PETER G. MORROS, Director
L.H. DODGION, *Administrator*
(702) 687-4670
TDD 687-4678
Administration
Mining Regulation and Reclamation
Water Pollution Control
*Facsimile* 687-5856
*Address Reply to:*
Capitol Complex
Carson City, NV 89710

STATE OF NEVADA
BOB MILLER
*Governor*

Waste Management
Corrective Actions
Federal Facilities
Air Quality
Water Quality Planning
*Facsimile* 687-6396
*Located at:*
333 W. Nye Lane
Carson City, NV 89710

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

**DIVISION OF ENVIRONMENTAL PROTECTION**

Capitol Complex
Carson City, Nevada 89710

November 4, 1996

ZAKI NASER
ENVIRONMENTAL MANAGER
US ECOLOGY INC
PO BOX 578
BEATTY NV 89003

RE: US Ecology, Inc. - Beatty, Nevada Facility
Permit No. NEV-HW002
**RCRA Part B Renewal Application**

Dear Mr. Naser:

The Nevada Division of Environmental Protection (NDEP) has reviewed the Response to Notice of Deficiency (NOD), October 18, 1996, prepared by TRC Environmental Solutions. There were several areas in need of clarification or revision, therefore, another NOD is being issued under cover of this letter (Attachment A). Pursuant to our phone conversation November 1, 1996, it is our understanding that all of the issues from the September 13, 1996 NOD regarding factors of safety and the design seismic event to be used, will be responded to in response to this NOD.

Please respond to this NOD by November 31, 1996. If an extension to this deadline is needed, US Ecology must submit a written request to the Division at least ten (10) days in advance of the deadline, describing why an extension is necessary, and the request must also include a date when US Ecology can provide all the information.

If you have any questions on the deficiencies noted, please contact me at (702) 687-4670, ext. 3005.

Sincerely,

Catherine R. Pool, P.E.
RCRA Facilities Branch
Bureau of Waste Management

CRP:gf
Attachment

cc(w/attachment): Jeffrey C. Dension, NDEP
Donald Brady, US Ecology, Houston

**ATTACHMENT A**

US ECOLOGY, INC.
BEATTY, NEVADA
**NOTICE OF DEFICIENCY**
Nevada Permit NEV-HW002

**GENERAL COMMENTS**

The response to the following comments should be in the form of revised or new pages which can be inserted into the original submittal. For each new page submitted, indicate if it is a revision to a page in the original submittal or a new page not contained in the original submittal. Each revised or new page must be dated. Please submit two copies of all revised pages.

The executive officer signing the Part B Permit Application must make the certification specified exactly as in 40 CFR 270.11 (a) each time material is submitted in response to the deficiency comments. **The certification must be a signed original.**

**SPECIFIC COMMENTS**

**Cell 12 Design Report, TRC Environmental Solutions, Inc., March 1996**

1. Pg.2-3 [Bullet 3]- A stability analysis must be done on the 50' buffer between Trench 11 and 12.

2. Pg.2-4 Define the size of the **smallest** depression in the side wall which will require repair with gunite.

3. Pg 3-3 3.2.2, #5, [First bullet]-After settlement occurs and the weakest interface (i.e. the interface between the geonet and nontextured interface of the 100 mil HDPE) has slipped, explain the forces realized by each interface of the liner system.

4. Pg 3-7 3.6.2, #1-Stability has been evaluated for Cell 12-A only. Stability analysis must be done on the other Phases before they can be permitted, phase 12 B appears to have an open end prior to the filling of 12 C..

**C.8 LCRS Flow Capacity and Pump Sizing**

5. Pg C.8-1 The purpose of the design of the LCRS is to ensure that the head on the primary liner does not exceed 1 foot. This should be added to the statement of purpose.

6. Pg C.8-2 The design of the LCRS assumes that run-off from the sideslopes is intercepted and directed away from the LCRS. This should be included in the design specifications, materials chosen and

interceptor shown on the design drawings or the volume of run-off needs to be included in the design of the LCRS.

7. Pg C.8-25 Calculate the flow capacity for the gravel in the sump to ensure the gravel can transmit the flow entering the sump.

8. Pg C.8-25 The amount of rainwater which could enter the landfill in a 25 year 24 hour event is shown to be 80,000 gallons. The LCRS can only deliver approximately 2500 gallons to the sump in a 24 hour period. The design should assume that the material in the landfill is saturated to account for the worst case scenario.

**C.9 LDS Flow Capacity**

9. Pg C.9-4 The sump should be designed to be able to remove the maximum flow which can be delivered to it in a 24 hour period.

**Exhibit D MTR Equivalency Demonstration**

10. The MTR does not provide a demonstration that the sideslopes do not require the same cation exchange capacity as the bottom. Please provide justification for this design specification.

11. The MTR must be revised to incorporate the final liner configuration.