

ATTACHMENT 3
INSPECTION PLAN

Attachment 3 INSPECTION PLAN

The Facility has a written inspection schedule. The inspection schedule specifies the items to inspect and the types of problems to look for during the inspection. A copy of the inspection schedule is in Table 1 below.

All inspections required by this Permit shall be recorded on inspection log forms and maintained as part of the Operating Record. These forms must be kept for a minimum of three years from the date of inspection. If the logged inspection has been identified in an enforcement action, the record retention period referred to in R315-262-40 is extended automatically during the course of any resolved enforcement action regarding the regulated activity or as requested by the Director. Deterioration or malfunctions revealed by an inspection are remedied before they lead to an environmental or human health hazard. Examples of these inspection log forms are located in Appendix A.

The inspection records include the following minimum information:

- The date of the inspection
- The time of the inspection
- The name of the inspector
- A notation of the observations made
- The date and nature of any repairs or other remedial actions

1.0 GENERAL INSPECTION REQUIREMENTS

The waste container storage unit (CSU) is subject to RCRA inspection requirements and Conditions II.F., III.C.1, III.E.4., and III.J. of this Permit. A schedule of required inspections is included in Table 1 below.

1.1 Types of Problems

The types of problems (e.g., malfunctions and deterioration) to look for during each inspection are specified on the inspection log forms located in Appendix A.

Table 1
INSPECTION SCHEDULE

<i>Facility Unit(s) and Basic Elements</i>	<i>Possible Error, Malfunction, or Deterioration</i>	<i>Frequency of Inspection</i>
Hazardous waste CSU	The concrete floor and secondary containment berms of the storage area and the containers have signs of deterioration (i.e., cracks, leaks, uneven settlement and defects); missing labels; inadequate aisle space (< 30 inches)	Weekly
Safety and emergency equipment	Safety and emergency equipment unsuitable for use; spill and emergency response material (e.g., absorbent materials, protective clothing) in insufficient quantities.	Monthly
Security devices (i.e., fence, gates, office alarm system, and warning signs)	Damaged or missing security devices (e.g., hole in fence, missing warning signs); malfunction in alarm system	Weekly

1.2 Frequency of Inspections

The frequency of each type of inspection is noted in the inspection schedule and on each inspection log form included in Appendix A. The elements inspected and their inspection frequencies are minimum requirements.

1.3 Schedule of Remedial Action

Any deterioration or malfunction of equipment or structures that the inspection reveals will be remedied on a schedule which ensures that the problem does not lead to an environmental or human health hazard in accordance with Conditions II.F.1.a. and II.F.I.b. Where a hazard is imminent or has already occurred, remedial action will be taken immediately.

1.4 Inspection Log

Records of the inspections will be kept in inspection log forms at the facility for at least three years from the date of the inspection. If the logged inspection has been identified in an enforcement action, the record retention period referred to in R315-262-40 is extended automatically during the course of any resolved enforcement action regarding the regulated activity or as requested by the Director. At a minimum, these records will include the date and time of inspection, name of the inspector, notation of the observations made, and nature of any repairs or other remedial actions. Examples of these inspection forms are located in Appendix A.

2.0 SPECIFIC PROCESS INSPECTION REQUIREMENTS

2.1 Container Inspection

The hazardous waste CSU is inspected weekly. The storage area is checked for proper housekeeping. The area is inspected for general cleanliness and for proper placement. Each container shall be stored on a pallet and not stacked more than two high (Condition III.E.3.). Stacks are checked for damaged and leaking containers and damaged or broken containment pallets.

Containers are inspected to ensure that they are in good condition (e.g., no leaks, no severe rusting, bulging or structural defects), properly closed, and properly labeled. Drum labels are checked to ensure that incompatible wastes are not being stored in the same area.

The floor and curbs of the storage areas are checked for cracks, wet spots, erosion or damage to the impervious coating. The loading/unloading areas are also inspected daily for cracks, wet spots, and erosion whenever hazardous waste is received or shipped.

2.2 Emergency and Safety Equipment Inspection

Monthly inspections of the emergency equipment listed in the Safety Equipment section of the facility's RCRA Contingency Plan (Attachment 4) are recorded on inspection log forms included as Appendix A. Absorbent materials, chemical neutralizers, first aid supplies, protective clothing, recovery drums, and tools are inspected to ensure sufficient quantities are on hand and that these materials are in good condition for use. The fork lifts, phones, and alarm system are inspected and tested, to ensure readiness during a potential emergency. The fire extinguishers are inspected for fullness, and to ensure seals are intact and no damage to the hose and case is observed. All eye washes and safety showers are inspected for cleanliness and to ensure the showers are in good working order. Security devices, such as the fence, gates, and warning signs are inspected on a weekly basis.

Actions to correct any deficiencies will be taken within twenty-four (24) hours to ensure that no emergency or safety equipment is unsuitable for use. Following an event in which emergency and safety equipment is used; the equipment is cleaned and prepared for future use.

The frequency of each type of inspection is noted in the inspection schedule and on each inspection log form included in Appendix A.

2.3 Air Emission Standards for Tanks, Surface Impoundments, and Containers Inspection

Hazardous wastes are not managed in tanks and surface impoundments at this facility. Refer to Attachment 9 for information regarding containers subject to the requirements of R315-264-1080 through 1090, Subpart CC.

APPENDIX A
INSPECTION LOG FORMS

DAILY LOADING/UNLOADING AREA INSPECTION LOG SHEET

WEEK OF _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	MONDAY		TUESDAY		WEDNESDAY		THURSDAY		FRIDAY	
		DATE _____		DATE _____		DATE _____		DATE _____		DATE _____	
		TIME _____		TIME _____		TIME _____		TIME _____		TIME _____	
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK
Loading/Unloading Area and Container Storage Area	Housekeeping, Cleanliness										
Base or Floor	Cracks, Wet Spots, Erosion										
Base or Floor	Leaks (and Quantity)										
INSPECTED BY:											
LIST BELOW ITEMS IN NEED OF ATTENTION		DATE FIXED		LIST BELOW ITEMS IN NEED OF ATTENTION						DATE FIXED	
1.				6.							
2.				7.							
3.				8.							
4.				9.							
5.				10.							
COMMENTS:											

WEEKLY CONTAINERIZED WASTE STORAGE AREA INSPECTION LOG

MONTH OF _____

PLANT AREA	ITEM INSPECTED	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5					
		DATE _____		DATE _____		DATE _____		DATE _____		DATE _____					
		TIME _____		TIME _____		TIME _____		TIME _____		TIME _____					
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK				
Containerized waste area	Container condition/corrosion, leaks, defects														
	Condition of Pallets														
	Impervious surface/cracks, deterioration/curbing														
	Container placement/aisle space, stack height														
	General Housekeeping														
	Labeling of containers														
	Warning signs														
INSPECTED BY:															
1. Storage Bay 1 (12,320 Gal Max)															
2. Storage Bay 2 (9,240 Gal Max)															
3. Storage Bay 3 (9,240 Gal Max)															
4. Storage Bay 4 (1,760 Gal Max)															
Total (32,560 Gal Max)															
LIST BELOW ITEMS IN NEED OF ATTENTION				DATE FIXED				LIST BELOW ITEMS IN NEED OF ATTENTION				DATE FIXED			

WEEKLY SECURITY DEVICES INSPECTION LOG SHEET

MONTH OF _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5	
		DATE _____		DATE _____		DATE _____		DATE _____		DATE _____	
		TIME _____		TIME _____		TIME _____		TIME _____		TIME _____	
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK
Facility Fence	Corrosion, Damage to Chain Link Fence										
Gate #1 Main Entrance Gate	Corrosion, Damage to Gate & Lock										
Main Exit Gate	Corrosion, Damage to Gate										
Main Gate	Corrosion, Damage to Gate										
Warning Signs	Are Signs Readable, Damaged, Missing										
INSPECTED BY:											
LIST BELOW ITEMS IN NEED OF ATTENTION		DATE FIXED		LIST BELOW ITEMS IN NEED OF ATTENTION		DATE FIXED					
1.				6.							
2.				7.							
3.				8.							
4.				9.							
5.				10.							
COMMENTS:											

MONTHLY INSPECTION LOG FOR EMERGENCY EQUIPMENT

Inspector: _____

Time: _____

Date: _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	USE STATUS		OBSERVATIONS	DATE & TYPE OF REMEDIAL ACTIONS
		O.K.	NOT O.K.		
Absorbent Materials	2 Boxes of Pads Minimum (see Form 0136-080 for number and location)				
Fire Extinguishers	Seals Intact/Gauge Full/Case & Hose Undamaged (see Form 0136-050 for number and location)				
Water Sprinkler System	In Working Order				
Recovery Drums	Recovery Drums Available (minimum of 10)				
Eye Wash Fountains	In Clean & Working Condition (see Form 0136-049 for number and location)				
Safety Showers	In Clean & Working Condition (see Form 0136-049 for number and location)				
First Aid Kits	In Good Condition Include number and locations (4 kits: office, J-10 office, J-10 pack out area, and lab)				
Aprons, Goggles, Gloves & Hard hats	Equipment Available for 2 Persons				
Emergency Air Horn	Canister Unit in Place				
Cellular Phones	Operational				
Fork Lifts	Operational				