

HAZARDOUS WASTE STORAGE AREA INSPECTIONS

Why Inspect?

To detect malfunctions, deterioration, operating errors, or discharges that could lead to a release of hazardous waste to the environment, or a threat to human health

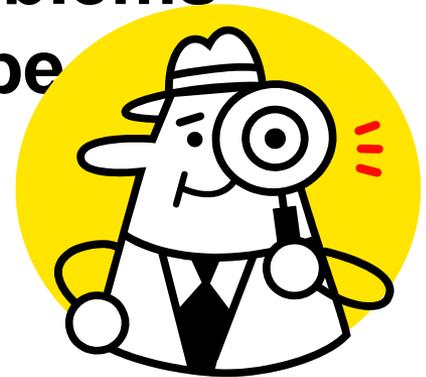
- ▶ Releases, or things that could cause releases

Finding the Rules

- ▶ Env-Hw 509.02(a)(1)
 - “Comply with 40 CFR 265.15, Inspection”
 - These are EPA rules that NH follows, and are included in the back of the chapter

General Inspection Requirements

- ▶ Write and follow a written schedule
- ▶ Schedule must identify types of problems (malfunctions or deteriorations) to be looked for during the inspection
 - Leaks
 - Monitoring equipment
 - Security devices, and operating and structural equipment
 - e.g., inoperative sump pump, leaking fitting, eroding dike, etc...



40 CFR 265.15(b)(4)

- ▶ At a minimum, the inspection schedule must include the items and frequencies called for in §§ 265.174, 265.193, 265.195, 265.226, 265.260, 265.278, 265.304, 265.347, 265.377, 265.403, 265.1033, 265.1052, 265.1053, 265.1058, and 265.1084 through 265.1090 of this part, where applicable.

- ▶ **Schedule must tell how often you will inspect the storage areas:**
 - 90-Day Storage Areas – every 7 days or less
 - Tanks – every day hazardous waste is in the tank
 - Satellite Storage Areas – monthly if >10 gal.

General Inspection Requirements



Develop a written inspection **log**

-You do the work, take credit for it

40 CFR 265.15(d)

At a minimum, the log of recorded inspections must include:

- ▶ the date of the inspection;
- ▶ the time of the inspection;
- ▶ the full name of the inspector;
- ▶ a notation of the observations made; and
- ▶ the date and nature of any repairs or other remedial actions.

Records Retention

- ▶ Keep all inspection logs for at least three years
- ▶ Keep available at the facility
 - It does not have to be at the waste storage area

A few ideas

- ▶ Have another qualified person do inspections once in a while. You can get stale, and overlook problems when you're the only person doing the check.
- ▶ Make your inspection checklists as comprehensive as practicable. It's your chance to pick up on many compliance items that aren't required to be included in the checklist.
- ▶ If there's no waste in the storage area, say so.