

Attachment 2  
Inspection Schedule

## INSPECTIONS

### I. GENERAL INSPECTION REQUIREMENTS

This section outlines the procedures used by Petro-Chem Processing Group of Nortru, LLC. (PCPG) to comply with the inspection requirements of 40 CFR 264.15. Inspection procedures are used to ensure that equipment and operational areas will not fail so as to endanger employees, public health or the surrounding environment. Inspections are conducted on a regular schedule to minimize any such risk. The inspection schedule identifies the type of problems, such as malfunctions or deterioration, which are to be looked for during the inspections, and the appropriate frequency necessary for inspecting each component based on operational experience or as mandated by appropriate regulations.

PCPG's inspection covers the following areas:

- Safety Equipment
- Tanks, Piping and Ancillary Equipment
- Container Storage Areas
- Emergency Equipment
- Security and Communication Equipment
- Loading/Unloading Areas

The degree of detail within the inspection schedule varies in relation to the importance of the equipment to ensure the environmental integrity of the complex.

Inspections of the material storage and operational areas are conducted on a routine basis to ensure that no leakage, malfunctions, deterioration, or operator errors are occurring or are likely to occur which may cause a release to the environment or a threat to human health. Safety and emergency equipment is inspected to ensure that it remains in good condition and that adequate supplies are available. Inspection procedures consist of visual and/or operational checks, depending on the type and importance of the equipment. The results of each inspection are recorded on logs. These logs identify:

- Equipment or area being inspected
- Observations or checks which should be conducted
- Date and time of the inspection
- Name of the inspector
- Notations of any observations made
- Copies of any maintenance request forms

The Inspection Logs are maintained at the facility for a period of at least three years.

### II. INSPECTION SCHEDULE

The frequency of inspections vary and are dependent upon the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. These inspections are summarized in Inspections Table 1. Refer to the Emissions Standards Section for the

monitoring and inspections conducted for compliance with 40 CFR Subparts BB and CC.

A. Container Storage Areas

? From what? The container storage areas will be visually checked each operational day. If a container holding hazardous waste is not DOT approved for the contents, in good condition, (i.e., severe rusting or apparent structural defects) and kept closed when not filling, removing or inspecting the contents. If the container is found to be leaking, PCPG will transfer the hazardous waste from the failed container to an container that is in good condition, place it into an overpack container or will otherwise manage the waste consistent with the appropriate container management regulations. Records of these inspections are maintained in the Daily Operational Inspection Log (see Inspections Appendix 1).

B. Tank Storage Areas

As Inspection Table 1 indicates, the integrity of each tank will be visually checked on a daily basis. This will include a visual inspection to determine any possible leaks. To the extent possible, the bottom of the tanks will be checked for leaks during this inspection as well. Records of these inspections are maintained in the Daily Operational Inspection Log (see Inspections Appendix 1).

Tank assessments are performed according to the schedules in 40 CFR 264.191, 192, 193 or if the results of daily inspections indicate the possible failure of a tank's integrity. Leak testing of ancillary equipment, assessed pursuant to 40 CFR 193(i)(3), is conducted in the same manner as that for compliance with 40 CFR Subparts BB and CC (see Emissions Standards Section). In addition to the testing performed under the Emissions Standards Section, leak testing of the flanges on the ancillary equipment is conducted using EPA Method 21. Reference Emissions Standards Appendix 1 for a detailed equipment listing of the ancillary equipment monitored at least annually.

If a tank holding hazardous waste is found to be structurally defective, severely corroded, leaking, or otherwise impaired, PCPG will remove the tank from service and take appropriate action consistent with procedures defined in the Contingency Plan for removing materials.

C. Containment Structures

All containers and tanks located at the PCPG complex employ secondary containment meeting the requirements of 40 CFR 264.175(a), 264.193(a), 264.193(b) - (f), and Act 451 Rule 299.9615. As Inspection Table 1 indicates, the integrity of each containment device will be visually checked on a daily basis. This will include a visual inspection to determine any possible leaks into or out of the containment device. Records of these inspections are maintained in the Daily Operational Inspection Log (see Inspections Appendix 1).

PCPG will remedy any deterioration or malfunction of equipment or structures identified by inspection in a timely manner so that the identified

problem will not lead to an environmental or human health hazard. Where a hazard is imminent or has occurred, available on-site emergency equipment will allow remedial actions to begin immediately.

D. Security and Communication Equipment

All security and communication equipment at the facility will be visually checked on a weekly basis. This will include a visual inspection to verify the proper operation and/or determine the condition of the equipment. Records of these inspections are maintained in the Weekly Operational Inspection Log (see Appendix II).

E. Safety and Emergency Equipment

All supplies of safety and emergency equipment at the facility will be checked on a minimum monthly basis. Eyewashes and emergency showers will be inspected on a weekly basis (see Inspections Appendix 2 for the Weekly Operational Inspection Log), Inspections will verify the proper operation of the equipment and/or determine if adequate inventory is available. Records of these inspections are maintained in the Monthly Operational Inspection Log (see Inspections Appendix 3). Please reference the Site Safety and Emergency Equipment Appendix for a complete listing of the equipment and the facility and figures detailing the equipment layout.

Personal Protective Equipment (PPE) including safety glasses/goggles, hard hats, safety boots, work gloves, tyvek suits, and organic vapor respirators are provided to each employee upon hire and as needed. Inspections are conducted on a monthly basis to ensure that adequate supplies are available for employee use.

**Inspections Table 1  
 Summary of Inspection Checks and Frequencies**

<b>Equipment</b>	<b>Specific Items</b>	<b>Inspection Required</b>	<b>Frequency</b>
<b>Tanks, Piping &amp; Ancillary Equipment</b>	Tank structure	Leaks, valves, corrosion, structural support, grounding, high level control	Daily; §264.193
	Piping	Leaks, corrosion, open ends	Daily; §264.193
	Containment integrity	Leaks, cracks, housekeeping	Daily; §264.193
	Tank structure (40 CFR 193(i)(2))	integrity test/assessment	as needed;
	Ancillary Equipment (flanges, pumps, valves) (40 CFR 193(i)(3))	leak detection and repair (EPA Method 21 testing)	Annually (minimum); §264.195; §264.1052
<b>Bulk Un/Loading Areas</b>	Pumps	Leaks, gaskets, deterioration, seal,	Daily (when in use); §264.193; §264.1052
	Filters	General condition	Daily (when in use); §264.193
	Piping to/from pumps	Leaks, corrosion, bonding, open ends	Daily (when in use); §264.193
	Flex hoses	Leaks, deterioration	Daily (when in use); §264.193
	Containment, pad area	Housekeeping, sump level, cracks	Daily (when in use); §264.193
<b>Dock Un/Loading Areas</b>	Drums	open, leaking, aisle spacing, housekeeping	Daily (when in use); §264.174; §264.1086
	Containment integrity	Leaks, cracks, housekeeping	Daily (when in use); §264.174
	Pad Areas	Housekeeping, sump level, cracks	Daily (when in use); §264.174
<b>Container Storage<sup>1</sup> Processing Areas</b>	CMB, Docks, SBS Storage	Aisle space, open lids, leaks	Daily (when in use); §264.174; §264.1086
	Containment	Leaks, cracks, housekeeping	Daily (when in use); §264.174
	Sand and/or absorbent material	Low supply	Daily (when in use)

**Inspections Table 1 (cont.)**

<b>Equipment</b>	<b>Specific Items</b>	<b>Inspection Required</b>	<b>Frequency</b>
<b>Container Storage Areas (cont'd)</b>	Ventilation hood and exhaust	Deterioration	Daily (when in use);
	Valves	Deterioration, leaks	Daily (when in use)
	Pumps	Leaks, seal, deterioration, gaskets	Daily (when in use); §264.1052
<b>Process Areas</b>	Containment integrity	Leaks, cracks, housekeeping	Daily (when in use); 5264.174
	Piping to/from pumps	Leaks, corrosion, grounding, open ends	Daily (when in use)
	Pumps	Leaks, seal, deterioration, gaskets	Daily (when in use); §264.1052
	Feed system	General condition, housekeeping	Daily (when in use)
<b>Emission Control Systems</b>	Vapor Balance System	Leaks, corrosion	Monthly; §264.1088
	Scrubber	Leaks, corrosion	
<b>Security Equipment</b>	Facility fences	Corrosion, damage to chain-link fence or barbed wire, vandalism	Weekly
	Warning Signs (on facility fences)	Damaged, legible, missing	Weekly
	Main access gate	Corrosion or damage to gate, motor control	Weekly
	Emergency gates (locked)	Corrosion or damage to gate, inspect lock	Weekly
	Office building burglar /intrusion alarm system	Sensors, alarms	Weekly
	Closed-circuit television surveillance system	Operable	Weekly

**Inspections Table 1 (cont.)**

<b>Area/Equipment</b>	<b>Specific Items</b>	<b>Inspection Required</b>	<b>Frequency</b>
<b>Communication Equipment</b>	Two-way/ stationary radios	Transmitter & receiver, battery charger, accessible	Upon failure, weekly
	Internal telephone communications	Operable	Weekly
<b>Personnel Protective Equipment (PPE)</b>	Organic vapor respirators	Cleanliness, filters, inventory	Monthly, as needed
	Tyvek suits	Worn, torn, inventory	Monthly
	Safety glasses/ Goggles	Scratched, inventory	Monthly
	Hard hats	Worn, cracked	Monthly
	Hard toe boots	Worn, inventory	Monthly
	Rubber aprons	Torn, inventory	Monthly
	Work gloves	Inventory	Monthly
<b>Safety Equipment</b>	Eyewash stations	Leaks, spray pattern, cleanliness, accessible, structural integrity	Weekly
	Safety shower	Leaks, water pressure, accessible	Weekly
	Fire extinguishers (hand held, portable, foam dolly)	charged, accessible	Monthly
	First aid station	Fully stocked, clean, accessible	Monthly
	Fire blanket	clean, accessible	Monthly
	Stretcher	clean, accessible	Monthly
	<b>Emergency Equipment</b>	Absorbent	Inventory, accessible
Sand		Inventory, accessible	Monthly
Containment Booms		Inventory, accessible	Monthly

**Inspections Table 1 (cont.)**

<b>Equipment</b>	<b>Specific Items</b>	<b>Inspection Required</b>	<b>Frequency</b>
<b>Emergency Equipment</b>	Alarm pull stations	Damage (operable)	Monthly (annually)
	Sewer Shutoff System	Operating correctly, calibration	Monthly



# APPENDIX I

## Daily Inspection Log

DAILY INSPECTION  
MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS

Inspector: \_\_\_\_\_  
Date/Time: \_\_\_\_\_

Record using 24 hour time.

DESCRIPTION	ACCEPTABLE?			CORRECTIVE ACTION (Who, What)	COMPLETE
	Yes	No	N/A		
<b>CMB Pump Room</b>					
Leaks, Corrosion-None					
Containers properly closed and labeled					
Ventilation Hood/Exhaust-No Deterioration					
Eye Wash Operational					
Fire Extinguisher Inspected					
Valves-No leaks					
Pumps-No leaks, seal/gasket deterioration, <del>excess noise</del>					
Hose/line ends closed					
Grounding & Bonding in place					
Containment Walls & Floor -- No cracks, debris, accumulated precipitation					

DAILY INSPECTION  
MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS

Inspector: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Record using 24 hour time.

DESCRIPTION	ACCEPTABLE?			CORRECTIVE ACTION (Who, What)	COMPLETE
	Yes	No	N/A		
<b>Waste Tank 1 &amp; 2</b>					
<b>Container Management Building (Waste Tank 1 &amp; 2)</b>					
Tank sample Ports closed					
Spills/Leaks -- None					
Trenches-- Empty					
NFPA Markings and BB Tags-Visible					
Covers and ends closed					
Fire Extinguisher Accessable					
Eye Wash Accessable					
Hi-Level Indicators-Operational					
Containment Walls & Floor -- No cracks, debris, accumulated precipitation					
Valves-No leaks					
Pumps-No leaks, seal/gasket deterioration, excess noise					
Grounding & Bonding in place					
Containers properly closed, labeled and elevated					

DAILY INSPECTION  
 MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS

Inspector: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Record using 24 hour time.

DESCRIPTION	ACCEPTABLE?			CORRECTIVE ACTION (Who, What)	COMPLETE
	Yes	No	NIA		
<b>CMB Container Storage Area (CSA) Rows 1-24</b>					
Spills/Leaks -- None					
Trenches/Containment -- Empty					
Aisle Spacing Adequate 2'					
Incompatibles-Properly segregated					
Containers not damaged or deteriorating.					
Walls & Floor -- No cracks, debris					
Eye Wash Accessable					
Fire Extinguisher Accessable					
Containers properly closed, labeled and elevated					





































