

ATTACHMENT 3
INSPECTIONS

Table of Contents

1.0 Introduction 1

2.0 Frequency of Inspections 1

3.0 Types of Problems..... 1

4.0 Sumps and Secondary Containment Areas 1

5.0 Corrective Action 2

6.0 Inspection Matrix 2

1.0 INTRODUCTION

At a minimum, the inspections outlined in this Attachment shall be conducted as instructed on the forms. All inspections required by this permit will be documented on forms and maintained as part of the operating record. The forms are not included in this Attachment, but a list of all required inspection items, frequencies, and what is being inspected is included as an Inspection Matrix. Although the format of the inspection forms may change, all items identified on the Inspection Matrix must be inspected at the frequency specified and will be included on the applicable forms.

Documentation of each inspection, necessary notifications and any corrective action shall be maintained at the Clive facility. Documentation may be maintained electronically if a legible hard copy can be produced upon request. All inspection forms will note the date, the inspector's name, the time of the inspection, any deficiencies found (parameter status), corrective action taken and a work order number if a repair request has been submitted. If a repair is minor and fixable the same day of the inspection (such as by replacing a sign or a fire extinguisher), the inspector may note remedy on the form rather than initiating a work order and referencing the order number. All items on the inspection forms and logs must be filled in and not left blank. If a particular inspection item is not applicable, it must be noted on the form along with the reason.

2.0 FREQUENCY OF INSPECTIONS

Inspections shall be conducted in accordance with the minimum frequency specified in the Inspection Matrix for each required item.

3.0 TYPES OF PROBLEMS

The personnel conducting the inspections shall be trained to identify conditions that indicate or may lead to a malfunction, deterioration or discharge related to the specific equipment or structures located at Clive. The inspection parameters found in the Inspection Matrix shall be on the inspection forms. The inspector or his supervisor shall prepare a remedial work order for deficiencies that cannot be resolved during the shift.

Any equipment or structure out-of-service or subject to an active work order will be documented on the inspection forms. The forms are maintained in the operating record. A historical list of out-of-service items or remedial work orders will also be maintained on paper or electronically. Once the corrective action specified in the work order has been completed, the reference to the work order will be removed from the inspection form going forward.

4.0 SUMPS AND SECONDARY CONTAINMENT AREAS

Sumps, secondary containment, and the Temporary Storage Pad are inspected daily when the facility is staffed to determine the presence of liquids or other material.

Any material or liquid identified in a sump, secondary containment area, or the Temporary Storage Pad will be emptied or removed within 24 hours of discovering the contents. During ongoing precipitation, the sump(s) or secondary containment system located outside a building will be emptied within 24 hours

of the end of the precipitation event. If this occurs, the time and date of the end of the precipitation event and the date and time that the sump is emptied will be noted on the inspection forms. However, material must be removed during the event to maintain secondary containment capacity of the system. Solid material that accumulates in sumps inside buildings from the routine operations (e.g., dried mud falling off pallets, small pieces of wood from pallets, dust, etc. (but not spill material)) will be noted on the daily inspection forms but may be removed weekly.

Any material removed will be managed as a hazardous waste, except for plant debris that may blow onto the exterior portion of Unit 106 or onto the Temporary Storage Area.

5.0 CORRECTIVE ACTION

The inspection forms will clearly state the status of each piece of equipment or structure (i.e., blanks will not be used to indicate that an item was acceptable or that the status had not changed). If the status is not acceptable, there will be a notation of the corrective actions performed (if it can be fixed immediately) or a reference to a work order if additional work needs to be done.

Inspection documentation shall specify the date and time of the request for repair or corrective action, the work order number, and the completion date.

All work orders will clearly describe the corrective action performed and who performed the work. Multiple work orders may be utilized to complete an individual repair or corrective action if each work order describes the completed work, the date of completion for the work describe and references to additional work orders to complete the individual corrective action.

Discharges shall be removed within 24 hours of discovery, whereas any malfunction or deterioration discovered by an inspection shall be noted on the inspection forms, reported internally, and corrected within 72 hours. If the remedy requires more time, Clean Harbors Clive, LLC shall submit to the Director of DWMRC before the expiration of the 72-hour period, a proposed time schedule for correcting the problem. All corrective actions will be completed in a timely manner. Until the deficiency is corrected, the deficiency will remain noted on the inspection form.

Until the problem is corrected, the equipment will be declared out-of-service. This will be noted on the inspection forms.

All deterioration shall be noted on the inspection forms and reported internally so that corrective action will be taken.

If a problem is discovered during an inspection where a hazard to human health or the environment is imminent or has already occurred, remedial action shall be taken immediately. When required, notification will be made to the appropriate agencies in accordance with Section I.P of Module 1.

6.0 INSPECTION MATRIX

The items that will be inspected, the frequency of inspection, and a brief description of the inspection parameters are contained in this section.

INSPECTION MATRIX

Inspection Item	Minimum Frequency	Types of Problems – Inspection Parameters
Container Storage (Units 101, 102, 105, 106, 535, 604, and Unit 33)		
Unit 101 sumps (includes docks)	Daily when staffed	Empty
Unit 101 debris drums	Weekly	Closed, labeled, dated, < 90 days
Unit 101 aisles (includes storage on trailers)	Weekly	Adequate (2.5 feet minimum)
Unit 101 containers (includes storage on trailers)	Weekly	Bulging, leaking, corroding
Unit 101 containers (includes storage on trailers)	Weekly	Proper placement and stacking
Unit 101 containers (includes storage on trailers)	Weekly	Closed, bungs in
Unit 101 containers (includes storage on trailers)	Weekly	Labels intact and legible
Unit 101 showers	Weekly	Operable
Unit 101 waste segregation (includes storage on trailers)	Weekly	Incompatibility verification
Unit 101 floor, berms (includes docks)	Monthly	Visually free of cracks, gaps, damage
Unit 102 sump	Daily when staffed	Empty
Unit 102 debris drum	Weekly	Closed, labeled, dated, < 90 days
Unit 102 aisles	Weekly	Adequate (2.5 feet minimum)
Unit 102 containers	Weekly	Bulging, leaking, corroding
Unit 102 containers	Weekly	Proper placement and stacking
Unit 102 containers	Weekly	Closed, bungs in
Unit 102 containers	Weekly	Labels intact and legible
Unit 102 shower	Weekly	Operable
Unit 102 waste segregation	Weekly	Incompatibility verification

Inspection Item	Minimum Frequency	Types of Problems – Inspection Parameters
Unit 102 floor, berms	Monthly	Visually free of cracks, gaps, damage
Unit 105 sumps	Daily when staffed	Empty
Unit 105 loading/unloading area	Daily when in use	Leaks, spills
Unit 105 loading/unloading area	Monthly	Visually free of cracks, gaps, damage
Unit 105 debris drum	Weekly	Closed, labeled, dated, <90 days
Unit 105 aisles	Weekly	Adequate (2.5 feet minimum)
Unit 105 containers	Weekly	Bulging, leaking, corroding
Unit 105 containers	Weekly	Proper placement and stacking
Unit 105 containers	Weekly	Closed, bungs in
Unit 105 containers	Weekly	Labels intact and legible
Unit 105 railcar tankers	Weekly	Leaking, corroding
Unit 105 railcar tankers	Weekly	Closed
Unit 105 railcar tanker hoses	Daily	Leaks, spills
Unit 105 railcars	Weekly	Labels intact and legible
Unit 105 pallets	Weekly	Provide 4" clearance
Unit 105 eyewash	Weekly	Operable
Unit 105 shower	Weekly	Operable
Unit 105 waste segregation	Weekly	Incompatibility verification
Unit 105 floor, berms	Monthly	Visually free of cracks, gaps, damage
Unit 106 secondary containment	Daily when staffed	Empty
Unit 106 loading/unloading area	Daily when in use	Leaks, spills
Unit 106 aisles	Weekly	Adequate (2.5 feet minimum)

Inspection Item	Minimum Frequency	Types of Problems – Inspection Parameters
Unit 106 containers/rolloff boxes	Weekly	Bulging, leaking, corroding
Unit 106 containers/rolloff boxes	Weekly	Proper placement and stacking
Unit 106 containers/rolloff boxes	Weekly	Closed (tarp/bungs in)
Unit 106 containers/rolloff boxes	Weekly	Labels intact and legible
Unit 106 pallets/containers	Weekly	Provide 4" clearance
Unit 106 eyewash	Weekly	Operable
Unit 106 shower	Weekly	Operable
Unit 106 waste segregation	Weekly	Incompatible check
Unit 106 floor, berms	Monthly	Visually free of gaps, cracks, damage
Unit 106 Spill Kit	Monthly	Verify contents (Shovel, broom, absorbent materials)
Unit 535 sumps	Daily when staffed	Empty
Unit 535 loading/unloading area	Daily	Leaks, spills
Unit 535 aisles	Weekly	Adequate (2.5 feet or greater)
Unit 535 railcars/containers	Weekly	Bulging, leaking, corroding
Unit 535 containers	Weekly	Proper placement and stacking
Unit 535 railcars/containers	Weekly	Closed, bungs in
Unit 535 containers	Weekly	Labels intact and legible
Unit 535 containers/pallets	Weekly	Provide 4" clearance
Unit 535 eyewash	Weekly	Operable
Unit 535 shower	Weekly	Operable
Unit 535 waste segregation	Weekly	Incompatibility verification
Unit 535 floor, berm	Monthly	Visually free of cracks, gaps, damage

Inspection Item	Minimum Frequency	Types of Problems – Inspection Parameters
Unit 535 hoses/fittings	Daily	Good condition, no leaks observed from rail tanker to truck tanker
Unit 535 piping	Daily	No leaks observed from rail tanker to truck tanker
Unit 535 Spill Kit	Monthly	Verify contents (Shovel, broom, absorbent materials)
Unit 604 loading/unloading area	Daily when in use	Leaks, spills
Unit 604 sumps	Daily	Empty
Unit 604 sumps	Weekly	Concrete coating free of cracks and chips
Unit 604 rolloff boxes	Weekly	Leaking, corroding
Unit 604 rolloff boxes	Weekly	Closed/tarped
Unit 604 rolloff boxes	Weekly	Labels intact and legible
Unit 604 eyewash	Weekly	Operable
Unit 604 shower	Weekly	Operable
Unit 604 waste segregation	Weekly when in use	Incompatibility verification
Unit 604 floor, berms	Monthly	Visually free of cracks, gaps, damage
Unit 604 Spill Kit	Monthly	Verify contents (Shovel, broom, absorbent materials)
Unit 33 Lamp Recycling System	Daily when in use	Equipment housekeeping adequate, vapor control system operating properly
Unit 33 Containers	Weekly when in use	Containers closed, aisle space at least 2.5 feet, labels intact and legible
Unit 33 Containment	Monthly	Containment visually free of cracks and gaps or damage

Inspection Item	Minimum Frequency	Types of Problems – Inspection Parameters
Unit 255 – Bulk Solid Rail to Truck Transfer		
Loading/unloading area	Daily	Leaks, spills
Eyewash	Weekly	Operable
Shower	Weekly	Operable
Spill Kit	Monthly	Verify contents (Shovel, broom, absorbent materials)
Warning signs	Weekly	Are signs visible and legible?
Temporary Storage Pad		
Loading/unloading area	Daily	Leaks, spills, debris present
Emergency Equipment		
Primary and secondary diesel fire pumps	Weekly	Start pump, operable (verify pressure is stable)
Safety and Security		
Fence	Weekly	All gates closed and locked, poles upright, no holes that would allow unauthorized entry
Warning signs	Weekly	Are signs secured to fence? Are signs visible and legible?
All phones plant wide	Weekly	Functioning properly
All fire extinguishers plant wide	Monthly	Tagged, charged, in place, damaged
Evacuation drills	Quarterly	Check for proper response