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INTERIM MEASURES WORKPLAN

FOR OMEGA CHEMICAL CORP
FACILITY AT WHITTIER, CALIFORNIA

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INTERIM MEASURES WORKPLAN

PURPOSE

The purpose of Interim Measures is to prevent imminent threats from being realized while a long-term comprehensive response is being developed. Interim measures may encompass a broad range of possible actions including control of the source of a release, control of the contaminanted medium or other exposure controls.

SCOPE

Interim Measures consists of two tasks
Task I: Interim Measures Workplan
Task II: Implementation of Interim Measures

Current Conditions Report

Facility Background

Omega Chemical Corp (OCC) has operated since 1976, a chemical recycling and treatment facility at 12504 E. Whittier Blvd., Whittier, Los Angeles County, California (Figure 2-1). Both corporate and operating facilities are located at the Whittier facility. It has operated the facility under the DBA Omega Recovery Services since 1984.

OCC presently operates as a RCRA Interim Status Hazardous Waste Management Facility and has submitted a Part B Application dated October 29, 1990, and revised Part B application January 20, 1991. In addition, OCC currently operates under a Conditional Use Permit issued by the city of Whittier. The facility operates a variety of waste management units and operational processes including distillation columns, thin film evaporating systems, holding tanks, and drum storage areas.

OCC receives a variety of hazardous wastes and recyclable materials from generators primarily in the commercial and industrial markets as well as air conditioning and refrigeration related industries. These materials are treated and/or disposed through the generation of new products for sale. azardous residues and sludges generated by the facility are generally transported to a Class I treatment facilities using the waste primarily as an alternative fuel for recyling in accordance with DHS regulations.

2.2 Prelimnary Activities

In order to be in compliance with the Consent order, the Interim Measures workplan has been proposed so that while the RCRA Facility Investigation (RFI) Workplan is prepared and accepted by the EPA any possible contamination or releases are controlled and reduced to minimal levels.

- o Task 1 -Interim Measures Workplan
- o Task 2 -Implementation of Interim Measures

Objectives of the Interim measures

a. Security at the facility by constructing a higher fence and assuring no open, unguarded gates.

b. Source control by immediately inspecting all potential sources of contamination such as leaking drums and inadequately stacked drums. Any leaking drums with hazardous waste should be repacked and processed or moved to an appropriate Class 1 facility.

How the measure will mitigate a potential

By increasing the height of the fence to the legal limit, it will reduce the possibility of unauthorized access to the facility. All gates will be locked when not attended.

With inspection of the facility for leaking or inadequately stacked drum, it will reduce the probability of any waste material leaking onto the site and possible ground contamination.

Design, construction,, operation , and maintenance requirements

The facility has a fence surrounding the entire property. The fence on the west side of the property will be raised to the maximum allowed height as stated in the City of Whittier building codes of six feet with additional restrictive wires at the top to impede any unauthorized access to the property.

All gates to the facility are locked when not in use and unattended. An intruder alarm which is triggered by movement has been installed. This alarm is connected by phone to a 24 hour service as well as a local on site audio alarm. When activated, it will call selected company individuals and the local police department if warranted.

Source control at the facility will be maintained by following an Inspection Plan (Amendment A). This plan will require the daily inspection of the facility for any leaking or inadequately stacked drums. The Inspection Plan requires a daily report to be maintained of the results of this inspection. These reports will be kept and made available to the laison of the EPA Region IX.

Schedules for design, construction and monitoring;

The adding to the current fencing of the facility will commence within 15 days of the approval of the Interim Measures Workplan by the EPA Region IX.

The alarm has been installed at the facility.

The Inspection Plan has already been implemented and records of the daily inspection are kept at the facility for review.

Schedule for progress reports

Monthly progress reports will be submitted to the contact individual at the EPA Region IX on the first of each month.

APPENDIX E

INSPECTION PLAN

OMEGA RECOVERY SERVICES

12504 E. WHITTIER BLVD.
WHITTIER, CALIFORNIA

EPA ID # CAD042245001

Dated October 29, 1990

PREFACE

The OMEGA has developed this Inspection Plan as an integral part of the RCRA Part B Permit Application for its facility located in Whittier, California. Inspection procedures described herein are designed to ensure that facility equipment and structures are operating properly and that a waste release has not/will not occur that may threaten human health or the environment. The procedures set forth in this plan dictate that the OMEGA facility will be in compliance with all requirements of 40 CFR 264.15 and CAC, Title 22, Division 4, Chapter 30, Section 67104. A copy of this plan is maintained in the administrative offices of the facility at all times.

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INSPECTION PLAN

1.0 INTRODUCTION

This Inspection Plan provides a mechanism for the regulatory community to understand how the OMEGA facility's inspection program is designed. Inspections are intended to prevent and detect system malfunctions, equipment deterioration, and operator errors which, if allowed to continue without remedial action, may ultimately lead to a release of hazardous waste constituents to the environment or create a threat to human health. Inspections also are designed to provide an early warning of the potential for such events in order that corrective and preventive actions may be taken in a timely manner.

The inspection program consists of three elements:
1) general facility inspection,
2) inspection of facility support activities, and
3) inspection of waste storage and treatment units.

The first element focuses on items which apply to facility-wide operations. Site security, safety, emergency, and surface water management devices and equipment are included in this category. The second inspection category covers specific facility support operations, including the laboratory and maintenance shop. Finally, the last category focuses on the facility's various waste management and storage units, such as the drum storage unit, waste storage/treatment tanks, and distillation systems. The inspection plan for the waste management units encompasses the process specific monitoring and control systems and associated containment and unloading structures.

Inspections are performed according to the inspection schedule developed for each unit based on engineering knowledge and operational experience with the systems and processes involved. Each element of a process or system is inspected with sufficient frequency so as to alert facility personnel prior to development of a serious problem. A trained inspector evaluates and assesses each item representing a potential malfunction, equipment deterioration, or operator- error through regular observation of the process and procedures. The level of response and its timing are determined by the nature and seriousness of the problem identified, with protection of personnel and the prevention of adverse environmental impact being of paramount importance.

2.0 INSPECTION PROGRAM ADMINISTRATION

The facility General Manager is responsible for implementation of the inspection program. Facility inspectors have the staff responsibility of performing the actual inspections. Reports of the inspection results, with appropriate documentation, are made by the inspector directly to the General Manager or his/her designee. The General Manager or his/her designee is responsible for directing the appropriate facility functional units to implement required remedial and corrective measures. The General Manager may delegate portions of his/her responsibilities to other staff members.

The inspection schedules provided in this Inspection Plan reflect current and proposed facility operations. Schedules may be modified periodically to accommodate the changing nature of facility operations and to reflect the experience and knowledge gained during prior inspections.

2.1 PERSONNEL QUALIFICATIONS

Inspections are conducted by qualified individuals with the responsibility to detect any unsafe condition at the facility. Inspectors are trained in inspection and follow-up procedures, documentation and recordkeeping requirements, and various safety and Contingency Plan procedures. Each inspector is familiar with the location of the equipment and systems to be inspected and their normal configuration. The qualifications and duties of facility inspectors are included in Position Description forms that are maintained at the facility.

2.2 HAZARD ASSESSMENT AND EVALUATION PROCEDURES

If a discrepancy is observed during an inspection, the inspector and/or supervisor determines the potential for personnel injury or for release of hazardous waste constituents, and assesses the nature and timing of remedial action required. This determination takes into consideration:

(1) the location and nature of the problem,
(2) the presence of secondary containment or control,
(3) the amount and type of waste material involved,
(4) the potential for human exposure, and
(5) the likelihood of waste migration.

Open lines of communication are maintained with the facility's Emergency Coordinator and General Manager, and their judgment and advice are solicited regarding physical constraints and scope of corrective actions, response timing, interim controls, and countermeasures.

When an inspection indicates equipment malfunction or deterioration, or any other improper condition, the following actions are taken:

Assess the situation

Determine the corrective/remedial measures needed in response to the situation, including appropriate interim measures

Establish the time frame within which the remedial action must occur. For emergency or near-emergency situations, prompt verbal reports are made to the General Manager, to be followed later with written reports. For minor discrepancies, routine written reporting procedures, as discussed later, are followed

Provide adequate follow-up to verify that the specified response has occurred and that the situation has been resolved satisfactorily.

2.3 DOCUMENTATION AND RECORDKEEPING

Inspections are conducted and documented using forms specifically designed to contain all pertinent information. (See Figure 1) The inspection checklist section of the form indicates the status of designated equipment or structures. The inspection report forms are prepared in advance to include pertinent items of equipment to be inspected according to the specific schedules included in this Inspection Plan. The inspector is required to enter his/her name, the date and time of the inspection, and any observation on the inspection form. These forms may be modified periodically to accommodate the changing needs of the facility or to reflect the knowledge and experience gained during prior inspections.

In the event that an element is found unacceptable, the inspector's assessment, including notations regarding

the urgency of the required response, are marked in a separate Corrective Action Report. (See Figure 2) This form is used to initiate corrective action and to document whether each discrepancy noted during an earlier inspection has been corrected adequately. The form identifies the equipment or process unit involved, the nature of the discrepancy noted, and the date of the inspection. It also describes requisite response actions, the date by which these are to be accomplished, and the name of the person responsible for such actions. The form is delivered to the Plant Manager's office for review and appropriate action. A copy is routed to the inspector for use as a reinspection reminder and follow-up documentation.

The lower portion of the Remedial Work Order form provides space for a reinspection report. During his/her next scheduled inspection following the date by which the corrective work was be completed, the inspector confirms that the corrective action has been made. When completed, the reinspection form is submitted to the General Manager's office for filing with the facility's inspection log.

In cases where specialized outside contractors are used to perform testing or inspection services (e.g., ultrasonic testing of tanks), the results are reported on the contractor's forms. These reports are incorporated into the inspection log when received.

All completed forms and attachments are accumulated in the facility's operating records and are retained at the facility for a minimum period of three years from the date of an inspection.

3.0 GENERAL FACILITY INSPECTION

General facility inspection activities encompass the facility perimeter and those items within the property that are common (i.e., not process-specific) to all operations. They include:

Security devices
Surface water management systems
Safety and emergency equipment.

The general inspection schedules, including inspection parameters and frequency, are determined by the types of problems that potentially can occur. These include:

> Breach of security, either intentional or unintentional, by persons, animals, or natural (e.g., climatological) events. Such breaches may occur due to: (1) failure of the surveillance system, (2) damage to fences, natural barriers, or entry control structures, or (3) obstruction, damage, or loss of warning signs
>
> Failure, absence, or inaccessibility of safety and emergency equipment.

The general inspection schedules and elements, described on Tables I through 3, are based on the facility's operational mode, potential failure modes, and an assessment of the hazard magnitude posed by a particular malfunction, failure, or discrepancy.

4.0 FACILITY SUPPORT ACTIVITIES INSPECTION

The laboratory and maintenance area support facility waste management operations. Equipment and structures at these two facilities are inspected regularly for malfunction, deterioration, or failure that could endanger human health or the environment. The types of potential problems and the hazards uniquely

associated with each facility are used to establish the elements (parameters) and frequency of inspection presented in the following sections.

4.1 LABORATORY

The principal source of concern at the facility's chemical laboratory is the potentia*l for an inadvertent spill or release of hazardous waste constituents due to the improper handling, storage, or disposal of samples and reagents. Failure of the ventilation or hooding system, improper placement or storage of samples, and contamination of sampling and testing equipment also are inspection concerns. Pertinent inspection parameters and the current schedule of inspection for the on-site laboratory are shown on Table 4.

4.2 MAINTENANCE AREA

The major concern at the maintenance shop is the potential for spills while servicing facility vehicles or repairing operational or safety equipment. The service areas are inspected daily to verify the absence of spills or verify the proper clean-up and removal of spilled materials and used absorbents. Table 5 describes the elements and frequency of inspection of the maintenance shop.

5.0 WASTE STORAGE/PROCESSING UNIT'S INSPECTION

Equipment and structures at each waste storage/process unit are inspected regularly for malfunction, deterioration, failure, operator errors, or other problems that could endanger human health or the environment. The types of potential problems and the hazards uniquely associated with each of the facility's process units are used to establish the elements (parameters) and frequency of inspection.

TABLE 1

Security Devices Inspection Schedule

Equipment	Inspection Element/Type of Problem	Inspection Frequency
Facility Gates	Check for proper signs	Daily
	Check for proper locks on emergency gates	Daily
Lights	Check for proper operation	Daily
Facility Fence	Inspect entire fence for breeches or damage	Daily
	Inspect entire fence for warning signs	Daily

TABLE2

Surface Water Management Systems Inspection Schedule

Equipment	Inspection Element/Type of Problem	Inspection Frequency
Surface Water Containment Areas	Check for liquid accumulation	Monthly or Daily during rainstorms*
	Check for proper locks on discharge points to Sanitation Sewer	Monthly or Daily during rainstorms

Defined as a one-inch rainfall within 24 hours or less.

TABLE 3

Safety and Emergency Equipment Inspection Schedule

Equipment	Inspection Element/Type of Problem	Inspection Frequency
Protective Gear	Check for adequate supply for each division	Monthly
	Check for deterioration and damage	Monthly
SCBA Units	Check for accessibility	Weekly
	Check for adequate supply of air tanks	Weekly
	Check for full charge on air tanks	Monthly
	Check for deterioration and damage	Monthly
Emergency Oxygen	Check for accessibility	Daily
	Check for deterioration and damage	Daily
	Check for full charge on air tank	Daily
First Aid Kits	Check for accessibility	Daily
	Check kits for full supply	Daily
Emergency Shower and Eye Wash Units	Check to ensure proper operation	Daily
	Check for accessibility	Daily
	Check for adequate water pressure	Daily
	Check for deterioration and damage	Daily
	Check for proper operation	Daily
Fire Extinguishers	Check for ensure that access is not blocked	Daily
	Check inspection tag to ensure annual maintenance is current	Daily
	Check seal to ensure that extinguisher has not been used	Daily
Fire Blankets	Check for accessibility	Daily
Absorbent Supply	Check for adequate supply	Daily
Recovery Drums	Check for adequate supply	Daily

EMERGENCY AND SPILL EQUIPMENT INSPECTION PLAN

I. Frequency

A. All emergency and spill equipment are to be inspected on a weekly basis.

II. Procedure

A. All inspections are to be conducted with a general concern for personal and environmental safety.

B. The inspections should include the following:
1. Fire extinguishers
2. Respirators
3. Oxygen canisters
4. Eye wash and shower station
5. Diaphragm pumps
6. Quantity of absorbent
7. Non-sparking shovels
8. Quantity of open top drums

C. The inspection shall be noted on the appropriate inspection sheets, (Appendix E Figure 1).

D. Any problems noted should be taken care of immediately. The remedial action should be noted on the inspection sheet. If the inspector con not take care of the action himself he should notify his immediate supervisor.

E. All remedial action shall be documented showing:

1. What action was taken.

2. When the action was taken.

3. Who performed the remedial action.

TABLE4

Laboratory Inspection Schedule

Equipment	Inspection Element/Type of Problem	Inspection Frequency
Sample Management	Check to insure proper disposal	Weekly
	Check sample storage area for signs of leaks	Daily
Sampling Equipment	Check for proper storage of sampling equipment	Daily
Laboratory Hoods	Check for proper operation	Daily
	Check hood air flow	Annually
Laboratory Drains	Record liquid level	Daily
	Check for signs of damage, corrosion, or deterioration	Daily
	Check for spills or leaks	Daily
	Check accumulation start date	Weekly
	Check condition of hazardous waste label	Weekly

TABLE 5

Maintenance Area Inspection Schedule

Equipment	Inspection Element/Type of Problem	Inspection Frequency
Loading/Unloading **Area**	Check for spills	Daily
Piping and Valves	Check for leaks	Daily

5.1 DRUM STORAGE UNIT

Potential problems relating to the facility's Drum Storage Unit are:

Spills in loading/unloading, sampling, or storage areas
Deteriorated, damaged, or leaking drums
Failure or deterioration of secondary spill containment structures
Improper placement or stacking of drums.
The existing Drum Storage Unit consists of a walled, paved enclosure located on the west side of the facility. A new storage unit is proposed at a more central facility location. The inspection elements and frequencies described on Table 6 apply equally to the existing and proposed units.

CONTAINER INSPECTION PLAN

I. Frequency

A. All containers (drums) are to be inspected at least once a day by the plant manager or by his designated shift supervisor. Based on the experience at our Whittier facility daily inspection is deemed advisable. This frequency will insure early detection of any possible leaking containers.

B. When containers are received at our facility they are inspected and any container that is not in good condition is to be immediately transferred to a container in good condition.

II. Procedure

A. All inspections are to be conducted with a general attitude of concern for personnel and environmental safety.

B. In these inspections the inspector shall inspect for such things as proper labeling, leakers, or possible hazardous situation.

C. All inspection are to be documented on the Site Inspection Form.

D. The physical condition of the dike shall be checked for cracks or other deterioration.

E. The whole site, (Figure II-5,II-6) within and without the diked area is to be inspected for accumulated liquids. If any liquids are found they are to be identified and dispose of properly.

F. The inspector must report any problems discovered during inspection to his immediate supervisor. The supervisor in charge of the container storage area shall be responsible for directing whatever remedial action is required.

III. Inspection Checklist

A. Inspections documentation shall be filled out immediately at the time of inspection.

B. All inspection are to be initialed and dated by personnel performing the inspection. (Appendix N)

C. Respective blocks are to be filled out with a "OK" or "NOT OK" , Depending on which is appropriate. (Appendix E).

1. If any situation required a NOT OK, an explanation should include:
   a. Description of the problem.
   b. Is there danger of imminent hazard?
   c. Remedial action recommended, such as transfer of leaking drum.

D. Any remedial action records shall include:

1. Description of action taken such a transfer of leaking drum.
2. When this action was taken.
3. Who performed the remedial action?

5.2 STORAGE/TREATMENT TANKS

Waste storage/treatment tanks are located in different sites on the facility. The inspection elements and schedule described on Table 7 apply to each of these areas. Potential problems associated with the facility's storage/treatment tanks are:

Spills in loading/unloading (i.e., truck bay) areas

Structural failure of tanks or secondary containment features

Failure or malfunction of operating equipment (i.e., pumps, valves, piping, sampling ports, etc.)

Malfunction of liquid level indicators or other process control devices and alarms.

The external condition of facility waste storage/treatment tanks and associated pumps and piping is assessed visually on a daily basis. In addition, a tank integrity assessment is performed annually on each in-use tank by means of ultrasonic testing. If a tank shell wall is determined to have exceeded its corrosion allowance, or if the tank otherwise is determined to be unsafe, the tank will be removed from service and either repaired or disposed of. Tanks that have undergone major repairs and new tanks will be certified by a qualified registered professional engineer prior to being placed in service.

All facility waste tanks except the laboratory tank are equipped with manholes that allow access by plant personnel. When it is necessary to enter the tank for purposes of inspection, maintenance, or repair, the contents of the tank first are directed to treatment or to off-site shipment. Waste transfer operations are performed by direct pumping to the treatment system/transport vehicle or by the intermediate use of vacuum trucks. Corporate-wide entrance procedures that are followed at the OMEGA facility during internal tank inspections are specified in (Confined Space Entry Procedure),

TANK INSPECTION PLAN

I. Construction of Materials

A. Frequency

1. Must be done on a weekly basis.

B. Procedure

1. The inspection shall include the following.
   a. All seams
   b. Supports
   c. Pumps
   d. Tank inlets and outlets and valves
   e. Tank vents
   f. Level indicator, check with water gauge
   g. The inspector must report any problems discovered during inspection to his immediate supervisor. The supervisor in charge of the tank storage area shall be responsible for directing whatever remedial action is required.
2. The inspector shall report any erosion, corrosion or any other defects of problem with any of the above.

II. Tank Proximity

A. Frequency

1. Must be done on a daily basis.

B. Procedure

1. The area around all tanks shall be inspected for obvious signs of leakage such as wet spots or accumulated liquid on the tank itself of on the slab beneath it.
2. The dikes around all tanks shall be inspected for cracks, erosion due to rain or wind, or damage caused by foreign objects.

III. Overfilling controls

A. Frequency and procedure

1. The operation of filling tanks at our facility is a manual operation with a person reading a level indicator, (feet of water gauge) and the shutting off a valve when a known quantity of waste has been charged. The operator is to be present at all times during the filling operation. When unloading from a truck both the tank truck driver and the facility operator will be present to monitor the operation.
2. Problems on the system can be alleviated by reversing the vacuum on the truck or releasing the pressure. Therefore, the actual inspection of the level indicators is performed on a periodic bases.

IV. Condition of Tanks

A. Frequency

1. All tanks will be periodically inspected at intervals determined by establishing the rate of corrosion or erosion observed. This will generally be once a year but may be more or less frequent depending upon each tanks' thickness history. Based on our many years of operation experience at Omega Recycling Corp. an annual inspection is deemed appropriate.

B. Procedure

1. This inspection is to determine the extent of corrosion or erosion which has been caused by the contents of the tank. To facilitate this, both visual inspection of the inside of the tank and instrumental inspection such as ultrasonic transducer, etc., will be utilized. This inspection is to be documented in the appropriate data logs.

V. General Inspection

A. Procedure

1. All inspections are to be conducted with a general attitude of concern for personnel and environmental safety.
2. Facility personnel are to document all inspections in the applicable inspection logs and reports.
3. If a problem is identified of such nature as to cause imminent hazard, remedial action is to be taken immediately. If there in no imminent hazard, action can be taken whenever deemed appropriate.
4. Any Remedial action records shall include:
   a. Description of action taken.
   b. When this action was taken.
   c. Who performed the remedial action

TABLE 6

Drum Storage Unit Inspection Schedule

Equipment/ Structure Item	Inspection Element/Type of Problem	Inspection Frequency
Container Loading/ Unloading Area	Check for spills	Daily
	Check for proper clean-up of spill materials	Daily
Stored Containers	Check for spills	Daily
	Check for adequate aisle space	Daily
	Check for swelling or corroded drums	Daily
	Check for leaking drums	Daily
	Check to ensure that containers are kept closed	Daily
	Check for proper labels	Daily
	Check to ensure drums are properly located	Daily
Containment Area	Check for evidence of rainwater	Weekly or Daily during rainstorm
	Check for evidence of seepage outside of containment area	Weekly or Daily during rainstorm
	Check for damage to containment walls, berms, and floor	Daily

Defined as a one-inch rainfall within 24 hours or less.

TABLE7

Storage/Treatment Tanks Inspection Schedule

Equipment/ Structure Item	Inspection Element/Type of Problem	Inspection Frequency
Truck Loading/ Unloading Areas	Check for spills	Daily
	Check hoses for leaks and deterioration	Daily
	Check containment area for signs of deterioration	Daily
	Check containment sump for liquids	Daily
Storage Tanks	Check condition of NFPA placards	Daily
	Check tank exterior for cracks, leaks, corrosion, and deformation	Daily
	Record liquid level for each tank	Daily
	Check high level alarms and waste feed cut-off systems (where applicable)	Daily
	Check for corrosion	Annually
Containment Areas	Check for evidence of spills	Daily
	Check for gaps or deterioration of concrete	Daily
	Check for evidence of seepage outside of containment area	Daily
	Check containment sump for liquids	Daily
Sampling Ports	Check for leaks	Daily
	Check for damage or deterioration	Daily
Piping, Valves, and Pumps	Check for spills	Daily
	Check for corrosion and deterioration	Daily
	Check for leaks	Daily
	Check for proper caps on open-ended lines	Daily

5.3 WASTE TREATMENT UNITS

The waste treatment units have in addition pumps, piping, and valves associated -with the waste- transfer and treatment systems, some of the units will have associated storage tanks or drum staging areas. The inspection schedule presented in Table 8, which presently is used for the existing systems, will apply as well to the proposed waste management operations:

Distillation and Thin Film Evaporation Units

TABLE8

Waste Treatment Units Inspection Schedule

Equipment/ Structure Item	Inspection Element/Type of Problem	Inspection Frequency
Containment Areas	Check for spills	Daily
	Check hoses for leaks and deterioration	Daily
	Check containment area for signs of deterioration	Daily
	Check containment sump for liquids	Daily
	Check for evidence of seepage outside of containment area	Daily
Storage Tanks (if applicable)	Check tank exterior for cracks, leaks, corrosion, and deformation	Daily
	Record liquid level for each tank	Daily
	Check high level alarms and waste feed cut-off systems	Daily
	Check for corrosion (RCRA-permitted tanks only)	Annually
Container Staging Areas (if applicable)	Check for spills	Daily
	Check for adequate aisle space	Daily
	Check for swelling or corroded drums	Daily
	Check for leaking drums	Daily
	Check to ensure that containers are kept closed	Daily
	Check to ensure drums are properly located	Daily
Piping, Valves, and Pumps	Check for spills	Daily
	Check for corrosion and deterioration	Daily
	Check for leaks	Daily
	Check for proper caps on open-ended lines	Daily

TRUCK INSPECTION PLAN

I. Frequency

A. All trucks are to be inspected before start up each operating day.

II. Procedure

A. All inspections ate to be conducted with a general attitude of concern for personnel and environmental safety.

B. In these inspections the inspector should inspect for such things as: proper placarding, proper condition of tires, proper tire pressure, proper fire extinguishers and other designated safety equipment.

C. All inspections are to be documented on the proper checklist, (Appendix N).

D. All problems found in the inspection are to be noted and possible remedial action suggested. The inspector shall notify the maintenance supervisor of any mechanical problems. The Maintenance supervisor shall insure that all mechanical problems ate corrected before releasing the truck to the driver.

The driver shall be notified of any problems which involve his area of responsibility (Placarding, etc.). These problems must be corrected and approved by his supervisor before the truck may be placed in service.

E. All remedial action shall be documented showing:

1. What action was taken.
2. When the action was taken.
3. Who performed the remedial action.

OMEGA RECOVERY FACILITIES INSPECTION REPORT

DATE:_____ INSPECTOR:_____ SUPERVISOR:_____

ATTACHED TO THIS INSPECTION FORM IS A PLOT LAYOUT. PLEASE MARK ON THE PLOT LAYOUT LOCATIONS WHERE YOU FIND: LEAKS - L; SPILLS - S; LABELS MISSING- LM; LABELS OUT OF DATE- LOD;

GENERAL FACILITY

	Satif.	Unsatisf.
Are all entrances and gates closed or controlled.		
Is there any trash or equipment (gloves) unattended or in wrong location.		
Are all the operational personnel properly attired and protected.		
Do any operation personnel have defective safety equipment-		
Personal Respirators		
Safety Glasses		
Gloves		
Are all the tools and equipment in the proper area		
Are any aisles blocked.		
All warning signs are in place and visible		
Are all outdoor and indoor lights in working order.		
Are all fences have warning signs		
Are all fences in good order		
Is there any accumulation of water in any sumps (greater than one inch)		
Are there any spills in the loading and unloading area.		

COMMENTS:

_____

_____

_____

_____

DIKES

On the accompanying plot map of the facility mark the locations of any dikes that are the following:

	Satisf	Unsatisf
Are there any residual waste and or spills in the diked areas.		
Could any of the diked areas leak .		
Are the diked areas in good repair.		

SAMPLING EQUIPMENT

	Satisf	Unsatisf
Is there adequate sampling equipment.		

SPILL EQUIPMENT

	Satisf	Unsatisf
AIR PUMPS		
Are the hoses and pumps operable and available for emergency use		
ABSORBENT		
Is there enough absorbent for emergency use		
RECOVERY CONTAINERS		
Is there an adequate supply		

SAFETY EQUIPMENT

	Satisf	Unsatisf
FIRST AID EQUIPMENT -F AID denotes location on plot map.		
Is the first aid equipment complete and available for emergency use.		
Are there any supplies need to be ordered.		
Are the Fire Blankets available for use		

Figure 1& 2 Inspection Report

OMEGA RECOVERY FACILITIES INSPECTION REPORT

DATE:_____ INSPECTOR:_____ SUPERVISOR:_____

	Satisf	Unsatisf
FIRE EXTINGUISHERS- FE denotes placement on plot map		
Are afl the extinguishers operable- mark those that are okay.		
Are all the extinguishers within service date.		
Are all areas surrounding extinguishers clear and signs visible.		
Are all extinguishers mounted properly.		
EMERGENCY OXYGEN APPARATUS	Satisf	Unsatisf
Is the oxygen equipment operable and available for emergency use.		
EYE WASH AND SHOWERS are denoted by S/E on plot map	Satisf	Unsatisf
Are all the eyewash and shower stations operable and available for emergency use.		
EMERGENCY WARNING BUTTONS- X denotes buttons on plot map	Satisf	Unsatisf
Is the emergency warning system operable and available for emergency use.		
EMERGENCY AIR MASKS	Satisf	Unsatisf
Are the air masks available for use and stored properly.		
WALKIE TALKIES	Satisf	Unsatisf
Are they all in operable condition.		
EMERGENCY PERSONNEL EQUIPMENT	Satisf	Unsatisf
Are the Rubber Boots available and working order		
Are the Yellow Rain/Spill Suits available and working order.		
Is there an adequate supply of emergency protective equipment.		

Comments:

_____

_____

_____

CONTAINERS

On the accompanying plot map of the facility, mark the locations of any containers that are the following:

	Satisf	Unsatisf
Identify any containers without labels.		
Identify any containers labels show out of date for storage		
Identify any containers that are or could leak - LK		
Are there any containers swelling or heavily corroded.		
Identify any containers stacked improperly - STK		
Verify that there is adequate aisle space between container rows		
Are there any non Omega labeled waste in an improper Area		
Is any flammable waste stored within 25 feet of the property line. F		
Is any flammable waste stored in an improper area.		
Are any corrosive waste and flammable waste stored in an incompatible manner.		
Is there any secondary containment leaks or cracks in the cement.		

Comments:

_____

_____

_____

OMEGA RECOVERY FACILITIES INSPECTION REPORT

DATE:_____ INSPECTOR:_____ SUPERVISOR:_____

TANKS

On the plot map of the facility mark the locations of tanks that are the following:	Satisf	Unsatisf
Identify any tanks that are leaking.		
Identify any tanks that are improperly labeled.		
Do all tanks have their identification name and placards displayed.		
Check all tanks for corrosion.		
Are there any spills in the containment area of the tanks.		
Check all valving and pipes for leaks.		
Are the hoses stored in a proper manner.		
Are the hoses and couplings in proper working order.		
Volume and identity of material in tanks is posted and correct.		

Comments:

Waste Storage Tank	Waste Type	Volume/Amount
1		
2		
3		
4		
5		

Comments:

Product Tank	Material Stored Type	Volume/Amount
A		
B		
C		
D		
E		
F		

Comments:

Process Tanks Material Type Stored **Volume/Amount**

OMEGA RECOVERY FACILITIES INSPECTION REPORT

DATE:_____ INSPECTOR:_____ SUPERVISOR:_____

Sandee		
Connie		
Elaine		
Carrie		
Shiela		
Peggy		
Amy		
Cindy		
Amy		
Linda		
Loudy		
Diane		
Susan		
Farrah		
Racquel		
Annette		
Evette		
Buela		
Jenny		
Heidi		

Comments:

_____

_____

_____

SUPPORT EQUIPMENT

BOILER	Satisf	Unsatisf
Pressure Gauge (85 psig)		
Temperature Gauge (325 ^{o}F)		

AIR COMPRESSOR Monitor and Record	Satisf	Unsatisf
Line Pressure Gauge (120 psig)		
Oil Level		
Temperature Gauge (170 ^{o}F)		
Air Filter Indicator		

Figure 1& 2 Inspection Report

OMEGA RECOVERY FACILITIES INSPECTION REPORT

DATE:_____ INSPECTOR:_____ SUPERVISOR:_____

PROCESSING EQUIPMENT

On the accompanying plot map of the facility mark the locations of any processing equipment that are the following;

UNIT	MATERIAL BEING PROCESSED	AMOUNT Being Processed
Jake		
Fat Jack		
Craig		
Kirk		
Patrick		
Paul		
I		

	Satisf	Unsatisf
Are any pumps leaking or malfunctioning		
Are all the units operating according to procedures		
Is any equipment in need of repair.		

Comments:

_____

_____

_____

_____

All remedial action shall be documented showing:

1. **What action was taken**
2. **When the action was taken.**
3. **Who performed the remedial action.**

INSPECTOR MUST REPORT REMEDIAL ACTION REQUIRED:

_____

_____

_____

_____

ACTIONS TAKEN TO CORRECT IDENTIFIED PROBLEMS:

_____

_____

_____

_____

_____

_____

Are there are areas or things that can be done to improve safety.

Remedial actions taken have corrected and reviewed by Supervisor and accepted as being completed:

Supervisor:_____ Date:_____ Time:_____

Figure 1& 2 Inspection Report

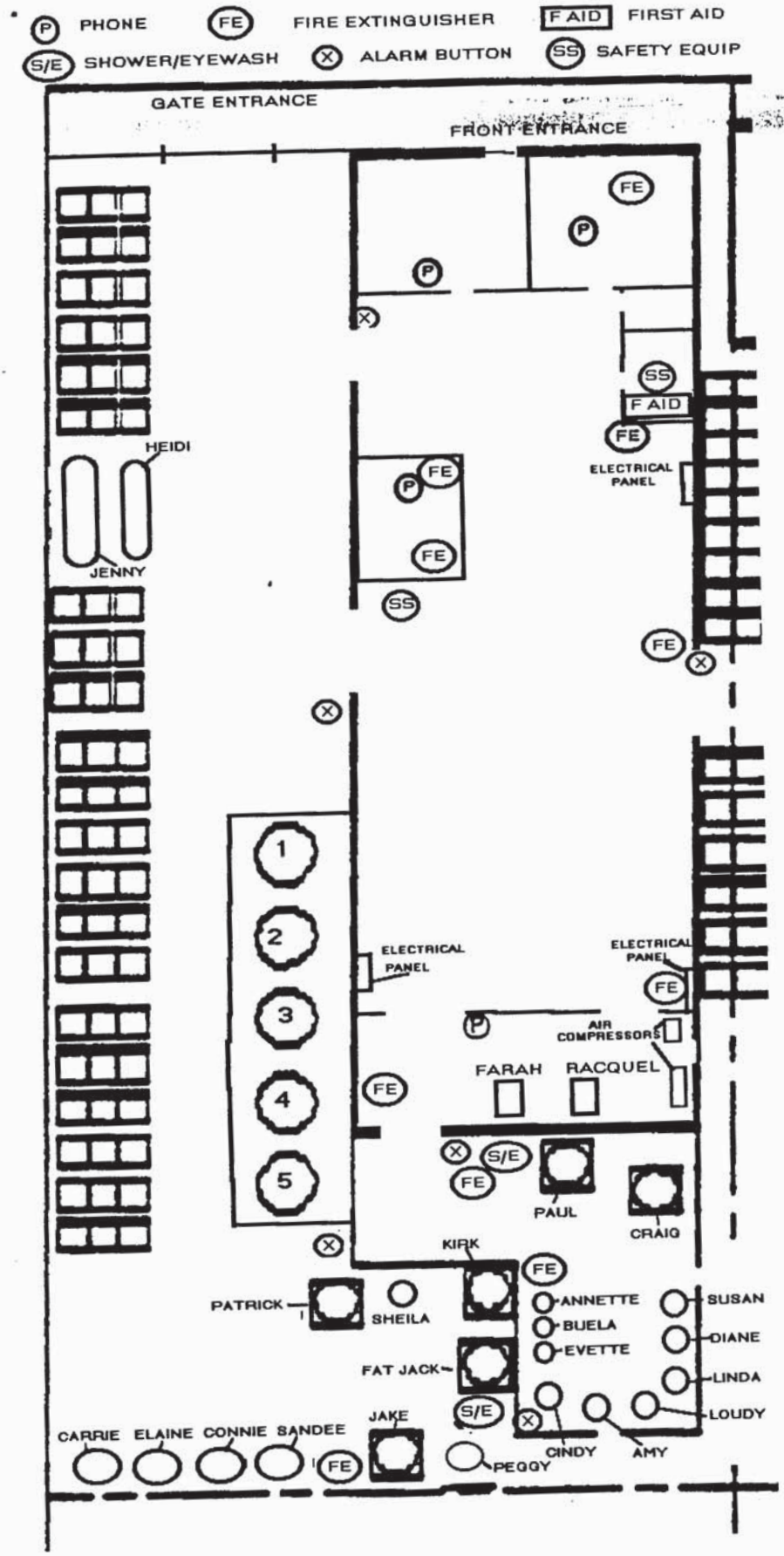

Figure 1& 2 Inspection Report

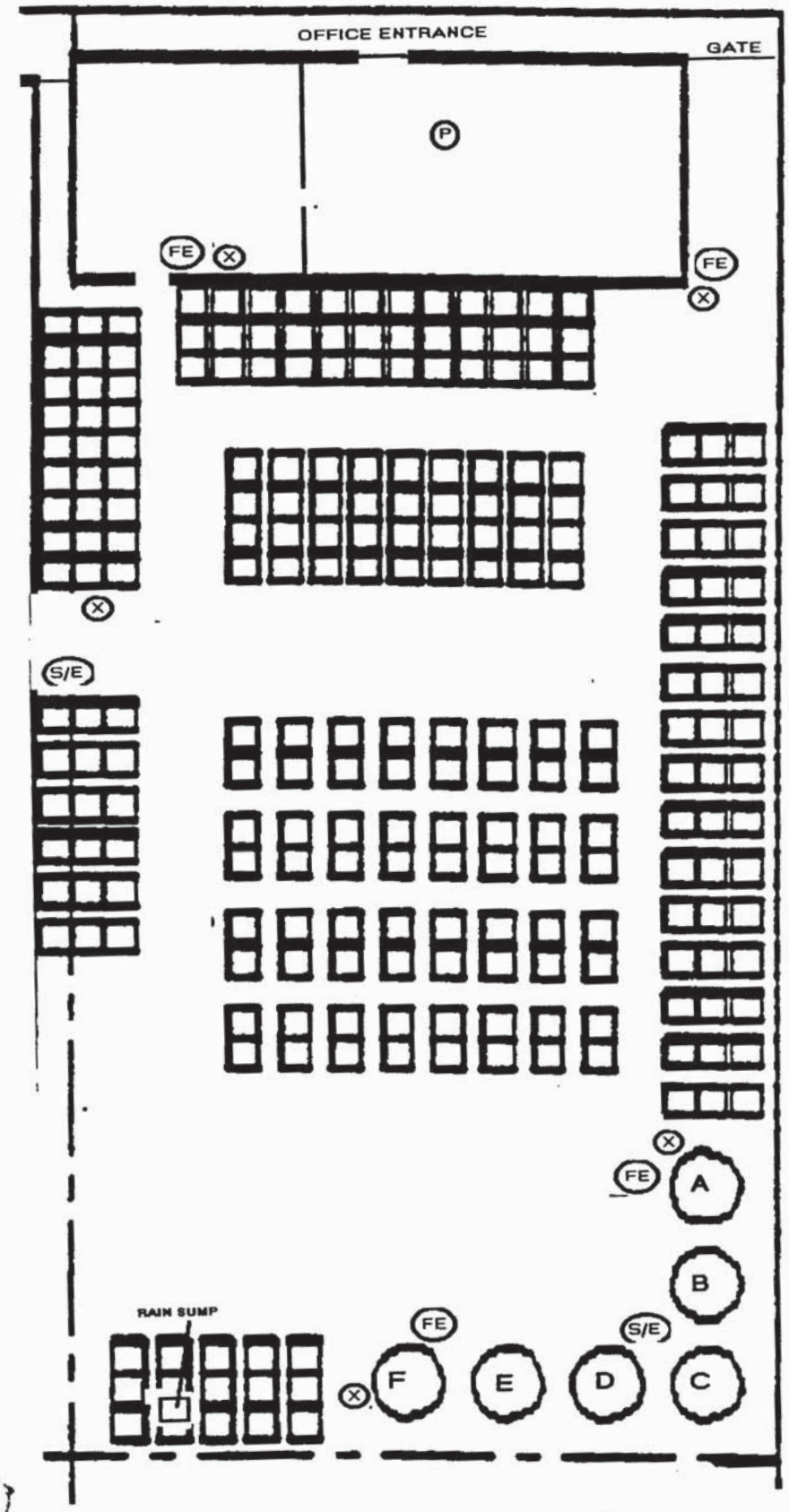

Figure 1& 2 Inspection Report

Omega Driver's Daily Vehicle Inspection Report

Date _____ Time _____ AM PM

Check any defective item and give details under Remarks

Tractor No._____

__Air Compressor
__Battery
__Body
__Brake Accessories
__Brakes
__Clutch
__Defroster
__Door Handles
__Drive Line
__Engine
__Fifth Wheel
__Front Axle
__Fuel Tanks
__Heater
__Horn
__Lights
__Loses Water
__Mirrors
__Oil Pressure
__Radiator
__Rear End
__Safety Equipment
__Springs
__Steering
__Tachograph
__Tires
__Transmission
__Wheels
__Windows
__Windshield Wiper
__ Other
_____
_____

Trailor No._____

__Brake Connectors
__Brakes
__Coupling Chains
__Coupling King Pin
__Doors
__Hitch
__Landing Gear
__Lights
__Roof
__Springs
__Tarpaulin
__Tires
__Wheels
__Other _____

__Condition of the above Vehicles is satisfactory

REMARKS:_____
_____
_____
_____
_____

Driver Making report_____(Signature)

Mechanic making Repair_____(Signature)

Figure 3 Inspection Report