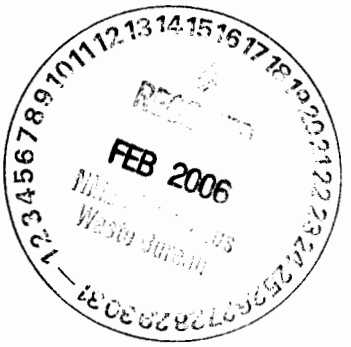
LANL Permit

DEPARTMENT OF ENERGY
National Nuclear Security Administration
Los Alamos Site Office
Los Alamos, New Mexico 87544

FEB 1 6 2006



Mr. John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Transmittal of the U.S. Department of Energy-National Nuclear Security Administration (DOE-NNSA)/University of California (UC) Class 1 Permit Modification to the Inspection Plan of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit

This letter transmits to the New Mexico Environment Department (NMED), the DOE-NNSA/UC a Class 1 permit modification to Attachment B-1 of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. Attachment B-1 is the inspection record form that is contained within the Inspection Plan.

The permit modification has been prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1, Subpart IX (20.4.1.900 NMAC) (incorporating Code of Federal Regulations [CFR] , Title 40 § 270.42(a)(1)), revised October 1, 2003. The attached permit modification package includes a revised inspection record form for insertion into the LANL Hazardous Waste Facility Permit. This form is currently included as Attachment B-1 of the Attachment B, Inspection Plan. This modification is an administrative and informational change and the update of the form does not change the frequency or content of the inspections conducted at the LANL permitted container storage units. The use of this form will be fully implemented at the permitted storage units no later than 90 days after the submittal of this permit modification.

Changes to the inspection record form are necessary in order to aid in creating consistency in the content of inspections at hazardous waste management units across LANL. These changes decrease the likelihood that inconsistencies within different versions of the form will impact the quality of the inspections. Notification of this modification will be sent to the NMED-maintained LANL facility mailing list after implementation in accordance with 20.4.1.900 NMAC (incorporating 40 CFR § 270.42(a)(1)(ii)).

NNSA/DOE
Los Alamos Site Office
528 35th Street
Los Alamos, NM 87544-2201

NNSA/DOE
Headquarters
1000 Independence Avenue, SW
Washington, DC 20585-1290

16301

Included herein are three hard copies and one electronic copy of this submittal. The electronic copy includes files containing editing marks as well as a clean version of the inspection record form and the instructions. The hard copy packages include only the clean version of the form and instructions. If you have any comments or questions regarding this submittal, please contact me at (505) 667-5794 or Jack Ellvinger, UC, at (505) 667-0633.

Sincerely,

Gene Turner

ES:3GT-006

Gene Turner
Environmental Permitting Manager

cc w/enclosure:
Laurie King, Chief (6PD-N)
New Mexico/Federal Facilities Section
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

cc w/out enclosure:
James Bearzi, Chief
Hazardous Waste Bureau
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M. Romero, NWIS, LANL, MS-J963
J. Ellvinger, RRES-SWRC, LANL, MS-K490

LA-UR-06-0877

Approved for public release: distribution is unlimited.

Title:	Los Alamos National Laboratory Hazardous Waste Facility Permit Class 1 Modification- Attachment B-1
Author(s):	
Submitted to:	New Mexico Environment Department- Hazardous Waste Bureau

Form 836 (8/00)

Attachment B-1

Hazardous and Mixed Waste Facility

Inspection Record Form

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

[1] FACILITY:	[2] Site ID #:	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	[3] START DATE:	[4] END DATE:

[5] Containers Landfill Chemical Treatment Tank Miscellaneous Unit (OB/OD, Cementation)

PART I- Enter condition of the item inspected (i.e. **OK**, **NA** [Not Applicable], or **AR** [Action Required]) in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
All TSDs								
[6] NO UNIT USE	No waste stored							
[7] NO WASTE HANDLING	No waste handled/treated (see instructions)							
[8] COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
[9] WARNING SIGNS	Posted, legible, and bilingual							
[10] SECURITY	Good condition of fences, gates, locks, and other access control equipment							
[11] WORK SURFACES/ FLOORS/ROADS	Absence of conditions that could lead to an accident or spill							
[12] SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
[13] EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
[14] WIND SOCK	Proper operating condition and no damage							
[15] SECONDARY CONTAINMENT	Integrity- No standing water/waste, erosion, or other signs of a spill							
[16] (UN)LOADING AREA	No spills or deterioration							
[17] RUN-ON/OFF CONTROL	Integrity- no ponding, erosion, or damage							
Container Storage Units and/or Tanks (see instructions)								
[18] COVERS/LIDS OF CONTAINERS	Closed and secured properly							
[19] LABELS	Proper labels with start date, present & legible							
[20] COMPATIBILITY	Separated according to compatibility							
[21] INTEGRITY	No leakage, deterioration, corrosion, or damage							
[22] AISLE SPACE/STACKING	Appropriateness and adequacy							
[23] PALLETS AND RAISED CONTAINERS	Absence of conditions that could result in failure							
[24] TANK SYSTEMS	Discharge controls and fill level and no corrosion or leakage							
Other TSDs								
[25] SHAFTS/LANDFILL COVERS	Presence and condition of cover							
[26] OPEN BURNING UNITS	Condition of cover, and no erosion, leakage, or deterioration							
[27] OPEN DETONATION UNITS	Unit and vegetation condition and no erosion							
[28] CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:

	MON	TUE	WED	THU	FRI	SAT	SUN
[29] DATE							
[30] TIME							
[31] INSPECTOR(S)							

Part II- For any AR (Action Required) in PART I, describe below: action required, action taken, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

32

Part III- Comments.

33

Instructions for the Hazardous and Mixed Waste Facility Inspection Record
Treatment, Storage, or Disposal Units (TSDs)

Part I

Weekly and daily inspection of TSDs will be conducted in accordance with the inspection plan in most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or the LANL Hazardous Waste Facility Permit, as appropriate. Not all items in this section will apply to all facilities. An "NA" (not applicable) is required if the item does not apply. Facilities may shade parts of the form to indicate items that need to be completed only on a weekly basis. Holidays and Laboratory closures can also be noted (e.g., by writing "H" (for holidays) or "Closed" in the first box and drawing a line all the way down the page).

1. Location information, including TA, building, room (if applicable), and any other location descriptors that may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).
2. A site identification number is assigned to every facility by the Solid Waste Regulatory Compliance Group (ENV-SWRC). This allows for ease in identification.
3. Start date of Monday for the week of record.
4. End date of Sunday for the week of record.
5. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from ENV-SWRC to combine inspections for more than one unit.
6. For container storage units only – "NO USE" may be checked (or marked "OK") if waste was not stored at the unit for the week in question. When this box is checked, the individual responsible for the inspection must only complete this box, the items related to site location (Items 1-5), and the inspector name section for that week (Items 29-31). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.
7. a. At a container storage unit if waste is in storage but no waste is handled at the unit for the week– "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
   b. If a treatment unit is not conducting treatment for the week – "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Equipment must be present in accordance with the appropriate contingency plan.
9. Required signs must be legible and prominently posted. Units must be equipped with bilingual (English/Spanish) signs with the legend "DANGER UNAUTHORIZED PERSONNEL KEEP OUT" legible from 25 ft away at each entrance to each TSD. Container storage units are required to have signs that read "HAZARDOUS WASTE STORAGE AREA" spaced 50 feet apart and legible from 25 feet away.
10. Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition.
11. Roads, process floors, and other work surfaces at TSDs must be inspected for any conditions that could lead to a spill or an accident.
12. Hazardous or mixed waste TSDs must have fire control and spill control equipment. Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans.

13. Where present, eyewashes and safety showers must be inspected to ensure proper operating condition. Outdoor locations must be checked for freezing.
14. Wind socks, where present at TSDs, must be inspected to ensure that they are in proper operating condition and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked.
16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.
17. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.
18. All tanks and containers used for storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container while waste is being placed into or removed from a container.
19. All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE," and EPA Hazardous Waste Numbers or hazardous waste constituents. They must also be marked with a legible accumulation start date. All containers must be dated when they arrive at the facility and no hazardous or mixed waste may be stored for over one year, unless specifically exempted.
20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction.
21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage that may impact integrity. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 23 below).
22. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. Containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space and containers may not be stacked more than 3 high, unless otherwise specified for the facility (i.e. some units within the LANL Hazardous Waste Facility Permit must have an aisle space of 28 inches and only 55 gallon drums may be stored three high). Please consult ENV-SWRC for permit related questions.
23. Hazardous or mixed waste containers stored at TSDs must be on pallets, elevated, or otherwise raised to be protected from contact with accumulated liquid.

TANKS SYSTEMS:

24. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion,

deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.

SHAFTS:

25. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion. Disposal shafts and shafts used for retrievable storage should have their covers securely in place and guard rails must be installed and in good condition. Landfill covers must be inspected at least weekly and after storms for evidence of erosion, subsidence, and water intrusion.

OPEN BURNING UNITS:

26. Open burning units must be inspected for deterioration, leakage, vegetation in the immediate vicinity that could catch fire, and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

OPEN DETONATION UNITS:

27. Open detonation units must be inspected for deterioration, leakage, or vegetation in the immediate vicinity that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

CEMENTATION UNITS:

28. The structural integrity and condition of equipment and systems must be inspected on cementation units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

FOR ALL INSPECTIONS:

29. Record of the date of the current inspection. Only one date is given for each inspection, whether a team or an individual performs the inspection.
30. Record of the time of the current inspection. Only one time is given for each inspection, whether a team or an individual performs the inspection.
31. Legible and/or printed name of each inspector involved in the current inspection.

Part II

List any action required.

32. Document any action taken immediately and express any plans for future action to be taken. Also, ensure that previous ARs are closed out with completed actions described. If the AR has not been resolved, ensure that it is carried over to the current inspection. If necessary, attach additional sheets to inspection record form to efficiently cover the action taken or required. Initial any information or comments added, and if more than one action is required or conducted, assign a number to each AR. Attach additional sheets if necessary.

Part III

Identify any comments.

33. Document informational comments associated with the current inspection that do not require specific regulatory action or remedies.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kenneth M. Hargis

2/8/06

Kenneth M. Hargis
Division Leader
Environmental Stewardship Division
Los Alamos National Laboratory

Date Signed

2/16/06

Edwin L. Wilmot
Manager, Los Alamos Site Office
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

Date Signed

Attachment B-1

Hazardous and Mixed Waste Facility

Inspection Record Form

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

[1] FACILITY: [2] ~~Site ID #:~~	[2] Site ID #:[3] ~~<90-DAY ACCUMULATION AREA~~	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	[34] START DATE:	[54] END DATE:

[65] Containers Landfill ~~Thermal Treatment~~ ~~Physical Treatment~~ ~~Biological Treatment~~ Chemical Treatment Tank ~~UST~~ Miscellaneous Unit (OB/OD, Cementation)

PART I- Enter condition of the item inspected **(**i.e. **OK**, **NA** [Not Applicable], or **AR** [Action Required]**)** in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
All TSDs								
[76] NO UNIT USE	No waste ~~handled~~stored ~~opened, moved, received, treated, or removed; or~~and ~~no waste stored~~							
[7] NO WASTE HANDLING	No waste handled/treated (see instructions)							
[8] COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
[9] WARNING SIGNS	Posted, legible, and bilingual							
[10] SECURITY	Good ~~C~~condition of fences, gates, locks, and other access control equipment							
[11] WORK SURFACES/ FLOORS/ROADS	Absence of ~~ny~~ conditions that could lead to an accident or spill							
[12] SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
[13] EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
[14] WIND SOCK	Proper operating condition and ~~checked for~~ no damage							
[15] SECONDARY CONTAINMENT	Integrity- No ~~S~~standing water/waste, ~~integrity, surrounding vegetation, and~~ erosion, or other signs of a spill							
[16] (UN)LOADING AREA	No spills or deterioration							
[176] RUN-ON/OFF CONTROL	Integrity- no ~~P~~ponding, ~~integrity,~~ erosion, ~~and~~or damage							
Container Storage Units and/or Tanks (see instructions)								
[178] COVERS/LIDS OF CONTAINERS	Closed and secured properly							
[198] LABELS	Proper labels with start date ~~on all tanks and containers~~, present & legible							
~~[19] ACCUMULATION START DATE~~	~~Present, legible, and not exceeding limit~~							
[20] COMPATIBILITY	Separated according to compatibility							
[21] INTEGRITY ~~(Containers, tanks, and ancillary equipment)~~	~~Integrity,~~No leakage, deterioration, corrosion, ~~and~~or damage							

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

202 (UN)LOADING AREA	No Sspills andor deterioration							
223 AISLE SPACE/STACKING	Appropriateness and adequacy							
234 PALLETS AND RAISED CONTAINERS	Absence of Any conditions that could result in failure							
245 TANK SYSTEMS (Aboveground portions)	Discharge controls and, leakage, fill level, and no corrosion or leakage							
26 TREATMENT TANKS	Proper operating condition and leakage							
Other TSDs								
257 SHAFTS/LANDFILL COVERS	Presence and condition of cover							
248 FILTER VESSELS (for open burning)	Sand condition and no Ddeterioration and sand condition							
269 OPEN BURNING UNITS	Deterioration, vegetation, sSand, Condition of cover, condition, and no erosion, leakage, and coveror deterioration							
2730 OPEN DETONATION UNITS	Unit and vegetation Ccondition, vegetation, and no erosion							
2831 CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:

	MON	TUE	WED	THU	FRI	SAT	SUN
DATE							
TIME							
SIGNATURE OF INSPECTOR(S)							

~~FACILITY:~~	~~Site ID #:~~	~~START DATE:~~	~~END DATE:~~

Part II- For any AR (Action Required) in PART I, describe below: action required, action taken, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

Part III- Comments.

33

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

Instruction for Use of the Hazardous and Mixed Waste Facility Inspection Record Form

Part I

TO BE CONDUCTED FOR ALL INSPECTIONS:

(Not all items in this section will apply to all facilities. An "NA" ([not applicable]) is required if the item does not apply. Weekly and daily inspection of TSDs will be conducted in accordance with the inspection plan in most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or the LANL Hazardous Waste Facility Permit, as appropriate. Not all items in this section will apply to all facilities. An "NA" (not applicable) is required if the item does not apply. Facilities may shade parts of the form to indicate items that need to be completed only on a weekly basis. Holidays and Laboratory closures can also be noted (e.g., by writing "H" (for holidays) or "Closed" in the first box and drawing a line all the way down the page).

1. FACILITY: Location information, including TA, building, and room (if applicable), and any . Oother location descriptors that may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).

2. Site ID Number: A siten identification number is assigned to every facility by the Solid Waste Regulatory Compliance Group (ENV-SWRC). This allows for ease in identification of a certain TSD unit <90-day accumulation area.

Start

4. <90-DAY ACCUMULATION AREA: Should be checked if this location is intended for operation in accordance with generator requirements for storage of hazardous or mixed waste for less than 90 days.

TREATMENT, STORAGE, OR DISPOSAL (TSD) UNIT: Should be checked if this location is listed in LANL's Hazardous Waste Facility Permit or General Part A Permit Application as a TSD operation.

3. START DATE: The date of Monday for the week of recordthe actual first working day of the week.

4. END DATE: End The date of Sunday for the week of recordthe actual last working day of the week.

5. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from RRESENV-SWRC to combine inspections for more than one unit.

12. For container storage units only – "NO USE" may be checked (or marked "OK") if waste was not stored at the unit for the week in question. When this box is checked, the individual responsible for the inspection

must only complete this box, the items related to site location (Items 1-5), and the inspector name section for that week (Items 29-31). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.

6.

7. a. At a container storage unit if waste is in storage but no waste is handled at the unit for the week– "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.

   b. If a treatment unit is not conducting treatment for the week – "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.

~~a.~~

~~For container storage units only – "NO USE" M~~may be checked ~~(or marked "OK")~~ if waste was not stored ~~,~~ received at, moved, or opened (to add or remove waste) within, treated at, or removed from a unit for the dayweek in question. ~~For some inspections that are performed weekly, "NO USE" may be checked if no waste was stored. In the situation that this box is checked, the individual responsible for the inspection must only complete this box, the items related to site location (Items 1-5) and the signature section for that day/week (Items 2-3). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the inspection plan.~~

~~List "NA" to show normal nonworking days. Holidays and Laboratory closures should also be noted (e.g., by writing "H" (for holidays) or "Closed" in the first box and drawing a line all the way down the page). f waste is in storage but waste is for the week~~

Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). ~~Consultation with RRESENV SWRC prior to~~ Equipment must be present in accordance with the appropriate contingency plan~~use of the facility/location is available, if necessary~~.

8.

9. ~~89.~~ Required signs must be legible and prominently posted. ~~TSD unit~~Units must be equipped with bilingual (English/Spanish) signs with the legend "DANGER UNAUTHORIZED PERSONNEL KEEP OUT~~.~~" legible from 25 ft away at each entrance to each TSD. ~~and <90-day accumulation areas must be identified with a sign with the legend "<90-DAY HAZARDOUS WASTE STORAGE AREA."~~ Container storage~~TSD~~ units are required to have signs that read "HAZARDOUS WASTE STORAGE AREA" spaced 50 feet apart and legible from 25 feet away.

~~9.~~

~~11.~~10. ~~The TSD unit or <90-day accumulation area s~~Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition.

Roads,

~~P~~process floors, and other work surfaces at TSD~~ unit~~s must be inspected for any conditions that could lead to a spill or an accident.

11.

~~13. 12~~1. Hazardous or mixed waste TSD~~ unit~~s ~~and <90-day accumulation areas~~ must have fire control and spill control equipment. ~~TSD units will be in compliance with the Laboratory's Hazardous Waste Facility Permit Contingency Plan.~~ Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. ~~-~~Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans.

12.

~~12.~~

~~15.~~13. ~~If~~ Where present, eyewashes and safety showers must be inspected to ensure proper operating condition. Outdoor locations must be checked for freezing.

~~13.~~14. Wind socks, where present at TSD~~ unit~~s, must be inspected to ensure that they are in proper operating condition and checked for damage.

~~17.~~Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked.

15.

16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.

~~15.~~17. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.

~~16.~~18. All tanks and containers used for ~~treating or~~ storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container ~~during treatment (if it is part of the treatment), and~~ while waste is being placed into or removed from a container.

~~20.~~ All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE~~,~~." and EPA Hazardous Waste Numbers or hazardous waste constituents.

~~17.~~19. ~~All containers and tanks of hazardous or mixed waste in <90-day accumulation areas~~ They must also be marked with a legible ~~the~~ accumulation start date. ~~This date must be legible. At <90-day accumulation areas, containers must be marked with the accumulation start date at the time the container first receives any waste. For <90-day accumulation areas, no containers may exceed 90 days from the accumulation start date to the time they are delivered to a permitted treatment, storage, or disposal unit. At TSD units, a~~All containers must be dated when they arrive at the facility and~~. At TSD units,~~ no hazardous or mixed waste may be stored for over one year, unless specifically exempted.

~~18.~~20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction.

~~19.~~21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage that may impact integrity. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 2~~5~~3 below).

~~24.Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.~~

~~21.~~22. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. ~~All c~~Containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space and containers may not be stacked more than 3 high, unless otherwise specified for the facility (i.e. some units within the LANL Hazardous Waste Facility Permit must have an aisle space of 28 inches and only 55 gallon drums may be stored three high). Please consult ENV-SWRC for permit related questions.

~~22.~~23. Hazardous or mixed waste containers stored at TSD ~~unit~~s ~~and <90-day accumulation areas~~ must be ~~stored~~ on pallets, elevated, or otherwise raised to ~~protected~~be protected from contact with accumulated liquid.

TANKS SYSTEMS:

~~23.~~24. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion, deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.

~~28. Hazardous and mixed waste treatment tanks must be operated within the design specifications and in accordance with standard operating procedures and work plans. Tanks must be inspected for leakage or damage prior to operation.~~

SHAFTS:

~~24.~~25. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion. Disposal shafts and shafts used for retrievable storage should have their covers securely in place and guard rails must be installed and in good condition. Landfill covers must be inspected at least weekly and after storms for evidence of erosion, subsidence, and water intrusion.

~~FILTER VESSELS:~~

~~30. The condition and adequacy of sand must be inspected in filter vessels. The vessels must also be inspected for deterioration and damage.~~

OPEN BURNING UNITS:

~~25.~~26. Open burning units must be inspected for deterioration, leakage, vegetation in the immediate vicinity that could catch fire, ~~the condition of sand (as appropriate),~~ and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

OPEN DETONATION UNITS:

~~26.~~27. Open detonation units must be inspected for deterioration, leakage, or vegetation in the immediate vicinity that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

CEMENTATION UNITS:

~~27.~~28. The structural integrity and condition of equipment and systems must be inspected on cementation units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

FOR ALL INSPECTIONS:

~~32~~299. ~~———~~Record of the date of the current inspection. Only one date is given for each inspection, whether a team or an individual performs the inspection.

~~33~~30~~3~~0. ~~———~~Record of the time of the current inspection. Only one time is given for each inspection, whether a team or an individual performs the inspection.

31~~4~~. Legible and/or printed name

~~Signature~~ of each inspector involved in the current inspection.

Part II

List any action required.

32~~2~~. Document any action taken immediately and express any plans for future action to be taken. Also, ensure that previous ARs are closed out with completed actions described. If the AR has not been resolved, ensure that it is carried over to the current inspection. If necessary, attach additional sheets to ~~IRF~~ inspection record form to efficiently cover the action taken or required. Initial any information or comments added, and if more than one action is required or conducted, assign a number to each AR. Attach additional sheets if necessary.

Part III

Identify any comments.

33. Document informational comments associated with the current inspection that do not require specific regulatory action or remedies.

Attachment B-1

Hazardous and Mixed Waste Facility

Inspection Record Form

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

[1] FACILITY:	[2] Site ID #:	TREATMENT, STORAGE, OR DISPOSAL UNIT (TSD)	[3] START DATE:	[4] END DATE:

[5] Containers Landfill Chemical Treatment Tank Miscellaneous Unit (OB/OD, Cementation)

PART I- Enter condition of the item inspected **(**i.e. **OK**, **NA** [Not Applicable], or **AR** [Action Required]**)** in column for day inspected.

ITEM	INSPECTED FOR:	MON	TUE	WED	THU	FRI	SAT	SUN
All TSDs								
[6] NO UNIT USE	No waste stored							
[7] NO WASTE HANDLING	No waste handled/treated (see instructions)							
[8] COMMUNICATIONS EQUIPMENT	Availability and proper operating condition							
[9] WARNING SIGNS	Posted, legible, and bilingual							
[10] SECURITY	Good condition of fences, gates, locks, and other access control equipment							
[11] WORK SURFACES/ FLOORS/ROADS	Absence of conditions that could lead to an accident or spill							
[12] SPILL/FIRE EQUIPMENT	Present, appropriate, and in proper operating condition							
[13] EYEWASHES/ SAFETY SHOWERS	Proper operating condition							
[14] WIND SOCK	Proper operating condition and no damage							
[15] SECONDARY CONTAINMENT	Integrity- No standing water/waste, erosion, or other signs of a spill							
[16] (UN)LOADING AREA	No spills or deterioration							
[17] RUN-ON/OFF CONTROL	Integrity- no ponding, erosion, or damage							
Container Storage Units and/or Tanks (see instructions)								
[18] COVERS/LIDS OF CONTAINERS	Closed and secured properly							
[19]LABELS	Proper labels with start date, present & legible							
[20] COMPATIBILITY	Separated according to compatibility							
[21] INTEGRITY	No leakage, deterioration, corrosion, or damage							
[22] AISLE SPACE/STACKING	Appropriateness and adequacy							
[23] PALLETS AND RAISED CONTAINERS	Absence of conditions that could result in failure							
[24] TANK SYSTEMS	Discharge controls and fill level and no corrosion or leakage							
Other TSDs								
[25] SHAFTS/LANDFILL COVERS	Presence and condition of cover							
[26] OPEN BURNING UNITS	Condition of cover, and no erosion, leakage, or deterioration							
[27] OPEN DETONATION UNITS	Unit and vegetation condition and no erosion							
[28] CEMENTATION UNITS	Structural integrity and condition of equipment and systems							

HAZARDOUS AND MIXED WASTE FACILITY INSPECTION RECORD FORM

FACILITY:	Site ID #:	START DATE:	END DATE:

	MON	TUE	WED	THU	FRI	SAT	SUN
[29] **DATE**							
[30] **TIME**							
[31] **INSPECTOR(S)**							

Part II- For any AR (Action Required) in PART I, describe below: action required, action taken, date, and time of action. Attach additional sheets if necessary. If more than one action is required, number each AR.

[32]

Part III- Comments.

[33]

Instructions for the Hazardous and Mixed Waste Facility Inspection Record
Treatment, Storage, or Disposal Units (TSDs)

Part I

Weekly and daily inspection of TSDs will be conducted in accordance with the inspection plan in most recent Los Alamos National Laboratory (LANL) General Part B Permit Application or the LANL Hazardous Waste Facility Permit, as appropriate. Not all items in this section will apply to all facilities. An "NA" (not applicable) is required if the item does not apply. Facilities may shade parts of the form to indicate items that need to be completed only on a weekly basis. Holidays and Laboratory closures can also be noted (e.g., by writing "H" (for holidays) or "Closed" in the first box and drawing a line all the way down the page).

1. Location information, including TA, building, room (if applicable), and any other location descriptors that may be necessary (e.g., TA-59-3-114 or TA-59-1-S, Dock).
2. A site identification number is assigned to every facility by the Solid Waste Regulatory Compliance Group (ENV-SWRC). This allows for ease in identification.
3. Start date of Monday for the week of record.
4. End date of Sunday for the week of record.
5. Check the appropriate box for the type of operation. Several boxes may be checked, if necessary, for those locations where inspections are combined on a single sheet. You must have prior approval from ENV-SWRC to combine inspections for more than one unit.
6. For container storage units only – "NO USE" may be checked (or marked "OK") if waste was not stored at the unit for the week in question. When this box is checked, the individual responsible for the inspection must only complete this box, the items related to site location (Items 1-5), and the inspector name section for that week (Items 29-31). If any hazardous or mixed waste is subsequently placed at the site for any reason, a full inspection must be performed immediately and then subsequently according to the appropriate inspection plan.
7. a. At a container storage unit if waste is in storage but no waste is handled at the unit for the week– "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
   b. If a treatment unit is not conducting treatment for the week – "NO USE" may be checked, but a weekly inspection in accordance with the appropriate inspection plan must be conducted.
8. Communication equipment must be inspected in order to ensure availability and proper operating condition for each piece of equipment (e.g., telephones, radios, and alarms). Equipment must be present in accordance with the appropriate contingency plan.
9. Required signs must be legible and prominently posted. Units must be equipped with bilingual (English/Spanish) signs with the legend "DANGER UNAUTHORIZED PERSONNEL KEEP OUT" legible from 25 ft away at each entrance to each TSD. Container storage units are required to have signs that read "HAZARDOUS WASTE STORAGE AREA" spaced 50 feet apart and legible from 25 feet away.
10. Site security must be verified. Items such as fences, gates, locks, and other access control equipment (as appropriate) should be checked for proper operating condition.
11. Roads, process floors, and other work surfaces at TSDs must be inspected for any conditions that could lead to a spill or an accident.
12. Hazardous or mixed waste TSDs must have fire control and spill control equipment. Equipment must be present, in proper operating condition, and appropriate for the material in question. Hose bibs, where present, should be inspected for proper operating condition and adequate pressure. Outdoor fire-water supply systems must be checked for freezing and damage. Equipment must be inspected and present in accordance with the appropriate inspection and contingency plans.

13. Where present, eyewashes and safety showers must be inspected to ensure proper operating condition. Outdoor locations must be checked for freezing.
14. Wind socks, where present at TSDs, must be inspected to ensure that they are in proper operating condition and checked for damage.
15. Secondary containment structures for hazardous or mixed waste operations must be inspected to verify proper operating condition and to ensure adequate capacity. Structures must also be inspected for the presence of standing water or hazardous/mixed waste or any other indication of a spill (i.e. discolored vegetation, soil, or concrete). For certain operations, secondary containment includes inspection of gloves, gloveboxes, hoods, and ventilation systems. For locations where inflatable "Porta Berms" are used, inspectors must ensure that they are adequately inflated. All monitoring and leak detection systems must also be checked.
16. Loading and unloading areas must be inspected daily when in use for signs of damage or deterioration that may lead to an accident or spill. This includes asphalt covered areas and areas where containers or tanks are handled or the contents thereof are transferred.
17. Run-on and runoff controls, wherever present, must be checked. The integrity should be inspected by looking for signs of damage, erosion, ponding, or any other conditions that could lead to a spill or an accident.
18. All tanks and containers used for storing hazardous or mixed waste must have the cover or lid securely in place. Containers are not considered to be closed until the lid/cover is fastened in the manner the manufacturer originally intended. However, the lid may be off of a tank or container while waste is being placed into or removed from a container.
19. All containers and tanks containing hazardous or mixed waste must be labeled with the words "HAZARDOUS WASTE," and EPA Hazardous Waste Numbers or hazardous waste constituents. They must also be marked with a legible accumulation start date. All containers must be dated when they arrive at the facility and no hazardous or mixed waste may be stored for over one year, unless specifically exempted.
20. All hazardous or mixed waste containers holding materials that may be incompatible with any other materials at that location must be separated from those materials by dikes, berms, or other physical barriers to prevent a possible reaction.
21. All containers and tanks must be checked for structural integrity, leakage, corrosion, or damage that may impact integrity. This includes checking the condition of all construction materials, fixtures, seams, and auxiliary equipment. There are special inspection criteria for tank systems (see Item 23 below).
22. Adequate aisle space must be maintained to allow for inspection and for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. Containers of hazardous and mixed waste must be stored in a manner that ensures a minimum 2-foot aisle space and containers may not be stacked more than 3 high, unless otherwise specified for the facility (i.e. some units within the LANL Hazardous Waste Facility Permit must have an aisle space of 28 inches and only 55 gallon drums may be stored three high). Please consult ENV-SWRC for permit related questions.
23. Hazardous or mixed waste containers stored at TSDs must be on pallets, elevated, or otherwise raised to be protected from contact with accumulated liquid.

TANKS SYSTEMS:

24. For tank systems used for treatment or storage of hazardous or mixed waste, all aboveground portions of the tank system, including any and all ancillary plumbing, must be inspected for signs of leaking, corrosion,

deterioration, or improper operation. Tanks must be operated with a minimum freeboard of 6 inches. If the tank system includes discharge controls, overtopping controls, tank level alarms, or other monitoring equipment, including leak detection equipment, all controls and relevant data must be checked to ensure they are operating properly and that operation is within design specifications for the system.

SHAFTS:

25. Shafts used for retrievable storage should have their covers securely in place and the surrounding area should show no evidence of erosion. Disposal shafts and shafts used for retrievable storage should have their covers securely in place and guard rails must be installed and in good condition. Landfill covers must be inspected at least weekly and after storms for evidence of erosion, subsidence, and water intrusion.

OPEN BURNING UNITS:

26. Open burning units must be inspected for deterioration, leakage, vegetation in the immediate vicinity that could catch fire, and assure that the unit is covered when not in use. Inspectors must also look for explosives and debris not consumed during the burn.

OPEN DETONATION UNITS:

27. Open detonation units must be inspected for deterioration, leakage, or vegetation in the immediate vicinity that could catch fire. Inspectors must also look for explosives and debris not consumed by the detonation.

CEMENTATION UNITS:

28. The structural integrity and condition of equipment and systems must be inspected on cementation units. Units must also be inspected for signs of leaking, corrosion, deterioration, or improper operation.

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Part III

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