

FORM EQP 5111 ATTACHMENT TEMPLATE A5 INSPECTION REQUIREMENTS

This document is an attachment to the Michigan Department of Environment, Great Lakes, and Energy'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: Dow Silicones Corporation in Midland, 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

Inspections for the Dow Silicones Corporation facility in Midland, Michigan are conducted according to the inspection schedules contained in this section. Inspections are documented in the operating record and retained for a period of three years. Current inspection log sheets are maintained at the facility and are available upon request.

Inspection records adhere to the same general format. Inspection records are formatted to include the following information:

1. Description of area being inspected
2. Name of inspector
3. Date and time of inspection
4. Notation of observations made during inspection
5. Nature and date of any repairs or actions performed pursuant to the inspection

A5.A WRITTEN SCHEDULE

[R 299.9605 and 40 CFR §264.15(b)(1)]

To meet the inspection requirements a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (e.g., as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards is developed and followed. This written inspection schedule is kept at the facility's records retention room.

A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

General inspection schedules are shown in the following tables. Additional items may be inspected beyond those listed.

Daily Tank Systems Inspections (19781, 19782, 19783, 19784, 19785, and 19786)

Item Inspected	Observation
Tank Overfill Protection	<ul style="list-style-type: none"> • Confirm level monitoring instrumentation is functional and a high level condition is not present
Leak detection	<ul style="list-style-type: none"> • No leaks of liquid or vapor from piping or equipment • No evidence of spilled material
Facility labeling	<ul style="list-style-type: none"> • NFPA symbols in place • Hazardous Waste signs in place
Tank shells and ancillary equipment	<ul style="list-style-type: none"> • No leaks or deterioration (e.g., severe corrosion)
Secondary containment	<ul style="list-style-type: none"> • No cracks, gaps, or deterioration (e.g., spalling), which would compromise integrity, has occurred • Seams, cracks, and gaps are properly caulked • Any caulk and/or coatings present are fully adhered to surface
Accumulated precipitation	<ul style="list-style-type: none"> • Presence of accumulated precipitation/solids in secondary containment and sumps • Accumulated precipitation removed within 24 hours

Daily Container Storage Inspection (809 container storage and tank farm load/unload spots)

Item Inspected	Observation
Bulk waste load/unload areas	<ul style="list-style-type: none"> • No leaks of liquid or vapor from container (when present), piping, or equipment • No evidence of spilled material
Secondary containment	<ul style="list-style-type: none"> • No cracks, gaps, or deterioration (e.g., spalling), which would compromise integrity, has occurred • Spill Pond lining is in good condition. • Seams, cracks, and gaps are properly caulked or sealed • Any caulk and/or coatings present are fully adhered to surface
Condition of stored containers	<ul style="list-style-type: none"> • All containers are properly labeled and labels are visible • All containers are closed • Material is not present on outside of containers • No signs of deterioration (e.g., severe rust), structural defects, or leaks • Adequate aisle space between rows
Accumulated precipitation	<ul style="list-style-type: none"> • Presence of accumulated precipitation/solids in secondary containment and sumps • Accumulated precipitation removed within a timely manner

Daily Landfill Inspection Log

Item Inspected	Observation
Slopes	<ul style="list-style-type: none"> • Check that sidewalls are intact and free of debris.
Daily Cover	<ul style="list-style-type: none"> • Is there sufficient daily cover applied at the end of the operational day? • No run-on/run-off occurring
Drainage Ditch	<ul style="list-style-type: none"> • Check landfill perimeter ditch is free of dirt and debris, free of erosion, overgrowth or blockages.
Leachate Collection System	<ul style="list-style-type: none"> • Check flow of leachate at metering manhole in 700 block.

Safety Equipment

See section A7, Contingency Plan, of this operating license reapplication for details regarding inspections of safety equipment.

A5.A.2 Frequency of Inspection

[R 299.9605 and 40 CFR §§264.15(b)(4), 264.174, 264.193, 264.195, 264.226, 264.254, 264.278, 264.303, 264.347, 264.602, 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089, where applicable]

The inspection frequencies are included in the descriptions in section A5.A1 of this attachment.

A5.B REMEDY SCHEDULE

[R 299.9605 and 40 CFR §264.15(c)]

Inspectors are to coordinate any required actions identified as necessary based on their inspection. The nature of each action performed is dependent on the type of deficiency identified through the inspection. Examples of typical actions may include replacement of missing or damaged signs and labels, repacking the contents of a deteriorated container, or arranging for maintenance personnel to address malfunctions of instrumentation or mechanical equipment. If a problem lies beyond the means of an inspector to address, they are instructed to promptly notify supervision of the nature of the deficiency for appropriate follow up.

A5.C INSPECTION LOG OR SUMMARY

[R 299.9605 and 40 CFR §264.15(d)]

Inspection records contain the inspector's name and the date of the inspection, a notation of inspector comments, and dates and nature of remedial repairs. These records are kept on file for at least three years from the date of inspection and are available upon request.