

APPENDIX IX-A

SITE POST-CLOSURE INSPECTION PLAN

POST-CLOSURE INSPECTION PLAN

1.0 PURPOSE

The Post-Closure Inspection Program is designed to be protective of human health and the environment by routine examination of post-closure care units and monitoring, maintenance, and security equipment which, in the event of malfunction or deterioration, could jeopardize the health of persons and/or affect the environment at the Clean Harbors Grassy Mountain facility (CHGM). Inspections are based upon a schedule that identifies potential or actual non-compliance status of a unit or equipment in a manner that allows CHGM adequate time to repair or correct the deficiency found by the inspection.

2.0 SCOPE

Personnel conducting inspections (the Inspector(s)) perform the required inspections in accordance with the frequency schedule and document the inspection findings.

When Inspectors document unacceptable conditions using the Clean Harbors internal corporate WINWeb system, the system automatically issues a Workticket. These Worktickets will be immediately available for review by the manager responsible for the closed facility. That manager will inform the Director of the Utah Division of Waste Management and Radiation Control (Director) within 24 hours if the Workticket is for an issue that endangers human health or the environment.

Inspectors possess the necessary qualifications and are trained to perform their duties according to the requirements of Utah Administrative Code (UAC) Rule R315.

3.0 INSPECTION DOCUMENTATION

Post-closure inspections are performed, at a minimum, according to the frequency specified in the inspection schedule in Section 4.0 (below). The schedule outlines the minimum number of inspection items and events that are required to adequately assess the condition of the units, equipment and/or containment structure inspected. The frequency of any inspection type may be increased (i.e., daily, weekly, monthly, annually) at the discretion of the Inspector, or if directed by the post-closure manager. The frequency can never be decreased from the approved schedule listed in the permit unless approved by the Director.

Inspection forms are used for inspection documentation and must document the following:

- Inspection date
- Inspection time
- Name of the Inspector
- The status of each inspected item
- The reasons for each “not ok” status checked, and
- The date the corrective action was taken and a description of the corrective action (initialed or signed by the person documenting the corrective action), or
- Reference to a Workticket.

For the convenience of the Inspectors, certain non-post-closure related inspection items may be included on the inspection forms. Such items may be added or deleted at the facility's discretion. Non-post-closure inspection items will be identified as such on the form.

All post-closure inspection forms and associated documents (i.e., Worktickets, survey notes, test results) will be incorporated into the facility's Operating Record. These records will be maintained by the facility in a readily available location for a minimum of three years from the applicable record's inspection date.

3.1. INSPECTORS SHALL FOLLOW THE DOCUMENTATION PROCEDURES BELOW:

1. The inspector will complete all the appropriate blanks on the form (e.g., date, time, etc.).
2. The inspector will print and sign their name if using a hardcopy format. Inspectors will be identified by their login identifications if using electronic forms.
3. Inspectors will conduct inspections at the frequency outlined in the schedule.
4. If the inspection item is “OK,” the inspector will indicate it by marking the appropriate column.

If the inspection item is “NOT OK,” the inspector will indicate it by marking the appropriate column and describing the problem in the adjacent column. For hard copy inspections, the inspector will generate a Workticket by entering the information into WINWeb. For electronic inspections, the inspector will select the appropriate reason for failure and include any necessary comments. A Workticket will be automatically created by the WINWeb System.

5. When a Workticket failure is resolved, the inspector will describe the solution in the Note section and close the Workticket in WINWeb. If the Workticket is not resolved within 72 hours, CHGM will notify the Director before the expiration of the 72-hour period in accordance with Module II.G.1.

4.0 INSPECTION SCHEDULE

SITE PERIMETER	INSPECTION ELEMENT: WEEKLY
SECURITY FENCE: (PC-RW01)	Inspect for integrity, breaks or damage
	Check for erosion which would allow for unauthorized entry
	Check gates for proper function and ensure they are locked
	Check for presence of warning signs at proper intervals (no more than 120 feet apart) and at all gates
	Inspect signs for deterioration (fading, damage, etc.)
PERIMETER RUN-OFF DIKES: (PC-RW01)	Check for evidence of erosion, severe settling, signs of burrowing animals or deterioration
SITE PERIMETER AND LANDFILL CELLS	INSPECTION ELEMENT: WITHIN 24 HOURS OF THE END OF A STORM EVENT (0.5 inches precipitation in 24 hours)
PERIMETER RUN-OFF DIKES: (PC-RAIN-1)	Check for evidence of erosion, severe settling, signs of burrowing animals or deterioration
CELLS: (PC-RAIN-1)	Check for erosion, settling and subsidence
SITE MONITORING SYSTEMS	INSPECTION ELEMENT: DAILY
MONITORING WELLS and PIEZOMETERS OUTSIDE THE SITE SECURITY FENCE: (PC-RD01)	Check wells for damage to casing and cover security
	Check for evidence of tampering with lock or cap
	Check for well visibility and accessible to personnel
METEROROLOGICAL STATION: (PC-RD02)	Check for proper operation of all instruments and recording devices.
	Check for presence of the data logbook.
SITE MONITORING SYSTEMS	INSPECTION ELEMENT: WEEKLY
MONITORING WELLS and PIEZOMETERS INSIDE THE SITE SECURITY FENCE: (PC-RW02)	Check wells for damage to casing and cover security
	Check for evidence of tampering with lock or cap
	Check for well visibility and accessible to personnel
ALL LANDFILL CELLS: LEACHATE: (PC-RW03)	Check leachate collection risers for secure caps.
LANDFILL CELLS: (PC-RW03)	Check for erosion, settling and subsidence

SITE MONITORING SYSTEMS	INSPECTION ELEMENT: ANNUAL
MONITORING WELLS: (PC-RA01)	Check for proper operation of pumps
	Check for insect infestation of casing
LANDFILL SYSTEMS	INSPECTION ELEMENT: Per Pumping Schedule in Post-Closure Plan
ALL CELLS: LEACHATE: (PC-SCHED-1)	Inspect for the presence of liquids or leachate and the proper functioning of the leachate detection/collection systems in all risers.
	Check leachate pump for operation
	Pump Leachate
LEACHATE COLLECTION ROADS (PC-SCHED-1)	Check for evidence of spills or leaks
TANK SYSTEMS	INSPECTION ELEMENT: DAILY
LEACHATE STORAGE: (PC-RD03)	Check the following for proper operation:
	1. Manual operating valves
	2. High level alarms power source operating mechanisms protective overlays sounding mechanism
	3. Check valve, piping, and pumps
	4. Discharge controls
LEACHATE SECONDARY CONTAINMENT: (PC-RD03)	Check for liquid in sump(s)
	Check for cracks in cement
	Inspect area around tank system for evidence of leaking (discoloration, vegetative stress)
LEACHATE TANK SYSTEMS: (PC-RD03)	Check liquid level log for entry
	Check for evidence of corrosion, deterioration, or leaking (ancillary equipment)
TRANSFER AREA: (PC-RD03)	Check tank unloading areas for evidence of spills