

**PUGET SOUND NAVAL SHIPYARD (PSNS) &
INTERMEDIATE MAINTENANCE FACILITY (IMF)
ADDENDUM F
PROCEDURES TO PREVENT HAZARDS
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
03/18/2022	PSNS.2021.1F

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ADDENDUM F
PROCEDURES TO PREVENT HAZARDS

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1 **F. PROCEDURES TO PREVENT HAZARDS**

2 **F.1 Security**

3 This section describes the security structures and procedures used at the Mixed Waste Storage Facility
4 (MWSF) to prevent unauthorized entry into the facility as required by Washington Administrative Code
5 (WAC) 173-303-310.

6 **F.1.1 Security Procedures and Equipment**

7 The MWSF must have:

8 **F.1.1.1 Warning Signs**

9 Front and back entrances to the MWSF are posted (legible from a distance of 25 feet) with the following
10 information:

11 "Danger Unauthorized Personnel Keep Out"

12 "No Smoking"

13 **F.1.1.2 Barrier and Means to Control Entry**

14 The MWSF is an enclosed, windowless, concrete-walled building. The MWSF has one vehicle and two
15 personnel access doors that are kept locked except when the building is in use.

16 The MWSF is normally staffed only when waste is being placed in or removed from the facility, or for
17 inspections and surveillances. The remainder of the time, the facility is closed and locked. Access to the
18 MWSF is limited to those having a valid need for entry (e.g., MWSF operations, building maintenance,
19 inspections, etc.). A Mixed Waste Storage Facility Operator (MWSFO) must be present whenever the
20 MWSF is unlocked.

21 Additional barriers and means to control entry:

- 22 a. The MWSF is located within the Controlled Industrial Area (CIA) of Naval Base
23 Kitsap–Bremerton (NBK–Bremerton). The entrances to the CIA are restricted by security fences
24 and access-controlled gates 24 hours a day. This control of the CIA provides further prevention of
25 unauthorized access to the MWSF.
- 26 b. The CIA is located within NBK–Bremerton, which is controlled by either security personnel or
27 access-controlled gates 24 hours a day. NBK–Bremerton security patrols and security/personnel
28 lighting at perimeters and at the MWSF greatly reduce the potential for tampering or vandalism.
29 There have been no instances of tampering or vandalism since the MWSF began operating in
30 September of 1996.

31 **F.1.2 Waiver**

32 Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) is not requesting a
33 waiver to the security procedures and equipment requirements.

34 **F.2 Inspection Plan**

35 This section provides the inspection requirements to prevent malfunctions and deterioration, operator
36 errors, and discharges which may cause or lead to the release of dangerous waste constituents in
37 accordance with WAC 173-303-320.

38 **F.2.1 General Inspection Requirements**

39 The MWSF inspection includes an inspection of the facility structure, load and unload areas, security of
40 the MWSF, safety and emergency equipment, and waste containers. These inspections are intended to
41 detect and prevent deficiencies that may threaten human health and the environment.

1 The items to be inspected are listed on the Mixed Waste Storage Facility Inspection Record (MWSFIR),
2 Figure F-1. A MWSFO performs and documents an inspection on the MWSFIR at least weekly
3 (every seven calendar days). A MWSFO also performs and documents an inspection on the MWSFIR
4 when containers of mixed waste are loaded or unloaded into or out of the MWSF, or when opened or
5 moved within the MWSF, or if a spill, fire, or breach of security to the MWSF occurs.

6 The MWSF is strictly a storage facility for PSNS & IMF-generated mixed waste. The frequency of
7 inspections is based on the static nature of MWSF operations, the rate of possible deterioration of
8 equipment, and the probability of an environmental or human health incident if deterioration,
9 malfunction, or operator error goes undetected between inspections.

10 The type of deficiency identified during an inspection will determine the remedial action required and the
11 timeframe for correction (See Section F.2.3).

12 Completed MWSFIRs for the current calendar year are kept in the MWSF. At the end of each calendar
13 year, completed MWSFIRs are filed in the operating record for at least five years from the date of
14 inspection.

15 **F.2.2 Inspection Log**

16 The inspection log for the MWSF is the MWSFIR, Figure F-1. Minor additions may be made to the
17 MWSFIR that are specific to PSNS & IMF's document control requirements or to clarify completion
18 instructions. Inspection attributes will remain the same.

19 Deficiencies identified during an inspection are documented on the reverse side of the MWSFIR.
20 Completed MWSFIRs for the current calendar year are kept in the MWSF. At the end of each calendar
21 year, completed MWSFIRs are filed in the operating record for at least five years from the date of
22 inspection.

23 **F.2.3 Schedule of Remedial Actions for Problems Revealed**

24 This section provides the remedial actions for any problem revealed. The schedule for remedial actions
25 ensures problems do not lead to an environmental or health hazard. Due to the static nature of operations
26 within the MWSF, the small quantities and nature of the waste forms stored, and the operating procedures
27 employed, the risk for problems is minimal. However, PSNS & IMF will respond to all problems in a
28 timely manner.

29 PSNS & IMF anticipates known maintenance or scheduled outages that may affect the MWSF, including
30 the brief loss of electricity or water supply. PSNS & IMF will ensure that such maintenance is limited in
31 time and mitigations are put in place to protect human health and the environment.

32 **F.2.3.1 Remedial Action for Problems Revealed by Inspections**

33 PSNS & IMF initiates actions to correct any unsatisfactory condition related to mixed waste storage.
34 When a hazard to human health and the environment is imminent or has already occurred, PSNS & IMF
35 will immediately take action. The MWSFO is responsible for initiating corrective action.

36 Depending on the type of problem, the MWSFO's initial corrective action will be to invoke PSNS & IMF
37 spill procedures. PSNS & IMF spill procedures apply to the spill of radioactive material and therefore
38 dictate the use of standard radiological spill response actions "SWIM" or "WIN."

39 a. "SWIM" actions (e.g., responding to a leaking container) require the MWSFO to:

- 40 • Stop the spill by securing the source.
- 41 • Warn others in the spill area and adjacent areas.
- 42 • Isolate personnel from the spill area.
- 43 • Minimize exposure.

1 b. “WIN” actions (e.g., where the MWSFO cannot contain the spill), require the MWSFO to:

- 2 • Warn others in the spill area and adjacent areas.
- 3 • Isolate the area and maintain a safe distance from the problem.
- 4 • Notify response personnel.

5 Any deficiency that poses no immediate hazard to public health and environment and cannot be
6 immediately corrected, requires technical resolution, or requires significant allocation of labor, funding,
7 or equipment resources, is formally documented on the MWSFIR and reported to PSNS & IMF using the
8 local deficiency reporting system. The local deficiency reporting system documents the problem, assigns
9 personnel responsibility to remedy deficient conditions, obtains funding, and tracks completion dates.

10 The following are remedial actions PSNS & IMF will take if problems are revealed by inspections:

- 11 a. Storage Area Access: If the MWSF is found unlocked when not in use, immediately verify that
12 the number of containers present matches the inventory, verify that containers are sealed, and
13 inspect containers for evidence of tampering. If there is evidence of tampering, initiate taking
14 inventory of container contents immediately.
- 15 b. Load and Unload Areas: If waste is spilled in the load or unload areas, respond immediately in
16 accordance with PSNS & IMF spill procedures, and initiate Addendum G, “Contingency Plan,” if
17 required.
- 18 c. Warning Signs: If warning signs are damaged or missing, initiate repair or replacement of
19 deficient warning signs by formally documenting the deficiency using the local deficiency
20 reporting system. Provide temporary warning signs within 24 hours of discovery.
- 21 d. Facility Structure: If the building structure is damaged, leaking, or deteriorated so that the MWSF
22 is incapable of protecting stored waste from environmental conditions, immediately initiate
23 temporary actions to ensure containers are not exposed to environmental conditions. Depending
24 on the extent of the damage, permanent repairs to the facility structure may require additional
25 time for evaluation, planning, and contracting. If damage to the building poses an actual or
26 imminent hazard to human health or the environment, respond in accordance with PSNS & IMF
27 spill procedures, and initiate Addendum G, “Contingency Plan,” if required.
- 28 e. Secondary Containment and Floor Coating: If the secondary containment and floor coating is
29 damaged, cracked, or deteriorated to the extent that spilled liquid waste may enter the
30 environment (e.g., crack exposes concrete or penetrates the impervious surface), immediately
31 initiate temporary repairs and formally document the deficiency using the local deficiency
32 reporting system. Position waste containers or provide additional secondary containment for
33 liquid waste containers so that solid or liquid waste does not enter the damaged area. Depending
34 on the extent of the damage, permanent repairs to the secondary containment may require
35 additional time for evaluation, planning, and contracting. Minor surface defects that do not
36 compromise the secondary containment’s ability to contain spills of waste from entering the
37 environment shall not cause the secondary containment to be deemed “unsatisfactory.”
- 38 f. Two-Way Communication: If phones are not functional, initiate repair by formally documenting
39 the deficiency using the local deficiency reporting system. If the building is occupied, place a
40 two-way radio or cell phone in the MWSF until repairs are complete.
- 41 g. Fire Extinguishers: If inspection tags are not current or fire extinguishers are not in their
42 installation racks, initiate corrective actions by formally documenting the deficiency using the
43 local deficiency reporting system. Provide compliant fire extinguishers within 24 hours of
44 discovery.
- 45 h. Spill Kits: If spill kits are deficient, obtain replacement spill kits or replenish materials in the spill
46 kits within 24 hours of discovery. If materials or supplies must be ordered, initiate the order
47 within 24 hours of discovery.

- 1 i. Emergency eyewash and shower station: If the emergency eyewash and shower station is not
2 operational, initiate repairs by formally documenting the deficiency using the local deficiency
3 reporting system. Because the MWSF is strictly a storage facility and containers are typically not
4 opened, the MWSFO can direct personnel in the building to the nearest emergency eyewash and
5 shower station until the equipment is repaired.
- 6 j. Aisle Space: If aisle space is less than 30 inches, adjust containers to ensure a 30-inch aisle within
7 the shift.
- 8 k. Containers: If a container is leaking, immediately respond in accordance with PSNS & IMF spill
9 procedures, and initiate Addendum G, "Contingency Plan," if required. If a container is open,
10 immediately close the container. If a container is damaged or deteriorating, mitigate based on the
11 potential for spills (e.g., replace container, provide secondary containment for container, etc.)
12 within 24 hours of discovery.
- 13 l. Labels: If labels require repair or replacement, properly label immediately.

14 **F.2.3.2 Remedial Action for Major Categories of Problems**

15 PSNS & IMF maintains and operates the MWSF to minimize the possibility of a fire, explosion, or
16 unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, surface water, or
17 groundwater that could threaten human health or the environment. Major categories of problems that
18 threaten the MWSF's ability to safely operate include severe damage to the facility structure, loss of
19 secondary containment, or a fire.

- 20 a. If the facility structure is so damaged as to threaten a release, PSNS & IMF will immediately take
21 corrective action. The corrective action may include removing all storage containers and
22 potentially ceasing storage operations at the MWSF until safe storage is restored.
- 23 b. If there is a loss of secondary containment, PSNS & IMF will immediately take corrective action.
24 The corrective action may include placing a cofferdam around liquid waste containers or ceasing
25 operation at the MWSF until the secondary containment is restored. Any action must ensure that
26 waste is not released to the environment.
- 27 c. If the fire suppression system is impaired, PSNS & IMF will take action to ensure the MWSF is
28 protected from a fire. The MWSF is strictly a storage facility and sources of ignition are
29 minimized, thereby reducing the risk of a spontaneous fire. Depending on the nature of the
30 impairment, PSNS & IMF will implement corrective actions as specified per Section 15.5.2 of
31 National Fire Protection Association (NFPA) 25 (e.g., evacuation, fire watch, establishing a
32 temporary water supply, eliminating potential ignition sources, etc.) during the impairment.

33 **F.2.4 Specific Process or Waste Type Inspection Requirements**

34 **F.2.4.1 Container Inspections**

35 Containers are inspected for detection of leaks, deterioration, and identification on the MWSFIR,
36 Figure F-1. The remedies for problems identified with containers or secondary containment/floor coating
37 underlying the containers is described in Sections F.2.3.1 and F.2.3.2 above. PSNS & IMF will also
38 respond to conditions that were not anticipated when writing the permit application if the condition
39 affects the ability of the container to safely store mixed waste.

40 **F.2.4.2 Tank System Inspections, Assessments, and Corrective Actions**

41 The MWSF does not have Tank Systems.

42 **F.2.5 Storage of Ignitable or Reactive Wastes**

43 Reactive wastes will not be stored at the MWSF.

1 Annually, the MWSFO will inspect the MWSF in the presence of a Fire & Emergency Services Fire
2 Marshal. This inspection is documented in the MWSF Operating Record and includes the following
3 attributes:

- 4 a. Date and time of the inspection.
- 5 b. Name of Fire Marshal.
- 6 c. Notation of observations made.
- 7 d. Notation of remedial actions taken because of inspection.

8 **F.2.6 Air Emissions Control and Detection – Inspections, Monitoring, and Corrective** 9 **Actions**

10 The MWSF is not subject to air emission monitoring. The facility does not have process vents,
11 equipment, or tanks associated with mixed waste. Containers in the MWSF are used strictly for the
12 storage of mixed waste. No reclamation or incineration is performed at the facility.

13 **F.2.7 Process Vents**

14 The MWSF does not have Process Vents.

15 **F.2.7.1 Equipment Leaks**

16 The MWSF is used strictly for storage. There is no equipment, closed vent systems, or air emissions
17 control devices.

18 **F.2.7.2 Tanks and Containers**

19 The MWSF does not have containers associated with mixed waste processing. No tanks are present at the
20 MWSF.

21 **F.3 Preparedness and Prevention Requirements**

22 **F.3.1 Equipment Requirements**

23 The MWSF is equipped with the emergency preparedness and hazard prevention described below.

24 **F.3.1.1 Internal Communications**

25 An internal communication system is not needed. The MWSF is a small single story building. The
26 interior is an open space with no partition. A 5' x 8.33' machinery room is accessed from the outside and
27 does not access the waste storage area inside. The fire alarm system would be heard in all parts of the
28 building. A MWSFO can verbally or visually warn other personnel inside the facility during an
29 emergency or when evacuation is otherwise warranted.

30 **F.3.1.2 External Communications**

31 External communications are achieved by either a telephone or the fire alarm system. These
32 communication modes summon emergency assistance:

- 33 a. A telephone is located near the north MWSF personnel access door. Hand-held radios or cell
34 phones can also be used.
- 35 b. The horn and strobe fire alarm system is actuated by either the water flow in pre-action sprinkler
36 system, actuation of heat detector, or manually operated pull station. Four combination
37 horn/strobe annunciators are located inside the MSWF. Four fire alarm pull stations are installed:
38 one at each personnel access door and one on either side of the vehicle access door.

- 1 c. The fire alarm system consists of initiating (heat detector) and notification (horns and strobes)
2 devices connected to a Fire Alarm Control Panel (FACP). The FACP is connected to an auxiliary
3 base loop that provides an alarm signal to Navy Region Northwest Fire and Emergency Services
4 dispatch center. The FACP panel has a battery back-up system. The auxiliary base loop is tested
5 daily to verify proper operation. The fire alarm will sound locally at the MWSF and at the Navy
6 Region Northwest Fire and Emergency dispatch center. Navy Region Northwest Fire and
7 Emergency Services dispatch center will dispatch Navy Region Northwest Fire and Emergency
8 Services.

9 **F.3.1.3 Emergency Equipment**

10 Fire extinguishers are located within the MWSF near personnel access doors.

11 Spill kits are located within the MWSF near personnel access doors.

12 An emergency eyewash and shower station is located within the MWSF. If this emergency eyewash and
13 shower station is not available, an alternate emergency eyewash and shower station may be used
14 (e.g., Building 983).

15 **F.3.1.4 Water for Fire Control**

16 Water is provided at adequate volume and pressure by one of two means:

- 17 a. A pre-action sprinkler system automatically actuated by heat detectors and temperature sensitive
18 sprinkler heads.
19 b. Two fire hydrants are located approximately 100' and 115' from the building. This is within 350'
20 hose distance to all portions of the building.

21 **F.3.2 Aisle Space Requirement**

22 A minimum aisle space of 30 inches is maintained at the MWSF for unobstructed movement of
23 personnel, fire protection equipment, spill control equipment, and decontamination equipment in case of
24 emergency. This criterion is included in the MWSFIR.

25 **F.4 Preventive Procedures, Structures, and Equipment**

26 **F.4.1 Loading/Unloading Procedures**

27 A 40' by 40' area directly in front of the facility (north side) is designated as the "load/unload area."
28 Waste arrives and departs on or in vehicles (e.g., flatbed trucks) which park in this load/unload area.
29 Waste is removed from the vehicle using a lifting device (e.g., forklift) or by hand (for light loads). In the
30 event that this designated area is unavailable, containerized waste may be hand carried into the MWSF
31 via the south personnel access door. All waste is immediately transferred into the facility.

32 The load/unload area is paved with concrete and asphalt. There are no storm drains within the load/unload
33 area, however, there is a downward slope towards storm drains, directly north and east of the load/unload
34 area. If PSNS & IMF loads or unloads liquid waste, spill control materials are staged between the waste
35 being loaded or unloaded and the storm drains (3 total) to contain the spill and prevent any unauthorized
36 discharge to the storm sewer system. There are covered manholes and service trenches in and adjacent to
37 the load/unload area.

38 **F.4.2 Run-off**

39 The MWSF is an enclosed, roofed structure which prevents the accumulation of precipitation or run-on.
40 The MWSF concrete floor is sealed with an impervious coating. The floor drains to an integral collection
41 sump. The sealed floor structure extends at least 8-inches upwards around the interior perimeter of the
42 facility to form a berm. There are no drain connections in the MWSF, which precludes contamination of
43 the sanitary or storm sewer system from within the structure.

1 **F.4.3 Prevent Contamination of Water Supplies**

2 As discussed in the general facility description (Addendum B), no groundwater wells are known to be
3 operating close to NBK–Bremerton. All known existing wells are outside of and up-gradient to
4 NBK–Bremerton.

5 Run-off prevention procedures (Section F.4.2) protect water supplies from hazardous waste
6 contamination by eliminating potential run-off. Any waste spill that may occur in the MWSF is contained
7 within the MWSF.

8 Water supply for the fire suppression system and the emergency eyewash and shower station are
9 protected by a reduced pressure zone backflow preventer in accordance with WAC 246-290-490.

10 **F.4.4 Equipment and Power Failure**

11 The operations at the MWSF are largely passive in nature. The building is heated and equipped with an
12 electrical unit heater, which is not essential under normal operating conditions. The vehicle access door is
13 manually operable. Each fire control sprinkler head is equipped with a thermal link which, when exposed
14 to heat resulting from a fire within the facility, will allow flow through the sprinkler head. Should the
15 sprinkler system fail to charge water pressure to the sprinkler heads when heat is detected by the heat
16 detection system, the sprinkler system can be manually charged from the pre-action pull stations in the
17 MWSF or the mechanical room. Manually charging the system and heat activation of the sprinkler heads
18 are both mechanical operations, which do not require external power sources.

19 A power failure at the MWSF would have negligible effect. This situation would result in activation of
20 installed emergency backup lighting. Neither the fire alarm system nor the pre-action sprinkler system
21 would be affected due to the battery backup power built into each system. In the event of a battery failure,
22 the pre-action sprinkler system's control valve can be operated manually.

23 **F.4.5 Personnel Protection Procedures**

24 Workers are not directly exposed to mixed waste during typical operations in the MWSF because the
25 waste is packaged prior to delivery to the MWSF. As a result, protective clothing is not normally
26 required. In the event of a spill at the MWSF, personnel must use protective clothing and equipment to
27 prevent undue exposure to mixed waste. The MWSF is equipped with an emergency eyewash and shower
28 station for use by personnel if contact with hazardous constituents occurs. Personnel receive training in
29 safe methods for handling mixed waste as well as on the hazards of the chemicals involved.

30 **F.4.6 Procedures to Minimize Releases to the Atmosphere**

31 Wastes are stored in sealed containers. Normal operations at the MWSF are limited to the consolidation
32 of pre-sealed packages and storage of mixed waste containers. Most of the liquid waste stored at the
33 MWSF consists of aqueous solutions. Pressurized gases, fuming acids, subliming solids or gas-generating
34 reactive waste are not stored at the MWSF. Consequently, the potential for releases to the atmosphere is
35 negligible.

36 **F.5 Prevent Reaction of Ignitable, Reactive, and/or Incompatible Waste**

37 This section provides the precautions for the storage of ignitable and incompatible waste. Reactive wastes
38 will not be stored at the MWSF.

39 **F.5.1 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste**

40 Reactive wastes will not be stored at the MWSF.

1 Ignitable waste is placed into compatible packaging at the jobsite; this packaging is not opened, mixed, or
2 commingled inside of the MWSF. Smoking is not allowed within the MWSF and the exterior is posted
3 with “No Smoking” signs. The MWSF is heated by a heater located in the overhead portion of the MWSF
4 and not directly accessible to the storage area. On the rare occasion that work requiring a source of
5 ignition needs to be performed near or within the MWSF, the ignitable waste will be moved as far away
6 from the source as possible and the storage container will not be opened during the work. A description of
7 the work requiring an ignition source and the precautions to prevent ignition of ignitable waste stored will
8 be documented in the Operating Record per WAC 173-303-395(1)(c).

9 **F.5.2 Precautions for Handling Ignitable or Reactive Waste and Mixing Incompatible** 10 **Waste**

11 Reactive wastes are not expected to be stored at the MWSF.

12 Ignitable waste is placed into compatible packaging at the jobsite; this packaging is not opened inside of
13 the MWSF. Handling of ignitable wastes is limited to consolidation of pre-sealed packages into
14 compatible storage and shipping containers. At no time is the ignitable waste directly handled at the
15 MWSF.

16 **F.5.2.1 Ignitable or Reactive Wastes in Tanks**

17 The MWSF does not store ignitable or reactive waste in tanks.

18 **F.5.2.2 Incompatible Wastes in Containers or Tanks**

19 All waste within a waste stream is compatible as determined using *A Method for Determining the*
20 *Compatibility of Hazardous Wastes* (Hatayama, et al, 1980). Waste streams are packed in separate
21 Department of Transportation (DOT) containers prior to storage in the MWSF and are not commingled.

Building 1002 Mixed Waste Storage Facility Inspection Record							
Inspection Criteria		Satisfactory (S) Unsatisfactory (U)					
If an attribute is marked "Unsatisfactory", complete the back of this form. Resolve all Unsatisfactory conditions immediately, whenever possible.		Inspection					
		1	2	3	4	5	6
A. Storage Area Access – Locked when not in use							
B. Load/Unload Area – No spills in the area							
C. Warning Signs – Signs posted							
D. Facility Structure – No damage, deterioration, or roof leaks							
E. Secondary Containment and Floor Coating – No damage, deterioration, or spilled waste on the floor or in the sump							
F. Two-Way Communication – Two-way communication is operational							
G. Fire Extinguishers – Extinguishers present and inspection tags current							
H. Spill Kits – Two spill kits staged							
I. Emergency Eyewash and Shower Station – Operational and inspection tag current							
If there are container(s) in the MWSF: Mark "Y" and complete inspection attributes J – M. If there are no container(s) in the MWSF: Mark "N" and leave inspection attributes J – M Blank.		Container(s) Yes (Y) or (N)					
		Satisfactory (S) Unsatisfactory (U)					
J. Aisle space is at least 30 inches.							
K. Container(s) are closed and not leaking, damaged, or deteriorated.							
L. Label(s) are visible for inspection, legible, and not damaged or faded.							
M. Placed in storage date shown on Hazardous Waste label(s). Date of Removal From Service for Disposal shown on PCB							
Inspector's Printed Name		Inspector's Signature		Time		Date	
1							
2							
3							
4							
5							
6							

Figure F-1 Mixed Waste Storage Facility Inspection Record

