

ADDENDUM I
INSPECTION REQUIREMENTS

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ADDENDUM I INSPECTION REQUIREMENTS

I INSPECTION REQUIREMENTS

I.1 Inspection Plan

This section describes the method(s) and schedule for inspections of the WRAP Operating Unit Group. These inspections help to ensure that situations do not exist that might cause or lead to the release of dangerous or mixed 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 helps prevent hazards to personnel, the public, and the environment. In addition to the requirements in Permit Condition II.X, the Permittees shall ensure that dangerous waste management units at the WRAP Operating Unit Group are maintained in accordance with [WAC 173-303-630](#)(7). The Permittees will ensure that WRAP dangerous waste management unit inspections, at a minimum, meet the requirements of [WAC 173-303-320](#)(2) and [WAC 173-303-630](#)(6).

The purpose of inspections is to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or 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.

I.1.1 General Inspection Requirements

The content and frequency of inspections are described in this section and in Table I.1. The inspections will be documented on inspection checklists and log sheets. The schedule and inspection records are maintained in accordance with Permit Condition II.X.1. Inspection records will be retained in accordance with Permit Condition II.X.2. Inspection records will be maintained in the Hanford Facility Operating Record, WRAP Facility File and retained in accordance with Permit Condition II.I.1.

The inspections will be performed by personnel qualified to inspect the WRAP Operating Unit Group processes and operations. The inspection checklists consist of a listing of items that are to be assessed during each inspection when dangerous waste is being managed at the location. A yes/no response is made for each listed item. Any problems identified during the inspection will be documented during the inspection and will be reported promptly to management.

I.1.1.1 Types of Problems

The WRAP dangerous waste management unit's inspections include, but are not limited to, the following:

- Condition of loading and unloading areas
- Condition of storage
- Condition of certified 14 packs (refer to Addendum F, Section F.1.2)
- Condition of safety and emergency equipment
- Condition of security equipment.

Discrepancies will be noted in the additional information section of the checklist. When completed, the inspector prints his/her name, signs, and dates the inspection checklist, and sends a copy to the Hanford Facility Operating Record, WRAP Facility File. The inspection checklist will be stored in accordance with Permit Condition II.X.3.

I.1.1.2 Frequency of Inspections

In accordance with [WAC 173-303-320](#), the inspection schedule for WRAP dangerous waste management units, including the frequency of inspections, is identified in Table I.1.

1 As required by [WAC 173-303-395](#)(1)(d), a Fire Protection Engineer performs annual fire inspections of
2 the WRAP Operating Unit Group. The assessment includes the date and time of the inspection, the name
3 of the professional inspector, a notation of the observations made, and any remedial actions, which were
4 taken as a result of the inspection. The completed fire protection facility assessment will be included in
5 the Hanford Facility Operating Record, WRAP Facility File. Fire protection equipment and storage
6 building alarms will be tested and inspected as identified in Table I.1.

7 **I.1.2 Schedule for Remedial Action for Problems Revealed**

8 Problems identified will be remediated in accordance with II.X.5.

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

10 Table I.1 describes the specific process inspection requirements for the WRAP dangerous waste
11 management units.

12 **I.1.3.1 Container Inspection**

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

- 14 • Condition of concrete floor, curbing, and walls
- 15 • Deterioration of containers
- 16 • Containers closed.
- 17 • Evidence of spills or leaks.
- 18 • Container labels and markings in place, legible, and unobscured
- 19 • Appropriate aisle spacing
- 20 • Containment used to meet the requirements of [WAC 173-303-630](#)(7).

21 WRAP dangerous waste management units store certain mixed waste containers in a unique configuration
22 in preparation for offsite transportation and disposal by placing them into a configuration known as a "14
23 pack". This 14 pack consists of two layers of containers; each layer consists of seven containers in a
24 circular pattern- six containers on the outside with one container in the middle. These containers have
25 undergone a rigorous offsite disposal facility certification process to verify the integrity of the containers
26 and their compatibility with internal contents.

27 Because of this configuration, external surfaces of containers packaged in the middle of the 14 pack are
28 not accessible for direct visual observation during weekly inspections. The 14-pack configuration allows
29 for inspection of most container surfaces and of the containment system for leakage to and/or
30 deterioration. The general objective of [WAC 173-303-630](#)(6) to identify leakage and degradation can be
31 met for the 14 pack by inspecting available external container surfaces and the storage area. The 14-pack
32 certification process requires evaluation of properties associated with wastes to be packaged and their
33 compatibility with containers to be used. This process, coupled with inspection of containers before
34 being placed into the 14 pack provides a high level of confidence that the external surfaces of containers
35 packaged in the middle of the 14 pack will not display signs of deterioration while in storage awaiting
36 transportation to the offsite disposal facility.

37 **I.1.3.2 Container Receipt and Inspection**

38 On receipt in accordance with Addendum B, Section B.2.1.2, each container for storage will be inspected
39 by operations personnel to confirm appropriate documentation and compliance with the waste acceptance
40 criteria before the container will be accepted for storage. Refer to [Section I.1.2](#) on remedial actions for
41 problems revealed.

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Table I.1. WAC 173-303-320(2) Inspection Schedule

Requirement Description	Inspection Frequency	Inspection
Areas subject to spills	Daily ¹	Check for spills
Container storage areas	Weekly ²	Check for leaks, spills, accumulated liquids, properly sealed containers; waste compatible; fencing system intact
Posted warning signs	Weekly ²	Verify signs are present, legible, and visible at 25 feet
Container labels	Weekly ²	Visible and readable; and adequately identification of risks
Containers/container storage areas including aisle space (including certified 14 packs)	Weekly ²	Refer to Section I.1.3.1.
Ignitable or reactive waste	Annual	Storage in compliance with Hanford Site fire protection standards and WAC 173-303-630(8)
Curbing, floors and sumps	Weekly ²	Verify no deterioration of containment system caused by corrosion or other factors
Spill response kits	Quarterly	Equipment present and functional
Safety showers, eyewash stations, fire extinguishers, emergency lighting	Monthly	Equipment present and functional
Fire extinguishers	Monthly	Equipment present and functional
Automatic fire suppression systems	Monthly	Verify system is pressurized
Automated storage and retrieval system, carousel, and floor storage equipment	Weekly when waste is present in the Shipping and Receiving Area ³	Equipment functional

2 Reference: [WAC 173-303-630](#), Use and management of containers

3 [WAC 173-303-320](#), General Inspection

4 [WAC 173-303 395\(1\)\(d\)](#), Other General Requirements

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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.

² Weekly inspection logs prepared to meet [WAC 173-303-630\(6\)](#) will be completed when dangerous waste is being managed within the WRAP storage areas. If the storage area is empty, “no waste in storage” or equivalent words will be entered on the inspection log.

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