

ATTACHMENT C

INSPECTION SCHEDULES AND FORMS

INTRODUCTION

This section presents the inspection schedules and forms as required by the A.A.C. R18-8-270A and 40 CFR 270.14(b)(5). Also included is an inspection and maintenance program to meet the general requirements of 40 CFR 264.15 and the miscellaneous units requirements of 40 CFR 264 Subpart X.

As part of its operation, maintenance, and monitoring program, of the Groundwater Remediation System (GRS) located at 1310 West Fairway Drive, Nogales, Arizona, the Permittee shall inspect facility areas, structures, equipment, and groundwater monitoring and extraction wells, to ensure proper condition and operation of the GRS. The following is a list of items that shall be inspected, on a regular basis:

- GRS equipment and operation;
- GRS secondary containment unit;
- GRS Security;
- Groundwater Monitoring Wells and Extraction Well(s) equipment and operation; and
- Groundwater Monitoring Wells and Extraction Well(s) Security.

The inspection schedule is found in Table 2-2 of Permit Attachment F. Examples of record keeping forms are provided in Figures 2-3, 2-4, 2-6a, and 2-6b of Permit Attachment F. These are examples of required inspection criteria. The actual form composition may vary. Records shall be maintained on-site for a period not less than three years from the date of the inspection.

1.0 INSPECTION RECORD-KEEPING REQUIREMENTS

The Permittee shall conduct routine visual inspections. Inspections shall be documented at the frequencies specified in Table 2-2 of Permit Attachment F, *Post-Closure Inspection & Maintenance Schedule*. Routine inspections of the GRS peripherals shall include checking for equipment malfunctions, structural deterioration, and any other deficiencies that could threaten human health, safety, or the environment or have the potential to cause a release of hazardous waste materials. All inspectors shall document the condition of items being inspected along with corrective actions taken (if appropriate), the name of the inspector, and the date of the inspection. When a hazard is imminent or has already occurred, corrective action shall be taken immediately according to the Contingency Plan in Permit Attachment E. Completed inspection forms shall be maintained by the Permittee, on site, for a period of at least three years from the date of the inspection. Inspection records shall be made available to ADEQ, upon request.

2.0 MAINTENANCE

2.1 GRS Maintenance

The Permittee's routine Preventive Maintenance Schedule and Operating Log are designed to identify and correct conditions relating to equipment and systems that can cause environmental degradation or endangerment of public health and safety before the equipment or system fails. These preventive maintenance policies and procedures are required to be followed by the Permittee's representatives at the GRS in Nogales, Arizona.

All maintenance activities shall be recorded in the Activity Log on the day the activity occurs. The equipment and systems shall be inspected, tested, adjusted, repaired, cleaned, lubricated, and replaced.

Items included on the Activity Log include:

- Date and time maintenance occurred;
- Name of individual(s) and company responsible for maintenance;
- Description of maintenance activity (including procedures used and specific equipment serviced)

A sample of the Groundwater Remediation System Operating Log is provided in Figure 2-3 of Permit Attachment F. A sample of the Activity Log is provided in Figure 2-4 of Permit Attachment F.

2.2 GRS Preventive Maintenance

Preventive maintenance shall be performed on the treatment system to prevent premature equipment wear and to keep the system in proper working order. Preventive maintenance shall include lubrication, cleaning or replacement of filters and replacement of air fan belts. Maintenance shall be performed only when the system is not operating.

The permittee shall perform routine preventive maintenance on the following items:

- Air blower intake screens;
 - Air fan belt wear;
 - System motors;
 - GRS pumps and piping;
 - Interlock/alarm functionality;
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- Visual inspection of stripper tower and packing material for scaling and biological growth; and
 - Operation of secondary containment sump pump.

Procedures for tower and packing material maintenance are provided in Sections 2.2.4.3 and 2.2.4.4 of Permit Attachment F.

2.3 Objectives

The objectives of the operation, maintenance, and monitoring program are as follows:

- To ensure that operation of the groundwater remediation system is safe and as designed;
 - To determine what maintenance work must be performed to ensure system continuous operation as designed; and
 - To document actions taken.
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