

**ATTACHMENT 4**

**GENERAL INSPECTION REQUIREMENTS**

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**1.0 General Inspection Requirements [R315-8-2.6(a) and (b)(1)]**

**1.1** The hazardous waste storage facility (HWSF) staff shall conduct regular inspections for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous waste and adversely affect the environment or threaten human health.

**2.0 Types of Problems [R315-8-2.6(b)(3)]**

**2.1** Table 4-1 presents the schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, operating and structural equipment, and container storage areas. The items listed are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of the types of problems that could be encountered. Tables and figures referenced in this Attachment are located at the end.

**3.0 Frequency of Inspection [R315-8-2.6(b)(4)]**

**3.1** Also provided in Table 4-1 is the frequency of inspection for each item. The frequency depends upon the potential for equipment deterioration, environmental or human health incidences, or equipment malfunction between inspections. The loading/unloading dock shall be inspected daily by personnel when in use. At a minimum, a complete visual inspection of the HWSF, storage areas, and personal protective clothing and equipment shall be made weekly.

**4.0 Container Inspection [R315-8-2.6, 8-9.5, and 8-9.6]**

**4.1** Inspections of the containers shall be conducted daily during a regular work week excluding holidays and weekends. All containers of waste, including those received on weekends and holidays, shall be inspected on those days. Inspections shall be conducted by employees trained in hazardous waste management procedures as required by Attachment 5 of this Permit. Other information contained in Table 4-2 includes a summary of problems to look for during container inspections and the frequency of inspection.

**4.2** Results of the general inspections shall be recorded on inspection forms or electronic equivalent, which shall be stored as part of the Operating Record at the HWSF. These inspection forms shall include the name of the inspector, date and time of inspection, item inspected, problems observed, and the date and nature of repairs and remedial action. Copies of inspection forms shall be maintained at the HWSF for three years. The HWSF shall maintain the inspection schedule until closure.

**5.0 Remedial Action [R315-8-2.6(c)]**

**5.1** If inspections reveal a deficiency that can be addressed by the Permittee, the deficiency shall be addressed within 24 hours and the action taken shall be noted on the inspection form.

- 5.2** If inspections reveal that non-emergency maintenance is needed at the HWSF, the Permittee shall begin immediate action to minimize further damage and to reduce the need for emergency repairs.
- 5.3** If inspections reveal that a hazard is imminent, or has already occurred, remedial action(s) shall be immediately taken by the Permittee in accordance with Attachment 7 of this Permit. If the remedy requires more than 72 hours from the time that the problem is detected, the Permittee shall submit to the Executive Secretary, before the expiration of the 72 hour period, a proposed time schedule for correcting the problem.
- 6.0** **Inspection Log [R315-8-2.6(d)]**
- 6.1** The inspection logs shall be kept onsite at the HWSF for three years as part of the HWSF Operating Record. The inspection log requires the date and time of inspection, the name of the inspector, the items inspected, frequency of inspections, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

**TABLE 4-1**  
General Inspection Schedule

Area/Equipment	Specific Item	Types of Problems	Frequency
Safety & Emergency Equipment	Absorbents (e.g. Sorb-All, Vermiculite)	Below minimum qty., saturated/contaminated	Weekly
	Empty drums/containers	Corrosion, structural damage, securely stored	Weekly
	Emergency eyewash/shower Bldg 888 (Bldg 898 inspected when waste is stored)	Water pressure, leaking, flushed	Weekly
	Face shields and chemical goggles	Broken, dirty or missing	Weekly
	Ventilation system	Not operating, blocked	Weekly
	Loading/unloading area	Leaks, incorrect valve position, spots indicating spills	Weekly
	Protective clothing	Missing, holes, worn	Weekly
	Nonsparking shovel	Missing, damaged	Weekly
	Nonsparking bung wrench	Missing, damaged	Weekly
	Push broom	Missing, damaged	Weekly
	Loading dock alarm system	Not operating	Monthly
	Telephone system	Not operating	Monthly
	First Aid equipment and supplies	Items out of stock, out dated, expired supplies	Monthly
	Fire extinguishers	Missing, not charged not mounted;	Monthly
		Not Rated for the area of use, Annual inspection not current	
Security Devices	Fire alarm system <sup>1</sup>	Not operating	Annual
	Building doors, locks	Locks missing, unlocked, signs of tampering	Weekly
	Fences and gates		
	Lighting	Not operating	Weekly
	Signs	Missing, illegible	Monthly

**TABLE 4-1 (CONTINUED)**  
General Inspection Schedule

Area/Equipment	Specific Item	Types of Problems	Frequency
Building	General debris and refuse	Aesthetics, obstruction general house keeping	Daily
	Odor, fumes, vapors	Detectable	Daily
	Bases or foundation, containment trenches, ramps, roof, walls	Structural integrity; e.g., erosion, uneven, settlement, cracks, and spalling in concrete, evidence of leaking	Weekly
	Loading & unloading areas	Structural integrity, evidence of leaking	Weekly
Material Handling Equipment	Is the forklift in good working condition?	Brakes – Worn pads, rotors, bands  Hydraulics – Leaking  Lights/horns/sirens – Non-operational  Lubrication – Low  Tires – Worn or low pressure  Safety Equipment – Not operational, missing  Lift, shift, tilt, control mechanisms – Loose, worn, or not functional  Instruments – Not operational, missing  Accessories – Missing, inoperative	Annually <sup>2</sup>

<sup>1</sup> Base Fire Department inspects the system for Building 898 and HWSF staff will receive a copy of the inspection report

<sup>2</sup> According to the Base safety standard

**TABLE 4-2**  
Waste Inspection Schedule

<b>Area/Equipment</b>	<b>Specific Item</b>	<b>Types of Problems</b>	<b>Frequency</b>
Container Storage Area	Container placement and stacking	Insufficient aisle space, height of stacks excessive	Daily
	Sealing of containers	Open lids	Daily
	Labeling of containers	Improper identification; data missing; label missing, not intact, or not readable	Daily
	Containers	Corrosion, leakage, structural defects	Daily
	Segregation of incompatible wastes	Storage of incompatible wastes in same area, improper distance, physical barriers	Daily
	Containment system coating/sealant	Present, cracks, worn spots, presence of accumulated liquids	Daily
	Pallets	Damaged (e.g., broken wood, warping, nails missing)	Daily
Signs posted (e.g. flammable, acid, toxic, etc)	Identification of storage areas (bays)		Daily