A.5 Inspection Schedule

MICHIGAN DISPOSAL WASTE TREATMENT PLANT (MDWTP)
MID000724831
JANUARY 18, 2019 ATTACHMENT REVISIONS

Replaces Previous Attachment A.5 Inspection Schedule text and Daily Inspection Form

FORM EQP 5111 ATTACHMENT TEMPLATE A5
INSPECTION REQUIREMENTS

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities.* See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, R 299.9605 and Title 40 of the Code of Federal Regulations (CFR) §§264.15 and 270.14(b)(5), establish requirements for inspections at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for inspections at the following hazardous waste management facility: *Michigan Disposal Waste Treatment Plant* in *Belleville*, Michigan.
(Check as appropriate)

☒ Applicant for Operating License for Existing Facility

☐ Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

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INTRODUCTION

[R 299.9605 and 40 CFR §264.15(a)]

The facility is inspected for malfunctions and deterioration, operator errors, and discharges that may be causing, or may lead to: (1) release of hazardous waste constituents into the environment or (2) a threat to human health. The owner or operator must conduct these inspection often enough to identify problems in time to correct them before they harm human health or the environment

A5.A WRITTEN SCHEDULE

[R 299.9605 and 40 CFR §264.15(b)(1)]

The inspection schedule has been developed in accordance with the requirements outlined in 40CFR 264.195, 264.174 and 264.15, and is kept at the facility as part of the operating record.
Inspections have been developed for the following items in order to identify problems in time to correct them before they harm human health or the environment:

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

A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

Container Storage Areas

Container storage areas are inspected for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors.

Tanks

Tank systems are inspected for the following items.

- Evidence of corrosion or release of waste from above ground tank system
- Erosion or evidence of a release in secondary containment systems
- Malfunctions in ancillary equipment without secondary containment has not had a release to the environment

Emergency Equipment

Are inspected to ensure proper operation in the event of an emergency.

A5.A.2 Frequency of Inspection

[R 299.9605 and 40 CFR §§264.15(b)(4), 264.174, 264.193, 264.195 and 264.1084, 264.1086, 264.1089]

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, and considers the tank and container storage inspection requirements outlined in 40 CFR 264.195 and 264.174.

Container Storage Areas

In accordance with the requirements set forth in 40 CFR 264.174, 264.1086 containers will be inspected weekly. On days when containers are added to or removed from a storage area and/or that the truck dock is used, that storage area and/or truck dock area will be inspected daily in accordance with 40 CFR 264.15(b)(4). The following will be inspected:

- Integrity/closure of the containers
- Evidence of a release
- Containment base is free of cracks or gaps
- Liquids have been removed from the containment system within 24 hours of detection and solids have been removed within 60 days of detection.
- Containers >121.5 gallons with VOC contents >20%, when first received, a portable instrument is used to detect individual leaks at each potential leak interface (i.e. anywhere an organic vapor leak could occur) on the cover and associated closure devices to ensure emissions are <500ppm above background.

Tanks

In accordance with the requirements set forth in 40 CFR 264.193, 264.195, 264.1084 tank system components will be inspected as follows:

Once each operating day (every day the tank is in operation (i.e., storing or treating hazardous waste):

- Above ground portions of the tank including areas around the tank
  - Erosion or signs of releases of hazardous waste
- Secondary containment and area around the tanks
  - Free of cracks and gaps
  - Spilled liquid waste or accumulated precipitation must be removed from the secondary containment system within 24 hours of detection in accordance with 40 CFR 264.193.
    - If spilled or leaked waste and accumulated precipitation cannot be removed from the secondary containment system within 24 hours, MDWTP will demonstrate to the DEQ that removal of the released waste or accumulated precipitation cannot be accomplished within 24 hours. (40 CFR 264.193(c)(4))
- Leak detection system
  - Check tanks A-H to detect the failure of the primary and secondary structure.
    - If the leak detection system fails to detect the failure of the primary containment structure or the presence of any release within 24 hours, MDWTP will demonstrate to MDEQ that existing detection technologies or site conditions will not allow the detection of a release within 24 hours. (40 CFR 264.193(c)(3))
- Ancillary equipment without secondary containment
  - Equipment ancillary to Silos 1-6 will be inspected daily when hazardous waste is present in the tanks and the equipment is used. All other tank system ancillary equipment is in secondary containment.

Monthly (if tank is not used in the month inspection will be completed prior to the next use)

- Overfill controls
  - Ensure overfill controls are properly functioning. Level indicator display that shows the volume present in the tanks is compared to the known volume pumped into the tanks. Inconsistencies are investigated.

All tanks and ancillary equipment that must have secondary containment systems meet the requirements of 40 CFR 264.193. As a result, leak and fit testing of tanks and ancillary equipment will occur following the replacement or repair of the tank system.

The control vent system and control device used for Subpart CC compliance meet the inspection requirements outlined in the facility Renewable Operating Permit.

Emergency Equipment
In accordance with the requirements, set forth in 40 CFR 264.33 emergency equipment will be inspected monthly as follows:

- Fire extinguishing equipment
  - Completed and documented in accordance with MIOSHA inspection requirements found in R 408.10835.
- Spill control equipment
  - Present in sufficient quantities
- Decontamination Equipment
  - Operational

A5.B REMEDY SCHEDULE
[R 299.9605 and 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.

If an unacceptable condition is detected, it is reported to the facility manager in charge at that time. The facility manager assigns responsibility for corrective action and a deadline by which corrective action has to be taken on the condition.

On subsequent daily inspections, the inspector monitors the condition until the situation is completely rectified. Once it is rectified, the date and time that the correction was made is noted on the first and last inspection forms that note the problem.

A5.C INSPECTION LOG OR SUMMARY
[R 299.9605 and 40 CFR §264.15(d)]

Inspection records are maintained onsite at the facility as part of the operating record. These records, at a minimum, 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. These records are kept for at least three years from the date of inspection. (40 CFR 264.73(b)(5)

The attached inspection report forms are used to comply with the requirements of this attachment.

MDWTP HW INSPECTION
MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS

Inspector: _____
Date: _____

DESCRIPTION	Acceptable Yes	No	N/A	CORRECTIVE ACTION	Initials	Date Completed
Daily (when in use)						
West Bay - Integrity & Tanks (A, B, C, D)						
Tank Spills or Leaks -- None						
Tank Secondary containment - Verify no liquids present.						
Walls, Doors, Floors, Roofs -- Integrity						
Trenches -- Empty (see definition of Empty* on back)						
East Bay - Integrity & Tanks (E, F, G, H)						
Tank Spills or Leaks -- None						
Tank Secondary containment -Verify no liquids present.						
Walls, Doors, Floors, Roofs -- Integrity						
NCSA Lime/Waste Storage Silos (1-6)						
Rotary Feeder Spills or Leaks -- None						
Spills or Leaks -- None						
Operational -- Fitness						
Screw Conveyor Leaks -- None						
Storage Tanks (Vertical 16-19, 21,25,27) & Aboveground Piping						
Spills -- None						
Leaks -- None						
Trenches -- Empty (See definition of Empty* on the back)						
Secondary containment Walls & Floor -- Integrity						
Pump Room						
Spills or Leaks -- None						
NCSA						
Spills -- None						
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.						
Adequate Aisle Space						
Trenches -- Empty (See definition of Empty* on the back)						
Pads -- Integrity						
ECSA						
Spills -- None						
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.						
Adequate Aisle Space						
Trenches -- Empty (See definition of Empty* on the back)						
Pads -- Integrity						
SECSA						
Spills -- None						
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.						
Adequate Aisle Space						
Trenches -- Empty (See definition of Empty* on the back)						
Pads -- Integrity						
SECSA Trailer Staging						
Trailers have been stored for <72 hours						
Trailers are not leaking						
Trailers not damaged						
Adequate Aisle Space						
Trenches -- Empty (See definition of Empty* on the back)						
Pads -- Integrity						
Truck Dock						
Spills - None						
Monthly						
Emergency Equipment (Monthly)						
Spill control equipment						
Decontamination equipment						
Communications System Available						
Storage Tanks (Vertical 16-19, 21,25,27) & Aboveground Piping *(if tank is not used in the month inspection will be completed prior to the next use)*						
Overfill Controls						

INSPECTION CRITERIA

Daily (when in use)

Treatment Bays/Tanks

Once each operating day (every day the tank is in operation (i.e., storing or treating hazardous waste)
Verify that there are no spills. Verify that there are no leaks.
Inspect walls, doors, floors, and roofs for signs of deterioration or damage. Verify that there are no leaks or cracks.
Inspect tracks on large doors to assure proper sliding and closing.

Lime/Waste Storage Silos 1-6

Once each operating day (every day the tank is in operation (i.e., storing or treating hazardous waste)
Verify that there are no spills. Verify that there are no leaks. Inspect silos for any signs of deterioration or damage.

Storage Tanks (Vertical 16-19, 21,25,27) & Aboveground Piping

Once each operating day (every day the tank is in operation (i.e., storing or treating hazardous waste)
Verify that there are no spills. Verify that there are no leaks.
Inspect impoundment walls and floor for leaks, cracks or accumulation of liquids.
Level indicator (overfill control) display is compared to the known volume added to the tanks. Inconsistencies are investigated.

Pump Room

Verify that there are no spills. Verify that there are no leaks.

Container Storage Areas

Inspection is done on days when containers are added to or removed from a storage area and/or that the truck dock is used
Verify that there are no spills. Inspect for leaks or cracks in dikes and the concrete or asphalt base.
Verify that labels are complete and readable.
Verify adequate aisle space to fit emergency equipment is available.
Verify that the containers are closed (lids and bungs on securely) except when necessary to add or remove waste.
Verify that the number of containers meet permit restictions as follows
1.SECSA: 240,240 gallons of liquid or solid waste in secondary contained concrete;
896,822 gallons (4,440 cubic yards) of solid-only waste that may be stored in the
asphalt area; 14,520 gallons in SECSA Building.
2.NCSA and ECSA may not exceed a combined total of 282,040 gallons.
3.East and West Treatment Bays 5,500 gallons. Each bay may also store 250 cubic
yards of treated waste outside of the waste treatment tanks.
Verify that trenches and sumps are empty*. Ascertain that the integrity of the containment system is satisfactory.
*Trenches and sumps are "empty" if all wastes have been removed that can be removed using the practices commonly employed to remove material from trenches and sumps.
Verify that no containers show signs of deterioration or leaking.

Monthly

Emergency Equipment

Verify presence of absorbent.
Verify equipment is available to block storm water drains
Verify equipment to remove solid residu is available (e.g. brooms, shovels, or sweeper).
Verify eyewashes and showers are operational.

Storage Tanks (Vertical 16-19, 21,25,27) & Aboveground Piping

(if tank is not used in the month, inspection will be completed prior to the next use)

Level indicator (overfill control) display is compared to the known volume added to the tanks. Inconsistencies are investigated.