2019	Operator
27	CUTLER, ROBERT	8/26/2010	Site Foreman
28	FERRELL, CASEY	8/19/2002	Operations Supervisor
29	GRAHAM, BAILEY	2/8/2021	Operator
30	HAZELL, LEE	7/25/2011	Operator
31	HERRERA, FREDY	1/11/2016	Senior Operator
32	IRELAND, JOSEPH	9/28/2007	Mechanic
33	JUTEAU, PIERRE LUC	7/10/2010	Assistant General Manager
34	LEONARD, CHET	5/1/2006	Senior Operator
35	LINDQUIST, ROBERT	9/1/1999	Maintenance Manager
36	MARVIN, CRYSTAL	12/9/2019	Operator
37	O'BRYANT, PATRICK	7/22/2019	Operator
38	POLLARD, RICKEY	4/15/1987	Operator
39	ROBERSON, KENNETH	9/6/1988	Operations Manager
40	ROGERS, BENJAMIN	6/20/2006	Lead Operator
41	SIMS, CHRISTOPHER	12/14/2020	Operator
42	STRAHAN, JUSTIN	7/15/2019	Operator
43	SUMMERS, CONNOR	11/30/2020	Operator
44	TENNEY, ADAM	3/16/2020	Operator
45	THOMAS, ISAIAH	10/7/2019	Operator
46	WHITAKER, CANDY	11/16/2020	Operator
47	WHITTED, DALE	6/28/2005	Mechanic
48	WILSON, DANIEL	1/17/2011	Senior Operator
49	WOODRUFF, DANE	10/31/2005	Operator
	Rail Facility		
50	HASTINGS, JONNY	7/16/2018	Mechanic
51	LOPES, JOAO	9/4/2007	Operator
52	MONASTERIO, JOSH	7/25/2005	Lead Operator
53	MORENO, ANDREW	12/2/1996	RTF Operations Supervisor
54	SPENCER, JUSTIN	9/25/2007	RTF Operations Supervisor
55	WININGS, ANDY	7/25/2011	Operator

49 @ TSDF
6 @ RTF
55 TOTAL

*updated March 2021