

PERMIT ATTACHMENT D

INSPECTION PROCEDURES

Modified from the Permit Application, Volume I, Section 5.2

5.2 INSPECTION PROCEDURES

This section of the permit application provides written inspection guidelines and an inspection schedule for the Facility in accordance with 20 NMAC 4.1.

5.2.1 General Inspection Procedures

Facility personnel will conduct inspections of all equipment and structures as frequently as necessary to prevent, detect, or respond to environmental or human health hazards. Inspection records describing malfunctions, deteriorations, operator errors, and discharges that may cause or contribute to a release of hazardous waste constituents to the environment or that may be a threat to human health will be kept at the Facility administration building for three years from the date of the inspection. Specific inspection procedures are outlined in Sections 5.2.2 through 5.2.10.

Personnel will receive general training about hazardous waste inspections as part of the Facility hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the Facility will receive classroom and/or on-the-job training in inspection procedures. Inspection procedures will be described in the operating manual, which will be located in the EC's office.

Facility guards will make rounds of the Facility at least once daily to detect any unauthorized entry to the Facility or any other abnormalities. The guards will not use inspection checklists, but they will notify the Emergency Coordinator (EC) and/or emergency response personnel of any spills or other emergencies. Requirements for the EC and/or emergency response personnel, subsequent to an inspection notification, are outlined in Permit Attachment C, *Contingency Plan*.

5.2.1.1 Inspection Checklist

Inspection checklists and an inspection schedule have been developed to ensure that inspections occur at appropriate frequencies. An inspection schedule matrix is provided in Permit Attachment D1, *Inspection Schedules and Checklists*, Table 5-1. This matrix will be expanded, as necessary, to reflect new equipment or changes to existing equipment inspection frequencies.

Inspection frequencies will vary according to the type and age of the equipment, the frequency of its use, and its importance in preventing environmental incidents. The inspection frequencies provided in Table 5-1 show that inspections will occur frequently so that problems can be identified in time to correct them before harm is done to human health or the environment.

The inspection checklists will identify the name of the inspector, date and time of the inspection, frequency of inspection, specific items to be checked, any notations or observations of abnormalities, and the nature and date of any corrective actions taken. Checklists are also provided in Permit Attachment D1. The inspection schedules will be kept in the office of the Emergency Coordinator (EC).

When new or modified equipment is installed or used at the Facility, the inspection procedures, forms, and schedule will be revised to reflect these changes and submitted to NMED.

5.2.1.2 Remedial Action

Facility personnel or contract personnel will remedy any deterioration or malfunction of equipment or structures encountered during inspections. The remedy will be completed in sufficient time to ensure that the problem does not result in an environmental or human health hazard.

All repairs to permitted portions of the Facility will be made in accordance with the original construction specifications and Construction Quality Assurance (CQA) plan.

If a hazardous or potentially hazardous condition is identified, the EC, as specified in the Contingency Plan, will be notified immediately to assess the situation and determine how to correct the situation and whether the Contingency Plan should be implemented.

5.2.2 Landfill Inspection Procedures

Landfill liners and the cover will be inspected during and immediately after installation in accordance with the CQA Plan, which is discussed in Permit Attachment A, *General Facility Description and Information*, Section 2.5.2.3, and contained in Permit Attachment M, *Construction Quality Assurance Plan*.

The landfill and associated equipment will be inspected weekly and after storms unless otherwise specified. Records of the inspections will be maintained in the operating record, which will be kept in the administration building.

If deterioration or any other abnormalities are noted during inspection of the landfill or associated components, the inspector's supervisor will be notified and will determine the appropriate course of action for correction. If the supervisor is not available, the EC will be summoned to make the determination.

The landfill will be inspected by properly trained personnel weekly and after storms for such items as spills, leaks, odors, wind-blown particulate matter, any evidence of deterioration of the landfill itself, and any malfunction or improper operation of the run-on/run-off control systems. All inspections will be documented on the landfill inspection checklist, described in Section 5.2.1.1 and contained in Permit Attachment D1. Inspection checklists will be kept for at least 3 years, in accordance with 40 CFR 264.15(d).

During the active life and during closure of the landfill, the LCRS and LDRS will be checked daily for the presence of liquid. The amount of water in the system can be used to determine if the system is functioning properly. The system will either be inspected through the cleanout pipe, which is connected to the primary collection pipe and the sump riser pipe, or with magnehelic gages or other liquid detection devices, if they are installed. The leachate collection tank will be inspected in accordance with the procedures outlined in Section 5.2.5.

During the operational phase of the landfill, periodic checks will be made within the landfill to detect the presence of hazardous gases and volatile organics. Surveys of the active landfill surface area and the riser pipes with an Organic Vapor Meter (OVM) or comparable device will be performed quarterly to detect the presence of organic compounds.

If it is evident that particulate matter from the landfill is subject to dispersal by the wind, the active portion of the landfill will either be covered or managed to control the dispersal (see Permit Attachment A, Section

2.5.1.7). Adding water to prevent wind erosion will be limited so that ponding in the landfill does not occur. If the dispersion is noted during an inspection, the landfill supervisor will notify the sprayer truck operator to rectify the situation.

The stormwater collection and holding unit associated with the run-off/run-on control systems will be inspected to ensure that liquid has not accidentally accumulated. The collection system will be emptied as quickly as possible to ensure that the design capacity of the system is not exceeded.

5.2.3 Evaporation Pond Inspection Procedures

Evaporation pond liners will be inspected during and immediately after construction and installation in accordance with the CQA Plan, which is discussed in Permit Attachment A, Section 2.5.2.3, and contained in Permit Attachment M.

While the evaporation pond is in operation, it will be inspected daily to detect any sudden drops in the level of the pond's contents and to measure the volume of and remove any liquid that has accumulated in the leachate collection and leak detection sumps. The daily inspections will also serve to ensure that there is no potential for overtopping by wind or wave action. Since all discharges into the pond will be monitored, visual inspections will be adequate.

Other inspection items, such as condition of berms, warning signs, and surrounding area, will be checked weekly and after storms. Weekly visual inspections will also be conducted to verify the integrity of the liners and associated systems. Visible portions of the leachate collection pipes and pump will be visually inspected weekly for deterioration. The concrete pad for tanker discharge will be visually inspected weekly for accumulation of liquids. The area around the pond will be inspected weekly for any signs of deterioration, leaks, erosion, etc. The evaporation pond berms will be inspected for any sign of abnormal deterioration, which may include excessive sloughing or the development of significant cracks. All of the above inspections will be used to assess the integrity of the surface impoundments.

An inspection checklist for the evaporation pond is provided in Permit Attachment D1.

5.2.4 Container Storage Area Inspection Procedures

Weekly visual inspections of container storage areas (drum storage area and roll off storage area) will be performed to identify the status of warning signs, condition of containers and labels, availability and accessibility of spill control and PPE, and the adequacy of aisle space and access/egress routes. Containers will be inspected for any signs of excessive corrosion, buckles, dents, holes, other structural defects or deterioration, and over-pressurization. An inspection checklist for container areas is provided in Permit Attachment D1.

If a container is found to be in poor condition, the inspector's supervisor will be notified, who will either arrange to transfer the hazardous waste to a new container, repair the existing container as specified by the manufacturer, or place the container in an overpack drum.

Containers used for storing liquids will be stored in a secondary containment area described in Permit Attachment A, Section 2.2. These areas will be inspected weekly during the container storage area inspections. The inspections will focus on (1) the condition of sump pits and trenches to ensure that they are free of cracks or gaps and are sufficiently impervious to contain leaks, spills, and accumulated liquids until the collected material is detected and removed; (2) pump operation; and, (3) placement of containers to ensure

that designed liquid flow paths are not obstructed. A record of the inspection will be maintained in the operating record, which will be kept in the administration building.

Spilled or leaked waste or accumulated precipitation that requires removal to prevent overflow of collection systems that is identified during inspection will be removed in a timely manner.

5.2.5 Tank Inspection Procedures

Tanks containing or treating waste will be inspected daily. Tanks containing stored waste include the liquid waste storage tanks and the leachate storage tanks for the landfill. These inspections will focus on the status of warning signs, the adequacy and availability of spill control and PPE, the adequacy of access routes, and the condition of the tanks, ancillary equipment, and monitoring and leak detection systems. The inspection will focus on (1) overflow control; (2) equipment condition to detect any signs of corrosion or releases of waste from the tanks or ancillary equipment; (3) data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated in accordance with design specifications; and, (4) the Cathodic Protection Systems, as installed.

Secondary containment areas in which tanks are located will be inspected daily during the tank inspections. These inspections will focus on the condition of the containment surface to ensure that it is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, or accumulated liquids until the collected material is detected and removed. Inspection records will be maintained in the Facility operating record, which will be kept in the administration building. An inspection checklist for tanks is provided in Permit Attachment D1.

5.2.6 Stabilization Unit Inspection Procedures

Inspection of the stabilization unit will be conducted according to the procedures specified in Section 5.2.5. The inspections will be conducted on days when the unit is operating and daily when waste is in storage. Additional inspection requirements are described in Section 2.4.6. Inspection records will be maintained in the administration building. The concrete vault area will be inspected monthly. If liquids are found they will be removed with a portable pump and transported to the liquid waste unit.

5.2.7 Security Equipment Inspection Procedures

Security inspections will be conducted daily and will include the following elements:

- visual inspection of the warning signs at all approaches to the Facility to ensure that the signs are present, legible, and securely attached to the fence;
- inspection of the Facility perimeter to ensure the integrity of the fence and gate by looking for signs of erosion of soil at the fence posts and corrosion or vandalism to the fence, fence posts, or locks;
- inspection and replacement, as necessary, of lights for the purpose of illuminating the Facility at night;
- inspection of structures for signs of erosion, tampering, or vandalism; and,
- records of inspections will be maintained in the administration building.

5.2.8 Safety and Emergency Response Equipment Inspection Procedures

Safety and emergency response equipment inspections will occur monthly. This category of equipment includes first aid supplies; respiratory protection equipment (other than personally issued respirators, which will be each employee's responsibility); protective clothing, including hard hats, gloves, and suits; fire extinguishers; eye wash stations; safety showers; empty 55-gallon drums; shovels; and spill cleanup and decontamination kits.

A monthly inventory of safety-related supplies and equipment will be performed to ensure that the items are available, in good condition, and at designated locations. Inadequate or missing items will be replaced or repaired.

Fire protection equipment, including fire extinguishers and fire hoses, will be inspected monthly and after each use to ensure that the equipment is capable of functioning properly and that access to the equipment is not blocked. Each fire extinguisher will be inspected to ensure that the seal around the handle is intact, that the pressure gauge indicates that the unit is adequately charged, and that an Underwriter's Laboratory listing label is attached to each unit. Building sprinkler systems will be inspected according to manufacturer specifications. Chemical fire-suppression systems will be checked to ensure that adequate quantities of the chemical and water exist. The fire-suppression vehicles will also be tuned up at least annually and inspected monthly. Records of inspections will be maintained in the administration building for each unit.

The public address (PA) system will be tested daily to ensure proper operation. In lieu of daily testing, the Facility may opt to broadcast music 24 hours a day, which ensures proper operation of the unit at all times.

Hand-held radios will be tested prior to use each day and periodically throughout the day. The units will be recharged after each shift to ensure that they are operating properly.

5.2.9 Loading and Unloading Area Inspection Procedures

Waste loading and unloading areas will be inspected daily when in use. The inspections will focus on integrity of the containment structure and safety-related issues that could lead to hazards or waste spills. Signs will be located at each loading and unloading area indicating that equipment or materials should not be left unattended as they could be obstructions for the loading and unloading operation.

Onsite roadways and vehicle traffic areas will be inspected on a preventive maintenance order (PMO) schedule to ensure that potential safety hazards, such as road surface deterioration, are minimized or avoided. Records of inspections will be maintained in the administration building for each unit.

5.2.10 Truck Wash Area Inspection Procedures

The sump and sediment bins will be inspected weekly for the accumulation of sediment and liquids in the sump and will be removed to the wash water storage tank. The wash water collected at the truck wash area will be sampled according to Permit Attachment F, *Waste Analysis Plan*, Section 4.6, and analyzed according to Permit Attachment F, Section 4.5.6.