ATTACHMENT II-3

SITE INSPECTION PLAN

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SITE INSPECTION PLAN

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APPENDIX I: INSPECTION FORMS

CLEAN HARBORS GRASSY MOUNTAIN FACILITY
SITE INSPECTION PLAN

I. PURPOSE

The inspection program is designed to assure protection of human health and the environment in areas that are subject to the Resource Conservation Recovery Act, and the portions of the facility that are subject to the Toxic Substance Control Act (TSCA). These include the PCB Tank Farm, PCB Storage Building and their ancillary equipment and piping. The program consists of routine inspection of permitted units, such as containers, tanks and container storage facilities, groundwater monitoring wells and hazardous waste landfills. Inspections are conducted in accordance with the schedule provided in this plan. The inspection identifies the compliance status of a unit, equipment, or containment structure. Deficiencies documented during inspections will be subject to the procedures of Section IV of this plan. Inspections of PCB areas are addressed in Module X of the Permit.

II. SCOPE

The facility's General Manager shall be ultimately responsible for the implementation of the inspection program. The General Manager can delegate this responsibility to other facility management personnel. Personnel conducting inspections (the Inspector) shall perform, at a minimum, the required inspections in accordance with the Frequency Schedule and document the inspection findings. For unacceptable conditions found during the inspections, the Inspector shall issue a "Remedial Work Order" (RWO) when the condition or deficiency cannot be corrected within 24 hours of identifying the deficient condition. An Inspector shall perform a re-inspection to verify the correction or repair. If the inspection parameter cannot be corrected within 72 hours, a schedule for the repair of the deficiency shall be submitted to the Director, as per Condition II.G.1.

Inspectors shall possess the necessary qualifications and shall be trained to enable them to perform their duties according to the requirements of the Rules (Utah Admin. Code R315). Refer to the Personnel Training Plan (Attachment II-4).

III. INSPECTION DOCUMENTATION

Inspections shall be performed, at a minimum, according to the frequency specified in the Inspection Schedule, Section V below. The schedule outlines the minimum number of required inspection items and events which assesses the condition of the units, equipment and storage building or area inspected. At the discretion of the Inspector, or if so directed by facility management, the frequency of any inspection type (i.e. daily, weekly, monthly, annually) can be increased. The frequency can never be decreased from the approved schedule listed in the permit unless approved by the Director.

Inspection Forms shall be used for inspection documentation. Inspection forms can consist of written hardcopy or equivalent electronic format. Electronic inspection data must be available to

the Division representatives in hardcopy or another compatible format upon request. An Inspection Form shall document the date, time of inspection, name of the Inspector, the status of each inspected item, the reason for each “not ok” status checked and either the date corrective action was taken, along with the initials of the person making the determination or reference a Remedial Work Order (RWO).

For the convenience of the Inspectors, certain non-RCRA inspection items can be included on the Inspection Forms. Such items can be added or deleted at the facility's discretion. Non-RCRA inspection items shall be identified as such on the form.

All RCRA Inspection Forms and associated documents (i.e., RWO's, survey notes, test results) shall be incorporated into the facility's Operating Record. These records shall be maintained at the facility in a readily available location and maintained for a minimum of three (3) years from the applicable record's inspection date.

IV. THE FOLLOWING INSPECTION DOCUMENTATION PROCEDURES SHALL BE FOLLOWED:

1. Fill in all of the appropriate blanks on the form (e.g., date, time, etc.).
2. Print and sign your name if in written hardcopy format. Electronic forms will be identified by computer user login identifications.
3. Inspect the items as indicated by the frequency as outlined in the schedule.
4. If inspection item is “OK” indicate by marking next to the item in the appropriate column.
5. If inspection item is “NOT OK” indicate by marking next to the item in the appropriate column and describe the problem in the adjacent column.
6. For items that are corrected within 24 hours, the person verifying that the item was corrected will write on the inspection form the date it was corrected and his/her initials.
7. For items that cannot be promptly corrected (e.g., within 24 hours), complete a Remedial Work Order (RWO) and submit to management and indicate on the inspection form that a RWO was written and the number of the RWO.
8. When a RWO problem is resolved, describe the solution on the RWO form, initial and note the date that remedial action was taken.

V. GRASSY MOUNTAIN FACILITY: INSPECTION SCHEDULE

Grassy Mountains inspection schedule is detailed in the tables below.

GRASSY MOUNTAIN FACILITY INSPECTION SCHEDULE	
SITE PERIMETER	**INSPECTION ELEMENT: DAILY**
SECURITY GATE: (RD01)	Check guard visitor log for current entry
SECURITY LIGHTING: (RD01)	Check operability of facility interior lighting in waste management areas
SECURITY FENCE: (RD01)	Inspect for integrity, breaks or damage
	Check for erosion which would allow for unauthorized entry
	Check gates for proper function
	Check for presence of warning signs at proper intervals (120 feet or less) and at all gates
	Inspect signs for deterioration (fading, damage, etc.)
SITE PERIMETER	**INSPECTION ELEMENT: WEEKLY**
PERIMETER RUN-OFF DIKES: (RW01)	Check for evidence of erosion, severe settling, signs of burrowing animals or deterioration
SAFETY/EMERGENCY EQUIPMENT	**INSPECTION ELEMENT: DAILY**
EMERGENCY RESPONSE TRAILER: (RD04)	Check security tag. If tag is broken or missing, check inventory for presence of all listed equipment
COMMUNICATION EQUIPMENT: (RD04)	Check telephone system to ensure connection and operation of outside line
	Check telephone system for "all page"
	Check Citizens Band Radio
	Check hand-held and base station radio
WINDSOCK: (RD04)	Check for presence
SAFETY/EMERGENCY EQUIPMENT	**INSPECTION ELEMENT: WEEKLY**
SELF-CONTAINED BREATHINGAPPARATUS: (RW05)	Check for air pressure at least seventy-five percent (75%)
	Check unit for deterioration or damage
OVERPACKS AND ABSORBENTSUPPLY: (RW05)	Check for a minimum of two (2) empty, overpack drums
	Check for stabilization or solidification agent supply
EMERGENCY SIREN: (RWO5)	Operate siren for ten to twenty (10-20) seconds
FIRE FIGHTING WATER SUPPLY: (RW02)	Check storage tanks (5 ea.) for at least ninety percent (90%) capacity
FIRE HYDRANTS / HOSES: (RW02)	Check for adequate access Start pump, pressurize lines, and open hydrant valves to ensure operational status

GRASSY MOUNTAIN FACILITY INSPECTION SCHEDULE	
	Check for damage or deterioration
EYEWASH / SHOWERS: (RW02) (in lab and operations areas) (see Attachment II-6, Table 4-2)	Check operational status
	Check for damage or deterioration
SAFETY/EMERGENCY EQUIPMENT	**INSPECTION ELEMENT: MONTHLY**
FIRE EXTINGUISHERS (RM01) (see Attachment II-6, Table 4-1)	Inspect tags for expiration dates
	Inspect pressure gauges for adequate pressure
EMERGENCY GENERATOR (RM01) (Admin and Ops)	Start and operate to ensure functional status
FIRST AID KITS (RM01)	Inspect to ensure adequate inventory of contents
SAFETY/EMERGENCY	**INSPECTION ELEMENT: QUARTERLY**
CONTINGENCY PLAN DRILL (RQ01)	Conduct a simulation of one of the contingency plan emergency situations.
SAFETY/EMERGENCY EQUIPMENT	**INSPECTION ELEMENT: SEMI-ANNUALLY**
FIREFIGHTING WATER SUPPLYSYSTEM: (RS01)	Start pump, pressurize lines, and open hydrant valves to insure operational status
	Unroll and pressurize firehoses and check for deterioration
	Check firefighting nozzles
CONTAINER MANAGEMENT UNIT	**INSPECTION ELEMENT: DAILY (WHEN DRUM DOCK IS STAFFED)**
DRUM DOCK AND PADS: (RD05)	Maximum container inventory in each area and record number
	Check for correct aisle space
	Check for "inspection aisles"
	Check dock loading/unloading area and pad(s) for evidence of spills
	Visually evaluate containers for leaks, severe corrosion or deterioration, record load number(s) if appropriate
	Check for labels on all containers
DRUM DOCK AND PADS: (RD06)	Check drum dock and pads to ensure incompatible wastes are segregated
	Check each container closure seals (bung, lid sealing ring, if appropriate)
	Check sumps for liquids
	Check for transfer loads nearing nine (9) days (10 day maximum)

GRASSY MOUNTAIN FACILITY INSPECTION SCHEDULE	
PCB Storage Building	(See Module X)
BULK CONTAINER STORAGE	**INSPECTION ELEMENT: DAILY**
RD07	Maximum container inventory and record number in each area
	Check for leaking containers
	Check for load labels and arrival date nearing 90 days
	Check containers for secure lids / tarps in good condition and secure
	Check areas for discoloration, debris
	Check daily inventory for accuracy and location of containers
CONTAINER MANAGEMENT UNIT	**INSPECTION ELEMENT: WEEKLY**
DRUM DOCK AND PADS: (RW04)	Check base and berm for cracks, gaps, flaking, chips, and gouges
	Check roof for leaks, tears, or deterioration
	Verify container inventory for accuracy.
	Check for drum stabilization in designated area(s)
CONTAINER MANAGEMENT UNIT	**INSPECTION ELEMENT: MONTHLY**
DRUM DOCK SECONDARY CONTAINMENT: (RM02)	Inspect secondary containment (including sumps) for cracks, gaps, and clean
CONTAINER MANAGEMENT UNIT	**INSPECTION ELEMENT: ANNUALLY**
SITE MONITORING SYSTEMS	**INSPECTION ELEMENT: DAILY**
MONITORING WELLS & PIEZOMETERS OUTSIDE THE SITE SECURITY FENCE: (RD02)	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: (RD03)	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	Check wells for damage to casing and cover security
	Check for evidence of tampering with lock or cap

GRASSY MOUNTAIN FACILITY INSPECTION SCHEDULE	
SECURITY FENCE: (RW09)	Check for well visibility and accessible to personnel
SITE MONITORING SYSTEMS	**INSPECTION ELEMENT: ANNUAL**
MONITORING WELLS: (RA01)	Check for proper operation of pumps
	Check for insect infestation of casing
SURFACE IMPOUNDMENTS	**INSPECTION ELEMENT: DAILY**
RD08	Check for three feet (3') freeboard
	Check loading/unloading areas for evidence of spills
SURFACE IMPOUNDMENTS	**INSPECTION ELEMENT: WEEKLY**
RW03	Visually inspect dikes for: 1. Vegetation that could be damaging 2. Burrowing animals 3. Evidence of erosion, leaks, or deterioration
	Inspect dikes run-on/run-off ditches and drains for deterioration, improper operations, or erosion
	Inspect synthetic liners where exposed for cracks, tears, and signs of deterioration
	Check leachate collection risers for secure caps and check for the presence of leachate in and the proper functioning of the detection system.
LANDFILL SYSTEMS	**INSPECTION ELEMENT: DAILY**
ALL CELLS: (RD13)	Visually inspect for free-standing liquids
	Check for evidence of wind dispersal of waste
LANDFILL SYSTEMS	**INSPECTION ELEMENT: WEEKLY**
ALL CELLS: LEACHATE: (RW06)	Check for secure caps, for the presence of leachate and the proper functioning of the leak detection system.
WHEEL WASH SYSTEMS	**INSPECTION ELEMENT: QUARTERLY**
WHEEL WASH CONTAINMENT: (RQ02)	Inspect secondary containment (including sumps) for cracks, gaps, and clean
RCRA CELLS: (RW07)	Inspect synthetic liners where exposed for cracks, tears, and signs of deterioration
	Check cell for 12 inches (12") freeboard

GRASSY MOUNTAIN FACILITY INSPECTION SCHEDULE	
	Visually inspect berms for: 1. Vegetation that could be damaging 2. Burrowing animals 3. Evidence of erosion, leaks, or deterioration
	Inspect run-on/run-off ditches and drains for deterioration, improper operations, or erosion
CLOSED CELLS: (RW07)	Check for erosion, settling and subsidence
TANK SYSTEMS	**INSPECTION ELEMENT: DAILY**
	(Tank systems tagged as "Out-of-Service" inactive, may be omitted)
LEACHATE STORAGE: (RD11)	Check the following for proper operation:
	1. Manual operating valves
	2. High level alarms o power source o operating mechanisms o protective overlays o sounding mechanism
	3. Check valve, piping, and pumps
	4. Discharge controls
LEACHATE SECONDARY CONTAINMENT: (RD11)	Check for liquid in sump(s)
	Inspect area around tank system for evidence of leaking (discoloration, vegetative stress)
LEACHATE TANK SYSTEMS: (RD11)	Check liquid level log for entry
	Check for evidence of corrosion, deterioration, or leaking (ancillary equipment)
ALL TANK SYSTEMS	**INSPECTION ELEMENT: DAILY**
ALL SECONDARY CONTAINMENT: (RD11),	Check for cracks in the cement
	Check for liquid in sump(s)
STABILIZATION TANK SYSTEMS	**INSPECTION ELEMENT: DAILY**
SECONDARY CONTAINMENT (RD10)	Check for liquid
	Check area around tank system for evidence of leaking (discoloration, etc.)
	Check for evidence of corrosion, deterioration, or leaking (ancillary equipment)

MISCELLANEOUS:	**INSPECTION ELEMENT: DAILY**
TRANSFER AREA: (RD09)	Check tank unloading areas for evidence of spills
WHEEL WASH AREA: (RD09)	Check for evidence of spills and discoloration
SAMPLING AREA: (RD09)	Check for evidence of spills and discoloration
MISCELLANEOUS:	**INSPECTION ELEMENT: RAIN EVENT**
PERIMETER RUN-OFF BERMS: (RAIN-1)	Check for evidence of erosion, severe settling, and signs of burrowing animals or deterioration
CELLS: (RAIN-1)	Check for erosion, settling and subsidence
MISCELLANEOUS:	**INSPECTION ELEMENT: RAIN EVENT**
PERIMETER RUN-OFF BERMS: (RAIN-1)	Check for evidence of erosion, severe settling, and signs of burrowing animals or deterioration
CELLS: (RAIN-1)	Check for erosion, settling and subsidence
CONSTRUCTION INSPECTION SCHEDULE:	As determined by CQA Plan.
DRAIN & FLUSH BUILDING WAREHOUSE ONE	**INSPECTION ELEMENT: DAILY (WHEN AREA IS STAFFED)**
A1, A2/A4, A3	Check for correct aisle space
	Check area for evidence of spills
	Visually evaluate containers for leaks, severe corrosion, or deterioration.
	Record load number(s) if appropriate.
	Check each container's closure seals for tightness (bung, lid sealing ring)
	Check sumps for liquids
	INSPECTION ELEMENT: WEEKLY
A1, A2/A4, A3	Check base, berms, and ramps for cracks, gaps, flaking, chips, and gouges
	Check roof for leaks, tears, or deterioration
	Verify container inventory for accuracy
	INSPECTION ELEMENT: MONTHLY
A1, A2/A4, A3	Inspect secondary containment (including base, berms, sumps, and ramps) for cracks, gaps, and clean if needed
	INSPECTION ELEMENT: ANNUAL
	To include all inspection elements

APPENDIX I

INSPECTION FORMS