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ADDENDUM I
INSPECTION REQUIREMENTS

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I INSPECTION REQUIREMENTS

I.1 Inspection Plan

This section describes the method and schedule for inspection of the Low Level Burial Grounds Trenches 31 & 34 (LLBG Trenches 31 & 34). The purpose of inspections is to meet the requirements for container storage in [WAC 173-303-630](#)(6) and/or landfill operations in [WAC 173-303-665](#)(4) and the general inspection requirements of Permit Condition II.X ([WAC 173-303-320](#)). These inspections help to ensure that situations do not exist that might cause or lead to the release of waste to the environment or that might pose a threat to human health. Abnormal conditions identified by inspections must be corrected on a schedule that prevents hazards to personnel, the public, and the environment as determined by a solid waste operations supervisor. In addition to the requirements in Permit Condition II.X, the Permittees shall ensure that container storage areas are maintained in accordance with [WAC 173-303-630](#)(7).

I.1.1 General Inspection Requirements

The content for types of problems and frequency of inspections are described in this section and Table I.1 and Table I.2. Inspections, implemented through operating requirements, will be documented on inspection checklists and log sheets.

The inspections will be performed by personnel qualified to inspect LLBG Trenches 31 & 34 storage areas and landfills. The inspection checklists consist of a listing of items that shall be assessed during each inspection when mixed waste is being managed and after storms.

The schedule and inspection records shall be maintained, retained, and stored in accordance with Permit Conditions II.X.1 and II.X.3.

The inspection checklists contain the items described in Permit Condition II.X.2

On a checklist, a yes/no/N/A response will be made for each listed item. A 'yes' response means that the item is in compliance with the conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no' response on the checklist, discrepancies are noted and are reported to the LLBG Trenches 31 & 34 operating organization. An 'N/A' response means the criteria is not applicable. When the inspection is completed, the inspector prints their name, signs, and dates the inspection checklist, and sends a copy to the LLBG Trenches 31 & 34 operating organization and files the inspection to the Hanford Facility Operating Record, LLBG Trenches 31 & 34 File.

I.1.1.1 Types of Problems

LLBG Trenches 31 & 34 inspections include, but are not limited to, the following:

- Condition of storage
- Condition of safety and emergency equipment
- Condition of security equipment
- Landfill inspections after storms
- Leachate collection system freeze protection

I.1.1.2 Frequency of Inspections

The LLBG operations organization performs an inspection of LLBG Trenches 31 & 34 to ensure compliance with Permit Condition II.X ([WAC 173-303-320](#)) and [WAC 173-303-630](#)(6) requirements in accordance to Tables I.1 and I.2.

I.1.2 Schedule for Remedial Action for Problems Revealed

In accordance with Permit Condition II.X.4 [[WAC 173-303-320](#)(3)] the LLBG Trenches 31 & 34 operating organization will remedy any problems revealed by the inspection on a schedule that prevents hazards to human health and the environment. Where a hazard is imminent or already has occurred,

1 immediate action will be taken. Immediate actions will be implemented in accordance with the
2 Contingency Plan as defined in Permit Conditions II.A and III.17.G.

3 **I.1.3 Specific Process Inspection Requirements**

4 The following sections detail the inspections to be performed at LLBG Trenches 31 & 34.

5 **I.1.3.1 Container Receipt Inspection**

6 On receipt in accordance with Addendum B (Waste Analysis Plan), each container will be inspected by
7 operations personnel.

8 Refer to Section I.1.2 on remedial actions for problems revealed. Records of inspection are maintained as
9 described in Section I.1.1.

10 **I.1.3.2 LLBG Trenches 31 and 34 (Landfill) Inspections**

11 LLBG Trenches 31 & 34 will be inspected in accordance with [WAC 173-303-665\(4\)](#) requirements as
12 listed in Table I.2.

13 Specific items and/or problems to be noted during inspections include the following:

- 14 • Emergency and spill response equipment
- 15 • Container integrity not compromised by punctures, dents, penetrating scratches, loose lids,
16 bulging, excessive corrosion, or other damage deterioration (where possible to inspect)
- 17 • Containers closed and stored in a manner which will not rupture the containers or cause them to
18 leak
- 19 • No evidence of spills or leaks, such as moisture on the sides or underneath (where possible to
20 inspect)
- 21 • Container marking/labeling is intact, unobscured, legible, and in good condition (where possible
22 to inspect)
- 23 • Aisle space between rows of containers is at least 30 inches
- 24 • Trench entrance ramp intact (not deteriorated, damaged, or eroded)
- 25 • Trench walls and floor intact (not deteriorated, damaged, or eroded)
- 26 • Clean interim soil covers bulk waste
- 27 • Interim soil cover not eroded by wind or water
- 28 • Subsidence area or sinkholes in interim soil cover are not observable.
- 29 • Posted warning signs
- 30 • Run-on and run-off control
- 31 • Wind dispersal control systems
- 32 • Leak detection system sump
- 33 • Leachate collection and removal systems
- 34 • Leachate detection system
- 35 • Proper operations and maintenance

36 Refer to Section I.1.2 on remedial actions for problems revealed. Records of inspection shall be
37 maintained as described in Section I.1.1.

38

1 **Table I.1. Container Storage Inspection Schedule of LLBG Trenches 31 & 34**

Requirement Description	Frequency	Inspection
Areas subject to spills	Daily ¹	Check for spills
Container storage areas	Weekly ²	See Section I.1.3.2
Posted warning signs	Weekly ²	Verify signs are present, legible, and visible at 25 feet
Container labels	Weekly ²	Visible and readable; and adequate identification of risks
Spill response kits	Monthly	Equipment present and functional
Fire extinguishers	Monthly	Equipment present and functional
<p>¹ To implement WAC 173-303-320(2)(c), “daily when in use” is defined as when dangerous waste management activities have a potential for spill to occur such as moving containers.</p> <p>² Weekly inspection logs prepared to meet WAC 173-303-630(6) will be completed when dangerous waste is being managed within the LLBG - Trenches 31 & 34 storage areas. If the storage area is empty, “no waste in storage” or equivalent words will be entered on the inspection log.</p>		

2 **Table I.2. Landfill Inspections Schedule of LLBG Trenches 31 & 34**

Requirement Description	Frequency	Inspection
Run-on and run-off control	Weekly and after storms ¹	Deterioration, malfunction, or improper operation
Wind dispersal control systems	Weekly and after storms ¹	Proper functioning ²
Leak detection system sump	Weekly and after storms ¹	Amount of liquid removed
Leachate collection and removal systems	Weekly and after storms ¹	Presence of leachate, proper functioning ³
Leachate detection system	Weekly	Amount of liquids removed
Proper operations and maintenance	Monthly ⁴	Evaluations on the leachate transfer lines for freeze protection
<p>¹ A storm is any atmospheric disturbance with either wind gusts of 56 kilometers (35 miles) per hour or greater or precipitation of 12.7 millimeters (0.5 inches) or greater with a 24-hour period.</p> <p>² Wind dispersal control systems inspections use varied methods to prevent wind dispersal of waste, depending on the waste form. Methods to prevent wind dispersal include containerizing, stabilizing, grouting, spray fixatives, and backfill. Sometimes the natural form of the waste precludes the need for wind dispersal protection, (i.e., scrap piping and other solid debris). In other instances, the operating contractor implements a wind speed restriction during handling, and immediately backfills the waste to prevent wind dispersal.</p> <p>³ The leachate collect and removal systems are inspected for proper function of the leachate collection and removal sump pumps with each use.</p> <p>⁴ This evaluation is performed from October through March.</p>		

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