

Attachment D

Inspection Procedures

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1 INSPECTION PROCEDURES

This section of the permit application provides written inspection guidelines and an inspection schedule for the Facility in accordance with 20.4.1.500 NMAC.

1.1 General Inspection Procedures

Facility personnel shall conduct inspections of all equipment and structures 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 shall be kept at the Facility's administration building for three years from the date of the inspection and be maintained in the operating record until closure of the landfill is completed. Specific inspection procedures are outlined in Sections 1.2 through 1.6.

Personnel shall 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 shall receive classroom and/or on-the-job training in inspection procedures. Inspection procedures shall be described in the operating manual, which will be located in the Emergency Coordinator's (ECs's) office.

Facility guards shall make rounds of the Facility at least once daily to check for any unauthorized entry to the Facility or any other abnormalities. The guards will not use inspection checklists, but they shall notify the 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.

1.1.1 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 as Table D-1 in Permit Attachment D1, Inspection Schedules and Checklists. This matrix shall 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 D-1 indicate that inspections will be conducted frequently with the goal of identifying problems in time to correct them before harm is done to human health or the environment.

The inspection checklists shall identify the name of the inspector, date and time of the inspection, the 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 shall be kept in the office of the EC.

When new or modified equipment is installed or used at the Facility, the inspection procedures, forms, and schedule shall be revised to reflect these changes and must be submitted to NMED within 15 days of implementation of the change(s).

1.1.2 Remedial Action

Facility personnel or contract personnel shall remedy any deterioration or malfunction of equipment or structures encountered during inspections. The remedy shall 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 shall 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, shall be notified immediately to assess the situation and determine how to correct the situation and whether the Contingency Plan should be implemented.

1.2 Landfill Inspection Procedures

Landfill liners and the cover shall be inspected during and immediately after installation in accordance with the CQA Plan, which is discussed in Permit Attachment A, Section 2.2.2.c, Construction Quality Assurance Plan, and contained in Permit Attachment M, Construction Quality Assurance Plan.

The landfill and associated equipment shall be inspected weekly and after storms unless otherwise specified. Records of the inspections shall 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 shall be notified and shall determine the appropriate course of action for correction. If the supervisor is not available, the EC shall be summoned to make the determination.

The landfill shall 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/runoff control systems. All inspections shall be documented on the landfill inspection checklist, described in Section 1.1.1 and contained in Permit Attachment D1. Inspection checklists shall be kept be maintained

in the operating record until closure of the landfill is completed. and in accordance with 40 CFR § 264.15(d).

During the active life and during closure of the landfill, the leachate collection and recovery system (LCRS) and leak detection and removal system (LDRS) shall be checked daily for the presence of liquids. The amount of liquid in the system can be used to determine if the system is functioning properly. The system shall 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 shall be inspected in accordance with the procedures outlined in Section 1.3.

During the operational phase of the landfill, periodic checks shall 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 shall be, at a minimum, performed monthly 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 shall either be covered or managed to control the dispersal (see Permit Attachment A, Section 2.2.1.g, Wind Dispersal Control Procedures). Adding water to prevent wind erosion shall be limited to prevent ponding in the landfill. If the dispersion is noted during an inspection, the landfill supervisor shall notify the sprayer truck operator to rectify the situation as soon as practicable.

The stormwater collection basin within the landfill associated with the runoff/run-on control systems shall be inspected to monitor whether stormwater accumulated following each storm event. Stormwater collected within the landfill that has the potential to have contacted waste will be managed by enhanced evaporation through recirculation on the landfill soil cover. The recirculation system is described in the Engineering Report in Permit Attachment L. The collection basin shall be emptied as quickly as possible to ensure that the design capacity of the system is not exceeded.

1.3 Tank Inspection Procedures

Leachate collection tanks will be used to store leachate as needed. While storing leachate, the leachate storage tank shall be inspected daily along with the daily inspection to check for leachate in the LCRS and LDRS. These inspections shall focus on the status of warning signs, the adequacy and availability of spill control and personal protective equipment (PPE), the adequacy of access routes, and the condition of the tanks, ancillary equipment, and monitoring and leak detection systems. The inspection shall focus on (1) overfill 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 shall

be inspected daily during the tank inspections. These inspections shall 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 shall 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.

1.4 Security Equipment Inspection Procedures

Security inspections shall 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.

1.5 Safety and Emergency Response Equipment Inspection Procedures

Safety and emergency response equipment inspections shall be conducted 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 shall be performed to ensure that the items are available, in good condition, and at designated locations. Inadequate or missing items shall be replaced or repaired.

Fire protection equipment, including fire extinguishers and fire hoses, shall 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 shall 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 shall be inspected according to manufacturer specifications. Chemical fire-suppression systems shall be checked to ensure that adequate quantities of the chemical and water exist. The fire-suppression vehicles also shall be tuned up at least annually and inspected monthly. Records of inspections shall be maintained in the administration building for each unit.

The public address (PA) system shall 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 shall 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.

1.6 Loading and Unloading Area Inspection Procedures

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

On-site roadways and vehicle traffic areas shall 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 shall be maintained in the administration building for each unit.