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ADDENDUM I
INSPECTION REQUIREMENTS

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ADDENDUM I
INSPECTION REQUIREMENTS

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1 **ADDENDUM I**
2 **INSPECTION REQUIREMENTS**

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4 **I INSPECTION REQUIREMENTS**

5 **I.1 Inspection Plan**

6 This section describes the method(s) and schedule for inspection of the Central Waste Complex (CWC).
7 The purpose of inspections is to identify leaking containers, improperly stored containers, and
8 degradation of containment and safety equipment and/or systems. These inspections help to ensure that
9 situations do not exist that might cause or lead to the release of dangerous waste constituents to the
10 environment or that might pose a threat to human health. Abnormal conditions identified by inspections
11 must be corrected on a schedule that prevents hazards to personnel, the public, and the environment as
12 determined by a solid waste operations supervisor. In addition to the requirements in Permit
13 Condition II.X, the Permittees shall ensure that container storage areas at CWC are maintained in
14 accordance with [WAC 173-303-630](#)(7). The Permittees shall ensure that CWC inspections, at a
15 minimum, meet the requirements of [WAC 173-303-320](#)(2) and [WAC 173-303-630](#)(6).

16 **I.1.1 General Inspection Requirements**

17 The content and frequency of inspections are described in this section and Table I.1. The inspections are
18 documented on inspection checklists and log sheets. The schedule and inspection records are maintained
19 in accordance with Permit Condition II.X.1. Inspection records are retained in accordance with Permit
20 Condition II.X.2. Inspection records are maintained in the Hanford Facility Operating Record, CWC File
21 and retained in accordance with Permit Condition II.I.1.

22 The inspections are performed by personnel qualified to inspect CWC storage areas. The inspection
23 checklists consist of a listing of items that are to be assessed during each inspection when dangerous
24 waste is being managed at the location. A yes/no response is made for each listed item. A 'yes' response
25 means that the item is in compliance with the conditions stated on the checklist. Any problems identified
26 during the inspection, as indicated by a 'no' response on the checklist, are reported to the CWC, operating
27 organization.

28 **I.1.1.1 Types of Problems**

29 CWC's inspections include, but are not limited to, the following:

- 30
- 31 • Condition of storage
 - 32 • Condition of safety and emergency equipment
 - 33 • Condition of security equipment.

34 Discrepancies are noted in the additional information section of the checklist. When completed, the
35 inspector prints their name, signs, and dates the inspection checklist, and sends a copy to the Hanford
36 Facility Operating Record, CWC File. The inspection checklist is stored in accordance with Permit
37 Condition II.X.3.

38 **I.1.1.2 Frequency of Inspections**

39 In accordance with [WAC 173-303-320](#), the inspection schedule for CWC, including the frequency of
40 inspections, is identified in Table I.1. As required by [WAC 173-303-395](#)(1)(d), a Fire Protection
41 Engineer performs annual fire inspections of the CWC. The assessment includes the date and time of the
42 inspection, the name of the professional inspector, a notation of the observations made, and any remedial
43 actions which were taken as a result of the inspection. The completed fire protection facility assessment
44 is included in the Hanford Facility Operating Record, CWC File. Fire protection equipment and storage
building alarms are tested and inspected as identified in Table I.1.

1 **I.1.2 Schedule for Remedial Action for Problems Revealed**

2 Problems identified will be remediated in accordance with Permit Condition II.X.4.

3 **I.1.3 Specific Process Inspection Requirements**

4 Table I.1 describes the specific process inspection requirements for CWC.

5 **I.1.3.1 Container Inspection**

6 Specific items and/or problems to be noted during weekly inspections include the following:

- 7 • Condition of concrete floor, curbing, and walls.
- 8 • Deterioration of Containers.
- 9 • Containers closed.
- 10 • Evidence of spills or leaks.
- 11 • Container labels and markings in place, legible, and unobscured.
- 12 • Appropriate aisle spacing.
- 13 • Containment used to meet the requirements of [WAC 173-303-630](#)(7).

14 **I.1.3.2 Container Receipt and Inspection**

15 On receipt in accordance with Addendum B, Section B.2.1.1, each container for storage is inspected by
16 operations personnel to confirm appropriate documentation and compliance with the waste acceptance
17 criteria before the container is accepted for storage. Refer to Section I.1.2 on remedial actions for
18 problems revealed.

19 **Table I.1 WAC 173-303-320(2) Inspection Schedule**

Requirement Description	Frequency	Inspection
Areas subject to spills	Daily ¹	Check for spills
Container storage areas	Weekly ²	Check for leaks, spills, accumulated liquids, properly sealed containers; waste compatible
Posted warning signs	Weekly ²	Verify signs are present, legible, and visible at 25 feet
Container labels	Weekly ²	Visible and readable; and adequate identification of risks
Containers/container storage areas including aisle space	Weekly ²	Refer to Section I.1.3.1
Ignitable or reactive waste	Annual	Storage in compliance with Hanford Site fire protection standards and WAC 173-303-630 (8).
Curbing, floor and sumps	Weekly ²	Verify no deterioration of containment system caused by corrosion or other factors
Spill response kits	Quarterly	Equipment present and functional
Safety showers, eyewash stations, fire extinguishers, emergency lighting	Monthly	Equipment present and functional
Automatic fire suppression systems	Monthly	Verify system is pressurized

20 Reference: [WAC 173-303-630](#), Use and management of containers
21 [WAC 173-303-320](#), General Inspection
22 [WAC 173-303-395](#)(1)(d), Other General Requirements

¹ To implement WAC 173-303-320(2)(c), “daily when in use” is defined as when dangerous waste management activities have a potential for spill to occur such as moving containers.

² Weekly inspection logs prepared to meet WAC 173-303-630(6) will be completed when dangerous waste is being managed within the LLBG - Trenches 31 & 34 storage areas. If the storage area is empty, “no waste in storage” or equivalent words will be entered on the inspection log.

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