



Inspecting & Maintaining Your Facility

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Inspecting your HW Storage areas

- 40 CFR 265.174 - The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
- [Comment: See Sec. 265.171 for remedial action required if deterioration or leaks are detected.]

Inspect areas where containers are stored, at least weekly, looking for leaks



Look for deterioration caused by corrosion or other factors.





03/3



40 CFR 265.171-If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.



While I'm already here inspecting the area, is there anything else I should check?


- Are the containers marked and dated? (visible for inspection?)
- Is accumulation storage time limit approaching? (90 or 180 days)
- Is there adequate Aisle Space for equipment in an emergency?



That's a good start, is there anything else I can look for?


- Are flammables < 50' from the property line & incompatibles segregated?
- Are containers closed? (bungs tight, snap rings closed)
- Do you have adequate Spill & Fire Equipment and access to communications and/or an alarm?





While I'm here, is there any thing else I should document?

- The name or initials of the person who conducted the inspection and the date.
- Any problems found, and the corrective actions taken to address them.



That's a lot of information,
would you happen to have all
that on one easy to use sheet?

SAMPLE - WEEKLY CONTAINER STORAGE AREA INSPECTION LOG

ITEM/WEEK	WEEK OF _____	WEEK OF _____	WEEK OF _____	WEEK OF _____	WEEK OF _____
Containers in good condition, not leaking?					
Containers closed when not in use?					
Containers properly marked?					
Container markings visible?					
Containers stored longer than allowed?					
Containers segregated by waste type?					
Ignitable or reactive waste stored >50' from property line?					
Adequate aisle space?					
Spill control, communication, safety, & fire equipment present?					
Name, date, and time of person performing inspection					
Corrective action taken (Use separate sheet as necessary)					

Cool, where can I get one of those?

**COMPLIANCE ASSISTANCE
PACKET**

FOR

**HAZARDOUS WASTE
GENERATORS**



**NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE COMPLIANCE AND ENFORCEMENT**



Where can I find that online?

- The whole Compliance Assistance Packet
www.nj.gov/dep/enforcement/CAVPacket%20Master.pdf
- Just the Sample Inspection Log
www.nj.gov/dep/enforcement/hw-inspection.pdf

What other areas of my facility should I inspect weekly?

- Satellite Accumulation Containers (Sept 2008 Position Paper)
- Universal Waste Accumulation Areas (closed, labeled and protected from breakage)



Any other spots?

- Used Oil Tank/Container (Labeled “Used Oil” No leaks/spills)
- HW Parts Washers (SQGs & LQGs should include this waste in waste generation/manifest)
- Bulb Crushers - (HW Satellite, Air permit needed)



Hazardous Waste Tanks

40 CFR 265.195 Inspections.

- (a) The owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design.

- (b) Except as noted under the paragraph (c) of this section, the owner or operator must inspect at least once each operating day:
 - (1) Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order;
 - (2) Above ground portions of the tank system, if any, to detect corrosion or releases of waste; and
 - (3) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

So, you have to inspect them every day, except ...

- (c) Owners or operators of tank systems that either use leak detection equipment to alert facility personnel to leaks, or implement established workplace practices to ensure leaks are promptly identified, must inspect at least weekly those areas described in paragraphs (b)(1) through (3) of this section. Use of the alternate inspection schedule must be documented in the facility's operating record. This documentation must include a description of the established workplace practices at the facility.
- (d) Performance Track member facilities may inspect on a less frequent basis, upon approval by the Director, but must inspect at least once each month. To apply for a less than weekly inspection frequency, the Performance Track member facility must follow the procedures described in §265.15(b)(5).

Why wasn't this included in (b) above?

- (e) Ancillary equipment that is not provided with secondary containment, as described in §265.193(f)(1) through (4), must be inspected at least once each operating day.



Cathodic Protection Systems

- (f) The owner or operator must inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:
 - (1) The proper operation of the cathodic protection system must be confirmed within six months after initial installation, and annually thereafter; and
 - (2) All sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).

 - Note: The practices described in the National Association of Corrosion Engineers (NACE) standard, “Recommended Practice (RP-02-85)—Control of External Corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems,” and the American Petroleum Institute (API) Publication 1632, “Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems,” may be used, where applicable, as guidelines in maintaining and inspecting cathodic protection systems.

Logs?

- (g) The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b) of this section.

