

A.5. Inspection schedules

**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: Wayne Disposal, Inc. in Belleville, Michigan.
(Check as appropriate)

- Applicant for Operating License for Existing Facility
- Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

Table of Contents

INTRODUCTION	3
A5.A WRITTEN SCHEDULE	3
A5.A.1 Types of Problems	3
A5.A.2 Frequency of Inspection	3
A5.B REMEDY SCHEDULE	5
A5.C INSPECTION LOG OR SUMMARY	5

INTRODUCTION

[R 299.9605 and 40 CFR §264.15(a)]

The employees designated by the Owner or Operator as the Inspector(s) will inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing -- or may lead to -- (1) release of hazardous waste constituents to the environment or (2) a threat to human health. The Inspector conducts these inspections 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)]

Inspection Categories:

The Operator has developed, and the Inspector follows a written schedule for inspecting:

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.

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

1. Annual
2. Quarterly
3. Weekly
4. Daily - Each day the facility is handling hazardous waste.
5. After Storm - Within 24 hours following 0.5" precipitation.

A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

Leachate Collection System and Leak Detection Collection and Removal System

Are inspected for equipment deterioration/malfunction, including inoperative pumps, leaking, and other issues important to preventing, detecting, or responding to environmental or human health hazards.

Container Storage Area

Container storage area is inspected for leaking containers and for deterioration of containers.

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, 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 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, malfunction, or any operator error goes undetected between inspections.

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.
- ◆ Hazardous waste containers with >500ppm VOC will receive a visual inspection of its cover and closure devices to check for defects when WDI takes possession of the container and places it into storage.

Landfill

During the active operation of the landfill, it must be inspected weekly and after storms to detect evidence of any deterioration, malfunctions or improper operation of run-on and run-off control systems and ensure proper functioning of wind dispersal control systems.

Leachate Collection System

The leachate collection system is inspected weekly to ensure it is operated and maintained to ensure leachate depth over the liner does not exceed 30 cm. (one foot).

Leak Detection Collection and Removal System

Record the amount of liquids removed from each leak detection system sump at least once a week during the active life and closure period.

After the final cover is installed, the amount of liquids removed from each leak detection sump must be recorded at least monthly. If the liquid level in the sump stays below the pump operating level for two consecutive months, the amount of liquids in the sumps must be recorded at least quarterly. If the liquid level in the sump stays below the pump operating level for two consecutive quarters, the amount of liquids in the sumps must be recorded at least semiannually. If at any time during the post-closure operating period the pump operating level is exceeded at units on quarterly or semiannual recording schedules, the owner or operator must return to monthly recording of amounts of liquids removed from each sump until the level again stays below the pump operating level for two consecutive months.

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

Post-closure monitoring

Post closure cap inspection monitoring will be performed quarterly.

A5.B REMEDY SCHEDULE

[R 299.9605 and 40 CFR §264.15(c)]

Inspection Response and Corrective Action:

The Operator remedies any deterioration or malfunction of equipment or structures that 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, the Inspector reports it 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.

A5.C INSPECTION LOG OR SUMMARY

[R 299.9605 and 40 CFR §264.15(d)]

Inspection Records:

The Inspector records inspections in an Inspection Log or Summary by compiling all completed Inspection Report forms into a binder kept on-site. These records are kept for at least three years from the date of inspection. 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.

The following Inspection Report Forms are currently in use at the facility:

- 1) Operations Inspection Report
- 2) Weekly and After Storm Inspection
- 3) Post-Closure Checklist (See Attachment A11)
- 4) Weekly Leachate Collection System Inspection Form (See Attachment B5.H)
- 5) Weekly Leak Detection, Collection and Removal Inspection Form (See Attachment B5.D)

**WAYNE DISPOSAL, INC. SITE #2
ACTIVE HAZARDOUS WASTE LANDFILL OPERATIONS
INSPECTION REPORT**

Description	Yes	No*	If "No" is checked, state required corrective action	Completed Yes/No
Daily				
Daily cover properly applied to new waste at end of work day and to previously covered areas where re-cover necessary due to weathering? Integrity of daily cover acceptable in all areas? ¹				
No spilled or tracked waste in area around transfer station? ²				
Is the Wheel Wash Operational?				
Is the Sweeper or Water Truck operational?				
Wind speed monitoring equipment is on and properly functioning?				
Wind Speed Monitoring Equipment Downtime Log is up to date?				
Wind speed sensor is no more than 10 ft below the elevation at which waste is currently being placed in the landfill, is located on the southwest slope of Master Cell VI, and is approximately vertical?				
Weekly				
Containers are not damaged or deteriorating. No leaks or spills present.				
Perimeter fence, gates and locks intact and secure? ³				
Monthly				
Is the South Sedimentation Basin gate valve operational?				
Is the Landfill Fire Extinguisher present and charged?				
Quarterly				
Is there sufficient spill absorbent materials available on site				

Operating date: _____

Inspector: _____

Time: _____

¹Daily cover is ConCover or 6 inches of soil. ConCover application in accordance with manufacturer's specification and of sufficient thickness and coverage to control dust emissions. New waste covered at end of each day. Previously covered waste that is becoming exposed due to weathering of cover material must be re-covered to required specification.

²Inspect for proper housekeeping around the truck transfer area (sweeping and shoveling of any waste material that may have fallen from truck bed onto the ground surface).

³Performed daily when secondary gates are used. Inspect for vandalism, deterioration, or damage that could result in unauthorized entry to the active disposal area. Verify gates are locked.

**WAYNE DISPOSAL, INC. SITE #2
ACTIVE HAZARDOUS WASTE LANDFILL OPERATIONS
WEEKLY AND AFTER-STORM INSPECTION REPORT**

Description	Yes	No	If "No", Explain. State Corrective Action.
Is this a WEEKLY inspection?			If yes, complete ENTIRE FORM
Is this an AFTER-STORM inspection?			If yes, complete ONLY Sections B & C
A. Leak Detection, Collection, and Removal System			Section A Inspected By: _____ Date: _____
Sump riser caps present and properly seated?			
Condition of sump risers acceptable?			
No evidence of tampering?			
Is the top of the riser and sample port protected from direct contact with waste?			
Motor controller condition acceptable? Protected from weathering?			
B. Storm Water Structural Controls			Section B Inspected By: _____ Date: _____
Contact water pumps and pump controls are properly functioning?			
Contact water is contained in the cell by separator berms and condition of berms is acceptable?			
C. Dike and Interim Cover Systems			Section C Inspected By: _____ Date: _____
Interim cover free of signs of erosion which could leave waste exposed?			
Is the interim cover surface free of signs of stressed vegetation?			
Condition of perimeter dike acceptable? Able to prevent run-on into cell and runoff out of cell?			
Is the perimeter free of signs of waste outside of the active cell?			
Is the visual boundary around the active cell intact?			

Specify Type of Inspection

Check yes for the appropriate type of inspection (i.e. a weekly or an after-storm inspection).

A. Leak Detection, Collection, and Removal System

Caps required at all times to prevent contaminants from entering the sumps. Check that caps are present and properly seated.
 Inspect aboveground exterior of sump risers for damage, buckling and deterioration.
 Note if there is any evidence of tampering that could introduce contamination into the sump.
 Waste must not be in contact with the sample port or in the vicinity of the riser opening.
 If present, the pump control box must be closed and protected from weathering. If not in use the controller should be moved indoors.

B. Storm Water Structural Controls

Inspect containment berms for damage and wear that could result in failure to contain runoff either due to leakage, permeation, spillage over, or slope failure. Immediately report to the Landfill Manager (or designee) erosion, soil displacement, equipment-induced damage, cracks, wet soil during dry weather, etc.

C. Dike and Interim Cover Systems

Inspect interim cover soil for erosion which could lead to waste exposure.
 Inspect interim cover soil for signs of stressed vegetation. Immediately notify the landfill manager (or designee) of any areas of stressed vegetation for further evaluation.
 Inspect the perimeter dike for erosion and vehicle/equipment damage that could weaken the dike and/or allow runoff into the cell or runoff out of the cell. Report any exposed geosynthetics. Report tire rutting which may have damaged underlying geosynthetics.
 Inspect the perimeter of the active cell for debris that has blown outside of containment. Collect immediately and return to landfill.
 Verify visual boundary around the active cell is intact.