PERMIT ATTACHMENT F
INSPECTION PLAN

General Inspection Requirements

Holloman Air Force Base Defense Reutilization and Marketing Office (**DRMO**) personnel shall perform regular inspections of the Container Storage Unit (**CSU**) as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.15. The inspection schedule for the CSU is provided in Table F-1. During inspections, DRMO personnel shall check for malfunctions, deterioration of structures and equipment, operator errors, and discharges (e.g., leaks or spills).

Unit-Specific Inspection Requirements

The unit-specific inspection requirements for the CSU are listed below. There are no tanks, waste piles, surface impoundments, incinerators, landfills, land treatment units, or miscellaneous units at this CSU.

Containers

Inspection of the CSU shall be done in accordance with the requirements specified by 20.4.1.500 NMAC, incorporating 40 CFR §264.174, which requires at least weekly inspections of the areas where containers holding hazardous waste are stored. During these weekly inspections, a DRMO inspector, who is trained in hazardous waste management and storage procedures shall check for leaking containers and deterioration of containers and the containment system caused by corrosion or other factors. Areas subject to spills, such as the staging area where wastes are loaded and unloaded shall be inspected daily when in use.

Air Emissions

There are separate inspection requirements in 20.4.1.500 NMAC, incorporating 40 CFR §264.1088 to ensure that organic air emissions from containers holding hazardous waste are controlled. Further information regarding compliance with these requirements is presented in Permit Attachment C, *Container Storage Unit Design and Operation*.

Written Inspection Schedule

DRMO personnel shall use the inspection schedule contained in Table F-1 for checking CSU-specific structures; monitoring equipment; safety and emergency equipment; security devices;

communications systems; and operating and structural equipment, such as the forklift, curbs, and sumps that are important in preventing, detecting, or responding to potential environmental or human health hazards. The schedule identifies potential problems for which DRMO inspectors shall check during weekly facility inspections. The inspection schedule shall be maintained at the CSU.

Inspection Frequency

The inspection frequencies noted in Table F-1 are based on the rate of deterioration of the equipment and probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. The frequency of inspections may vary for the items listed on the inspection schedule as noted in 20.4.1.500 NMAC, incorporating 40 CFR §264.15(b)(4).

TABLE F-1

INSPECTION SCHEDULE

Area/Equipment	Specific Item	Potential Problems	Frequency of Inspection
Safety And Emergency Equipment	Standard industrial absorbents (e.g., sorb-all, vermiculite, etc.)	Insufficient quantity, saturated with water	Weekly
	Spare containers and salvage drums	Corrosion, structural damage, inadequate number	Weekly
	Shovels	Damaged, missing	Weekly
	Emergency shower and eye wash	Water pressure, leaking, drainage	Weekly
	Face shields and extra protective eyeglasses	Broken or dirty equipment	Weekly
	Protective clothing (impermeable full-body coveralls, foot coverings)	Damaged, missing	Weekly
	Fire alarm system	Power failure	Monthly
	Fire extinguishers (Expired?)	Need of recharging?	Monthly
	Fire hydrants	Pressure, flow	Monthly
	Telephone system	Power failure, poor transmission	Monthly
	Panic doors	Easily open	Weekly
Security Devices	Facility fence	Corrosion, damage	Weekly
	Warning Signs	Illegible, missing	Weekly
	Storage building doors	Locks missing	Weekly
	Main gate	Locking mechanism jammed	Weekly
	Lighting	**Burned out, switch**	Weekly
	Alarms	Inoperable	Weekly
Operating And Structural Equipment	Dikes, berms	Cracks, deterioration, spalling, wet spots	Weekly
	Dikes, cell walls	Cracks, spalling, deterioration	Weekly
	Bases or foundation	Erosion; uneven settlement; cracks or spalling in concrete pads, base rings, and piers; wet spots	Weekly
	Sumps and secondary containment	Erosion, uneven settlement, cracks and spalling in concrete, wet spots deterioration or grating	Weekly
	Floor joints	Cracks, spalling, deterioration	Weekly
	Ramps	Erosion, uneven settlement, cracks and spalling in concrete	Weekly
	Roll up doors	Sticking	Weekly
	Drum racks	Corrosion, deterioration, structural integrity, wet spots	Weekly
	Roofs	Leaks	Weekly
	Walls	Cracks, coating deterioration	Weekly
Communication	Telephones	Power failure	Monthly

Area/Equipment	Specific Item	Potential Problems	Frequency of Inspection
Equipment			
	Fire alarms	Power failure	Annually
Container Storage Area	Container placement	Aisle space, insecure placement	Weekly
	Container stacking	Containers stacked more than two high	Weekly
	Sealing of containers	Open lids, leaks	Weekly
	Labeling of containers, Odor, Fumes, Loadind/Unloading Areas, Debris, Pallets (Broken wood? warping/, nails missing?)	Improper identification, incorrect documentation, identification missing, obscured or incomplete label	Weekly
	Segregation of Incompatible Waste	In same cell, Transfer containers previously used, waste in wrong cell	

Remedial Action for Inspection Deficiencies

DRMO personnel shall be responsible for seeing that deterioration or malfunction of equipment or structures revealed during an inspection is repaired on a schedule that ensures that the problem does not lead to an environmental or human health hazard. If inspections reveal that non-emergency maintenance is needed, then DRMO personnel shall initiate actions to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, then remedial action will immediately be taken. The general nature of the remedial action to be taken shall be noted in the inspection log.

Inspection Log

All inspections of the CSU shall be recorded by the DRMO inspectors in an inspection log. The inspection log includes spaces for the date, time of inspection, name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. The inspection logs shall be kept on file at the CSU. These records shall be maintained for at least three years from the date of the inspection.