APPENDIX C

INSPECTION PLAN

TABLE OF CONTENTS

LIST OF FIGURES ii
LIST OF ABBREVIATIONS/ACRONYMS iii

INSPECTION PLAN C-1
C.1 GENERAL INSPECTION SCHEDULES AND REQUIREMENTS C-1
C.1.1 Inspection Records C-2
C.1.2 Inspection Frequency C-3
C.1.3 Actions Resulting From Inspections C-3
C.2 INSPECTION SCHEDULE AND REQUIREMENTS FOR CONTAINER STORAGE UNITS [20.4.1 NMAC §§ 264.15(b) and 264.174] C-4
C.2.1 On Day(s) of Waste Handling C-4
C.2.2 Weekly C-4
C.3 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART AA REQUIREMENTS C-5
C.4 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART BB REQUIREMENTS C-5
C.4.1 Requirements for Pumps In Light Liquid Service C-5
C.4.2 Requirements for Pressure Relief Devices In Gas/Vapor Service C-5
C.4.3 Requirements for Open-ended Valves or Lines C-6
C.4.4 Requirements for Valves In Gas/Vapor or Light Liquid Service C-6
C.4.5 Requirements for Pressure Relief Devices In Light Liquid Service, Flanges and Other Connectors C-7
C.5 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART CC REQUIREMENTS C-7
C.5.1 Container Level 1 Inspection Requirements C-8
C.5.2 Container Level 2 Inspection Requirements C-9
C.6 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART DD REQUIREMENTS C-10

LIST OF FIGURES

FIGURE NO.	TITLE
C-1	Hazardous Waste Facility Inspection Record Form

LIST OF ABBREVIATIONS/ACRONYMS

%	percent
20.4.1 NMAC	New Mexico Administrative Code, Title 20, Chapter 4, Part 1
AR	Action Required
CFR	Code of Federal Regulation
CSU	container storage unit
DOT	U.S. Department of Transportation
IRF	Inspection Record Form
LANL	Los Alamos National Laboratory
m^3	cubic meters
NA	Not Applicable
ppm	parts per million
TA	technical area
TRUWF	Transuranic Waste Facility

APPENDIX C
INSPECTION PLAN

In accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1 NMAC) § 264.15, revised October 1, 2003 [10-01-03], this appendix presents inspection requirements that are applicable to the hazardous waste storage units at Los Alamos National Laboratory (LANL) and the inspection requirements that will be applicable to the storage/treatment unit at the Transuranic Waste Facility (TRUWF) at Technical Area 52. Pursuant to 20.4.1 NMAC § 264.15(a) [10-01-03], the inspection schedule for the unit has been developed to identify equipment malfunctions and deterioration, operator errors, and discharges that might cause or lead to a release of hazardous waste and pose a threat to human health and the environment. As specified in 20.4.1 NMAC § 270.14(b)(5) [10-01-03], this inspection plan, presents general inspection schedules, is being submitted with this permit modification package. Inspections will be conducted often enough to identify problems in time to correct them before they harm human health or the environment. Inspection schedules or methods may differ at certain waste management units based upon worker safety issues or the nature of the safety and emergency equipment. The inspection requirements and schedule for the hazardous waste management unit to be located at the TRUWF are consistent with and have been presented in this plan as the requirements and schedule for container storage units (CSUs) across LANL. Inspection requirements and schedules for the treatment units not covered within this application are presented in the most recent version of the LANL General Part B Permit Application (LANL, 2003) hereinafter referred to as the LANL General Part B.

C.1 GENERAL INSPECTION SCHEDULES AND REQUIREMENTS [20.4.1 NMAC § 270.14(b)(5) AND 20.4.1 NMAC § 264.15(b) AND (c)]

In accordance with the requirements of 20.4.1 NMAC § 270.14(b)(5), and 20.4.1 NMAC § 264.15(b)(1) [10-01-03], a written inspection schedule has been developed at LANL. This schedule will be followed for the inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, and responding to environmental or human health hazards. Inspections may be conducted at any time during the applicable day or week, as specified in the inspection schedule. A copy of this inspection plan, which includes inspection schedules, will be maintained by LANL's hazardous waste compliance personnel and by the site operator (i.e., the division or operating group that is responsible for or manages the unit at the TRUWF), as required in 20.4.1 NMAC § 264.15(b)(2) [10-01-03].

Inspection schedules outlining the items to be addressed on LANL's Hazardous Waste Facility Inspection Record Form (IRF) (Figure C-1) and inspection frequencies for the CSU to be permitted are provided in Section C.2. The IRF and instructions for its completion are provided for informational purposes only as Figure C-1 of this appendix; the form may be supplemented, changed, or otherwise replaced with an equivalent form. Pursuant to 20.4.1 NMAC § 264.15(b)(3) [10-01-03], the IRF lists the types of problems to be looked for during an inspection. The activities discussed below are addressed according to the specified regulatory requirements as well as to existing LANL inspection requirements for hazardous waste management units.

C.1.1 Inspection Records [20.4.1 NMAC § 264.15(d)]

Inspection training is provided through LANL's central training personnel. The division or operating group is responsible for ensuring that training is repeated, as necessary. After training, personnel assigned from the division or operating group that is responsible for or manages the unit will conduct inspections and record the information on IRFs or equivalent forms. The division or operating group responsible for or managing the unit will retain the inspection records for a minimum of three years from the date of inspection. During that timeframe, the inspection records will be available for review in the event that the New Mexico Environment Department or the U.S. Environmental Protection Agency inspects the facility for compliance with inspection requirements.

If necessary, LANL may modify the IRF or develop an equivalent form. Because the IRF is a comprehensive form, not all sections of the form apply to all units. The IRF encompasses 20.4.1 NMAC, Subpart V, Part 264 [10-01-03], requirements for permitted hazardous and mixed waste management units, and additional requirements directed by LANL policy. Instructions included with the IRF provide specific guidance for each inspection item listed.

The IRF or equivalent form will be completed according to the daily and/or weekly schedules provided in Section C.2. Inspections will be conducted and recorded in Parts I and II of the IRF for each working day or week that waste is opened, moved, received, stored, treated, or removed, as appropriate. Other records, such as a memo to file, may be used to document a condition of “No Use” at a unit.

For every item requiring inspection, a response indicating the condition of each item must be entered in the column under the appropriate day of the week. Responses may include "OK," "NA"

(Not Applicable), or "AR" (Action Required). If the response is AR, the action required must be noted in Part II of the IRF. If more than one AR is listed, ARs should be numbered. All ARs must be identified and noted, even if corrected immediately by the inspector. If inspection results indicate that corrective measures are warranted, any and all actions taken (along with time, date, and other pertinent information) will be recorded in Part II of the IRF and the AR noted on all subsequent IRFs until corrective measures are completed. Only after corrective measures have been completed and recorded on an IRF can an OK be entered in the "Condition" column on the IRF.

C.1.2 Inspection Frequency [20.4.1 NMAC § 264.15(b)(4)]

Inspection frequencies relevant to the unit types at the TRUWF is presented in Section C.2 of this appendix. Inspection frequencies may be increased at LANL's discretion when it determines that increased frequency may further assist in the detection or prevention of environmental hazards.

C.1.3 Actions Resulting From Inspections [20.4.1 NMAC § 264.15(c)]

If any defects, deterioration, operator errors, discharges, or potential hazards are discovered during an inspection, appropriate corrective measures (e.g., transfer of waste from a defective container to an appropriate container in good condition, repair or replacement of nonfunctioning equipment and/or systems, or removal of any accumulated liquids) will be completed on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Any action taken in response to an inspection will be noted on the IRF or IRF documentation.

If a hazardous condition is imminent or has already occurred, an assessment of the condition will be made immediately, followed by appropriate remedial action. The condition will be assessed by the division or operating group that is responsible for or manages the unit. If this assessment indicates that human health or the environment may be adversely affected, the contingency plan (Appendix E of this document) may be implemented. The contingency plan discusses the appropriate responses to emergency situations. Evacuation determinations will be made as outlined in Table E-4 of the contingency plan. In the event the contingency plan is implemented, any sampling, decontamination, and verification will be conducted as specified in that plan. If the condition is such that the contingency plan is not implemented, remedial action will be defined and documented by the division or operating group that is responsible for or manages the unit.

C.2 INSPECTION SCHEDULE AND REQUIREMENTS FOR CONTAINER STORAGE UNITS [20.4.1 NMAC §§ 264.15(B) AND 264.174]

The TRUWF will be inspected according to the schedule provided below. Inspection frequencies are adequate based on the deterioration rates of equipment/systems and the probability of harm to human health or the environment if failure of the equipment/systems occurs, or any operator error goes undetected between inspections.

C.2.1 On Day(s) of Waste Handling

Inspections will be conducted every day of or the day after waste handling, with special attention placed on areas subject to spills, such as loading and unloading areas. Waste handling includes when waste is received at, moved or opened within, treated at, or removed from a CSU. For inspections of CSUs, the following items will be addressed, as appropriate:

- General information (Items 1-5)
- Secondary containment structures
- Run on/off control
- Covers/lids of containers
- Labels
- Accumulation start date
- Compatibility
- Structural integrity of containers
- (Un)loading area

C.2.2 Weekly

Weekly inspections of CSUs will be conducted every week that waste remains in storage. These weekly inspections will address the following items, as appropriate:

- General information (Items 1-5)
- Communications equipment
- Warning signs
- Security
- Work surfaces/floors
- Spill/fire equipment
- Eyewashes/safety showers
- Wind sock (if present)
- Secondary containment structures
- Run on/off control
- Covers/lids of containers
- Labels

- Accumulation start date
- Compatibility
- Structural integrity of containers
- (Un)loading area
- Aisle space/stacking
- Pallets/raised containers

C.3 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART AA REQUIREMENTS [20.4.1 NMAC, SUBPART V, PART 264, SUBPART AA]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart AA [10-01-03], are not applicable to any of the units at LANL.

C.4 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART BB REQUIREMENTS [20.4.1 NMAC, SUBPART V, PART 264, SUBPART BB]

Equipment at the facility that is subject to specific requirements for inspection, monitoring, and repair at 20.4.1 NMAC, Subpart V, Part 264, Subpart BB will comply as described below:

C.4.1 Requirements for Pumps In Light Liquid Service [defined by 20.4.1 NMAC § 264.1031 and outlined in 20.4.1 NMAC §§ 264.1052 and 264.1059]

- Leak detection monitoring must be performed monthly pursuant to 20.4.1 NMAC § 264.1063(b) requirements using Reference Method 21 in 40 CFR Part 60.
- Visual inspection for liquids dripping from the pump seal must be performed each calendar week.
- If a leak is detected, repair(s) shall be initiated no later than within 5 calendar days and completed as soon as possible, but no later than 15 calendar days.
    - A delay of repair is allowed if the repair is technically infeasible without shutting down the unit, and/or if the leaking equipment is isolated from the unit and does not contain or contact hazardous waste with greater than or equal to 10% by weight organics.

C.4.2 Requirements for Pressure Relief Devices In Gas/Vapor Service [20.4.1 NMAC §§ 264.1054 and 264.1059]

- Devices must be measured and monitored to ensure that they are operated with no detectable emissions (less than 500 parts per million (ppm) above background) pursuant to 20.4.1 NMAC § 264.1063(c) requirements using Reference Method 21 in 40 CFR Part 60.

- Measurement and monitoring will be performed as soon as practicable, but no later than 5 calendar days after a pressure release.
- A delay of repair is allowed if the repair is technically infeasible without shutting down the unit, and/or if the leaking equipment is isolated from the unit and does not contain or contact hazardous waste with greater than or equal to 10% by weight organics.

C.4.3 Requirements for Open-ended Valves or Lines [20.4.1 NMAC § 264.1056]

- Ensure that open-ended valves or lines are equipped with a cap, blind flange, or plug.
- Ensure that all caps, blind flanges, or plugs are sealed except during operations requiring movement of hazardous waste through the open-ended valve or line.

C.4.4 Requirements for Valves In Gas/Vapor or Light Liquid Service [defined by 20.4.1 NMAC § 264.1031 and outlined in 20.4.1 NMAC §§ 264.1057 and 264.1059]

- Leak detection monitoring must be performed monthly pursuant to 20.4.1 NMAC 264.1063(b) requirements using Reference Method 21 in 40 CFR Part 60.
    - If no leaks are detected for two successive months, monitoring frequency may be changed to the first month of every succeeding quarter unless a leak is detected.
        - Should that occur, monitoring frequency must return to monthly until no leaks are detected for two successive months.
    - Alternatively, and following notification to the Secretary, if 2% or fewer valves are found to be leaking after two consecutive quarters, monitoring frequency may be changed to once every six months. If 2% or fewer valves are found to be leaking after five consecutive quarters, monitoring frequency may be changed to annually.
        - Should the percentage of leaking valves exceed 2%, monitoring must be performed monthly.
    - Alternatively, and following notification to the Secretary, no more than 2% of valves may be allowed to leak if performance testing is conducted pursuant to 264.1061 initially, annually, and upon the Secretary's request to ensure that the leak percentage is being met.

        - Should use of this alternative discontinue, written notification to NMED must be made.

- If a leak is detected, repair(s) shall be initiated no later than within 5 calendar days and completed as soon as possible, but no later than 15 calendar days.
    - A delay of repair is allowed if the repair is technically infeasible without shutting down the unit, if the leaking equipment is isolated from the unit and does not contain or contact hazardous waste with greater than or equal to 10% by weight organics, if purged emissions from immediate repair would exceed emissions from delaying repair, and/or if insufficient valve repair supplies exist although adequately stocked normally and the next unit shutdown is within 6 months.

C.4.5 Requirements for Pressure Relief Devices In Light Liquid Service, Flanges and Other Connectors [20.4.1 NMAC § 264.1058]

- Monitoring must be conducted pursuant to 20.4.1 NMAC 264.1063(b) requirements within 5 days of identifying a potential leak by visual, audible, olfactory, or other method.
- If a leak is detected by an instrument reading of 10,000 ppm or greater, repairs shall be initiated no later than within 5 calendar days and completed as soon as possible, but no later than 15 calendar days.
- No monitoring is required for inaccessible, glass, or glass-lined connectors.

C.5 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART CC REQUIREMENTS [20.4.1 NMAC, SUBPART V, PART 264, SUBPART CC]

The hazardous wastes stored in containers that may be subject to 20.4.1 NMAC, Part 264, Subpart CC, “Air Emission Standards for Tanks, Surface Impoundments, and Containers” based on the applicability criteria specified in 20.4.1 NMAC § 264.1080. Subpart CC standards for containers require that owners or operators shall control air pollutant emissions for containers of hazardous waste subject to this provision.

General inspection provisions detailed in 20.4.1 NMAC § 264.1088 require that the facility develop, implement, and incorporate in the facility inspection plan a written plan and schedule to perform inspections and monitoring of air emission control equipment used to comply with any container requirements.

As detailed in 20.4.1 NMAC § 264.1086 the defined Container Levels that may be present at the storage areas are defined as follows:

Container Level 1- The volume of the container in direct contact with waste is greater than $0.1m^3$ and less than or equal to $0.46m^3$, or the volume of the container is greater than $0.46m^3$ and not in light material service, as defined by 20.4.1 NMAC § 265.1081. The container must also be either: (1) compliant with the applicable Department of Transportation (DOT) regulations (20.4.1 NMAC § 264.1086(f)); (2) equipped with a cover and closure devices that form a continuous barrier so that, when closed, no visible holes, gaps, or open spaces into the interior of the container are evident; or (3) an open-top container with an organic vapor suppressing barrier that precludes exposure of waste to the atmosphere.

Container Level 2- The volume of the container in direct contact with waste is greater than $0.46m^3$ and is in light material service, as defined by 20.4.1 NMAC § 265.1081. The container also must be either: (1) compliant with the applicable DOT regulations (20.4.1 NMAC § 264.1086(f)); (2) capable of operation with no detectable organic emissions as determined by the procedure specified at 264.1086(g); or (3) demonstrated to be vapor-tight within the past 12 months using 40 CFR 60, Appendix A, Method 27 and the procedure specified at 264.1086(h).

C.5.1 Container Level 1 Inspection Requirements

Inspection requirements for Container Level 1 are as follows (20.4.1 NMAC § 264.1086(c)(4)):

- If waste is already in the container when received:
  - On or before the date the container is accepted at the facility, a visual inspection will be performed of the container, cover, and closure devices for visible cracks, holes, gaps, and other open spaces into the interior when cover and closure devices are secured in closed position.
  - If a defect is detected, repair(s) must be initiated no later than within the first 24 hours and completed as soon as possible, but no later than within 5 calendar days.
    - If defect(s) are not completely repaired within 5 calendar days, waste must be removed and the container not used until the defect(s) have been repaired.
- If waste remains in storage for greater than or equal to 1 year:

- A visual inspection of the container will be performed at initial receipt and at least once every 12 months.
- If a defect is detected, repair(s) must be initiated no later than within the first 24 hours and completed as soon as possible, but no later than within 5 calendar days.
    - If defect(s) are not completely repaired within 5 calendar days, waste must be removed and the container not used until the defects have been repaired.

- Covers and closure devices used must be appropriately designed and must be composed of suitable materials to minimize exposure of waste to the atmosphere and maintain equipment integrity (20.4.1 NMAC § 264.1086(c)(2)).
- Covers and closure devices must be installed, secured, and maintained in closed position, except when: adding or removing material; performing routine activities (other than waste transfer) inside the container; operating pressure relief and safety devices to maintain and return container to safe internal pressure, pursuant to 20.4.1 NMAC § 264.1086(c)(3).

C.5.2 Container Level 2 Inspection Requirements

Inspection requirements for Container Level 2 are as follows:

- If waste is already in the container when received (20.4.1 NMAC § 264.1086(d)(4)):
    - On or before the date the container is accepted at the facility, a visual inspection will be performed of the container, cover, and closure devices for visible cracks, holes, gaps, and other open spaces into the interior when cover and closure devices are secured in closed position.
    - If a defect is detected, repair(s) must be initiated no later than within the first 24 hours and completed as soon as possible, but no later than within 5 calendar days.
        - If defect(s) are not completely repaired within 5 calendar days, waste must be removed and the container not used until the defects have been repaired.
- If waste remains in storage for greater than or equal to 1 year (20.4.1 NMAC § 264.1086(d)(4)):
    - A visual inspection of the container will be performed at initial receipt and at least once every 12 months.
    - If a defect is detected, repair(s) must be initiated no later than within the first 24 hours and completed as soon as possible, but no later than within 5 calendar days.

- If defect(s) are not completely repaired within 5 calendar days, waste must be removed and the container not used until the defects have been repaired.

- Covers and closure devices must be installed, secured, and maintained in closed position, except when: adding or removing material; performing routine activities (other than waste transfer) inside the container; operating pressure relief and safety devices to maintain and return container to safe internal pressure, pursuant to 20.4.1 NMAC § 264.1086(d)(3).
- The process of waste transference in or out of containers must ensure that exposure of hazardous waste to the atmosphere is minimized, in accordance with 20.4.1 NMAC § 264.1086(d)(2).

C.6 INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART DD REQUIREMENTS [20.4.1 NMAC, SUBPART V, PART 264, SUBPART DD]

Inspection and monitoring requirements for units subject to 20.4.1 NMAC, Subpart V, Part 264, Subpart DD [10-01-03], are not applicable to any of the units at LANL.

HAZARDOUS WASTE FACILITY INSPECTION RECORD FORM

[1] FACILITY:	[2] Site ID #:	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	[3] START DATE:	[4] END DATE:
[5] Containers Landfill Chemical Treatment Tank Miscellaneous Unit (OB/OD, Cementation)				

PART I- Enter condition of the item inspected **(**i.e. **OK**, **NA** [Not Applicable], or **AR** [Action Required]**)** in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
[6] NO UNIT USE	No waste stored							
[7] NO WASTE HANDLING	No waste handled (see instructions)							
All TSDs								
[8] COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
[9] WARNING SIGNS	Posted, legible, and bilingual							
[10] SECURITY	Good condition of fences, gates, locks, and other access control equipment							
[11] WORK SURFACES/ FLOORS/ROADS	Absence of conditions that could lead to an accident or spill							
[12] SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
[13] EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
[14] WIND SOCK	Proper operating condition and functional							
[15] SECONDARY CONTAINMENT	Integrity- No standing water/waste, erosion, or signs of a spill							
[16] (UN)LOADING AREA	No spills or deterioration							
[17] RUN-ON/OFF CONTROL	Integrity- no ponding, erosion, or damage							
Container Storage Units and/or Tanks (see instructions)								
[18] COVERS/LIDS OF CONTAINERS	Closed and secured properly							
[19] LABELS	Proper with start date, present & legible							
[20] COMPATIBILITY	Separated according to compatibility							
[21] INTEGRITY	No leakage, corrosion, or damage							
[22] AISLE SPACE/STACKING	Appropriateness and adequacy							

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Figure C-1 - Hazardous Waste Facility Inspection Record Form

HAZARDOUS WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
[23] PALLETS AND RAISED CONTAINERS	Absence of conditions that could result in failure							
[24] TANK SYSTEMS	Discharge controls and fill level and no corrosion or leakage							
Other TSDs								
[25] SHAFTS/LANDFILL COVERS	Presence and condition of cover							
[26] OPEN BURNING UNITS	Condition of cover, and no erosion, leakage, or damage							
[27] OPEN DETONATION UNITS	Unit and vegetation condition and no erosion							
[28] CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

	MON	TUE	WED	THU	FRI	SAT	SUN
[29] **DATE**							
[30] **TIME**							
[31] **INSPECTOR(S)**							

Part II- For any AR (Action Required) in PART I, describe below: action required, action taken, status, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

32

Part III- Comments.

33

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Figure C-1 - Hazardous Waste Facility Inspection Record Form

Instructions for the Hazardous Waste Facility Inspection Record
Treatment, Storage, or Disposal Units (TSDs)

Part I

Weekly and daily inspection of TSDs will be conducted in accordance with the inspection plan in most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or the LANL Hazardous Waste Facility Permit, as appropriate. Not all items in this section will apply to all facilities. An "NA" (not applicable) is required if the item does not apply. Facilities may shade parts of the form to indicate items that need to be completed only on a weekly basis. Holidays and Laboratory closures can also be noted (e.g., by writing "H" (for holidays) or "Closed" in the first box and drawing a line all the way down the page).

1. Location information, including TA, building, room (if applicable), and any other location descriptors that may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).
2. A site identification number is assigned to every facility by the Resource Conservation and Recovery Act (RCRA) compliance personnel. This allows for ease in identification.
3. Start date of Monday for the week of record.
4. End date of Sunday for the week of record.
5. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from RCRA compliance personnel to combine inspections for more than one unit.
6. For container storage units only – "NO USE" may be checked (or marked "OK") if waste was not stored at the unit for the week in question. When this box is checked, the individual responsible for the inspection must only complete this box, the items related to site location (Items 1-5), and the inspector name section for that week (Items 29-31). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.
7. a. At a container storage unit if waste is in storage but no waste is handled at the unit for the week– "NO WASTE HANDLING" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
   b. If a treatment unit is not conducting treatment for the week – "NO WASTE HANDLING" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
   c. For a tank storage system unit, if no waste is being stored and the tank system is empty, "NO WASTE HANDLING" may be checked. However, a weekly inspection in accordance with the appropriate inspection plan must be conducted.
8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Equipment must be present in accordance with the appropriate contingency plan.
9. Required signs must be legible and prominently posted in accordance with 40 CFR § 264.14(c) and/or the permit as applicable.
10. Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition.
11. Roads, process floors, and other work surfaces at TSDs must be inspected for any conditions that could lead to a spill or an accident.
12. Hazardous or mixed waste TSDs must have fire control and spill control equipment. Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans.
13. Where present, eyewashes and safety showers must be inspected to ensure proper operating condition. Outdoor locations must be checked for freezing.

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14. Wind socks, where present at outside TSDs, must be inspected to ensure that they are in proper operating condition and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked.
16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.
17. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.
18. All tanks and containers used for storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container while waste is being placed into or removed from a container.
19. All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE," and EPA Hazardous Waste Numbers or hazardous waste constituents. They must also be marked with a legible accumulation start date. All containers must be dated when they arrive at the facility and no hazardous or mixed waste may be stored for over one year, unless specifically exempted.
20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction.
21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage that may impact integrity. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 24 below).
22. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. Containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space and containers may not be stacked more than 3 high, unless otherwise specified for the facility (i.e. some units within the LANL Hazardous Waste Facility Permit must have an aisle space of 28 inches and only 55 gallon drums may be stored three high). Please consult RCRA compliance personnel for permit related questions.
23. Hazardous or mixed waste containers stored at TSDs must be on pallets, elevated, or otherwise raised to be protected from contact with accumulated liquid.

TANKS SYSTEMS:

24. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion, deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.

SHAFTS:

25. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion. Disposal shafts and shafts used for retrievable storage should have their covers securely in place and, during waste handling operations, guard rails must be installed and in good condition. Landfill covers must be inspected at least weekly and after storms for evidence of erosion, subsidence, and water intrusion.

For Informational Purposes Only

Instructions for the Hazardous Waste Facility Inspection Record
Treatment, Storage, or Disposal Units (TSDs)

OPEN BURNING UNITS:

26. Open burning units must be inspected for deterioration, leakage, vegetation in the immediate vicinity that could catch fire, and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

OPEN DETONATION UNITS:

27. Open detonation units must be inspected for deterioration, leakage, or vegetation in the immediate vicinity that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

CEMENTATION UNITS:

28. The structural integrity and condition of equipment and systems must be inspected on cementation units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

FOR ALL INSPECTIONS:

29. Record of the date of the current inspection. Only one date is given for each inspection, whether a team or an individual performs the inspection.
30. Record of the time of the current inspection. Only one time is given for each inspection, whether a team or an individual performs the inspection.
31. Legible and/or printed name of each inspector involved in the current inspection.

Part II

List any action required.

32. Document any action taken immediately and express any plans for future action to be taken. Also, ensure that previous ARs are closed out with completed actions described. If the AR has not been resolved, ensure that it is carried over to the current inspection. Status should be provided for both open and closed items. If necessary, attach additional sheets to inspection record form to efficiently cover the action taken or required. Initial any information or comments added, and if more than one action is required or conducted, assign a number to each AR.

Part III

Identify any comments.

33. Document informational comments and any status associated with the current inspection that do not require specific regulatory action or remedies.

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