

PERMIT ATTACHMENT E INSPECTION PLAN

E.1 INTRODUCTION

E.2 INSPECTION LOGS FOR THE FACILITY

The inspection schedules/logs described in this section and indicated on Tables E-1 through E-3 shall be followed for the inspection of the Units noted in Section E.2.1 through E.3.4 of this Permit Attachment. If a power outage occurs during operation of the facility all activities related to the operation of the facility must cease until power is returned.

E.2.1 Daily Inspection

During each day that hazardous wastes containers are handled (e.g., containers are opened or moved) at the facility the Permittee shall inspect:

- a. The loading/unloading areas that are used, including waste handling equipment, and the containers loaded/unloaded.
- b. Treatment areas that are used, including treatment equipment.
- c. Security devices, including the perimeter fence, gates and doors, warning signs, locks, and tamper indication devices.

E.2.2 Weekly Inspection

During each week that hazardous waste management (including storage) occurs at the facility the Permittee shall at least inspect once weekly: the container storage areas, containers in which hazardous waste is stored, including container placement, integrity, sealing, labeling, dates of storage, condition of storage area (i.e., floors, walls), secondary containment (where liquid waste is stored), waste compatibility and container compatibility storage conditions.

E.2.3 Monthly Inspection

During each month that hazardous waste management occurs at the Facility, the Permittee shall at least once inspect monthly:

- a. The Safety & Emergency Equipment, including spill control equipment, fire extinguishers, decontamination equipment, external communication systems, internal communication and alarm systems, and fire suppression systems.
- b. Unit operation and structural equipment, including the floors, walls, ceilings.
- c. Treatment areas, including floors, walls, treatment equipment and tools.
- d. Supply of protective glasses and hard hats both for employees and visitors.
- e. Adequate number of sets of respirators (functional) and PPE for employees.

E.3 INSPECTION PLAN FOR THE HAZARDOUS WASTE TREATMENT AND STORAGE FACILITY

E.3.1 Daily Inspection Schedule:

During the daily inspection of items and areas listed in Table E-1, the inspecting personnel must note any repairs that are needed and ensure that they are completed promptly. Completion of any repairs shall also be documented in the Facility Operation Record.

TABLE E-1: DAILY INSPECTION SCHEDULE

Area / Item to be Inspected Daily	Criteria	Comments
SAFETY, SECURITY, AND EMERGENCY EQUIPMENT		
Fence / Gate / Signage	Make sure gates close properly and locks are in working order, the fence is intact and in good condition, warning signs are present and not faded. Does any part of the fence or gate require maintenance; Are the warning signs legible, and are they bilingual in English & Spanish?	
Emergency Eyewash / Showers, First Aid Kits	Make sure the items inspected are present, accessible, and functioning; and access to Eyewash and showers is not blocked.	
Fire Extinguishers / Suppression	Are fire extinguishers present, adequately charged, properly hanged, and tagged? Does the Suppression system have adequate pressure?	
Emergency Exits	Are emergency exits accessible and clear?	
Spill Clean Up Equipment	Is spill cleanup equipment stocked and accessible?	
TANK SYSTEM		
Tanker Truck Volume	Sudden deviations in the solvent volume will be investigated and their causes determined	
High Level Alarm	Test for oral and visual alarming	
Interstitial Monitoring System	Evidence of liquid in containment space indicating leak	
CONTAINERS, LOADING DOCK, AND FUEL BLENDING AREA		
Volume in Storage Area	Volume cannot exceed permitted storage capacity, Is the warehouse free of trash and debris?	
Containers in Storage Area	Check for evidence of leaks/spilled material on concrete floor and drains, bulging or corrosion of containers? proper closure, required labeling, is there adequate aisle space? Are containers properly stored in racking and on pallets?	
Secondary Containment	Inspect for evidence of spills, cracks or gaps, deterioration	
Loading/Unloading and Fuel Blending Area	Check that no containers of hazardous waste are left open or exposed overnight. Check for evidence of spilled material on concrete below the truck and on dock. Check for debris and refuse. Are tanker truck containers and ancillary equipment in good condition and not leaking?	

Table E-2 below presents the detailed items the Facility personnel shall inspect for, during the weekly inspections:

TABLE E-2:
WEEKLY INSPECTION SCHEDULE

Area/Equipment	Specific Item	Criteria	Comments
Safety and Emergency Equipment	Standard industrial absorbents	Is there insufficient quantity? Make sure they are not saturated with water	
	Spare containers and salvage drums	Check for evidence of corrosion, structural damage, inadequate number, check for labeling	
	Shovels	Are they damaged, missing?	
	Emergency shower and eye wash	Check for water pressure, leakage, and the drainage	
	Face shields, eyeglasses	Check for broken or dirty equipment, face shields, etc.	
	Protective clothing (impermeable full-body coveralls, foot coverings)	Are they damaged, missing?	
	Panic Doors	Are they easily opened?	
Security Devices	Perimeter fence	Check for corrosion, damage	
	Warning Signs on Perimeter fence	Make sure they are legible, not missing	
	Storage building doors	Ensure locks not missing	
	Main Gate	Ensure locking mechanism is not jammed	
	Emergency Lighting and all indoor and outdoor lighting	Replace burned out, expired lamps and batteries; also check the light switches	
	Alarms	Are they operable?	
Operating and Structural Equipment, both Outdoors and Indoors	Dikes, berms Dikes, cell walls Bases or foundation	Check for cracks in dikes, deterioration, spalling, wet spots, Check for Cracks in walls, spalling, deterioration. Erosion; uneven settlement; cracks or spalling in concrete pads, base rings, and piers; wet spots.	
	Sumps and secondary containment	Check for erosion, uneven settlement, cracks and spalling in concrete, wet spots deterioration or grating	
	Floor Joints	Check for cracks, spalling, and deterioration.	
	Ramps	Check for erosion, uneven settlement, cracks and spalling in concrete	
	Roll up doors	Check for sticking	
	Drum racks	Corroded? Deteriorated? structural integrity, wet spots	
	Roofs	Check for leaks	
	Walls	Check for Cracks, coating deterioration	
Container Storage Areas	Container placement	Aisle space, insecure placement	
	Container stacking	Containers stacked more than two high	
	Sealing of containers	Open lids, leaks, free of gaps or holes?	
	Labeling of containers, Odor, Fumes, Loading/Unloading Areas, Debris, Pallets	Improper identification, incorrect documentation, identification missing, obscured or incomplete label. Check for broken pallets/wood, warping, nails missing?	
	Dumpster/Tanker Trucks	Check for evidence of failure, leakage, label.	
	Segregation of Incompatible Waste	In same cell, Transfer containers previously used, waste in wrong cell	
Storm Water Retention Ponds	Run-off/Run-on concerns	In good condition, adequate freeboard, outlet not obstructed, no evidence of release of hazardous waste	

The Permittees shall conduct monthly inspections of the items listed below in Table E-3.

**TABLE E-3:
MONTHLY INSPECTION SCHEDULE**

Area/Equipment	Specific Item	Criteria	Comments
Safety and Emergency Equipment	Telephones	Power failure or poor transmission, functional	
	Fire alarm system	Power failure	
	Fire extinguishers	Check Expiration date, check pressure gauge for full charge	
	Air Supplied respirators	Check to see if supplied air respirators are functional	
	Fire Hydrants	Pressure, Flow	
	Panic Doors	Easily open	
Accessibility of Safety Equipment/ Protective Gear	Emergency Wear boots, gloves, clothing, duct tape, hard hats	Enough supply available	
Container Loading/Unloading Area	Check Dock leveler	Check for proper adjustment, operation, and corrosion	
	Containers, drums	condition and availability of overpack and open head drums	

E.3.2 Tanker Truck Inspections

The tank system holding the used solvent shall be inspected each operating day. The inspections shall include checks of the high-level alarm, and the volume held in the tank. Sudden deviations in the solvent volume shall be investigated and their causes determined. If necessary, repairs shall be initiated immediately. The solvent shall not exceed 95% of the tank volume at any time.

A liquid sensing leak detector is located between the two walls (secondary containment) of the tanks and the recorder chart must be checked each operating day. Any leaks detected which may indicate a leak or damage to the secondary containment must be noted and repaired immediately.

E.3.3 Container Storage Units

The container storage units or areas shall be inspected each operating day for leaks to the containers, typically Mondays through Fridays (see Tables E-1 to E-3 above). The total volume of the hazardous waste held in the drum storage area must not exceed ten times the amount that can be collected in the secondary containment system. The contents of any leaking or suspect drums must immediately be placed in a drum of adequate integrity. The drums must be properly labeled and marked in accordance with the U.S. Department of Transportation (DOT), EPA, and the New Mexico Hazardous Waste Management Regulations. The secondary containment systems must be inspected for deterioration or failure. If cracks or leaks are detected, repairs shall be initiated immediately.

E.3.4 Roll-off Dumpster

The dumpsters/roll-off container must be inspected weekly for leaks and sediment buildup. Any leaks must be noted and repaired immediately, and excess sediment must be removed from the dumpster.

E.4 DOCUMENTATION OF INSPECTIONS

The results of Daily and Weekly inspections shall be kept in the Facility Operating Record. The documentation may be recorded and maintained electronically. Any electronic inspection records shall be produced in a paper or an electronic copy at the time of a request for records by NMED.