

DRAFT

INSPECTION SCHEDULE GUIDELINES

Regulations require that a written inspection schedule be prepared for each hazardous waste storage or treatment facility. The inspection must include "all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards." The inspection schedule details potential problems that may be detected and specifies the frequency of inspection. The regulation requires that the schedule be strictly adhered to, that deficiencies be remedied before they pose a hazard, and that an inspection log be maintained for three years.

A. The EPA regulations require the following actions to be taken as part of and as a result of the facility inspection:

The owner or operator must inspect the facility for malfunctions and deterioration, operator errors and discharges to prevent damage to the environment and a threat to human health. A written schedule for inspection must be developed and followed and must be kept at the facility. The schedule must identify the types of problems which are to be looked for during the inspection.

weekly

The owner/operator must record inspections in an inspection log which he must keep for at least three years from the date of inspection.

The owner or operator must remedy any deterioration or malfunction of equipment or structures which inspection reveals. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

In addition to the above, the following requirements apply to storage of hazardous wastes in the containers:

1. Check the type and condition of lining material to make sure that it is compatible with the waste stored and will not damage the container prior to its expected life.
2. Make sure that the container is closed, all the time, except when adding or removing the waste.
3. Areas where containers are stored, must be inspected weekly for leaks and deterioration caused by corrosion or other factors.
4. If the container is not in good condition, or if it begins to leak, all the waste must be transferred to a container which is in good condition.

Where the storage or treatment is in the tank, the inspection requirements, where present, are as follows:

1. Discharge control system including feed cut-off, by-pass, drainage system and pressure relief systems should be inspected at least once each operating day to ensure that it is in good working order;

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2. Data gathered from monitoring equipment (such as pressure, temperature, pH, speed, etc.), should be inspected at least once each operating day, to ensure that the tank is being operated according to its design;

3. The level of waste in the tank should be inspected at least once each operating day, to ensure that it has adequate freeboard;

4. The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams; and

5. The construction materials of, and the area immediately surrounding, discharge confinement structures (dike), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or damage to vegetation).

B. The State regulations may require that daily visual inspections be conducted for all facilities and the results recorded in the facility's daily operating log. The visual inspection should include the following as applicable:

1. Storage areas for rust, corrosion, cracks in storage devices, missing or improper labels, and spills.

2. Dikes and drainage systems.

3. Operating and monitoring equipment and readings.

4. Emergency response equipment.

5. Damage to fences or barriers.

6. Damage to vegetation on or around the facility.

7. Fugitive air emissions.

8. Check and see that the tank or container is covered at all times except during use. If not covered, check to make sure that it maintains two (2) feet freeboard.

An inspection log must be developed for each type of storage or treatment facility; i.e., one each for acid neutralization, silver recovery, oil storage, paint storage. As a minimum, the inspection log must include the date and time of the inspection, the 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 organized in four parts: a) facility and inspector identification, b) general facility inspection, c) particular process or storage inspection, and d) notes and comments. The inspection log must be kept at the facility.

