

PERMIT ATTACHMENT II

Inspection Plan – Section 7 of the Permit Application

Permit Number: WA 7890008967

The following listed documents are hereby incorporated, in their entirety, by reference into this Permit. Some of the documents are excerpts from the Permittees' DBVS Facility Research, Development, and Demonstration Dangerous Waste Permit Application dated May 10, 2004 (document #04-TED-036); hereafter called the Permit Application. Ecology has, as deemed necessary, modified specific language in the attachments. These modifications are described in the permit conditions (Parts I through V), and thereby supersede the language of the attachment. These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit conditions.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

CONTENTS

7.0 INSPECTION PLAN 7-1
7.1 PROJECT REQUIREMENTS 7-1
7.2 SCHEDULED INSPECTIONS 7-1
7.2.1 General 7-1
7.2.2 Startup Inspections 7-1
7.2.3 Daily Inspections 7-1
7.2.4 Weekly Inspections 7-1
7.2.5 Additional Inspections 7-2
7.3 DOCUMENTATION 7-2
7.4 CORRECTIVE ACTION 7-2
7.5 RECORDKEEPING 7-3

FIGURES

Figure 7-1. Typical Inspection Checklist for Waste Storage Area 7-4
Figure 7-2. Typical Inspection Checklist for Waste Tank Storage Area 7-5

1 **7.0 INSPECTION PLAN**

2 **7.1 PROJECT REQUIREMENTS**

3 Inspections are intended to ensure that situations do not exist that might cause or lead to the
4 release of dangerous or mixed waste to the environment or that might pose a threat to human
5 health and the environment. Abnormal conditions identified by inspections must be corrected on
6 a schedule that helps prevent hazards to personnel, the public, and the environment. ORP will
7 ensure that inspections conducted at the Test and Demonstration Facility activity area meet
8 applicable regulatory requirements including WAC 173-303-320(2), WAC 173-303-395(1)(d),
9 WAC 173-303-630(6), and WAC 173-303-640(6).

10 **7.2 SCHEDULED INSPECTIONS**

11 **7.2.1 General**

12 In addition to the campaign startup inspections, overall routine inspections and maintenance
13 requirements have been defined for the DBVS. These scheduled inspections are described in the
14 following sections. The content and frequency of any additional scheduled inspections will be
15 based on the operating and maintenance instructions specified by the equipment manufacturers.

16 **7.2.2 Startup Inspections**

17 Startup inspections will be performed in compliance with the equipment manufacturers'
18 instructions.

19 **7.2.3 Daily Inspections**

20 Daily inspections will include the following:

- 21 • Areas subject to spills
- 22 • Accessible tank systems, including tanks, pumps, piping, valves, flanges, and other
23 ancillary equipment
- 24 • The accessible aboveground portions of waste transfer piping and waste vacuum transfer
25 lines
- 26 • Monitoring data from any leak detection equipment
- 27 • The construction materials and the area immediately surrounding the externally
28 accessible portion of tank systems, including secondary containment systems.

29 **7.2.4 Weekly Inspections**

30 Weekly inspections will consist of the following:

- 31 • Inspection of container storage areas for leaking containers and for deterioration of
32 containers and containment system
- 33 • Confirmation that containers are segregated by material compatibility

- 1 • Confirmation that adequate and unimpeded aisle space is provided (i.e., thirty inches
- 2 aisle space as a minimum)
- 3 • Confirmation that area security controls including placards and signage are in place,
- 4 intact, and functional
- 5 • Confirmation that containers are properly stacked.

6 **7.2.5 Additional Inspections**

7 Additional inspections will include, but not be limited to, safety equipment and emergency
8 response supplies:

- 9 • Fire extinguishers
- 10 • Eye wash and emergency shower
- 11 • First aid supplies
- 12 • Personnel protective equipment
- 13 • Spill control supplies
- 14 • Spill control equipment
- 15 • Each ICV[®] container (design/operation specifications).

16 **7.3 DOCUMENTATION**

17 A report of each inspection is to be recorded by the facility operator. The reports will be
18 maintained in a master inspection log maintained at the facility. Frequency of inspection, and
19 format and content of the inspection report forms and inspection log will be in compliance with
20 WAC 173-303-320, WAC 173-303-630(6), and WAC 173-303-640(6).

21 Where observations indicate a finding of deficiency, the inspector must specifically describe the
22 situation on the inspection form and determine whether the condition of the item is "acceptable"
23 for continued use pending repair or replacement, or is "unacceptable" and must be repaired or
24 replaced prior to further use. If repair or replacement of the item or area is required, the Test and
25 Demonstration Facility manager must be notified and the repair or replacement initiated
26 immediately.

27 Once the situation is corrected, documentation of the repair effort must be prepared and filed per
28 Section 9.0. The existing "Problem Evaluation Request" (PER) form and documentation
29 procedures will be used to formally identify, track, and close deficiencies.

30 **7.4 CORRECTIVE ACTION**

31 The inspection checklists for each activity or area contain a signature and date block for review
32 and approval of corrective actions (if any) by the operator. Discrepancies and non-compliant
33 conditions noted on the checklist must be corrected at the first opportunity as indicated in the
34 PER procedures. Typical inspection checklists for containerized waste storage areas and waste
35 tank systems are provided in Figures 7-1 and 7-2, respectively.

1 CH2M HILL is responsible for committing staff and resources to correct any noted conditions.
2 Once a condition is corrected, the inspector is required to sign the inspection checklist, noting
3 the area has been reinspected and is in compliance with permit requirements. The inspector must
4 also provide a brief description of those actions in the space provided. A corrective action log
5 will be maintained by the facility.

6 **7.5 RECORDKEEPING**

7 An inspection log containing all completed inspection reports and supporting documentation for
8 corrective actions taken must be maintained for each calendar year in accordance with
9 WAC 173-303-380. The inspection log will provide a case history of all items and areas
10 inspected. A current copy of the corrective action log must be kept with the inspection log.

11

1

Figure 7-1. Typical Inspection Checklist for Waste Storage Area

AREA: _____
INSPECTOR: _____ DATE: _____

- 1. Are items properly labeled?
YES NO COMMENT
- 2. Is adequate aisle space and item segregation being maintained?
YES NO COMMENT
- 3. Are only authorized items stored in the area?
YES NO COMMENT
- 4. Are items elevated on pallets or racks to prevent contact with wet surfaces or runoff?
YES NO COMMENT
- 5. Are item exteriors kept clean (i.e., drips and spills cleaned up)?
YES NO COMMENT
- 6. Are suitable and adequate spill control supplies and equipment available in the area?
YES NO COMMENT
- 7. Is area drainage in good repair?
YES NO COMMENT

Comments: _____

Signature of Inspector: _____

Signature of Reviewer: _____

Date of Review: _____

Description of Corrective Actions: _____

Corrective Action Approval: _____

Date of Approval: _____

Corrective Actions Completed: _____
(Signature and Date)

Figure 7-2. Typical Inspection Checklist for Waste Tank Storage Area

1
2 AREA: _____
3
4 INSPECTOR: _____ DATE: _____
5
6 NOTE TANK DESIGNATIONS AND CONTENTS ON ATTACHED TABLE.
7
8 1. Are tank shell, valves, gauges, etc. in good condition and free of leaks?
9 YES NO COMMENT
10
11 2. If so equipped, is tank insulation in good repair?
12 YES NO COMMENT
13
14 3. Is tank containment in good condition?
15 YES NO COMMENT
16
17 4. If so equipped, are tank containment drain valve(s) secured in the closed position?
18 YES NO COMMENT
19
20 5. Is tank containment free of accumulated liquids, including precipitation?
21 YES NO COMMENT
22
23 6. Have spills from liquid transfer operations been cleaned up?
24 YES NO COMMENT
25
26 7. Are suitable and adequate spill control supplies and equipment available in the area?
27 YES NO COMMENT
28
29 8. Is area drainage in good repair?
30 YES NO COMMENT
31
32 9. Has local sedimentation or erosion occurred around tank or containment since last inspection?
33 YES NO COMMENT
34

Figure 7-2. Typical Inspection Checklist for Waste Tank Storage Area (Cont.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30

Comments: _____

Signature of Inspector: _____

Signature of Reviewer: _____

Date of Review: _____

Description of Corrective Actions: _____

Corrective Action Approval: _____

Date of Approval: _____

Corrective Action Completed: _____

Figure 7-2. Typical Inspection Checklist for Waste Tank Storage Area (Cont.)

1
2
3
4

STORAGE TANK SUMMARY

TANK NAME/NUMBER	TANK CONTENTS

5