

Keyword Summary:

eDocument Workflow Data Ingestion Form

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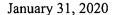
2/4/2020

DERR - Hazardous Waste Permitting

Note: All HW Permitting Documents fall under "Permit-Intermediate" doc type.

Secondary ID: OHD 071 654 958

racinty Name:	Retrieve rechnologies			
County:	Fairfield		CBI/Trade Secret Info (see protoc	ol below)
Program:	RCRA C – Hazardous Waste		Request contains CBI/TS claim?	No
Permit Type:	Permit to Install & Operate		Was a "public" copy included?	No
			Financial Assurance Info (see prot	ocol
Permit Subtype:	Application & Support	ا	below)	
Permit Classification:	Permit Application		Request contains FA policy/account # info?	No
Permit Purpose:	Class 2 Mod		Contingency Plan Info (see protocol below)	
Confidentiality Status:	Public Record for Publication		Request contains facility staff pers/home phone #'s?	No
CBI/Trade Secret Protocol				
3745-50-30. Permittees must comply va corresponding "public" copy of the a Financial Assurance Info Protoco If the application contains "original signor Melissa Cheung) as these types of dapplication is not "original signature", impacted pages should simply be physically page, a page can be inserted which state account numbers have been removed	with the complete requirements of the oplication or request which should be plication or request which should be nature" financial assurance documents comments must be secured in CO's fire it includes information like insurance cally removed and not scanned/includes: "Pages of this application which co from this web-available version of the mods, ERAS has set up a tracking/req	above-cited rule ingested into eD s, these docume eproof file cabine e policy, bank acted as a part of tontain financial document."	ints must be forwarded to CO FA staff (set. Also, even if the FA information included to count, letter of credit or bond numbers the ingested application. In place of the assurance mechanism details specific to SharePoint where DO staff can make a result of the country of the	Shawn Sellers uded in a mod , these removed o policy or
<u></u>				
If the application contains facility staff personal/home phone number information, the impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain facility staff personal/home phone number information have been removed from this web-available version of the document."				
Form Completed by:	Chloé Mercier	2/5/2020)	
				-
Comments				





Ohio EPA Director c/o Brad Mitchell, DERR, Hazardous Waste Permitting Section 50 West Town Street, Suite 700 Columbus, Ohio 43215

RE: Class 2 Modification Request for Change in Inspection Frequency and Points of Inspection, RCRA Permit Renewal Application, Retriev Technologies, Inc., Lancaster, Ohio, OHD071654958

On November 14, 2017, Ohio EPA journalized the Retriev Technologies, Inc. (Retriev) Hazardous Waste Facility Installation and Operation Renewal Permit. Table 5-1 of the Permit Renewal Application identifies the inspection schedule, including frequency and points of inspection. When Retriev originally prepared the Renewal Application, all points of inspection were identified for a daily frequency. Additionally, some of the included points of inspection were unrelated to our RCRA Permit. OAC 3745-54-15 and the referenced regulations therein, allow for inspection frequencies other than daily unless subject to spills (e.g., loading and unloading areas, tanks, etc.). Therefore, Retriev is requesting a transition to a weekly inspection frequency for various points of inspections that are not required by regulation to be performed daily. Additionally, Retriev is requesting the removal of various points of inspection that have no relevance to our RCRA Permit, as these items pertain to health and safety or permitted air emissions and are addressed by other regulatory programs (OSHA, PTIO). Points of inspection that are similar/duplicative of others or related to the no longer relevant flood plain are also proposed to be removed.

The proposed changes are reflected in Table 5-1 of the Permit Renewal Application. These proposed changes are not only in line with regulatory requirements but will help Retriev ensure manpower is available to adequately perform inspections without unnecessary burden. A redline and clean version of Table 5-1 is attached. A complete updated PDF of the renewal application is also provided on CD. The revision log has also been updated appropriately and is attached.

Per C.4 of the Appendix to OAC 3745-50-51, the proposed changes to inspection frequency and items of inspection are considered a Class 2 Modification. Within seven days of the date of this modification request, Retriev will complete the necessary notifications identified in OAC 3745-50-51(D)(2)(b). A copy of the modification request will also be placed in the Lancaster public library, a 60-day public comment period will be established, and a public meeting will be held as required by OAC 3745-50-51(D)(2).

If you have any questions or require additional information, please contact Tom Plute of Retriev at 740-653-6290.

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

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Component of RCRA Part B Renewal Application	January 31, 2020 Subject to Revision - Refer to Letter Referenced Endnotes
Certification Statement	X (Rev 6)
1.0 Introduction	` '
1.1 Applicable Rules and Regulations	· ·
1.2 Excluded and Exempt Activities	
1.3 Terminology	C1 (Rev 0.1); I (Rev 0.4); V (Rev 1)
1.4 Application Content and Format	
2.0 Facility Description	
2.1 Facility Location	
2.2 Facility Layout	
2.2.1 265 Quarry Road Building Construction	
2.2.2 295 Quarry Road Building Construction 2.3 Traffic Information	
2.4 Floodplain Information	B (Rev 0.2); T (Rev 4)
2.5 Waste Placement Prohibitions and Seismic Considerations	B (Rev 0.2), 1 (Rev 4)
3.0 Waste Characteristics	
4.0 Process Information	C1 (Rev 0.1); I (Rev 0.4); V (Rev 5)
4.1 Hazardous Waste Receiving	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); P (Rev 1); V (Rev 5)
4.2 Hazardous Waste Shipping	A (Rev 0.1); C1 (Rev 0.2); V (Rev 5)
4.3 Hazardous Waste Transfer and Staging Associated with Recycling	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); V (Rev 5)
4.4 Description of Permitted Storage Units	I (Rev 0.4); L (Rev 0.5); Q (Rev 2); V (Rev 5)
4.4.1 265 Storage Unit	C1 (Rev 0.1); R (Rev 3); V (Rev 5)
4.4.2 295 Storage Unit	A (Rev 0.1); C1 (Rev 0.2); Q (Rev 2); R (Rev 3); V (Rev 5)
4.5 Containers	V (Rev 5)
4.5.1 Container Management Practices	V (Rev 5)
4.5.2 Special Requirements for Ignitable, Reactive, or Incompatible Wastes	V (Rev 5)
4.5.3 Tracking and Recordkeeping	I (Rev 0.4); T (Rev 4); V (Rev 5)
5.0 Procedures to Prevent Hazards	
5.1 Security Information	
5.2 Inspections	
5.2.1 Frequency of Inspection	
5.2.2 Inspection Logs 5.3 Design and Operation of Facility	
5.4 Equipment Requirements	
5.4.1 Internal and External Communication Systems	
5.4.2 Emergency Equipment	
5.4.3 Water for Fire Control	
5.4.4 Aisle Space Requirements	
5.5 Arrangements with Local Authorities	
5.6 Preventive Procedures, Structures, and Equipment	
5.6.1 Loading and Unloading Operations	
5.6.2 Run-off	
5.6.3 Water Supplies	
5.6.4 Equipment and Power Failure	
5.6.5 Personnel Protective Equipment	
5.7 Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes	
6.0 Contingency Plan	
7.0 Personnel Training	
8.0 Closure	
9.0 Groundwater Protection 10.0 Corrective Action	
Figures 2-1	
2-1	
2-3	
2-4	I (Rev 0.1)
2-5	A (Rev 0.1); C1 (Rev 0.2); R (Rev 1); V (Rev 2)
4-1	1. (1.0. 0.1), 01 (1.0. 0.2), 11 (1.0. 1), 1 (1.0. 2)
4-2	
Tables	
1-1	
1-2	C1 (Rev 0.1); V (Rev 1)
4-1	R (Rev 1)
5-1	C1 & C2 (Rev 0.1); R (Rev 1); T (Rev 2); Y (Rev 3); Z (Rev 4)
7-1	C2 (Rev 0.1); I (Rev 0.2); T (Rev 1)
10-1	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
Appendices	
A Supporting Documentation for Floodplain	T (Removed Entire Appendix)
Floodplain Evaluation Report (Stone Environmental)	B (Rev 0, New)
MuscleWall Design Package	B (Rev 0, New); F (Rev 0.1)
Plates	
	A (Paul 0.1); C1 (Paul 0.2); I (Paul 0.2); P
2 3	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
4	R (Rev 1); T (Rev 2) A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); R (Rev 1); V (Rev 2)
	1 A (Nev 0.1), C1 (Nev 0.2), 1 (Nev 0.4), K (Nev 1); V (Nev 2)

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Component of RCRA Part B Renewal Application	Subject to Revision - Refer to Letter Referenced Endnotes
Attachment A - Waste Analysis Plan	
1.0 Introduction	C1 (Rev 0.1); I (Rev 0.3); V (Rev 1)
2.0 Facility Description	A (Rev 0.1); R (Rev 1)
3.0 Waste Characteristics	I (Pay 0.2); T (Pay 2)
4.0 Computer-Based Waste Acceptance, Container Tracking, and Recordkeeping 5.0 Waste Acceptance Procedure	I (Rev 0.3); T (Rev 2) A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); V (Rev 1)
6.0 Requirements for Ignitable, Reactive, and Incompatible Wastes	A (Rev 0.1), C1 (Rev 0.2), 1 (Rev 0.3), V (Rev 1)
7.0 Requirements Pertaining to Land Disposal Restrictions	
Figures	
2-1	
2-2	I (Rev 0.1)
2-3	A (Rev 0.1); C1 (Rev 0.2); R (Rev 1); V (Rev 2)
5-1	
Tables	
3-1	
Appendices A Representative Safety Data Sheets on CD	
B Example Material Profile and General Service Agreement	
Addendum - Subpart BB and CC	P (new Rev 0)
Attachment B - Contingency Plan	
1.0 Introduction	
1.1 Facility Description	R (Rev 1)
1.2 Floodplain Information	B (Rev 0.1); T (Rev 2)
2.0 Emergency Coordinators	I (Rev 0.1)
3.0 Implementation	
4.0 Emergency Response Procedures	
4.1 Notification 4.2 Identification of Hazardous Materials	
4.2 Identification of Hazardous Materials 4.3 Assessment	
4.4 Control Procedures	
4.4.1 Fire or Explosion	
4.4.2 Release	
4.4.3 Flood	B (Rev 0.1); C2 (Rev 0.2); I (Rev 0.3); R (Rev 1); T (Removed)
4.5 Prevention of Recurrence/Spead of Fires, Explosions, or Releases	(
4.6 Storage and Treatment of Released Material and Impacted Environmental Media	
4.7 Incompatible Waste	·
4.8 Post-Emergency Equipment Maintenance	
4.9 Container Spills and Leakage	
5.0 Emergency Equipment	
6.0 Coordination Agreements 7.0 Evacuation Plan	
8.0 Required Reports	
9.0 Copies of the Contingency Plan	
10.0 Amendment of the Contingency Plan	
Figures	
1-1	
1-2	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
4-1	B (Rev 0, New); I (Rev 0.1); U (removed)
5-1	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); U (Rev 2); V (Rev 3)
7-1	U (Rev 1)
Tables	D1 (D0.1) T (D0.2) C (D0.2)
2-1	B1 (Rev 0.1); E (Rev 0.2); G (Rev 1); H (Rev 2); K (Rev 3); M (Rev 4); Y (Rev 5); V (Rev 6)
4-1	4); X (Rev 5); Y (Rev 6) N (Rev 1)
5-1	U (Rev 1)
Appendices	(NOV 1)
A Supporting Documentation for Flood Control Procedures	B (Rev 0, New); F (Rev 0.1); T (Removed)
Plates	
	R (Rev 1); T (Rev 2)
Attachment C - Personnel Training Outlines and Job Descriptions on CD	
Job Descriptions Battery Technician	T (D 0.1)
Environmental Manager	I (Rev 0.1)
Health & Safety Manager	I (Rev 0, New) I (Rev 0, New)
Facility Manager	I (Rev 0, New)
Janitorial	I (Rev 0.1)
Lead Supervisor	I (Rev 0.1)
Maintenance	I (Rev 0.1)
Shipping and Receiving	I (Rev 0.1)
Personnel Training Outlines	
Accident Prevention	
Cadmium Safety	
Communication and Alarm Systems	
Contingency Plan Implementation Emergency Action Plan (Evacuation)	
FirstAid-CPR	
HAZMAT-DOT-Manifesting	·
HAZWOPER 8 Hour Refresher	C2 (Rev 0.1)
HAZWOPER Emergency Response	C2 (Rev 0.1) C2 (Rev 0.1)
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Commence of DCD A Dord D Dorgon 1 Annihing	Subject to Devision Refer to Letter Referenced Enductes
Component of RCRA Part B Renewal Application Attachment C - Personnel Training Outlines and Job Descriptions on CD (CONTINUED)	Subject to Revision - Refer to Letter Referenced Endnotes
HAZWOPER HAZWOPER	
	C2 (Parr O. Narry), I (Parr O. 1), T (Parrayed)
Flood Control Supervisor	C2 (Rev 0, New); I (Rev 0.1); T (Removed)
Lead Safety Maintenance	
On the Job Training	
OSHA, RCRA, OAC	
Respiratory Protection	
Right to Know - Safety Data Sheets	
Safe Handling-Transfer-Storage of Hazardous Materials	
Shutdown Operations	
Standard Operating Procedures	
Using, Repairing, and Maintaining Equipment Attachment D - Closure Plan	
1.0 Introduction	
1.1 Site Location and Description	
1.2 Environmental Setting	•
2.0 List of Hazardous Waste	
3.0 Description of Hazardous Waste Management Units to be Closed	n /n 1)
3.1 265 Storage Unit	R (Rev 1)
3.2 295 Storage Unit	R (Rev 1)
3.3 Maximum Inventory of Waste	A (Rev 0.1); D (Rev. 0.3); I (Rev 0.4); L (Rev 0.6)
4.0 Closure Performance Standard and Type of Closure	A (Rev 0.1)
5.0 Closure Activites	
5.1 Waste Removal	
5.2 Surface Decontamination	
5.3 Integrity Evaluation	
5.4 Soil Sampling	A (Rev 0.1)
6.0 Management of Waste	
6.1 Wastes from Waste Removal	
6.2 Wastes from Surface Decontamination	
6.3 Investigation Derived Waste	
7.0 Air Emissions and Wastewater	
8.0 Personnel Health and Safety	
9.0 Oversight and Certification	
10.0 Closure Coste Estimate and Financial Assurance	A (Rev 0.1); B (Rev 0.2); D (Rev 0.3); I (Rev 0.4); J (Rev 0.5)
11.0 Closure Schedule	
12.0 References	
Figures	
1-1	
1-2	I (Rev 0.1)
1-3	A (Rev 0.1); C1 (Rev 0.2); R (Rev 1); V (Rev 2)
3-1	
5-1	
5-2	A (Rev 0, New); R (Rev 1)
Tables	
2-1	
5-1	
Appendices	
A 2006 Closure Plan on CD	
B Custom Site Soil Resource Report	
Plates	
1	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
Attachment E - Closure Cost and Financial Assurance	
Closure Cost Estimate	A; B; D; I; J; R; S; W
Financial Assurance	O; S; W
Attachment F - Part A Application	
Form 9029 Site ID	l; X
Form 2050	I; X
Figure 1	R (Rev 1)
Figure 2	R (Rev 1)
Photographs	I; R (Rev 1)

K:\CCA\PROJECTS\TOXCO\Haz Permit\2020 Jan Mod\Class 2\[Revision Log.xlsx]Page 3

- Revision to various components of the Part B Renewal Application, submitted 11-3-15 in response to Ohio EPA's 9-22-15 NODs
- Revision to various components of the Part B Renewal Application, submitted 12-31-15 in response to Ohio EPA's 9-22-15 NODs
- B1 Revison to emergency contacts based on personnel change, submitted 12-31-15
- C1 Revision to various components of the Part B Renewal for Big Green Box, typos, WMUs, and page number format, submitted 3-4-16
- C2 Revision to various components of the Part B Renewal Application, submitted 3-4-16 in response to Ohio EPA's 2-23-16 and 3-1-16 emails
- Revision to various components of the Part B Renewal Application, submitted 4-5-16 in response to Ohio EPA's 2-23-16 and 3-1-16 emails
- Revison to emergency contacts based on personnel change, submitted 5-31-16 F
- Revision to various components of the Part B Renewal Application, submitted 6-14-16 in response to Ohio EPA's 2-23-16 and 3-1-16 emails
- G Revison to emergency contacts based on personnel and responsibility change, submitted 9-14-16
- Revison to emergency contacts based on personnel and responsibility change, submitted 1-5-17
- Revisions to various componenents of the Part B Renewal Application, submitted 1-27-17 in response to 10-3-16 Ohio EPA meeting
- Revisions to various componenents of the Part B Renewal Application, submitted 8-17-17 in response to 10-3-16 Ohio EPA meeting Revison to emergency contacts based on personnel and responsibility change, submitted 10-5-17 (withdrawn 12-1-17) K
- Typo correction to main text and closure plan, submitted 10-19-17.
- Revison to emergency contacts based on personnel and responsibility change, submitted 11-15-17 Μ
- Revision to outside emergency contacts based on typo, submitted 11-29-17
- Annual Update to Financial Assurance, submitted 1-10-18
- P Revision to BGB receiving; new WAP addendum, submitted 5-18-18
- Request for floodplain schedule extension, submitted 7-5-18 (no changed pages to application)
- Informational revision to storage time language as allowed by regulation and permit, submitted 8-20-18 Q
- Revisions to various components of the Part B Renewal Application to expand capcity and footprint of 295 unit, submitted 10-4-2018
- S Annual Update to Financial Assurance, submitted 11-1-18
- T Revisions to remove floodplain and revise operational record requirements within the Part B Renewal Application and Permit, submitted 11-5-18
- Revisions to the contingnecy plan, submitted 1-28-19
- V Revisions to remove BGB operations and update financial assurance language, submitted 4-19-19
- W Annual Update to Financial Assurance, submitted 11-1-19
- X Contacts and certification upate, submitted 12-3-19
- Revision to inspection procedure and emergency contacts, submitted 1-30-20
- Revision of inpsection frequency and points of inspection, submitted 1-31-20

Clean Changed Pages

Table 5-1. Inspection Schedule, Retriev Technologies, Inc., Lancaster, Ohio

Revision 4

Inspection Category	Frequency	Points of Inspection		
General		• Container time limit in staging adjacent to recycling process (1)	• Container time limit in staging prior to storage or shipping (1)	• Sump in truck bays empty (1)
	Daily	• Visual condition of 90 day storage tank (leaks present) (2)	 Sufficient freeboard in 90 day storage tank based on alarm (2) 	• Liquids present in interstitial space of 90 day storage tank based on alarm (2)
		• 90 day storage tank properly labeled (2)	 Visual condition of 90 day storage tank containment (leaks present) 	
General		Waste-related warning signage is in place	 Eye wash and shower stations clean and functional 	Waste containers properly closed
		Minimum 30 inches of aisle space maintained	 Oil storage area clean and drums properly marked 	 Fire extinguishers charged, tagged, and accessible
		• Floor clean and free of debris	 Evidence of leaks near waste containers 	Hazardous conditions observed
	Weekly	• Water, fire, service, and gas lines properly marked	 Emergency equipment containers full and accessible 	Lighting working properly
		Proper stacking height of waste containers	 Sump in recycling areas free of liquid and debris 	Waste containers properly labeled
		Waste container condition (visual deterioration)	Emergency equipment inventoried	Audible and visual alarms functional
		Personnel protective equipment inventoried and functional	 Waste container time limit in less than 90 day storage areas 	Perimeter Fence/Security (Quarterly)
		Leaking containers	Spills observed	General cleanliness
265 Permitted Storage Unit		Container condition	Containers properly labeled	Containers closed
	Weekly	Berm and ramp condition	 Cracks or gaps in base 	Coating condition
		Incompatible wastes properly segregated	• Proper aisle space	Proper stacking height
		Container time limit in temporary staging area/battery sorting	Available capacity	Container storage time limit
295 Permitted Storage Unit		Only containers without free liquids present	Spills observed	General cleanliness
	Weekly	Container condition	Containers properly labeled	Containers closed
	Weekly	Cracks or gaps in base of unit	• Proper aisle space	Proper stacking height
		Incompatible wastes properly segregated	Available capacity	Container storage time limit

Notes:

K:\CCA\PROJECTS\TOXCO\Haz Permit\2020 Jan Mod\Class 2\[Table 5-1 - inspection schedule Rev 4 clean.xlsx] Sheet1

Daily frequency means within a 24-hour period, regardless of facility operation schedule, when the applicable area/item is in use

Weekly frequency means at least once between Sunday through Saturday, regardless of facility operation schedule, when the applicable area/item is in use

Refer to actual inspection procedure and log for additional information on points of inspection

Corrective actions will be performed if necessary based on inspection observations

⁽¹⁾ Daily inspection relevant to loading/unloading areas only when in use

Daily inspection may be performed remotely via Virtual Tank Inspection SOP VT01 (1/13/2020 and subsequent revisions) by viewing live feed from camera(s) that can: identify presence of leakage within and outside of secondary containment, identify actuated visibile alarm for freeboard, identify actuated audible alarm for liquids in interstitial space, and identify precence of label; remote inspections require recordkeeping similar to non-remote inspections; at least once per week the inspection must be non-remote; inspection relevent only when a tank is in use

Redline Changed Pages

Inspection Category	Frequency	Points of Inspection		
General		• Container time limit in staging adjacent to recycling process (1)	Container time limit in staging prior to storage or shipping (1)	• Sump in truck bays empty (1)
	Daily	• Visual condition of 90 day storage tank (leaks present) (2)	 Sufficient freeboard in 90 day storage tank based on alarm (2) 	• Liquids present in interstitial space of 90 day storage tank based on alarm (2)
	* I	• 90 day storage tank properly labeled (2)	• Visual condition of 90 day storage tank containment (leaks present) (2)	MA 37 10 10 10 10 10 10 10 10 10 10 10 10 10
		• Waste-related warning signage is in place	 Eye wash and shower stations clean and functional 	Sump in truck bays empty
		Machine guards in place and working properly	 Oil storage area clean and drums properly marked 	• Waste containers properly closed
		• Minimum 30 inches of aisle space maintained	 Evidence of leaks near waste containers 	 Fire extinguishers charged, tagged, and accessible
		• Floor clean and free of debris	 Emergency equipment containers full and accessible 	Hazardous conditions observed
		Water, fire, service, and gas lines properly marked	 Sump in recycling areas free of liquid and debris 	Lighting working properly
		Outside conditions do not interfere with work	 Rain event in last 24 hours 	Overhead hazards
General	Daily	- Guard, deadman switches, and machine safety devices operating correctly	 Parameters of scrubber checked and recorded 	• Supply room cleaned
	Weekly	- Perimeter inspection	Emergency equipment inventoried	Air pollution control equipment operating correctly
		- Floor greating structural condition	• Waste container condition (visual deterioration)	Waste containers properly labeled
		• Proper stacking height of waste containers	 Container time limit in staging prior to storage or shipping 	Container time limit in temporary staging prior to shipment
		- Container time limit in staging adjacent to recycling process	 Personnel protective equipment inventoried and functional 	Audible and visual alarms functional
		Material storage tanks properly labeled	 Materials are properly label and segregated 	Sufficient freeboard present in storage tanks
		Storage tank level switches operational	 Visual condition of storage tanks 	 Tank secondary containment condition and liquids present
		• Waste container time limit in less than 90 day storage areas	Perimeter Fence/Security (Quarterly)	
265 Permitted Storage Unit		Leaking containers	Spills observed	General cleanliness
	Daily Weekly	Container condition	Containers properly labeled	Containers closed
		Berm and ramp condition	 Cracks or gaps in base 	Coating condition
		• Incompatible wastes properly segregated	Proper aisle space	Proper stacking height
		Container time limit in temporary staging area/battery sorting	Available capacity	Container storage time limit
295 Permitted Storage Unit		Only containers without free liquids present	Spills observed	General cleanliness
	Daily Weekly	Container condition	Containers properly labeled	Containers closed
		Cracks or gaps in base of unit	Proper aisle space	Proper stacking height
	6.8%	Incompatible wastes properly segregated	Available capacity	Container storage time limit

Notes:

Daily frequency means within a 24-hour period, regardless of facility operation schedule, when the applicable area/item is in use

Weekly Daily frequency means at least once between Sundary through Saturday, regardless of facility operation schedule, when the applicable area/item is in use

Refer to actual inspection procedure and log for additional information on points of inspection

Corrective actions will be performed if necessary based on inspection observations; flood control corrective actions will be completed within 45 days of initial documentation

(1) Daily inspection relevant to loading/unloading areas only when in use

 $K: \CCA\PROJECTS\TOXCO\Haz\ Permit\2020\ Jan\ Mod\Class\ 2\\ [Table\ 5-1\ -\ inspection\ schedule\ Rev\ 4\ redline.xlsx] Sheet 1$

Daily inspection may be performed remotely via Virtual Tank Inspection SOP VT01 (1/13/2020 and subsequent revisions) by viewing live feed from camera(s) that can: identify presence of leakage within and outside of secondary containment, identify actuated visibile alarm for freeboard, identify actuated audiblevisible alarm for liquids in interstitial space, and identify precence of label; remote inspections require recordkeeping similar to non-remote inspections; at least once per week the inspection must be non-remote; inspection relevent only when a tank is in use