

**400 AREA WASTE MANAGEMENT UNIT
ADDENDUM I
INSPECTION REQUIREMENTS
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
09/5/2012	

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**ADDENDUM I
INSPECTION REQUIREMENTS**

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3 **ADDENDUM I**
4 **INSPECTION REQUIREMENTS**

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1 **I. INSPECTION REQUIREMENTS**

2 This section describes the method and schedule for inspection of the 400 Area WMU. The purpose of the
3 inspections are to prevent malfunctions and deterioration, operating errors, discharges, identify leaking
4 containers, improperly stored containers, and degradation of containment and safety equipment and/or
5 systems (e.g., inert gas pressure in feed line). These inspections help to ensure that situations do not exist
6 that might cause or lead to the release of waste to the environment or that might pose a threat to human
7 health. Abnormal conditions identified by inspections are corrected in accordance with WAC 173-303-
8 320(3).

9 **I.1 General Inspection Requirements**

10 The content and frequency of inspections are described in this section. Inspections, implemented through
11 operating requirements, are documented on inspection checklists and log sheets. Inspection records are
12 maintained in accordance with Permit Condition II.I.1, and contain the following information:

- 13 • Date and time of inspection.
- 14 • Printed name and the handwritten signature of the inspector.
- 15 • Notation of the observations made.
- 16 • Date and nature of any repairs or remedial actions taken.

17 The inspection checklists consist of a listing of items that are to be assessed during each inspection. For
18 each item listed, a yes/no response is made. A 'yes' response means that the item complies with the
19 conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no'
20 response on the checklist, are reported to the S & M Operations Manager.

21 **I.1.1 Types of Inspections**

22 A qualified person performs an inspection of the active 400 Area WMU storage areas and containers for
23 any signs of malfunctions, deterioration, discharges, and other anomalies. Specific items and/or problems
24 to be noted during weekly inspections include the following:

- 25 • Condition of concrete floor, curbing, and walls in the FSF
- 26 • Container structural integrity
- 27 • Containers closed
- 28 • Inert gas pressure in feed line to CCP boxes in the FSF
- 29 • Significant corrosion of containers
- 30 • Evidence of spills or leaks
- 31 • Accumulated liquids
- 32 • Container labels and markings in place, legible, and un-obscured
- 33 • Moisture in modules including condensation in the ISA storage modules

34 Monthly personnel will conduct inspections of safety equipment. Testing of the equipment will be
35 completed as necessary. These inspections and tests include portable fire extinguishers, portable
36 emergency response kit, and spill kit. For addition information, refer to Table I.1, Inspection Schedule.

37 **I.1.2 Frequency of Inspections**

38 The following inspection frequencies exist (refer to Table I.1):

- 39 • Weekly container inspections
- 40 • Monthly, fire extinguishers, emergency response kit, and spill kit

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- 1 • Daily inspections of those portions of the 400 Area WMU that are in the process of receiving
- 2 waste or transferring waste out to document any deficiencies noted and to immediately bring
- 3 deficiencies to the attention of the S & M Operations Manager.
- 4 • Annual ignitable/reactive waste storage area inspections

5 **I.2 Schedule for Remedial Action for Problems Revealed**

6 Consistent with WAC 173-303-320(3), if inspections identify leaks, spills, and/or precipitation, in the
7 secondary containment, the resultant material will be removed on a schedule that prevents hazards to
8 human health and the environment. If corrosion or other obvious structural deficiency is observed on
9 containers, corrective actions shall be pursued in a timeframe established by the S & M Operations
10 Manager.

11 On receipt and before containers are accepted for storage in the 400 Area WMU, personnel inspect each
12 container to confirm appropriate documentation, labeling, and soundness of containers. Depending on the
13 severity of any container anomalies, corrective actions could range from continued monitoring to
14 correcting on discovery or longer if procurement of needed materials and personnel are required. Other
15 conditions that are not a threat to human health and the environment will be dispositioned in a timeframe
16 established by the S & M Operations Manager.

17 **Table I.1. Inspection Schedule**

Requirement Description	Inspection Frequency	Types of Problems
Inspections of those portions of the 400 Area WMU that are in process of receiving or transferring waste out	Daily	Document any deficiencies noted and immediately bring the deficiencies to the attention of the S & M Operations Manager
Container storage areas (FSF)	Weekly	Condition of concrete floor, container structural integrity, containers closed, inert gas pressure in feed line to large boxes, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, container labels and markings in place, legible, and unobstructed
Container storage, large boxes, and unique components (ISA)	Weekly	Condition of containers/large boxes/unique components structural integrity, containers closed, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, and open and improperly sealed containers, container labels and markings in place, legible, and unobstructed, and moisture and condensate in the storage modules
Portable fire extinguishers, portable emergency response kit, and spill kit	Monthly	Check to insure that required equipment is present. Test equipment as appropriate.
Ignitable or reactive waste	Annual	Storage in compliance with WAC 173-303-395(1)(d)