

ATTACHMENT 7
INSPECTION SCHEDULE
(PERMIT APPLICATION SECTION 8)

8.0 § 270.14(b)(5) – Inspection Plan

8.1 Treatment Unit Inspections

Hazardous waste treatment units are inspected on a regular basis by contractor Environmental personnel. All inspections are documented in an inspection log, which is kept on file in the operating record (Records Management System) for at least three years as required by § 264.15(d). The log will reflect: items inspected, inspection location, inspection date and time, observations made during the inspection, and identity of the individual performing the inspection.

The 200 Area Hazardous Waste Drain Line (HWDL) is inspected for items and at frequencies listed in Table 8.1 as required by § 264.15(b). The HWDL inspection route will follow the required piping and continue into the buildings with which they connect as depicted on Figure 21.4 the 200/800 Piping Diagram. The route will continue from the ETU to the Decon Station #3 at Bldg. 861. The inspections will be performed for the specific items (valves, gauges, monitors) and in the NASA identified areas/labs called out on the Inspection Logs which are included in Appendix 8-A. The ETU is inspected for items and at frequencies listed in Table 8.2 as required by §§ 264.15(b) and 264.195. The FTU is inspected, at a minimum, for those items given in Table 8.3 as required by §§ 264.15(b) and 264.195. The specific items that require inspection at the ETU and FTU are identified on the Inspection Logs in Appendix 8-A.

Table 8.1 HWDL Line Inspection Items

Inspection Items	Frequency	Observations
Above ground piping	Every working day	Inspect for evidence of leaks or deterioration
Indoor piping	Every working day	Inspect for evidence of leaks or deterioration
HWDL sump pit piping	Every working day	Inspect for evidence of leaks or deterioration
Valves	Every working day	Inspect valves for leaks and proper positioning
Leak detection sight glass for secondary containment between sump and ETU	Every working day	Inspect for fluid
Optical detectors for drain line between 200 area and HWDL sump	Every working day	Ensure power is on and alarm condition does not exist
Sump moisture sensor	Every working day	Ensure power is on and the operation switch is in normal position
Sump level sensor	Every working day	Ensure power is on and sump level is displayed
Level sensor auto-dialer	Monthly	Function check
Moisture sensor auto-dialer	Monthly	Function check

Table 8.2 ETU Inspection Items

Inspection Items	Frequency	Observations
Tank freeboard	Every working day	Inspect for adequate freeboard (at least 2 feet)
Leak detection	Every working day	Inspect sight glasses for fluid

NASA White Sands Test Facility

Table 8.2 ETU Inspection Items

Inspection Items	Frequency	Observations
Odors	Every working day	Any unusual odors will be noted
Access road	Every working day	Inspect for obstructions or deterioration which may cause delays or hamper the movement of vehicles and equipment
Fence/access gates	Every working day	Inspect for general condition or evidence of unauthorized entry
Loading/unloading pad	Every working day	Inspect for spills, ponding of water, and general area condition
Liners	Every working day	Inspect for damage or abnormalities
Tanks & foundations	Every working day	Inspect for signs of leakage, corrosion, or deterioration
Signs	Weekly	Inspect for presence and legibility of proper warning signs
Shower & eyewash	Weekly	Function check
High level beacon	Weekly	Function check
High level auto-dialer	Monthly	Function check
Corrosion protection	Monthly	Ensure rectifier power is on and record tank structure potential readings
Corrosion protection	Annually	Corrosion expert inspection

Table 8.3 FTU Inspection Items

Inspection Items	Frequency	Observations
Tank levels	Every Working Day	Inspect sight glass to ensure that tanks have at least 10% headspace
Tanks, foundations, and secondary containment	Every Working Day	Inspect for signs of leakage, corrosion, or deterioration
Surrounding area	Every Working Day	Inspect for leaks, spills or unauthorized discharge
Odors	Every Working Day	Any unusual odor will be noted
Associated valves and piping	Every Working Day	Inspect for evidence of leaks or deterioration
Access road	Every Working Day	Inspect for obstructions or deterioration which may cause delays or hamper the movement of vehicles and equipment
Fence/access gates	Every Working Day	Inspect for general condition or evidence of unauthorized entry

Table 8.3 FTU Inspection Items

Inspection Items	Frequency	Observations
Loading/unloading pad	Every Working Day	Inspect for spills, ponding of water, and general area condition
Emissions controls	Every Working Day	Inspect for change in color of indicator and condition of the carbon filter system
Signs	Weekly	Inspect for presence and legibility of proper warning signs

8.2 Post Closure Care Units

The inspection requirements for the five permitted Closures are provided in Table 8.4. Any sign of erosion, cracks, settling of the fill material, animal burrowing activity, or other damage to the environmental caps observed during inspections will be corrected as soon as possible by repairing or resurfacing the affected environmental cap with the required materials. In addition, general tidiness duties (removal of weeds and litter) are performed at least annually or as required from the inspections. Erosion of the environmental caps is not anticipated, but the caps will be repaired if erosion is discovered during the scheduled inspections. WSTF maintains a variety of earth-moving equipment on site which provides the capability of responding quickly to emergency situations such as severe storm erosion, drainage failure, or other damage to the HWMUs or their environmental caps. If such an event occurs, the equipment will be used to divert storm waters and to construct additional barriers. When the initial emergency has passed, the equipment will be used to repair and/or replace any component of the final cover and associated structures that have been damaged.

Table 8.4 200, 300, 400 and 600 Area Closures Inspection Criteria

Inspection Item	Description
Erosion	Caps/covers should be free from erosion.
Cracks	Caps/covers should be free from cracks.
Settling	Caps/covers should be free from settling.
Tidiness	Caps/covers should be free from debris, litter, and weeds.

The Closures in the 200, 300, 400 and 600 Areas will be inspected once every month for the criteria specified by Table 8.4.

8.3 Fire Department & Security

WSTF employs a full time Fire Department and Security Section that maintains and inspects emergency equipment and safety devices as required by § 264.15(b). WSTF emergency equipment is inspected and/or function checked for the items and at frequencies listed in Table 8.5. Inspections will be documented in an inspection log, which will be kept on file for at least

three years as required by § 264.15(d). Inspection logs will reflect: the name of inspector, the date and time of inspection, and any observations made during inspection.

Table 8.5 Security and Emergency Equipment Inspection Items

Inspection Items	Frequency	Observations
Site perimeter	Every 4 hours	Security inspection
General work area inspection	Every 8 hours	Potential hazards, product or waste leaks
Firefighter PPE	Daily	Inventory, equipment condition
Emergency ringdown phone system	Weekly	Function check
Fire response pumper trucks	Semimonthly	Back-flush system
Perimeter fence	Semimonthly	Breaks in fencing
HazMat spill response trailer	Monthly	Inventory, equipment condition
Emergency paging system	Monthly	Function check
Chemical spill siren	Monthly	Function check
Fire alarms	Quarterly	Function check
Fire hydrants and fire protection water risers	Quarterly	Static pressure, flow pressure, and water flow