

ATTACHMENT 2

INSPECTION SCHEDULES AND PROCEDURE

INSPECTION SCHEDULES AND PROCEDURES

II.A. Purpose and Scope

The inspection schedule used by ATK for the hazardous waste management areas has been designed to meet the requirements of R315-264-15. The inspection schedule promotes the detection of malfunctions, deterioration, discharges, and other situations which may be causing or leading to a release of hazardous waste constituents into the environment or pose a threat to human health. Inspections are conducted by personnel trained to identify potential problem areas and to use the inspection schedule and the inspection log. Nine areas are designated for inspection: the container storage area at E-501, M-705S, M-186, the Thermal Treatment Areas at M-136 (including the burn trays and Burn Station 14) and M-225, T-29B hydrazine dilution, oxidizer leaching at M-705L, the solid propellant/motor storage building M-629, and storage pad S-633.

Waste solid propellant and rocket motors are stored at buildings M-629 and storage pad S-633 as well as M-136 burn grounds. Periodically, waste hydrazine is treated (by dilution) at building T-29B. In addition, ATK periodically operates a simple leaching process to remove the oxidizer from 1.3 propellants/explosives and contaminated production materials at Building M-705L. Therefore, inspections of these facilities, in accordance with their inspection schedules, are only required when hazardous waste is being stored or treated at the facility. A facility must be inspected, however, prior to receiving hazardous waste for storage or treatment if inspections were discontinued during the period of inactivity. If any problems are identified with the areas of concern that are listed in the inspection schedules (contained in this attachment), they must be corrected before the facility is put back into use.

II.B. Remedial Action or Maintenance

Repairs or corrective action for any deterioration or malfunction discovered by an inspection shall be conducted as outlined in Module II, Section F. Repairs to security equipment shall be completed as soon as practicable, but not later than 72 hours after the problem is discovered. As stated in R315-264-15(c), where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

II.C. Inspection Records

All records of inspections and remedial actions shall be retained in the Operating Record, for a period of at least three years. At a minimum, inspection records shall include the date and time of the inspection, the name of the inspector, a

notation of the observations made, and the date and nature of any repairs or maintenance taken.

II.D. Inspection Schedules

The inspection schedules appear in detail in Tables II-A through II-H. Each inspection schedule is designed so that the items appearing on the schedule are inspected frequently enough to avoid any deterioration of equipment and thus reduce the probability of an environmental or human health incident between inspection times. Each inspection schedule is divided into individual categories and each category contains a specific list of items to be inspected. Inspections are also required within 24 hours after a storm event as outlined in the schedules below. A storm event is defined as precipitation in excess of 1.0 inch in a one-hour period. It shall be documented in the inspection log that the inspection was conducted in response to a storm event.

**TABLE II-A
 INSPECTION SCHEDULE FOR DRUM STORAGE AT M-186**

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines and look for broken or downed fence lines, loose wires
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate, safety flags in place
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration

Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Safety Equipment		
Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone/Radio	Monthly	Working condition
4. Storage Containment		
Containers	Weekly	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums, adequate aisle space (2.5 feet)
Pads	Weekly	Chips, cracks, or irregularities in concrete, general condition
Sumps/Pads	Daily ²	Standing liquid on pad or in sumps
Drainage Area	Weekly	Spills, discolored soil
Roof	Weekly	General condition including holes or defects
5. Emergency Equipment		
Fire Extinguisher	Monthly	Fire extinguisher full, in working order
Absorbent	Monthly	Adequate supply (minimum 25 lbs)
Repack Drums	Monthly	Two repack drums with seals
55-Gallon drums	Monthly	Six empty 55-gallon drums with bungs in good condition, no dents, etc.
Generator	Monthly	Routine oil check, fill with gas, test startup
Pump	Monthly	Good working order, hoses intact, test

startup and pump

¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

² Daily except for nonscheduled work days and holidays

**TABLE II-B
 INSPECTION SCHEDULE FOR BURNING GROUNDS AT M-136**

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines, look for loose wires or broken lines
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/ Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation
3. Safety Equipment		
Telephone/Radio	Monthly	Check operating condition of equipment
4. Burn Ground Area		
Erosion	Weekly ³	Survey area and note severe erosion on grounds
5. Storage/Containment		
Burn tray	Prior to placing	Tray is intact and liquid tight, accumulation

	Waste then Weekly ^{2, 3}	of liquids
Container	Weekly ²	Closed, labeled, signs of leaks or spills

6. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full and in working order
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1 Daily when in use (i.e. when loading or unloading operations occur at the facility).

2 Inspect upon arrival, then each calendar week

3 And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

**TABLE II-C
 INSPECTION SCHEDULE FOR BURNING GROUNDS AT M-225**

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines, look for loose wires or broken lines
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation

3. Safety Equipment

Telephone/Radio	Monthly	Check operating condition of equipment
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4. Burn Ground Area

Erosion	Weekly ²	Survey area and note severe erosion on grounds
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Burn Tray	Prior to placing waste, then Weekly ²	Tray is intact and liquid tight, accumulation of liquids
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5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full and in working order
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¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

**TABLE II-D
INSPECTION SCHEDULE FOR STORAGE AND CONSOLIDATION
ROOM AT M-705S**

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly	Readable signs, signs in place
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/Unloading Areas	Daily ¹	Spills, discolored soil

Periphery	Daily ¹	Spills, discolored soil, stressed vegetation
3. Safety Equipment		
Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone/Radio	Monthly	Check operating condition of equipment
4. Storage containment		
Containers	Weekly	Number of containers, severe corrosion (i.e. flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, no open bungs, no standing liquid on the drums
Pads, Sumps	Weekly	Chips, cracks, or irregularities in the concrete, general conditions
Portable Secondary	Daily ²	Cracks, liquid, containment integrity
Roof	Weekly	General condition including holes or defects
Sump, pads	Daily ²	Check for standing liquids in the sump and containment system
5. Emergency Equipment		
Fire Extinguisher	Monthly	Fire extinguisher full and in working order
Absorbents	Monthly	Adequate supply (minimum 25 lbs.)
Repack Drums	Monthly	Two repack drums with seals
55-Gallon Drums	Monthly	Six empty 55-gallon drums with bungs in good condition, no dents, etc.

¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

² Daily except for weekends and holidays.

**TABLE II-E
 INSPECTION SCHEDULE FOR M-629**

(Note: As stated in section II.A. of this Attachment, inspections of these storage buildings are not required during periods when hazardous waste is not being stored at the facility)

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly	Readable signs, signs in place
Bay Doors	Weekly	Function properly
Lock	Weekly	Function properly
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Communications Equipment		
Telephone	Monthly	Working condition; place call to verify operation
4. Storage Containers		
Motors/bags, etc.	Weekly	Verify condition of motors/bags, properly marked and labeled, out of place material and check for leakage, or liquid discharge from waste solid rocket motors and propellant .

Building	Weekly	Verify no damage done to exterior of facility
Roof	Weekly	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Monthly	In working order and full
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¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

**TABLE II-F
 INSPECTION SCHEDULE FOR DRUM STORAGE PAD AT E-501**

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines and look for broken or downed fence lines, loose wires
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate, safety flags in place
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation

3. Safety Equipment

Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone/Radio	Monthly	Working condition

4. Storage Containment

Containers	Weekly	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums, adequate aisle space (2.5 feet)
Pads	Weekly	Chips, cracks or irregularities in concrete, general condition
Sumps/Pads	Daily ¹	Standing liquid on pad or in sumps
Drainage Area	Weekly ²	Spills, discolored soil
Roof	Weekly	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full, in working order
Absorbent	Monthly	Adequate supply (minimum 25 lbs)
Repack Drums	Monthly	One repack drum with seals
55-Gallon drums	Monthly	Three empty 55-gallon drums with bungs in good condition, no dents, etc.

¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

TABLE II-G
INSPECTION SCHEDULE FOR T-29B Hydrazine Dilution Bay

(Note: As stated in section II.A. of this Attachment, inspections of building T-29B are not required during periods when hazardous waste is not being treated at the facility)

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Prior to treatment	Readable signs, signs in place
Door Locked	Prior to treatment	In working order, locked
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Safety Equipment		
Eyewash/Shower	Prior to treatment	Ensure in working order by testing, check water supply
Telephone(cell)	Prior to treatment	Working condition
4. Storage Containment		
Containers	Prior to treatment	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums

Floor	Prior to treatment	Chips, cracks, or irregularities in concrete, general condition
Roof	Prior to treatment	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Prior to treatment	Fire extinguisher full, in working order
Absorbent	Prior to treatment	Adequate supply (minimum 25 lbs)

¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

**TABLE II-H
 INSPECTION SCHEDULE FOR STORAGE PAD S-633**

(Note: As stated in section II.A. of this Attachment, inspections of this storage pad are not required during periods when hazardous waste is not being stored on the pad)

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines, look for loose wires or broken lines
Signs	Weekly	Readable signs, signs in place
Gate	Weekly	Able to properly close gate
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Spills, discolored soil

Loading/Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation
Erosion	Weekly ²	Survey area and note severe erosion on or around storage pad

3. Storage Containers

Motors/containers, etc.	Weekly ³	Verify condition of motors/containers, properly marked and labeled, out of place material and check for leakage, or liquid discharge from waste solid rocket motors and propellant.
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¹ Daily when in use (i.e. when loading or unloading operations occur at the facility).

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

³ Inspect upon arrival, then each calendar week

TABLE II-I INSPECTION SCHEDULE FOR M-705L Oxidizer Leaching Process

(Note: As stated in section II.A. of this Attachment, inspections of building M-705L are not required during periods when hazardous waste is not being treated at the facility)

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly ¹	Readable signs, signs in place
Egress paths	Weekly ¹	Egress paths clear during treatment
2. Area		
Loading/ Unloading Areas	Weekly ¹	Inspect loading areas for spills, soil discoloration

3. Safety Equipment

Eyewash	Weekly ¹	Ensure in working order by testing, check water supply
Telephone (cell)	Monthly ²	Working condition

4. Equipment

Treatment Tank	Weekly ¹	Tank and ancillary equipment is liquid tight, no visible signs of leaking
Containment Sump	Daily ^{3, 4}	Liquid present in sump
Containment	Weekly ¹	Containment is intact, free from Chips, cracks, or irregularities in concrete, general condition

5. Emergency Equipment

Fire Extinguisher	Monthly ²	Fire extinguisher full, in working order
Spill Kit	Monthly ²	Spill Response Material Available

¹ Weekly when in use (i.e. when treatment is occurring at the facility).

² Monthly when in use (i.e. when treatment is occurring at the facility).

³ Daily when in use (i.e. when treatment is occurring at the facility).

⁴ Daily inspection when electronic leak detector is not operable. No inspection required when electronic leak detector is operable.