Section F
Procedures to Prevent Hazards

Section F — Procedures to Prevent Hazards

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Section F — Procedures to Prevent Hazards

WAC-173-303-806(4)(a)(iv), (v), (viii), (ix), 310, 320, 340, 395, 630(3), (6), 690-692

1. Security [806(4)(a)(iv), 310(1) and (2)]

1.1. Security Procedures and Equipment [806(4)(a)(iv), 310(2)]

1.1.1. This section describes the procedures and security systems in place at the Permitted Unit where dangerous wastes are stored in containers.

1.1.2. The Ross Complex, in which the Permitted Unit is located, is surrounded by a chain link fence. The main gate into the facility is located on the North Road and is attended by security guards 24 hours a day, 7 days per week, who limit access to badged employees and visitors that have received entry clearances. Other gates are closed and locked at all times but are accessible to employees with proximity badges. A truck entry gate is located off Minnehaha St. at the northeast end of the facility and is also attended by security guards 24 hours a day, 7 days per week, who limit access.

1.1.3. The Permitted Unit is locked 24 hours per day. The building is equipped with a card key-activated security system to control entry.

1.1.4. All dangerous waste storage areas are located within the confines of the Permitted Unit. Pedestrian doors to the outside are spring-loaded to automatically close and lock, and they can only be opened with an authorized card key. Roll-up doors located in the Shipping and Receiving Area are kept closed and locked except during the following conditions:

- waste is being delivered or transported, and a Material Handler is present in the Shipping and Receiving Area, or
- when ventilation is necessary for the comfort of personnel working in areas without HVAC. A Material Handler is present in the Shipping and Receiving Area if the roll-up doors are allowed to stay open.

1.1.5. During non-operating hours, all doors remain locked. At the close of business each operating day, the doors are checked to verify that they are secured and locked. When the shipping and receiving and storage areas are not occupied by personnel, such as during lunch hour or non-operating hours, all doors are closed and locked. A Permitted Unit staff member is always in or near the Shipping and Receiving Area during operating hours.

1.1.6. Signs stating "DANGER DO NOT ENTER, AUTHORIZED PERSONNEL ONLY" are posted at each entrance of the Permitted Unit. The signs are in English, printed in red and black ink on a white background, and can be seen from at least 25 feet.

1.2. Waiver [310(1)]

1.2.1. A waiver of the security procedure and equipment requirements is not applicable.

2. Inspection Plan [395(d), 630(6), 690-692, 806(4)(a)(v), 320, 340]

2.1. Inspection Plan Overview

2.1.1. This section summarizes how often inspections are conducted, what is inspected, how the results are recorded, and how remedial actions are initiated, if necessary, to prevent releases of dangerous waste that threaten the environment or human health.

2.1.2. Reoccurring inspections are conducted in the Loading and Unloading Area, the Shipping and Receiving Area (including the Bulking Room), and the Dangerous Waste Storage rooms, as described in Section D, Process Information.

2.2. General Inspection Requirements [806(4)(a)(v), 320(1), 320(2)(a), (b), and (c), 340(1)(d)]

2.2.1. At a minimum, the following areas are addressed in inspections at the Permitted Unit: monitoring equipment; safety and emergency equipment (including those described in the Contingency Plan); security devices; preparedness and prevention equipment; and operating and structural equipment that helps prevent, detect, or respond to environmental or human health hazards related to the areas where regulated wastes are stored.

2.2.2. Table F-1 lists the schedule for inspections performed in the Permitted Unit. Copies of the actual inspection logs, which are included in Attachments F-1 and F-2, identify the types of problems the inspector is checking for. The schedule of Permitted Unit inspections is maintained by the Material Handler Foreman II. All inspections will follow the inspection logs provided in Attachments F1 and F-2. The Material Handler Foreman II, or his or her designee, performs the inspections at the Permitted Unit. For inspection duties delegated by the Material Handler Foreman II, a formal letter of designation signed off by the Foreman II and the permit holder will be included in the operational records and available upon inspection. The delegate must be knowledgeable of the contents of this section, the contingency plan, and be familiar with the dangerous waste stored at the Permitted Unit and its hazards. The delegate must also be familiar with the inspection logs and how to fill out correctly, to understand and judge the severity of a deficiency or release, and to know the locations and use of spill kits, and to report timely and appropriately.

2.3. Inspection Log [320(2)(d)]

2.3.1. The Permitted Unit Inspection Logs are documented and filed by the calendar date the work was performed. Each time an inspection is completed, the results are documented in the Inspection Log to indicate if any unsatisfactory conditions exist(ed) during the inspection. Inspection Logs are filed by month in the operating record.

2.3.2. The Inspection Log includes the date and time of inspection, printed name and signature of the inspector, an indication of satisfactory or unsatisfactory conditions for the required areas, an account of spills or discharges, and a record of corrective actions performed.

2.3.3. One log is completed for all the dangerous waste handling areas.

2.4. Remedial Action Schedule [320(3)]

2.4.1. The procedure to implement remedial action of problems depends upon the severity of the incident. When leaking or spilled containers are observed, or there is a threat of imminent hazard, immediate remedial actions are taken by the Material Handler(s) to stop the source of leaks or spills and clean up the materials spilled or prevent the hazard.

2.4.2. Priority 1 deficiencies are the most serious and pose an immediate threat to human health or the environment. Any equipment, or supply deficiency that would prevent an immediate response to a leak or spill is considered a Priority 1 deficiency. Any loss of structural integrity, such as a structural crack greater than 0.01 inch wide, or breach of containment which would allow a potential spill or release to pose an immediate threat to human health, or the environment is considered a Priority 1 deficiency. Use of the portion of the Permitted Unit where the Priority 1 deficiency has occurred will be restricted until corrective measures have been taken. Examples of Priority 1 incidents and associated response actions are provided in Table F-2.

2.4.3. Priority 2 deficiencies do not pose an immediate threat to human health or the environment but are important to the ongoing operations of the Permitted Unit. Priority 2 deficiencies may become Priority 1 deficiencies if not addressed in a timely manner. Examples of Priority 2 incidents and associated response actions are provided in Table F-2.

2.4.4. Repairs will be completed consistent with the design of the building and dangerous waste storage areas. Repairs to cracks in the floors and containment systems will be made using equipment and supplies consistent with the building design and construction specifications as described in Section D, Process Information.

2.4.5. Post-emergency inspection procedures are presented in Section G, Contingency Plan.

2.5. Specific Process or Waste Type Inspection Requirements

2.5.1. Container Inspections [806(4)(a)(v), 630(3) and (6), 320(2)(c) and (3)]

2.5.1.1. As indicated in the weekly Inspection Log provided in Attachment F-1,[1] dangerous waste handling areas that are in use are inspected weekly for leaks, spills, container condition, label placement, and accumulated liquids on floors and in containment systems.

2.5.1.2. Inspections are conducted weekly on both operating and non-operating days (weekends and holidays included).

2.5.1.3. Copies of the weekly and monthly Inspection Logs are provided in Attachments F-1 and F-2. These inspection logs are used to visually assess the containers and the container storage areas for deterioration of containers or secondary containment systems. These inspections also document wear and deterioration of floor coating, as well as the accumulation of materials that could prevent visible inspection of floors and foundations.

2.5.1.4. During the inspection, if an observation is made that requires action, the Material Handler Foreman II, or an approved delegate, is trained, has the authority, and is required to remedy the situation, if his or her safety is not threatened, when it is first encountered. After the incident is remedied, a report will be prepared to document the incident, and a copy will be sent to the manager of the Permitted Unit and the Ross Complex Environmental Specialist. Spills identified during inspections that are not large enough to report to the Washington Department of Ecology will be documented in the operating record.

2.5.1.5. If a problem can be fixed without prior budget approval, the problem is remedied immediately by the Material Handler. When budget approval is necessary, the Permitted Unit Manager is notified of the problem(s) and is responsible both for obtaining approval to do the necessary work and for approving the subsequent repair.

2.5.1.6. If cracks in the floor or secondary containment require repair, access to the area will be restricted. The Material Handler Foreman II will evaluate the crack to determine if Priority 1 or 2. If Priority 1, the area will be restricted

[1] BPA may periodically update or revise the forms used for inspections of the Permitted Unit. The information contained in the sample forms serves as the minimum amount of information that would be included in subsequent versions of those, or equivalent, forms.

from personnel and use until repaired. The Permitted Unit Manager will contact maintenance staff to perform the repairs in accordance with the facility design specifications. The concrete slab will be repaired according to the design and construction specifications described in Section D, Process Information. Table F-2 provides more detail on the priority assigned to each type of repair including cracks in the concrete floor or secondary containment.

2.5.2. Tank System Inspection and Corrective Actions [640(6) and (7)]

2.5.2.1. Dangerous waste will not be stored in tanks; therefore, this requirement is not applicable.

2.5.3. Inspection of Ignitable or Reactive Wastes Storage Areas [395(1)(d)]

2.5.3.1. At least annually, either the Vancouver Fire Department or a consultant knowledgeable in fire code conducts an inspection of the dangerous waste storage areas to verify compliance with the International Fire Code.

2.5.3.2. The inspection reports include the name of the inspector, the date and time of the inspection, and the results of the inspection. Results of the inspection and the actions taken are kept in the operating record.

2.5.4. Air Emissions Control and Detection – Inspections, Monitoring, and Corrective Actions [110; 690; 691; 692, 806(4)(j) and (k), 806(4)(a)(v)]

2.5.4.1. Process Vents [690; 806 (4)(a)(v), 806(4)(j)]

2.5.4.1.1. There are no dangerous waste process vents at the Permitted Unit or the Ross Complex, therefore this requirement is not applicable.

2.5.4.2. Equipment Leaks [691; 806(4)(k)]

2.5.4.2.1. During bulking or repackaging of regulated wastes in the Bulking Room (Room 104), regulated wastes potentially containing greater than 10 percent by weight organics are transferred to and from containers by the simple practice of pouring. No mechanical transfer equipment, such as pumps, are used in the Bulking Room or elsewhere in the Permitted Unit.

2.5.4.3. Tanks and Containers [692 (40 CFR 264.1086); 806(4)(m)]]

2.5.4.3.1. No tank systems are used at the Permitted Unit for the management of regulated wastes.

2.5.4.3.2. Numerous regulated wastes are received at the Permitted Unit in containers that are greater than 26 gallons in capacity and have an average volatile organic compound (VOC) concentration equal to or greater than 500 parts per million (ppm) by weight. These waste streams are generated either at off-site BPA generator locations or from on-site generator-only activities at the Ross Complex. Areas of the Permitted Unit that may be used to handle or store these waste streams include:

- Room 103 – Shipping and Receiving
- Room 100 – Ignitable/Flammable Waste
- Room 102C – Pending Analysis Results
- Room 102D – State-only Regulated Waste and TCLP Wastes
- Room 104 – Bulking Room

2.5.4.3.3. No devices, such as closed vent systems (40 CFR §264.1087) or container enclosures (40 CFR §264.1086(e)(1)(ii)), are used at the Permitted Unit or Ross Complex for the management of regulated wastes. Therefore, the requirements of 40 CFR §270.27(a)(1), (a)(3), (a)(5), and (a)(6) are not applicable.

2.5.4.3.4. The following activities are conducted to prevent hazards from the air emissions:

- Using and accepting only DOT-approved containers suitable for the waste;
- Performing, within 24 hours of receipt at the Permitted Unit, a visual inspection by personnel of each container to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure are secured in the closed position;
- Recording the container size, DOT packaging verification, and results of visual inspections on the drum tracking logs prepared for each container (a copy of the drum tracking log is provided in Section D, Process Information, Attachment D-1).
- Repairing the container if defects are noted during the initial inspection or overpacking the container or the container contents into a new container within 24 hours of discovery of the defect;
- Keeping the containers closed during storage, except when adding or removing waste from the container or when sampling the container;

- Promptly securing the cover of the container, and securing all closure devices upon completion of the sampling operation;
- In accordance with WAC 173-303-692(1)(a) [40 CFR 264.1086(c)(3)(i)(B)], promptly securing the cover of the receiving container and securing all closure devices within 15 minutes of intermittent additions to the container, when the operator leaves the immediate bulking operation area, and upon completion of bulking or consolidating wastes;
- Verifying that the container being emptied meets the definition of empty, or by promptly replacing and securing the cover until such time as the bulking, consolidating, or emptying operation can be completed.

2.5.4.4. Waste Pile Inspection

2.5.4.4.1. Waste piles will not be used at the Ross Complex; therefore, this requirement is not applicable.

2.5.4.5. Surface Impoundment Inspection

2.5.4.5.1. Surface impoundments will not be used at the Ross Complex; therefore, this requirement is not applicable.

2.5.4.6. Incinerator Inspection

2.5.4.6.1. Incinerators will not be used at the Ross Complex; therefore, this requirement is not applicable.

2.5.4.7. Landfill Inspection

2.5.4.7.1. Landfills will not be used at the Ross Complex; therefore, this requirement is not applicable.

2.5.4.8. Land Treatment Facility Inspection

2.5.4.8.1. Land treatment facilities will not be used at the Ross Complex; therefore, this requirement is not applicable.

3. Preparedness and Prevention Requirements [806(4)(a)(iv)(v), (vii), and (ix); 340]

3.1. Preparedness and Prevention Plan

3.1.1. A preparedness and prevention plan has been prepared for the Ross Complex and the Permitted Unit. The preparedness and preventive measures required for the Permitted Unit by WAC 173-303-340 are specified in Section G, Contingency Plan.

4. Preventive Procedures, Structures, and Equipment [806(4)(a)(vii)]

4.1.1. The Permitted Unit is equipped with multiple design features to prevent hazards and contain spills of dangerous waste. Specific details of each of the areas of the Permitted Unit are described in Section D, Process Information. This section highlights some of the features constructed at the Permitted Unit:

- Each area of the Permitted Unit and the Loading and Unloading Area have containment systems to capture spills or released materials.
- All waste handling areas are paved or are concrete slabs.
- Drums are lifted with equipment designed to pick up and transport them.
- All incoming waste is processed or placed into a separate, compatible storage area within 24 hours of receipt.
- Wastes are stored according to their characteristics so that only compatible materials are stored together.
- Each dangerous waste storage room has a fire-resistant barrier (concrete wall) between it and the next room, as well as containment trenches and sumps for collection of spilled materials.
- Runoff of dangerous waste from handling areas is prevented by storing all drums containing liquids on containment pallets. In addition, the facility is equipped with containment sumps and with trenches and sloped floors designed to collect spilled materials into sumps. Sumps are divided so that spilled materials that are incompatible do not come into contact with each other. The trenches are installed across door openings to prevent spilled materials from flowing beyond the concrete walls of the building. Doors to the outside that do not have containment trenches are equipped with 4- to 6-inch-high curbs to prevent releases.
- The entire Permitted Unit is constructed with a sealed, reinforced-concrete slab floor. The grounds surrounding the Permitted Unit are asphalt with a storm drain system for the collection and routing of stormwater through a stormwater filtration treatment system.

4.1.2. Power outages are not anticipated to cause an imminent hazard at the Permitted Unit because of the limited operations. The HMB has an emergency lighting system and battery backup system for the alarm; these function in the event of an electrical power outage. The fire suppression system is a dry-type system and does not rely on the electrical system.

4.1.3. Prevention of exposure of personnel to dangerous waste is accomplished through the use of personal protective equipment and clothing suitable for the material being handled. Tyvek coveralls, gloves, goggles or glasses, and chemical-resistant latex boots are worn by Material Handlers during waste consolidation and handling. The HMB

also has an extensive ventilation system. Additional details and specifications regarding prevention of exposure of personnel to dangerous waste during an emergency are provided in Section G, Contingency Plan.

5. Prevention of Ignition or Reaction of Ignitable or Reactive, and/or Incompatible Wastes [806(4)(a)(ix)], (b)(v), and (c)(x); 395(1)(a), (b), and (c); 630(9)(a) and (b)

5.1. The Permitted Unit stores ignitable, reactive, and/or incompatible wastes and has sufficient procedures in place to prevent accidental ignition or reaction of these wastes, as discussed below. No treatment of waste occurs at the Permitted Unit.

5.1.1. Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste [806(4)(a)(ix), 395(1)(a) and (c)

5.1.1.1. Wastes are separated and protected from sources of ignition or reaction.

5.1.1.2. Containers of liquid waste will be stored in unique secondary containment pallets.

5.1.1.3. No smoking, cutting, or open flames are allowed within the confines of the Permitted Unit.

5.1.1.4. All mechanical equipment is designed as explosion-proof and spark-resistant.

5.1.1.5. No Smoking signs are posted in conspicuous places throughout the building.

5.1.1.6. When cutting or welding is necessary for maintenance or repair activities, personnel will take the precautions necessary to remove any flammable or ignitable waste from the areas where work will be performed.

5.1.1.7. Wastes are stored in designated areas as follows:

- **Room 100 – Ignitable/Flammable Waste.** All containers are stored on secondary containment pallets, with drums stored no more than two drums wide (one pallet). A minimum aisle spacing of 30 inches is maintained to allow for inspection of containers, unobstructed movement of personnel, and emergency response equipment. Small containers (5 gallons or less when space is available), are stored in International Fire Protection Association-approved flammable liquid storage cabinets with a 60-gallon capacity, or equivalent.

- **Room 102A – Acid Corrosives (pH ≤ 2).** A minimum aisle spacing of 30 inches is maintained to allow for inspection of containers and unobstructed movement of personnel and emergency response equipment. Drums are stored so that labels always face outward for inspection.

- **Room 102B – Caustic Corrosives (pH ≥ 12.5).** Containers are stored no more than two drums wide (one pallet). A minimum aisle spacing of 30 inches is maintained to allow for inspection of containers and unobstructed movement of personnel and emergency response equipment. Drums are stored so that labels always face outward for inspection.

- **Room 102C – Pending Analysis Results.** Containers in this area are placed in rows of two (one pallet) leaving a minimum of 30 inches of aisle spacing between rows. Drums are stored so that labels always face outward for inspection. Because of potential incompatibilities, drums in this area are stored in a secondary containment pan or similar drum spill containment system capable of holding the entire contents of the container. Once analysis is received, the containers are administratively processed and placed in an appropriate designated storage area as determined by the characteristics of the waste. If analysis shows waste is not listed in Part A of the permit, the container(s) will remain in this room until shipped for off-site disposal, which will occur within 10 working days of receiving the waste, as described in Section D, Process Information.

- **Room 102D – State-only Regulated Waste and TCLP Wastes.** A minimum aisle spacing of 30 inches is maintained to allow for inspection of containers and unobstructed movement of personnel and emergency response equipment. Because of potential incompatibilities, drums in this area are stored in pans or secondary containment spill pallets or a similar drum spill containment system capable of holding the entire contents of the container. Drums are stored so that labels always face outward for inspection.

  Additionally, structural wall and containment systems keep incompatible wastes separated and, in the event of a spill, prevent spilled materials from coming into contact with incompatible materials.

  D003 wastes are stored in Room 102D. D003 wastes are limited to water-reactive and cyanide-bearing solutions. The following storage procedures will be implemented when these wastes are present:

- Water-reactive wastes will be stored in air- and watertight containers away from combustibles and flammable solvents, and the containers will be stored inside watertight secondary containment devices, such as NewPig© or an equivalent roll-top hard-cover drum storage spill containment device, to protect them from the automatic sprinklers that are installed throughout the Permitted Unit.

- Cyanide-bearing solutions will be stored in air- and watertight containers away from products with a pH less than 2 and more than 12.5.

5.1.1.8. Physical combining or "bulking" is done with a Positech TPA-15 hydraulic drum manipulator that has rubber covers over the fingers to prevent metal-to-metal contact and reduce the risk of sparks. Containers are grounded while waste is combined to prevent the risk of sparks or shock.

5.1.1.9. Documentation demonstrating the implementation of the above procedures is placed in the operating record at the Permitted Unit.

5.1.2. Precautions for Handling Ignitable or Reactive Waste and Mixing Incompatible Wastes [806(4)(a)(ix), (b)(v), and (c)(x); 395(1)(b) and (c); 630(9)(a) and (b)]

5.1.2.1. Ignitable wastes and occasional reactive wastes are handled at the Permitted Unit; however, incompatible wastes are not mixed, as documented below. The procedures summarized below have been placed in the operating record.

5.1.2.2. **Ignitable or Reactive Wastes in Tanks 806(4) (c)(x), 640(9)**

5.1.2.2.1. Dangerous wastes are not stored in tanks at the Permitted Unit; therefore, this requirement is not applicable.

5.1.2.3. **Incompatible Wastes in Containers or Tanks 806(4)(b)(v) and (4)(c)(x), 630(9)(a) and (b), 640(10)**

5.1.2.3.1. The Permitted Unit has site-specific precautions in place to prevent mixing of incompatible wastes in containers that could result in extreme heat, pressure, fire or explosion, or reactions including the following:

- Dangerous waste containers at the Permitted Unit are not reused.

- At the time the waste is accepted at the Permitted Unit, a regulated waste tracking log sheet is completed for each

drum containing waste. This regulated waste tracking log sheet is kept on file and consulted by the Material Handler before any waste is added to ensure that only similar wastes and waste codes are added to that drum, or that waste is added to a similar waste. Only wastes with the same or compatible waste codes are repackaged together in DOT-approved containers that meet the detailed design specifications in 49 CFR 172, 173, and 178 for the specific waste in the container. At times, waste is repackaged in the original DOT-approved product container in which it was received from the vendor (for example, solvents).

- As described above, the Permitted Unit stores dangerous waste in rooms designed for compatible waste types. If there are waste types within the same room because of their designation, but they happen to be incompatible, then the wastes will be placed within separate spill pans or similar spill control pallets or devices capable of holding the contents of the containers.
- Rooms are separated by fire-resistant walls. Waste is not stored in tanks at the Permitted Unit.
- Limited reactive wastes are stored in containers in accordance with Section 5.1.2.

Tables – Section F

Table F-1 Inspection Plan BPA Permitted Unit				
Items/Groups	**Specific Items**	**What to Look For**	**Inspection Form Used**	**Frequency**
Security Structures/Operations	Door locks	Ensure doors are closed and locked	N/A This inspection is conducted by Security Guards during routine patrols	Weekly
Emergency/Fire Response Equipment	[See Inspection Logs]	[See Inspection Logs]	TSD Inspection Form (Load/unload area; Rooms 100, 101, 102A, B, C, D, 103, 104)	Weekly (at least every 7 days)
Spill Response Equipment	[See Inspection Logs]	[See Inspection Logs]	TSD Inspection Form (Load/unload area; Rooms 100, 101, 102A, B, C, D, 103, 104)	Weekly (at least every 7 days)
Containment Systems	[See Inspection Logs]	[See Inspection Logs]	TSD Inspection Form (Load/unload area; Rooms 100, 101, 102A, B, C, D, 103, 104)	Weekly
Waste Storage Areas	[See Inspection Logs]	[See Inspection Logs]	TSD Inspection Form (Load/unload area; Rooms 100, 101, 102A, B, C, D, 103, 104)	Weekly
Incoming Waste on Trucks	Drums of dangerous waste	Leaks, damaged drums Matching manifest/shipping papers against waste authorized to manage	Checked against manifests and shipping papers	When incoming waste received
Drums Handling Equipment	Lift trucks Drums lift	Forks/drums lift in good working condition with no wear Check hydraulics for wear/leaks	N/A	Periodically during routine maintenance performed by contractor
Containers Subpart CC[a]	Containers in Permitted Unit	See Inspection Logs for containers at Permitted Unit Make sure lids are on and tight when in use; inspect container prior to use for damage	TSD Inspection Form See Ross Complex Environmental Coordinator	Weekly (at least every 7 days)
Biannual Containment Inspections	1. Enter sumps to perform visual detailed inspection of containment sumps	Cracks, spalling, or other indications of potential failure Cracks, spalling, or other indications of potential failure	Individual report Individual report	1. 1st 6 months of year 2. 2nd 6 months of year

Table F-1 Inspection Plan BPA Permitted Unit				
Items/Groups	**Specific Items**	**What to Look For**	**Inspection Form Used**	**Frequency**
	2. Visual Inspection from surface by a knowledgeable person not associated with the Permitted Unit			
Fire Code Inspection	Performed by a consultant specializing in IFC requirements	IFC compliance	Consultant report	Annual

[a] Only required for containers of > 26-gallon capacity.

Table F-2 Timeline for Correction Actions BPA Permitted Unit	
Priority 1 Incidents[2] - Immediate Threat to Human Health or the Environment ***Require Immediate Action Upon Discovery and Restriction of Area Until Further Evaluated, Resolved, or Repaired***	
Description of Incident	**Actions To Take**
Leaking or open container, or containers with incompatible waste in a common secondary containment area (storage areas or loading/unloading)	Restrict area, control leak, close container, segregate incompatible wastes, and refer to Contingency Plan to determine if it should be implemented.
Spill/release during bulking or container movement or accumulation of waste material in containment systems	Restrict area, control leak, and refer to Contingency Plan to determine if it should be implemented.
Fire/explosion	Restrict area and initiate Contingency Plan.
Crack in concrete flooring or containment system greater than 0.01 inch (does not include damage to surface coating or shrinkage cracks)	Restrict Area immediately from personnel and use upon discovery and notify the Material Handler Foreman II, who will evaluate crack to determine if Priority 1 or 2. If Priority 1, restrict area from personnel and use until repaired. See Priority 2 for all others.
Structural damage due to seismic activities or breach of containment	Restrict area until evaluated and/or fixed by qualified personnel. Areas with structural damage will remain restricted until the repair is completed or area deemed structurally sound.
Accumulation of stormwater in unloading/loading area sump during severe rain events rendering it 25% full.	During shift when the inspection occurred and water level was documented. Empty to overpack drums. Sample contents for disposal annually and verify in inspection logs that no spills of waste have occurred in unloading/loading area.
Containers damaged during shipment (but not leaking)	Isolate and repackage to new container or overpack container same shift received.

[2] These are examples of incidents; other incidents with similar threats to human health or the environment will be subject to the same timeliness of required action.

Priority 2 Incidents[2] – Potential Deficiency, But Not Immediate Threat to Human Health or the Environment ***Require Action to Be Scheduled and Tracked to Completion as Noted Below***	
Description of Incident	**Actions To Take**
Crack in concrete flooring or containment system less than 0.01 inch, shrinkage or drying crack in concrete flooring or containment that is greater than 0.01 inch, damage to floor coating, including joint where there is a water stop beneath the joint.	Submit Office and Facilities repair request within one week of discovery. Repair schedules will vary but will be implemented as soon as practical. Repair documentation will be made on the inspection report when complete and kept in the operating record.
Spill control equipment missing or damaged or inoperable	Within 24 hours of discovery, repair equipment or order replacement equipment (in general, replacement equipment is obtained within a couple of days from Ross Complex warehouse)
Structural damage due to seismic activities or breach of containment	Within 30 days or as soon as practical if repair is non-critical to controlling spills or releases

Figure – Section F

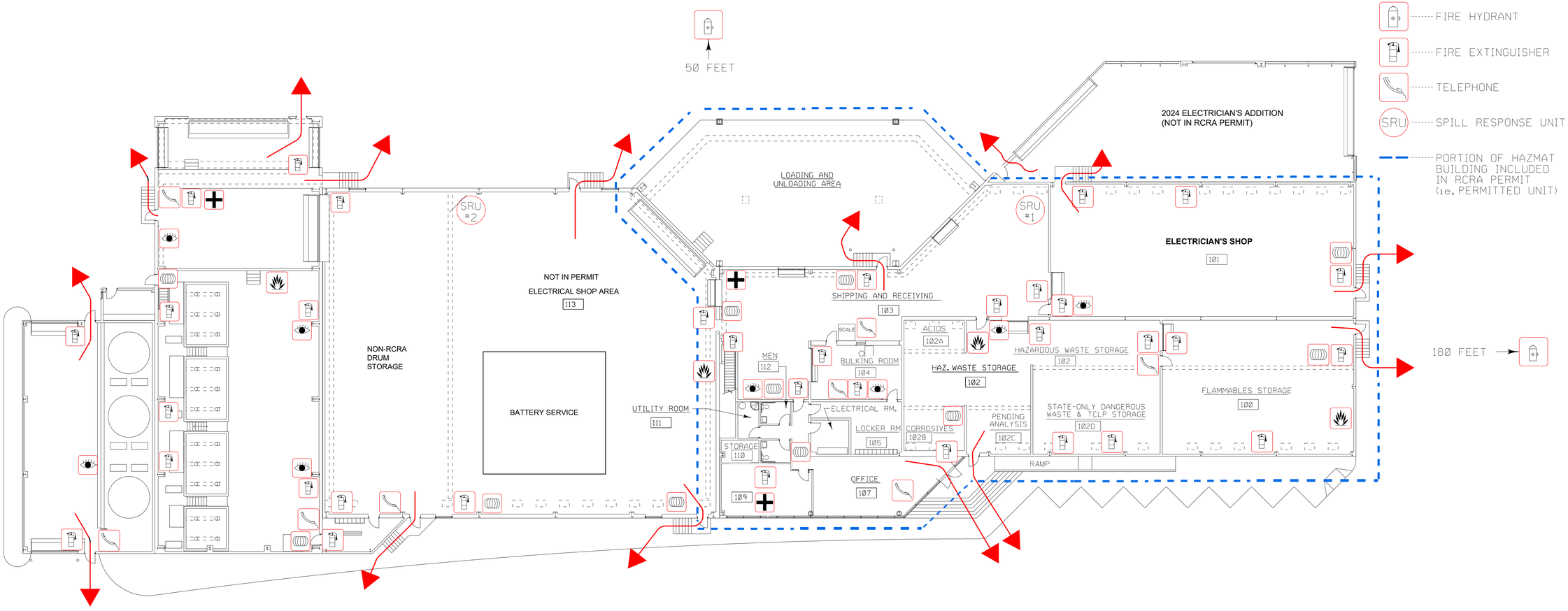
FOR FACILITY INTERCOM/PA, DIAL X7133
FROM ANY PHONE

RED ARROWS INSIDE BUILDING
INDICATE ESCAPE ROUTES

LEGEND

- EYE WASH/SHOWER
- FLAMMABLE STORAGE
- FIRST AID KIT
- FIRE ALARM
- FIRE HYDRANT
- FIRE EXTINGUISHER
- TELEPHONE
- SRU — SPILL RESPONSE UNIT
- PORTION OF HAZMAT BUILDING INCLUDED IN RCRA PERMIT (ie, PERMITTED UNIT)

DATE



UPON ARRIVAL AT DESIGNATED EVACUATION AREA, REPORT TO WARDEN FOR HEAD COUNT

PRIMARY
HAZMAT EVACUATION
AREA LOCATED
125 FEET EAST AT
SCALE HOUSE

SECONDARY
HAZMAT EVACUATION
AREA LOCATED 125 FEET
WEST IN THE PARKING LOT

SCALE
1/32" = 1'-0"

0 4 8 16 32 48 FT

Official Use Only

NO.		PL-6	COMPUTER REVISION ONLY	BY	DATE	APPROVED

Drawn BE BOSCO
Envsp
Chkd
Appr
Date

UNITED STATES DEPARTMENT OF ENERGY
BONNEVILLE POWER ADMINISTRATION
HEADQUARTERS, PORTLAND, OREGON

FIGURE F-1
HAZMAT BUILDING
(Z-1255) FLOOR PLAN

SERIAL	SOURCE	SIZE	SHEET	REVISION
PART B	KEP	B	1 OF 1	0

Attachments — Section F

Attachment F-1 and F-2
Inspection Logs

WEEKLY INSPECTION LOG

This inspection log is to be completed for rooms 100, 102 (A, B, C, D), 103 (Shipping and receiving), 104 (bulking room), and loading / unloading area. If problems are noted the inspector must indicate the room number or location in the "If not ok, provide details" section.

DATE: _____ TIME: _____

Week Inspected (circle)	1	2	3	4	5

Inspector Name (please print): _____ Inspector Signature:_____

Inspection Item	Acceptable (Yes/No)	If not acceptable, provide details	Selected remedy	Remedy completion date	Initials when done
DRUMS/CONTAINERS: Inspect to verify these are not leaking, damaged, or rusted and that lids are tight, are not stacked too close or too high to restrict movement or create a safety hazard, and that incompatible wastes are not stored near each other.					
Leaking? Damaged? Rusted? Lid on?					
Rows no larger than 2 drums wide or 2 pallets high? At least 30-inch aisle space?					
Are incompatible wastes stored near each other?					
Verify no RCRA containers are stored in Loading / Unloading area.					
LABELS: Inspect to verify labels are not missing, difficult to read or incomplete.					
Verify labels are NOT missing (including the D.O.T waste code), difficult to read, facing in, nearing the 365-day cutoff from the "date placed in storage" or is label falling off?					
WORK SPACE: Verify areas are not cluttered or blocked by equipment. Keeping working spaces orderly will help avoid safety hazards associated with emergency evacuation and emergency crises.					
No open drums?					
Cluttered?					
Phones/radios missing, or not functioning?					

Inspection Item	Acceptable (Yes/No)	If not acceptable, provide details	Selected remedy	Remedy completion date	Initials when done
CONTAINMENT					
Do trenches or sumps have accumulated fluids?					
Are there cracks[1] or damage on the floors?					
Containment areas damaged?					
BUILDING LOCK: Verify lock is not broken or otherwise malfunctioning.					
Emergency exit doors and card key lock on doors to outside in good repair?					
EYE WASH STATIONS: Test to verify each station is not broken or otherwise malfunctioning.					
Is the eye wash blocked by equipment?					
Test shower and eyewash bowl – open valve to flush and test flow.					
FIRE ALARMS, SIGNS AND EXTINGUISHERS: Verify materials are present and that units are not expired or otherwise damaged.					
Fire alarm pull box accessible (if present)?					
EA 5# or 17# Halon extinguisher Blocked? (Check inspection tag, safety pin in-place, and pressure gauge in safe zone.)					
Phones/radios missing, or not functioning?					
Emergency signs and lighting bulbs burned out?					
EMERGENCY SPILL CONTAINMENT SUPPLIES: Verify emergency response equipment is not blocked and that overpack drums are not missing.					
Accessible, not blocked by obstacles?					
Verify no items are missing from emergency equipment inventory list posted on SRU and at emergency supply storage area in loading / unloading area.					

[1] Significant cracks are defined as wider than 0.01 inch. If a crack is observed wider than 0.01 inch, notify the Material Handler Foreman II for further evaluation.

MONTHLY INSPECTION LOG

This inspection log is to be completed for rooms 100, 102 (A, B, C, D), 103 (Shipping and receiving), 104 (bulking room), and loading / unloading area. If problems are noted the inspector must indicate the room number or location in the "If not ok, provide details" section.

DATE: _____ TIME: _____

Inspector Name (please print): _____Inspector Signature:_____

Inspection Item	Acceptable (Yes/No)	If not acceptable, provide details (Be specific about room number and location)	Selected remedy	Remedy completion date	Initials when done
SUMPS AND CONTAINMENT SYSTEMS: ***Note: Confined Space Entry monitoring must be performed and followed. Contact Ross Complex Safety Office.					
Cracks or deteriorated coating in concrete? [1]					
Accumulated fluids? (Pumps in loading area sump should be plumbed with switch and drums tested when full. Describe fluids in trench.)					
Other damage, gaps, or deterioration?					
CHECK PLATE COVER ON FLOOR: Inspect for cracks or broken welds or holes in all rooms with check plate floor					
Cracks or broken welds in check plate?					
Caulking around check plate floor deteriorated?					

[1] Significant cracks are defined as wider than 0.01 inch. If a crack is observed wider than 0.01 inch, notify the supervisor for further evaluation.