

## **SECTION O**

### **FACILITY INSPECTION SCHEDULES**

R 299.9504(1)(c) and 40 CFR, Part 264.15(b)(5)

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## **O-1 General Information**

(40 CFR 264.15(a)(1)(2))

This Inspection Plan has been designed to detect malfunction, deterioration, operator errors, discharges and any other situation that may cause, or lead to, the release of hazardous materials which could become a threat to human health or the environment. The designated personnel conducts these inspections often enough to identify problems in time to initiate corrective actions before any harm to human health or the environment is created.

The facility conducts regular inspections of the Treatment and Storage areas, including associated tanks/vaults and all ancillary equipment. The facility's structures and equipment, including monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment are inspected routinely by plant personnel.

"Inspection Report Forms" have been developed for use during EQD facility inspections. These forms specify the areas to be inspected, the frequency of each type of inspection and the type of problems to investigate. When identifying a problem, the inspector is required to specify:

- The type of problem identified,
- The remedial action required, if known,
- Notify management in order to implement remedial action.

Completed inspection report forms and the schedule of inspections are kept at the facility's office at 1923 Frederick Street, Detroit, Michigan. The facility Inspection Plan shall be maintained at the facility at all times and updated as required whenever any changes take place at the facility.

## **O-2 Purpose of the Inspection Plan**

The purpose of this plan is to describe and delineate the procedures that will be implemented by EQD personnel for inspecting the facility. Periodic inspections are required at EQD to detect any malfunctions, deteriorations, operator errors, discharges and any other situation which may cause a release of hazardous materials, and to identify and correct it before any threat is posed to human health or the environment.

## **O-3 Inspection Categories**

The inspector follows a written schedule for inspections in compliance with RCRA, part 111 and the Rules:

1. Safety and emergency equipment,
2. Security devices; and
3. Operating and structural equipment important to preventing, detecting or responding to human health hazards.

#### **O-4 Inspection Frequency**

The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction, or any operator error goes undetected between inspections.

#### **O-5 Inspection Schedule**

(40 CFR 264.15(b)(1-4), 264.33, 264.174, 264.193(i), 264.195 and 270.14(b)(5))

The inspection schedule is kept at the facility. The inspections are to be conducted at the frequency and timeframe indicated below:

- Daily - Each day the facility is handling hazardous waste
- Weekly - Each week the facility is handling hazardous waste
- Monthly - Each month the facility is handling hazardous waste

#### **O-6 Daily Inspection Schedules**

The following areas at EQD are inspected daily when the facility is in operation. The inspection sheets for daily inspections are found in **Figure O-1**.

##### **O-6a Inspection Requirements for Waste Handling and Storage Areas**

(40 CFR 264.15)

The inspector will inspect waste handling and storage areas looking for any evidence of spilled material or leaks from storage containers or tanks. The containment system will be inspected for any cracks or deterioration. Spilled or leaked waste must be removed from the secondary containment system within 24 hours or as soon as possible in accordance with 40 CFR 264.193.

##### **O-6b Areas Subject to Spills**

(40 CFR 264.15)

Areas subject to spills, such as loading and unloading areas are inspected daily when in use. Spilled or leaked waste will be removed within 24 hours or as soon as possible in accordance with 40 CFR 264.193.

##### **O-6c Container Storage Areas**

(40 CFR 264.174)

The inspector must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. Containers stored in the container storage areas are inspected for signs of deterioration.

##### **O-6d Tank Systems**

(40 CFR 264.193)

As applicable to the facility, the inspection schedule meets the following requirements for all tank systems for storing or treating hazardous waste.

Containment and detection of release:

*Leak Detection Devices* for primary containment are checked to detect the failure of that structure or the presence of any release within 24 hours or at the earliest practical time if it is not possible to detect a release within 24 hours. If the leak detections system fails to detect the failure of the primary containment structure or the presence of any release within 24 hours, EQD will demonstrate to the MDEQ that existing detection technologies or site conditions will allow the detection of a release within 24 hours (40 CFR 264.193 (c)(3))

*Spilled or leaked waste* and accumulated precipitation must be removed from the secondary containment system within 24 hours or in as timely manner as possible in accordance with 40 CFR 264.193. If spilled or leaked waste and accumulated precipitation cannot be removed from the secondary containment within 24 hours, EQD will demonstrate to the MDEQ that removal of the released waste or accumulated precipitation cannot be accomplished in 24 hours. (40 CFR 264.193(c))

*Aboveground piping* without secondary containment is visually inspected for leaks on a daily basis. All such piping at the facility is provided secondary containment by sloping concrete and blind trenches, therefore daily piping inspection is not mandatory, but will be conducted as best management practice. (40 CFR 264.293(f)(1))

*Welded flanges, welded joints and welded connections* without secondary containment are visually inspected for leaks on a daily basis. (40 CFR 264.193(f)(2))

Sealless or magnetic coupling pumps and sealless valves without secondary containment are inspected on a daily basis. (40 CFR 264.193(f)(3))

*Pressurized aboveground piping systems with automatic shutoff* e.g. excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices that have no secondary containment are visually inspected on a daily basis. All such piping at the facility is provided secondary containment by the sloping concrete and blind trenches, therefore daily piping inspection is not mandatory, but will be conducted as best management practice (40 CFR 264.193(f)(4))

*For all tank systems without secondary containment* meeting 40 CFR 264.193, annually conduct a leak test that meets the requirements of 40 CFR 264.191(b)(5) or other tank integrity method (40 CFR 264.193(i)(1-2)). All tanks in use at the facility have secondary containment, therefore annual tank integrity assessment is not mandatory. Tank integrity assessment will be conducted according to the Steel Tank Institute (STI) SPOO1 standard with future assessments based on STI calculated deterioration rates.

## **O-6e Tank Inspections**

(40 CFR 264.195)

EQD will develop and follow best management practices for ensuring that tanks are not overfilled. At least once a day, EQD personnel will inspect aboveground portions of the tank system, the area immediately around the tank system and check the data gathered from monitoring and leak detection equipment.

## **O-7 Weekly Inspections**

Surface conditions at EQD are inspected weekly when the facility is in operation using the inspection sheet found in **Figure O-2**.

## **O-8 Monthly Inspections**

EQD conducts a monthly safety and security inspection using the inspection sheet found in **Figure O-3**.

## **O-9 Inspection Records**

(40 CFR 264.73(b)(5))

The Inspection Log or Summary is compiled by inserting all completed Inspection Report forms into a binder kept on site. These records, at a minimum, include the date of the inspection, the name of the inspector, and a notation of the observations made. For routine and quickly remedied types of problems, such as precipitation in containment, a check mark on the inspection form will indicate that the problem has been corrected, for example, the containment was pumped.

Problems requiring more extensive repairs or remedies will also be recorded on the inspection form; specific plan(s) of action needed to correct the problem as well as the anticipated completion date may be included in other documents such as the EQD Non-Conformance and Corrective Action Log. The date the problem was corrected will be recorded in the EQD inspection log.

The inspection records are kept for at least three years from the date of the inspection.

Three Inspection Report forms (**Figure O-1, Figure O-2 and Figure O-3**) are currently in use at the facility.

1. Daily Inspection Report
2. Weekly Inspection Report
3. Monthly Inspection Report

These Inspection Report forms list and describe items to be examined at a specific frequency. A revised or improved version of any Inspection Report form may be implemented upon proper administrative change notification to Michigan Department of Environmental Quality (MDEQ), Waste Management Division. Each inspection record will be kept on file in an Inspection Log binder or file for a minimum of three years from the time of the inspection.

## **O-10 Corrective Measures**

(40 CFR 264.15(c))

The operator remedies any deterioration/malfunction of equipment or structures, which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action is taken immediately.

## **O-11 Procedures to Ensure Transport Vehicles and Containers are Empty**

(R 299.9504(16) and R 299.9605(2) and 40 CFR 261.7)

EQD has a Vehicle Post Inspection (VPI) Release Ticket (RT) log to ensure hazardous waste transport vehicles and/or other containers leaving the EQD facility will be empty of hazardous waste.

If a transport vehicle or other container is not RCRA empty, EQD will either instruct the driver to have the waste removed by physical means (dig-out, wash-out) before leaving the site or will modify the manifest as described in the WAP under "Rejected Load Procedures".

## **O-12 Standard Operating Procedures**

In addition to the formal inspection program, EQD has Standard Operating Procedures (SOP) that ensure hazardous waste track-out does not occur, that the air handling system is maintaining negative pressure in the Chemical Fixation Building, and that equipment scheduled for repair is decontaminated prior to removal from hazardous working conditions.

It should be noted that these Standard Operating Procedure references are provided for informational purposes only, and are not intended to be incorporated into the Hazardous Waste Operating License as License conditions. However, EQD intends to follow these procedures, or similar procedures that provide equivalent protection with respect to matters addressed therein.

**FIGURE O-1: DAILY INSPECTION LOGS**



**FIGURE O-2: WEEKLY INSPECTION LOGS**

**FIGURE O-3: MONTHLY INSPECTION LOG**