

ATTACHMENT 3

INSPECTIONS

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1.0 Introduction

The inspections outlined in this attachment are the minimum required. All inspections required by this permit will be documented on forms and maintained as part of the operating record. Those 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 on the Inspection Matrix will be included on the forms and inspected.

This inspection attachment addresses those areas that store and or treat hazardous waste or have the potential to come in contact with hazardous waste. It addresses mainly the lab and areas south of Main Street. It also includes inspection items which pertain to the Clean Harbors Aragonite (Aragonite) facility's ability to respond quickly to a spill, fire, explosion, or natural disaster.

All inspections must be documented. Documentation may be maintained electronically with the on-site capability to produce a legible hard copy when electronic documentation is unavailable. All inspection forms will note the day, the inspector's name, the time of the inspection, any deficiencies found, or corrective action taken and the work order number which indicates that a repair request has been submitted to the maintenance department. If the repair is minor and the inspector can fix it (such as by replacing a sign or getting another fire extinguisher) the notation of what was done will be made on the form rather than referencing a work order number. All items on the inspection logs will be filled in (i.e., no blanks). If a particular item is not applicable for some reason, it will be noted on the form along with the reason. Actual gauge readings from inspected apparatus where gauges are present, or readings are taken will be noted on the inspection logs.

2.0 Frequency of Inspections

The Inspection Matrix specifies the minimum frequency of inspection for each required item. The following outlines the basis for the frequencies specified in the Inspection Matrix.

2.1 Daily

- Loading and unloading areas when in use.
- Operability of doors on Buildings 68, 69, 70-East, 70-West, 71-East, and 71-West when in use.
- Aboveground piping visually inspected for leaks.
- Tank systems for leaks, leaking pumps, leaking piping, gauge readings, data gathered from the leak detection equipment, monitor printouts, equipment operation, waste levels, emission control equipment, indications of leaks or spills, use of overflow equipment, detect corrosion, secondary containment integrity, seal pot liquid level above the bottom of pipe to form a seal, and nitrogen blanket on tank. Spills/leaks must be cleaned up with 24 hours.
- Welded flanges, joints, connections.
- Tank monitoring equipment.
- Inspect incinerator and associated equipment (e.g., pumps, valves, conveyors,

pipes, etc.) for leaks, spills, fugitive emissions, deterioration, excessive wear, and signs of tampering.

- Visually inspect the incinerator monitoring instrumentation for out of tolerance and/or recorded operational data.
- Kiln combustion air system.
- Continuous Emissions Monitoring System.
- Temperature in refrigerated trailers when in use.
- Cylinder storage area when in use.
- Cylinder feed station when in use.
- Slag pad east of the bulk solids maintenance bay when in use
- Drum pumping storage area when in use.
- Drum pumping station when in use.
- Shred tower when in use.
- ATF storage magazines when in use.

2.2 Weekly

- Carbon vent systems.
- Condensation traps.
- Fire pump check.
- Emergency generator check.
- Eyewash and showers.
- Perimeter lights, signs on fence, fence.
- Containers and containment systems.
- Test alarm system.
- Carbon vent systems.
- ATF storage magazines when in use.

2.3 Monthly

- Fire Extinguishers.
- Tank secondary containment system for indications of cracks, gaps, and peeling of the epoxy sealant.

2.4 Quarterly

- Potable water system check must be done for the Utah Division of Drinking Water.
- Spill kit inspection. The required spill kits and contents of each kit are outlined in the Preparedness and Prevention Plan (Attachment 5). If used, the kits must be fully restored prior to being placed in-service. The kits will also be inspected once per quarter to ensure their integrity.
- Evacuation drills.

2.5 Annual

- The closed vent system between the bulk solids building, the shredder, the apron feeder, the sludge receiving tank and the inlet to the ID fans (both kiln/ABC combustion air fans and the carbon adsorption system ID fan) will be inspected initially and annually thereafter for holes, gaps, loose connections, etc. that could lead to air pollution emissions.
- The duct work sections between the carbon adsorption system ID fan (K-401) and the carbon adsorbers, and between the combustion air fans (K-101 and K-02A/B) and the incinerator will be monitored initially and annually thereafter by EPA Method 21 to ensure there are “no detectable emissions” (no readings greater than 500 ppm above background levels). All components and connections will be visually inspected each year after the initial monitoring to check for defects that could lead to air emissions. Any components that are repaired or replaced will be monitored to ensure that it operates with no detectable emissions.
- The sludge receiving tank fixed roof and its closure devices will be inspected initially and annually thereafter for defects such as cracks, holes, gaps, broken, cracked, or otherwise damaged seals, broken or missing hatches, access covers, caps, or other closure devices, etc.

2.6 Other

- When the hydrocarbon vent system carbon canisters are in operation, they must be monitored every 3 hours for breakthrough.
- The drive through direct burn system, the truck unloading direct burn system, the direct burn corrosive feed system, the sludge pad direct burn system, and the drum pumping station must be inspected at least once each operating hour when hazardous waste is being transferred from the drive through direct burn tanker, the truck unloading direct burn tanker, the direct burn corrosive tanker/tote, the sludge pad direct burn tanker/tote, or container in the drum pumping station to the kiln/afterburner.
- The sludge and bulk solids tanks will be emptied and inspected every four years for the general condition and to measure the corrosion of each tank.
- All of the blend and aqueous tanks will be emptied and inspected every five years for the general condition and to measure the corrosion of each tank.

3.0 Types of Problems

The personnel conducting the inspections shall be trained on the types of problems they should be looking for. The Inspection Matrix briefly outlines the types of problems that will be looked for. However, more detailed, written instructions describing what the inspector should look for, the acceptable criteria (e.g., gauge readings, liquid levels, valve positions, etc.), and the proper notation to be placed on the inspection log (e.g., "ok", "x", "clean", "out-of-service", etc.) for each inspection item will also be used by the inspectors. These instructions may be specified on the form itself, or they may be specified in instructions which will accompany the applicable log.

The following sections outline some of the items that will be looked for during the inspections. Additional detail will be included in the instruction book and communicated to the inspectors.

These instructions shall be developed with sufficient detail to avoid inconsistencies and confusion between inspections and log entries between different inspectors. These instructions will be in place for all items on the Inspection Matrix.

Any item currently out-of-service or active work orders will be listed on the backlog list maintained by maintenance and on the inspection forms. A historical list of out-of-service items or work orders will also be maintained on paper or electronically.

3.1 Containers

Hazard labels, barcode labels with green acceptance labels or marks on the barcode, which are required for storage of the containers, are inspected. Unique barcode labels (identified by “REPACK” or “CONS” (for consolidate) on the barcode) are used for repacks and the green label or mark on the barcode is not required. Any labels that have fallen off are replaced. Label deficiency is noted on the weekly form and corrected in-place.

The drums and containers are inspected to ensure that the lids/covers and bungs are in place.

The containers are inspected for signs of corrosion. The drum/container will be overpacked/repackaged if it has lost its integrity.

Drums/containers are inspected for leaks. If a leak is found, the source of the leak is determined. The contents may be transferred to another suitable container. Absorbent is used to contain and clean up the spilled liquid. As an alternative, the container may be overpacked into a salvage drum.

The stacking of containers is inspected to ensure stability. There is also a check for the minimum required aisle space.

Compressed gas cylinders are checked for leakage daily by walkthrough monitoring with a photo ionization detector and color indicating tubes.

3.2 Tanks

Tanks are inspected to determine that the overflow has not been used, the seal pot has integrity, and nitrogen is blanketing the tank farm tanks and sludge storage tank (T-401). Tank level is checked to determine compliance with the capacity limitations.

Each tank is inspected once per day to detect corrosion or erosion and leaking of fixtures or seams.

The overfilling control equipment is inspected visually every day. The seal pot is checked to determine if liquid level is above the discharge pipe which maintains the seal. The tank and its auxiliary equipment, i.e., pump, levels, piping, valves, seals, etc. will be checked.

Equipment used to off-load, such as hoses and couplings, are visually inspected after each use. The unloading bay is sufficient to contain a tanker spill in case of ultimate failure by a hose. The hose will be replaced on any visual indication of a leak.

Data collected on all monitoring equipment, such as pressure gauges, level indicators, etc. is logged each day to ensure that the tank is operating according to design specifications and operation procedures. Plant maintenance is responsible for all calibration.

The level of waste in each tank (including bulk solids) is checked at least once each day to ensure that the tanks have not exceeded their permitted capacity.

The bulk solids tanks are in a building. Inside the tanks and the areas above the tanks within the internal walls of the building are treated as a confined space. There is a walkway that runs under the bulk solids tanks. The tanks are set on 12" beams. The inspector will walk underneath the bulk solids tanks and check for leaks under the four tanks: T-403, T-404A, T-404B-East, and T-404B-West. The inspector illuminates the area under each tank to look for leaks. If there are any leaks, a spill report will be prepared. If the leak came from a tank, then the tank will be declared out-of-service and the contents of the leaking tank will be transferred to another bulk solids tank.

The blend liquids and aqueous tanks are emptied and visually inspected and the shell thickness measured at least once every five years. A similar inspection and measurement of the sludge and bulk solids tanks is conducted at least once every four years. A report of these inspections will be retained on-site.

All the tanks (except the bulk solids tanks, T-403, T-404A and T-404B East and West, and the sludge receiving tank, T-406) contain manways to allow access for visual inspections. Tank entry procedures will conform to OSHA standards for confined space entry.

Should the tank be found defective, it will be taken out of service and repaired or replaced. Defective is defined as a leak, bulge, or a split seam.

3.3 Incinerator

The inspection schedules for the incinerator are included in this section. The waste feed flow is recorded continuously as are the combustion parameters, such as air, oxygen, temperature, etc. Also, parameters that are mandated in the permit will be monitored at the frequency specified.

Daily inspections at the incinerator will be conducted for all equipment associated with the incinerator train, material feed systems, process, and residue handling system. The inspector will check for leaks or spills, fugitive emissions, and signs of tampering. Any evidence of leaking must be reported to the shift supervisor as a possible indication of a worn seal.

The emergency waste feed cut-off controls and alarms will be tested every 168 operating hours. The test is detailed in Attachment 12.

3.3.1 Instruments

The instrument checklist is signed off by a shift supervisor daily. All of the instruments critical to monitoring the incinerator and gas cleaning process are included on the checklist. These are

listed on the Inspection Matrix. The supervisor signs off that the instrument is in good working order.

Typically, the shift supervisor and operators will be looking for the following indications of faulty instruments:

Thermocouples: The transmitters are set up to have the 4-20 ma signal fail low if the thermocouple breaks and fail high if the transmitter fails. In either case, the signal will show in the plant control system as "BAD" and provide a "SENSOR" alarm. Various other conditions could cause the reading to drift. An instrument will be checked if the variation in reading between any two instruments is greater than 10% of the lower value.

Oxygen Probes: These instruments will generally fail high. By comparison to each other and the oxygen probe in the stack, response of each instrument to the process, and visual examination of process conditions, a determination can be made of which instrument is reading correctly.

Pressure Transmitters: If the transmitter fails, the signal should fail to the low end of the span. If the measuring diaphragm is damaged, then the signal should read zero, which may not be the low end of the span. If the sensing line is plugged, then the signal will not vary during changing process conditions. The process can also be used to determine if a pressure instrument has failed by comparison to other pressure instruments in the process.

Flame Sensors: These will fail open indicating no flame. Since each BMS has two flame sensors both would have to fail during running to trip the BMS. In the process of relighting the burner, the bad flame sensor would be found.

Pressure Switches: Failure of these devices can only be determined by process conditions. A specific action is expected under certain process conditions. If that does not occur, then the switch is considered bad.

Magnetic Flowmeters: These instruments are set to fail low when the signal strength fails. The instruments would be reading correctly otherwise.

pH Probes: Deposit build-up on the probe can cause the reading to respond very slowly or even not at all.

3.4 Sumps and Secondary Containment Areas

Sumps are inspected daily to determine if they contain liquids or other material. The locations of the sumps subject to these inspection requirements are found on Drawings D-034-M-002 SP and SK-090-997-AR in Attachment 10.

If a sump, drip pan, or secondary containment area contains any material, it will be emptied within 24 hours of discovering the contents. This means that all material, liquid, solid, or both, will be removed. If ongoing precipitation prevents the emptying of all material from a sump or secondary containment system located outside of a building, the sump or secondary containment system will be emptied within 24 hours of the end of the precipitation event. If this occurs, an explanation to

this effect, and the time and date of the end of the precipitation event will be noted on the inspection forms. However, sufficient material must be removed during the event to maintain sufficient secondary containment capacity of the system. Solid material which accumulates in sumps inside buildings from the routine processing of containers (e.g., dried mud falling off of 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 liquid collected in sumps SP-614A, B, C, and D and their associated bermed areas which is returned to the neutralization system for use in the process. It will follow the management procedures as outlined in the Waste Analysis Plan (Attachment 1).

3.5 Closed Vent Systems and Carbon Adsorbers

The combustion air ductwork and the ductwork for the backup carbon adsorbers will be visually inspected annually. The inspections will look for leaks, holes, cracks, gaps, etc. which could lead to emissions from the ductwork and the carbon adsorption vessels.

3.6 Other Areas

Safety and security inspections are made of the fence, locks, fire extinguishers, alarms, eyewash stations and showers. In addition, the fire pumps, both electric and diesel are started-up and checked for operability. The emergency generator is also started-up with oil and gas checks for operability. Drawing D-034-M-005 in Attachment 10 specifies the location of this equipment.

Two spill kits are located at opposite ends of the plant. There will also be one located for the container management buildings (in building E-4). Each kit is inspected for complete inventory. If the seal is broken, the inventory sheet is checked, initialed, and placed back in the spill kit. A quarterly check will be made to determine integrity of the contents of the spill kit.

4.0 Corrective Action

All items on the inspection logs will have a notation of their status (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.

The method of documenting that a request for repair has been made is through the work order system. That same system is also used to indicate when the work has been completed. The form itself may change but will contain sufficient information to be able to clearly track all the work completed.

All work orders will clearly indicate the work that was performed. It will also indicate who performed the work. It will also clearly indicate that all of the required work is completed and the date of completion. If some of the work is done but additional work is needed, this will be noted on the work order or reference additional work orders.

Any malfunction or deterioration discovered by an inspection shall be corrected within 72 hours. If the remedy requires more time, Aragonite will submit to the Director of the Division of Waste Management and Radiation Control (Director), 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 problem is corrected, the equipment will be declared out-of-service. This will be noted on the inspection logs.

For purposes of these reporting requirements, deterioration shall be reported to the Director when it has proceeded to such an extent as to make the device inoperable or unable to function according to its intended purpose. However, all deterioration leading to this final state shall be noted on the appropriate inspection forms and reported internally so that corrective action will be taken when necessary.

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.

If a tank is determined to be unfit for use, it will be removed from service immediately and emptied. If the nitrogen blanket is removed the tank must be isolated from the fume management system.

5.0 Inspection Matrix

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

INSPECTION MATRIX

| Inspection Item | Minimum Frequency | Types of Problems |
|---|-----------------------|-------------------------------|
| Laboratory | | |
| Lab refrigerators and freezers | Daily | Operable, correct temperature |
| Lab instrument eyewashes | Weekly | Operable |
| Lab instrument showers | Weekly | Operable |
| Lab sample prep eyewashes | Weekly | Operable |
| Lab sample prep showers | Weekly | Operable |
| Lab cooler storage secondary containment | Daily (when in use) | In place, empty |
| Lab cooler storage access | Weekly (when in use) | Adequate |
| Lab cooler storage containers | Weekly (when in use) | Bulging, leaking, corroding |
| Lab cooler storage containers | Weekly (when in use) | Proper placement |
| Lab cooler storage containers | Weekly (when in use) | Closed, bungs in |
| Lab cooler storage containers | Weekly (when in use) | Labels intact and legible |
| Lab cooler storage waste segregation | Weekly (when in use) | Incompatibility check |
| Lab cooler storage portable secondary containment | Monthly (when in use) | Visually free of damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|---------------------|---------------------------------------|
| Container Buildings (E-1, E-2, E-3, E-4, E-5, E-6, E-7, E-8, 68, 69, 70-East, 70-West, 71-East, and 71-West) | | |
| E-1 sumps (4) | Daily | Empty |
| E-1 sump at dock (SP-625) | Daily | Empty |
| E-1 loading/unloading area | Daily (when in use) | Leaks, spills |
| E-1 loading/unloading area | Monthly | Visually free of cracks, gaps, damage |
| E-1 debris drum | Weekly | Closed, labeled, dated, <90 days |
| E-1 aisles | Weekly | Adequate |
| E-1 containers | Weekly | Bulging, leaking, corroding |
| E-1 containers | Weekly | Proper placement and stacking |
| E-1 containers | Weekly | Closed, bungs in |
| E-1 containers | Weekly | Labels intact and legible |
| E-1 pallets | Weekly | Provide 4" clearance |
| E-1 eyewashes | Weekly | Operable |
| E-1 showers | Weekly | Operable |
| E-1 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-1 waste segregation | Weekly | Incompatible check |
| E-1 floor, berms | Monthly | Visually free of cracks, gaps, damage |
| E-2 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-2 aisles | Weekly | Adequate |
| E-2 containers | Weekly | Bulging, leaking, corroding |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|--|
| E-2 containers | Weekly | Proper placement and stacking |
| E-2 containers | Weekly | Closed, bungs in |
| E-2 containers | Weekly | Labels intact and legible |
| E-2 pallets | Weekly | Provide 4" clearance |
| E-2 eyewashes | Weekly | Operable |
| E-2 showers | Weekly | Operable |
| E-2 waste segregation | Weekly | Incompatible check |
| E-2 floor, berms | Monthly | Visually free of gaps, cracks, damage |
| E-2 repack carbon filter | Weekly | Operable, carbon level, free of plugging, breakthrough |
| E-3 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-3 aisles | Weekly | Adequate |
| E-3 containers | Weekly | Bulging, leaking, corroding |
| E-3 containers | Weekly | Proper placement and stacking |
| E-3 containers | Weekly | Closed, bungs in |
| E-3 containers | Weekly | Labels intact and legible |
| E-3 pallets | Weekly | Provide 4" clearance |
| E-3 eyewashes | Weekly | Operable |
| E-3 showers | Weekly | Operable |
| E-3 waste segregation | Weekly | Incompatible check |
| E-3 floor, berm | Monthly | Visually free of cracks, gaps, damage |
| E-4 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|-------------------|--|
| E-4 aisles | weekly | Adequate |
| E-4 containers | Weekly | Bulging, leaking, corroding |
| E-4 containers | Weekly | Proper placement and stacking |
| E-4 containers | Weekly | Closed, bungs in |
| E-4 containers | Weekly | Labels intact and legible |
| E-4 pallets | Weekly | Provide 4" clearance |
| E-4 eyewashes | Weekly | Operable |
| E-4 showers | Weekly | Operable |
| E-4 decant eyewash/shower | Weekly | Operable |
| E-4 repack eyewash/shower | Weekly | Operable |
| E-4 waste segregation | Weekly | Incompatible check |
| E-4 floor, berms | Monthly | Visually free of cracks, gaps, damage |
| E-4 decant LEL/O ₂ /HCN/H ₂ S alarms | Monthly | Calibrate, alarms audible |
| E-4 repack LEL/O ₂ /HCN/H ₂ S alarms | Monthly | Calibrate, alarms audible |
| E-4 decant LEL/O ₂ /HCN/H ₂ S alarms | Weekly | Instruments operable |
| E-4 repack LEL/O ₂ /HCN/H ₂ S alarms | Weekly | Instruments operable |
| E-4 decant carbon filters | Weekly | Operable, carbon level, free of plugging, breakthrough |
| E-4 repack carbon filters | Weekly | Operable, carbon level, free of plugging, breakthrough |
| E-5 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-5 aisles | Weekly | Adequate |
| E-5 containers | Weekly | Bulging, leaking, corroding |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|---------------------------------------|
| E-5 containers | Weekly | Proper placement and stacking |
| E-5 containers | Weekly | Closed, bungs in |
| E-5 containers | Weekly | Labels legible and intact |
| E-5 pallets | Weekly | Provide 4" clearance |
| E-5 eyewashes | Weekly | Operable |
| E-5 showers | Weekly | Operable |
| E-5 waste segregation | Weekly | Incompatibility check |
| E-5 floor, berms | Monthly | Visually free of cracks, gaps, damage |
| E-5 sumps (4) | Daily | Empty |
| E-5 sump at dock (SP-619) | Daily | Empty |
| E-5 loading/unloading area | Daily (when in use) | Leaks, spills |
| E-5 loading/unloading area | Monthly | Visually free of cracks, gaps, damage |
| E-6 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-6 aisles | Weekly | Adequate |
| E-6 containers | Weekly | Bulging, leaking, corroding |
| E-6 containers | Weekly | Proper placement and stacking |
| E-6 containers | Weekly | Closed, bungs in |
| E-6 containers | Weekly | Labels intact and legible |
| E-6 pallets | Weekly | Provide 4" clearance |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|-------------------|---------------------------------------|
| E-6 eyewashes | Weekly | Operable |
| E-6 shower | Weekly | Operable |
| E-6 waste segregation | Weekly | Incompatibility check |
| E-6 floor, berm | Monthly | Visually free of cracks, gaps, damage |
| E-7 aisles | Weekly | Adequate |
| E-7 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-7 containers | Weekly | Bulging, leaking, corroding |
| E-7 containers | Weekly | Proper placement and stacking |
| E-7 containers | Weekly | Closed, bungs in |
| E-7 containers | Weekly | Labels intact and legible |
| E-7 pallets | Weekly | Provide 4" clearance |
| E-7 eyewashes | Weekly | Operable |
| E-7 showers | Weekly | Operable |
| E-7 waste segregation | Weekly | Incompatibility check |
| E-7 floor | Monthly | Visually free of gaps, cracks, damage |
| E-8 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-8 aisles | Weekly | Adequate |
| E-8 containers | Weekly | Bulging, leaking, corroding |
| E-8 containers | Weekly | Proper placement and stacking |
| E-8 containers | Weekly | Closed, bungs in |
| E-8 containers | Weekly | Labels legible and intact |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|---------------------------------------|
| E-8 pallets | Weekly | Provide 4" clearance |
| E-8 eyewashes | Weekly | Operable |
| E-8 showers | Weekly | Operable |
| E-8 waste segregation | Weekly | Incompatibility check |
| E-8 floor, berms | Monthly | Visually free of cracks, gaps, damage |
| E-8 sumps (12) | Daily | Empty |
| E-8 sump at dock (SP-627) | Daily | Empty |
| E-8 loading/unloading area | Daily (when in use) | Leaks, spills |
| E-8 loading/unloading area | Monthly | Visually free of cracks, gaps, damage |
| Building 68 secondary containment including tank T-611A and T-611B | Daily (when in use) | Empty |
| Building 68 doors | Daily (when in use) | Operational check |
| Building 68 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Building 68 containers | Weekly | Bulging, leaking, corroding |
| Building 68 containers | Weekly | Proper placement and stacking |
| Building 68 containers | Weekly | Closed, bungs in |
| Building 68 containers | Weekly | Labels intact and legible |
| Building 68 pallets | Weekly | Provide 4" clearance |
| Building 68 waste segregation | Weekly | Incompatibility check |
| Building 68 floor, berm | Monthly | Visually free of gaps, cracks, damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|---------------------------------------|
| Building 69 secondary containment | Daily (when in use) | Empty |
| Building 69 doors | Daily (when in use) | Operational check |
| Building 69 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Building 69 containers | Weekly | Bulging, leaking, corroding |
| Building 69 containers | Weekly | Proper placement and stacking |
| Building 69 containers | Weekly | Closed, bungs in |
| Building 69 containers | Weekly | Labels intact and legible |
| Building 69 pallets | Weekly | Provide 4" clearance |
| Building 69 waste segregation | Weekly | Incompatibility check |
| Building 69 floor, berm | Monthly | Visually free of gaps, cracks, damage |
| Buildings 70-East / 70-West secondary containment | Daily (when in use) | Empty |
| Buildings 70-East / 70-West doors | Daily (when in use) | Operational check |
| Buildings 70-East / 70-West alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Buildings 70-East / 70-West containers | Weekly | Bulging, leaking, corroding |
| Buildings 70-East / 70-West containers | Weekly | Proper placement and stacking |
| Buildings 70-East / 70-West containers | Weekly | Closed, bungs in |
| Buildings 70-East / 70-West containers | Weekly | Labels intact and legible |
| Buildings 70-East / 70-West pallets | Weekly | Provide 4" clearance |
| Buildings 70-East / 70-West waste segregation | Weekly | Incompatibility check |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|---------------------------------------|
| Buildings 70-East / 70-West floor, berm | Monthly | Visually free of gaps, cracks, damage |
| Buildings 71-East / 71-West secondary containment | Daily (when in use) | Empty |
| Buildings 71-East / 71-West doors | Daily (when in use) | Operational check |
| Buildings 71-East / 71-West alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Buildings 71-East / 71-West containers | Weekly | Bulging, leaking, corroding |
| Buildings 71-East / 71-West containers | Weekly | Proper placement and stacking |
| Buildings 71-East / 71-West containers | Weekly | Closed, bungs in |
| Buildings 71-East / 71-West containers | Weekly | Labels intact and legible |
| Buildings 71-East / 71-West pallets | Weekly | Provide 4" clearance |
| Buildings 71-East / 71-West waste segregation | Weekly | Incompatibility check |
| Buildings 71-East / 71-West floor, berm | Monthly | Visually free of gaps, cracks, damage |
| Breezeway | | |
| Breezeway sump SP-626 | Daily | Empty |
| Breezeway aisles | Weekly | Adequate |
| Breezeway eyewash | Weekly | Operable |
| Breezeway shower | Weekly | Operable |
| Breezeway alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Breezeway floor, berms | Monthly | Visually free of cracks, gaps, damage |
| Breezeway containers | Weekly | Bulging |
| Breezeway containers | Weekly | Leaking, corroding |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|----------------------|-------------------------------|
| Breezeway containers | Weekly | Closed, bungs in |
| Breezeway containers | Weekly | Labels intact and legible |
| Breezeway waste segregation | Weekly | Incompatibility check |
| Breezeway pallets | Weekly | Provide 4" clearance |
| E-1, E-5, E-8 Receiving Docks - Refrigerated Trailers and Containers | | |
| Refrigerated trailer containers | Weekly (when in use) | Bulging, leaking, corroding |
| Refrigerated trailer containers | Weekly (when in use) | Proper placement and stacking |
| Refrigerated trailer containers | Weekly (when in use) | Closed, bungs in |
| Refrigerated trailer containers | Weekly (when in use) | Labels intact and legible |
| Refrigerated trailer pallets | Weekly (when in use) | Provide 4" clearance |
| Refrigerated trailer aisles | Weekly (when in use) | Adequate |
| Refrigerated trailers | Daily (when in use) | Temperature ≤ 40 °F |
| E-1, E-5, E-8 receiving dock aisles and access | Weekly (when in use) | Adequate |
| E-1, E-5, E-8 receiving dock containers | Weekly (when in use) | Bulging, leaking, corroding |
| E-1, E-5, E-8 receiving dock containers | Weekly (when in use) | Proper placement |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|----------------------|--|
| E-1, E-5, E-8 receiving dock containers | Weekly (when in use) | Covered/closed, bungs in |
| E-1, E-5, E-8 receiving dock containers | Weekly (when in use) | Labels intact and legible |
| E-1, E-5, E-8 receiving dock pallets | Weekly (when in use) | Provide 4" clearance |
| E-1, E-5, E-8 receiving dock waste segregation | Weekly (when in use) | Incompatible check |
| E-1, E-5, E-8 receiving dock secondary containment | Monthly | Visually free of cracks, gaps, damage |
| Gas cylinder storage area | | |
| Cylinder storage area cylinders | Daily (when in use) | Bulging, leaking, corroding |
| Cylinder storage area cylinders | Weekly (when in use) | All cylinders capped |
| Cylinder storage area cylinders | Weekly (when in use) | Barcodes/labels intact and legible |
| Cylinder storage area segregation | Weekly (when in use) | Incompatibility check |
| Cylinder storage area | Weekly (when in use) | All barriers and signs in place |
| Cylinder storage area | Weekly (when in use) | Area clear of combustible waste and vegetation |
| Gas cylinder feed station | | |
| Cylinder feed station cylinders | Daily (when in use) | Bulging, leaking, corroding |
| Cylinder feed station cylinders | Weekly (when in use) | All cylinders capped |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|-----------------------|------------------------------------|
| Cylinder feed station cylinders | Weekly (when in use) | Barcodes/labels intact and legible |
| Cylinder feed station fittings | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station hoses | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station lance assembly | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station LEL Alarm | Monthly (when in use) | Calibrate, alarm audible |
| Cylinder feed station LEL Alarm | Weekly (when in use) | Instrument operable |
| Gas cylinder feed station glove box | | |
| Cylinder feed station glove box doors, north | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station glove box doors, north | Weekly (when in use) | Operational check |
| Cylinder feed station glove box doors, south | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station glove box doors, south | Weekly (when in use) | Operational check |
| Cylinder feed station glove box seals | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station glove box lexan | Daily (when in use) | Leaks, visible damage |
| Cylinder feed station glove box safety latches, north | Daily (when in use) | Visible damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|-----------------------------|
| Cylinder feed station glove box safety latches, south | Daily (when in use) | Visible damage |
| Cylinder feed station glove box lance assembly | Daily (when in use) | Leaks, visible damage |
| Slag pad east of the bulk solids maintenance bay | | |
| Slag pad east of the bulk solids maintenance bay storage secondary containment | Daily (when in use) | In place, empty |
| Slag pad east of the bulk solids maintenance bay storage barriers | Daily (when in use) | In place, damage |
| Slag pad east of the bulk solids maintenance bay storage aisles and access | Weekly (when in use) | Adequate |
| Slag pad east of the bulk solids maintenance bay storage containers | Weekly (when in use) | Bulging, leaking, corroding |
| Slag pad east of the bulk solids maintenance bay storage containers | Weekly (when in use) | Proper placement |
| Slag pad east of the bulk solids maintenance bay storage containers | Weekly (when in use) | Closed, bungs in |
| Slag pad east of the bulk solids maintenance bay storage containers | Weekly (when in use) | Labels intact and legible |
| Slag pad east of the bulk solids maintenance bay storage waste segregation | Weekly (when in use) | Incompatibility check |
| Slag pad east of the bulk solids maintenance bay storage portable secondary containment | Monthly (when in use) | Visually free of damage |
| Drum pumping storage | | |
| Drum pumping storage secondary containment | Daily (when in use) | In place, empty |
| Drum pumping storage barriers | Daily (when in use) | In place, damage |
| Drum pumping storage aisles and access | Weekly (when in use) | Adequate |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|--------------------------|---|
| Drum pumping storage containers | Weekly (when in use) | Bulging, leaking, corroding |
| Drum pumping storage containers | Weekly (when in use) | Proper placement |
| Drum pumping storage containers | Weekly (when in use) | Closed, bungs in |
| Drum pumping storage containers | Weekly (when in use) | Labels intact and legible |
| Drum pumping storage waste segregation | Weekly (when in use) | Incompatibility check |
| Drum pumping storage portable secondary containment | Monthly (when in use) | Visually free of damage |
| Drum pumping station | | |
| Drum pumping station containers/educt system and waste feed system pump and piping integrity | Hourly (when in use) | Spill control equipment, corrosion, erosion, other damage/deterioration, releases, gauge readings |
| Drum pumping station secondary containment | Daily (when in use) | Empty |
| Drum pumping station containers | Weekly (when in use) | Bulging, leaking, corroding |
| Drum pumping station containers | Weekly (when in use) | Closed, bungs in |
| Drum pumping station containers | Weekly (when in use) | Labels intact and legible |
| Drum pumping station containers | Weekly (when in use) | Incompatibility check |
| Drum pumping station secondary containment | Monthly | Check for cracks/gaps/damage |
| Drum pumping station LEL Alarm | Weekly | Instrument operable |
| Drum pumping station LEL Alarm | Monthly | Calibrate, alarm audible |
| CO ₂ fire suppression system | Daily (when in use) | Isolation valve open, cylinder charged and connected |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|--|---|
| Drum pumping station glove box doors | Daily (when in use) | 1" WC vacuum, visible damage |
| Drum pumping station glove box lexan | Daily (when in use) | 1" WC vacuum, visible damage |
| Drum pumping station glove box seals | Daily (when in use) | 1" WC vacuum, visible damage |
| Drum pumping station grounding | Daily (when in use) | Good connections, deterioration |
| Direct Burn Tanker Systems and Container Storage/Direct Burn Corrosive System | | |
| Drive through direct burn tanker, piping integrity and pump system | Hourly (when in use) | Spill control equipment, corrosion, erosion, releases, gauge readings |
| Drive through direct burn station secondary containment | Monthly | Check for cracks/gaps/damage |
| Drive through direct burn tankers/containers | Weekly (when not being fed to the incinerator) | Leaking, deterioration |
| Drive through direct burn station | Daily (when in use) | Check for the presence of combustible debris |
| Drive through direct burn station eyewash | Weekly | Operable |
| Drive through direct burn station shower | Weekly | Operable |
| Truck unloading direct burn tanker, piping integrity and pump system | Hourly (when in use) | Spill control equipment, corrosion, erosion, releases, gauge readings |
| Truck unloading direct burn station secondary containment | Monthly | Check for cracks/gaps/damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--|---|
| Truck unloading direct burn tankers | Weekly (when not being fed to the incinerator) | Leaking, deterioration |
| Truck unloading direct burn station | Daily (when in use) | Check for the presence of combustibile debris |
| Truck unloading direct burn station eyewash | Weekly | Operable |
| Truck unloading direct burn station pad shower | Weekly | Operable |
| Truck unloading aisles and access | Weekly (when in use) | Adequate |
| Truck unloading containers | Weekly (when in use) | Bulging, leaking, corroding |
| Truck unloading containers | Weekly (when in use) | Proper placement and stacking |
| Truck unloading containers | Weekly (when in use) | Closed, bungs in |
| Truck unloading containers | Weekly (when in use) | Labels intact and legible |
| Truck unloading pallets | Weekly (when in use) | Provide 4" clearance |
| Truck unloading waste segregation | Weekly (when in use) | Incompatibility check |
| Drive through corrosive direct burn tanker/tote, piping integrity and pump system | Hourly (when in use) | Spill control equipment, corrosion, erosion, releases, gauge readings |
| Drive through corrosive direct burn station secondary containment | Monthly | Check for cracks/gaps/damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--|---|
| Drive through corrosive direct burn tanker | Weekly (when not being fed to the incinerator) | Leaking, deterioration |
| Drive through corrosive direct burn station | Daily (when in use) | Check for the presence of combustibile debris |
| Drive through corrosive direct burn station eyewash | Weekly | Operable |
| Drive through corrosive direct burn station shower | Weekly | Operable |
| Drive through corrosive direct burn station LEL/O ₂ /HCN/H ₂ S alarms | Monthly | Calibrate, alarms audible |
| Drive through corrosive direct burn station LEL/O ₂ /HCN/H ₂ S alarms | Weekly | Instruments operable |
| Drive through corrosive direct burn station aisles and access | Weekly (when in use) | Adequate |
| Drive through corrosive direct burn station totes/containers | Weekly (when in use) | Bulging, leaking, corroding |
| Drive through corrosive direct burn station totes/containers | Weekly (when in use) | Proper placement and stacking |
| Drive through corrosive direct burn station totes/containers | Weekly (when in use) | Closed, Bung In |
| Drive through corrosive direct burn station totes/containers | Weekly (when in use) | Labels intact and legible |
| Drive through corrosive direct burn station pallets | Weekly (when in use) | Provide 4" clearance |
| Drive through corrosive direct burn station segregation | Weekly (when in use) | Incompatibility Check |
| ATF Storage Magazines | | |
| ATF Storage Magazines containers | Daily (when in use) | Bulging, leaking, corroding |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|--------------------------|--|
| ATF Storage Magazines containers | Daily (when in use) | Proper placement and stacking |
| ATF Storage Magazines containers | Daily (when in use) | Closed |
| ATF Storage Magazines containers | Daily (when in use) | Labels intact and legible |
| ATF Storage Magazines pallets | Daily (when in use) | Provide 4" clearance |
| ATF Storage Magazines aisles | Daily (when in use) | Adequate |
| ATF Storage Magazines | Weekly (when in use) | Signs on outside of magazines |
| ATF Storage Magazines | Weekly (when in use) | Access road drivable |
| ATF Storage Magazines | Weekly (when in use) | Magazines secure, locks secure, no unauthorized access |
| Sludge Tanks T-401 and T-406 | | |
| T-401 sump SP-620 | Daily | Empty |
| T-406 sump SP-618 | Daily | Empty |
| T-401 | Daily | Nitrogen blanket, leaking piping, waste levels |
| T-406 | Daily | Leaking pump(s) |
| sludge pit O ₂ instrument/alarm | Monthly | Calibrate, alarm audible |
| sludge pit O ₂ instrument/alarm | Weekly | Instrument operable |
| T-401 integrity | Daily | No visible leaks, check for corrosion |
| T-406 integrity | Daily | No visible leaks, check for corrosion |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|-------------------|--|
| T-401 and T-406 interior inspection | Every Four Years | Inspect interior of each tank for pitting, corrosion, general condition, thickness |
| T-406 berm (secondary containment system) | Monthly | Concrete free of gaps/cracks, clean |
| T-401 berm (secondary containment system) | Monthly | Concrete free of gaps/cracks, clean |
| T-401 waste level | Daily | Acceptable, record |
| T-406 waste level | Daily | Acceptable, record |
| valves for T-401 & T-406 | Daily | Leaks |
| The sludge receiving tank fixed roof and its closure devices | Annually | Check for defects such as cracks, holes, gaps, broken, cracked, or otherwise damaged seals, broken or missing hatches, access covers, caps, or other closure devices, etc. |
| T-406 berm eyewash | Weekly | Operable |
| T-406 berm shower | Weekly | Operable |
| Bulk Solids Tanks | | |
| T-403 waste level | Daily | Acceptable |
| T-404B-East/West waste level | Daily | Acceptable |
| T-404A waste level | Daily | Acceptable |
| T-403, T404A, T-404B-East/West interior inspection | Every Four Years | Inspect interior of each tank for pitting, corrosion, general condition, thickness |
| Bulk Solids Tunnel | | |
| T-403 | Daily | Evidence of leak |
| T-404B-East/West | Daily | Evidence of leak |
| T-404A | Daily | Evidence of leak |
| Tunnel concrete | Monthly | Visually free of cracks/gaps, clean |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|----------------------|--|
| Bulk Solids Unloading Berm/Sludge System Unloading Berm, Bulk Solids/Sludge Pad Container Storage, and Sludge Pad Direct Burn Station | | |
| Bulk solids unloading area | Daily (when in use) | Spills |
| Sludge unloading area | Daily (when in use) | Spills |
| Concrete/secondary containment | Monthly | Free of cracks/gaps, damage, clean, welds intact |
| Sump SP-617 | Daily | Empty |
| Alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Bulk solids/sludge pad storage barriers | Daily (when in use) | In place, free from damage |
| Bulk solids/sludge pad aisles | Weekly (when in use) | Adequate |
| Bulk solids/sludge pad totes/containers | Weekly (when in use) | Bulging, leaking, corroding |
| Bulk solids/sludge pad totes/containers | Weekly (when in use) | Proper placement |
| Bulk solids/sludge pad totes/containers | Weekly (when in use) | Covered/closed, bungs in |
| Bulk solids/sludge pad totes/containers | Weekly (when in use) | Labels intact and legible |
| Bulk solids/sludge pad pallets | Weekly (when in use) | Provide 4" clearance |
| Bulk solids/sludge pad waste segregation | Weekly (when in use) | Incompatible check |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--|---|
| Sludge pad direct burn station tankers | Weekly (when not being fed to the incinerator) | Leaking, deterioration |
| Sludge pad direct burn station | Daily (when in use) | Check for the presence of combustible debris |
| Sludge pad direct burn station pumps (P420A, P422) | Hourly (when in use) | No leaks/drips observed |
| Sludge pad direct burn station tanker/tote and piping integrity | Hourly (when in use) | Spill control equipment, corrosion, erosion, releases, gauge readings |
| Truck Unloading (E-14) | | |
| Truck unloading areas | Daily (when in use) | Spills |
| West bay concrete | Monthly | Visually free of cracks/gaps/damage |
| Middle bay concrete | Monthly | Visually free of cracks/gaps/damage |
| E-14 sumps (3) | Daily | Empty |
| Sump SP-309 | Daily | Empty |
| Hoses/fittings | Daily | Good condition |
| Piping | Daily | No leaks observed from truck unloading to tank farm |
| Pumps (P302A,B) | Daily | No leaks/drips observed |
| Alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Truck unloading LEL alarms | Monthly | Calibrate, alarms audible |
| Truck unloading LEL alarms | Weekly | Instrument operable |
| Eyewashes | Weekly | Operable |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|-------------------|--|
| Showers | Weekly | Operable |
| Thaw Shed | | |
| Spill Kit | Quarterly | Verify contents |
| Fire Station | | |
| Spill Kit | Quarterly | Verify contents |
| Container Building | | |
| Spill Kit | Quarterly | Verify contents |
| Tank Farm Pump Houses (E-15 and E-16) | | |
| E-15 sump | Daily | Empty |
| P306A | Daily | Check for leaking |
| P306B | Daily | Check for leaking |
| P303A, B | Daily | Check for leaking |
| E-15 nitrogen blankets for T-301 through T-324 | Daily | Blanket present |
| E-15 piping and headers | Daily | Check for leaking, empty drip pans |
| E-15 containment area | Daily | Spills |
| E-15 eyewash | Weekly | Operable |
| E-15 shower | Weekly | Operable |
| E-15 containers | Weekly | Closed container; label is current; no leaks; <90 days |
| E-15 concrete floor | Monthly | Free of cracks/gaps/damage |
| E-15 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-15 LEL alarms | Monthly | Calibrate, alarms audible |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|-------------------|--|
| E-15 LEL alarms | Weekly | Instrument operable |
| E-16 sump | Daily | Empty |
| P304A | Daily | Check for leaking |
| P304B | Daily | Check for leaking |
| P312 | Daily | Check for leaking |
| E-16 piping and headers | Daily | Check for leaking, empty drip pans |
| E-16 containment area | Daily | Spills |
| E-16 eyewash | Weekly | Operable |
| E-16 shower | Weekly | Operable |
| E-16 containers | Weekly | Closed container; label is current; no leaks; <90 days |
| E-16 concrete floor | Monthly | Free of gaps/cracks/damage |
| E-16 alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| E-16 LEL alarms | Monthly | Calibrate, alarms audible |
| E-16 LEL alarms | Weekly | Instrument operable |
| Tank Farm (T-301-312 and T-321-324) | | |
| T-301-312 and T-321-324 seal pots and overflows | Daily | Check level of liquid and signs of waste |
| T-301-312 and T-321-324 integrity | Daily | Check if tank is leaking, check for corrosion |
| T-301-312 and T-321-324 tank temperatures, waste levels, valve positions | Daily | Acceptable, record |
| T-301-304, T-305-308, T-309-312, and T-321-324 berm floors | Monthly | Check for cracks/gaps/damage |
| T-301-304, T-305-308, T-309-312, and T-321-324 berm walls | Monthly | Check for cracks/gaps/damage |
| T-301-312 and T-321-324 interior inspection | Every Five Years | Inspect interior of each tank for pitting, corrosion, general condition, thickness |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|---------------------|---|
| Sumps SP-310A, B, C, and D | Daily | Empty |
| Lower T-323-324 shower/eyewash | Weekly | Operable |
| Upper T-322-321 shower/eyewash | Weekly | Operable |
| Lower T-303-304 shower/eyewash | Weekly | Operable |
| Upper T-303-304 shower/eyewash | Weekly | Operable |
| Lower T-309-310 shower/eyewash | Weekly | Operable |
| Upper T-309-310 shower/eyewash | Weekly | Operable |
| Tank Farm Carbon Canister Fume Management System | | |
| Condensation traps | Weekly | liquid accumulation |
| Hydrocarbon sensor ports | 3 hrs (when in use) | Breakthrough |
| Carbon canisters | 3 hrs (when in use) | Temperature |
| Combustion Air System Inspection | | |
| Shredder vent duct | Daily | Check for presence of dust or liquids |
| Bulk solids building vent | Daily | Check for presence of dust or liquids |
| North ABC combustion air duct | Daily | Check for presence of dust or liquids |
| South ABC combustion air duct | Daily | Check for presence of dust or liquids |
| Kiln combustion air silencer | Daily | Check for presence of dust or liquids |
| Drain valves/traps, Bottom of kiln, Combustion air silencer | Daily | Open and drain any liquids; record amount drained |
| Sludge X309 | Daily | Open, drain, record |
| Decant X308 | Daily | Open, drain, record |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|--|
| Kiln X310 | Daily | Open, drain, record |
| Trap X311 | Daily | Open, drain, record |
| The closed vent system between the bulk solids building, the shredder, the apron feeder, the sludge receiving tank and the inlet to the ID fans (both kiln/ABC combustion air fans and the carbon adsorption system ID fan) | Annually | Check for leaks, holes, gaps, loose connections, etc. that could lead to emissions |
| The duct work sections between the carbon adsorption system ID fan (K-401) and the carbon adsorbers, and between the combustion air fans (K-101 and K-102A/B) and the incinerator | Annually | No detectable emissions (Method 21), defects that could lead to emissions |
| Carbon Adsorption Vessels F-412A/B | Annually | Check for leaks, holes, gaps, that could cause emissions |
| Kiln Area | | |
| Kiln/ABC berm | Daily | Clean; free of spills |
| Kiln/ABC and associated equipment (including feed conveyors, deslagger, piping, etc.) | Daily | Fugitive emissions, deterioration, excessive wear, signs of tampering, leaks, spills |
| Sump SP-624 | Daily | Empty |
| Sump SP-615 | Daily | Empty |
| Eyewashes | Weekly | Operable |
| Showers | Weekly | Operable |
| Slag Pad Area | | |
| Sumps SP-623A/B | Daily | Empty |
| Eyewash | Weekly | Operable |
| Shower | Weekly | Operable |
| Wet End I Area | | |
| Sump SP-629 | Daily | Empty |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|--|
| Sump SP-614B | Daily | Empty |
| Sump in dust loadout | Daily | Empty |
| Wet End I equipment (pumps, piping, valves, tanks, etc.) | Daily | Fugitive emissions, deterioration, excessive wear, signs of tampering, leaks, spills |
| Sump SP-614A | Daily | Empty |
| Eyewashes | Weekly | Operable |
| Showers | Weekly | Operable |
| Wet End II Area | | |
| Soda Ash Sump SP-614D | Daily | Empty |
| Sump SP-616 | Daily | Overflowing, pump operable |
| WESP Sump SP-614C | Daily | Empty |
| Wet End II equipment (pumps, piping, valves, tanks, etc.) | Daily | Fugitive emissions, deterioration, excessive wear, signs of tampering, leaks, spills |
| Eyewashes | Weekly | Operable |
| Showers | Weekly | Operable |
| CEM system | Daily | Sample transport and interface system, CEMS calibration data |
| Emergency Equipment | | |
| Emergency Generator | Weekly | Start generator, operable, check oil & gas |
| Primary electric fire pump | Weekly | Start pump, operable |
| Secondary diesel fire pump | Weekly | Start pump, operable |
| Safety and Security | | |

| Inspection Item | Minimum Frequency | Types of Problems |
|--|---------------------------|--|
| 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? |
| Perimeter lighting | Weekly | Check for lights working |
| All fire extinguishers plant wide | Monthly | Tagged, charged, in place, damaged |
| Evacuation drills | Quarterly | Check for proper response |
| Instrumentation | | |
| Kiln temperature TT 1005 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Kiln rotation ST1003 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Combustion zone pressure PIT 1006 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| ABC temperature TE/TT 1009 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Hot duct O ₂ AT 1010 A,B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Spray dryer gas temperature TE/TT 2001 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Baghouse pressure drop PIT 2020 A,B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Activated carbon feed rate WT 2037 RL | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Saturator flow FT 2081A/B | Daily (when in operation) | Good working order, out of tolerance, recording properly |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|---------------------------|--|
| Saturator gas temperature TE/TT 2082 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| 1st stage flow FT 2092A/B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| 2nd stage flow FT 2095A/B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| 1st stage pH AE/AT 2104 A,B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| 2nd stage pH AE/AT 2130 A,B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| 2nd stage effluent pH AE/AT 2129 A,B | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Stack CO AE/AT 2199 A,B,C | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Gas velocity FE/FT 2195 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Vent position ZSC 1017 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Atomization air differential pressure PDSL 1124, 1187, 1224 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Waste liquid pressure PSL 1119A, 1119B, 1196 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Combustion air pressure PSL 1127, PI 1191, 1244 | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| BMS operating A104M, A106AM, A106BM | Daily (when in operation) | Good working order, out of tolerance, recording properly |
| Shred Tower | | |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|--------------------------|--|
| Shred tower equipment and piping integrity | Daily (when in use) | Leaking, deterioration |
| Shred tower conveyor containment | Monthly | Check for cracks/gaps/damage |
| Shred tower conveyor containment | Daily | Empty |
| Shred tower eyewashes and safety showers | Weekly | Operable |
| Sump SP-624 | Daily | Empty |
| Sump SP-650 | Daily | Empty |
| Shred tower O ₂ instrumentation/alarm | Monthly | Calibrate, alarm audible |
| Shred tower O ₂ instrumentation/alarm | Weekly | Instrument operable |
| Shred tower LEL instrumentation/alarm | Monthly | Calibrate, alarm audible |
| Shred tower LEL instrumentation/alarm | Weekly | Instrument operable |
| Shred tower vent system | Daily (when in use) | Check for leaks, holes, gaps, loose connections, etc. that could lead to emissions |
| Shred tower alarms (plant alarms for fire, evacuation, and paging system) | Weekly | Alarms audible |
| Shred tower conveyor containers | Weekly | Closed, bung in |
| Shred tower conveyor containers | Weekly | Labels, intact and legible |
| Shred tower conveyor containers | Weekly | Proper placement and stacking |
| Shred tower conveyor containers | Weekly | Incompatibility check |
| Shred tower conveyor containers | Weekly | Leaking, corroding |
| Shred tower conveyor containers | Weekly | Bulging |
| Shred Tower Storage Racks | | |
| Shred tower storage racks secondary containment | Monthly | Check for cracks/gaps/damage |

| Inspection Item | Minimum Frequency | Types of Problems |
|---|-------------------|-------------------------------|
| Shred tower storage racks secondary containment | Daily | Empty |
| Shred tower storage racks containers | Weekly | Closed, bung in |
| Shred tower storage racks containers | Weekly | Labels, intact and legible |
| Shred tower storage racks containers | Weekly | Proper placement and stacking |
| Shred tower storage racks containers | Weekly | Incompatibility check |
| Shred tower storage racks containers | Weekly | Leaking, corroding |
| Shred tower storage racks containers | Weekly | Bulging |