SECURITY AND INSPECTION PLAN

NORLITE LLC COHOES, NEW YORK NYD080469935

PREPARED BY: NORLITE LLC 628 SOUTH SARATOGA STREET COHOES, NEW YORK 12047

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SECURITY AND INSPECTION PLAN

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1.0 INTRODUCTION

This Security and Inspection Plan (SIP) was developed by Norlite LLC for the Norlite facility hereafter referred to as the "Facility." This Plan provides a description of the equipment and procedures in place to prevent unknowing or unauthorized entry of persons or livestock onto active portions of the hazardous waste management areas along with inspection procedures to identify and prevent system malfunction, equipment deterioration, and human error.

When changes in the facility, operations, or equipment occur, the Operations Manager or designee will revise the inspection schedules and/or criteria contained in this plan. The requirements for making changes and/or revisions to this document are provided in Condition D of Module I.

2.0 SECURITY PROCEDURES AN EQUIPMENT

To comply with 6 NYCRR Part 373-2.2(f)(1), Norlite employs personnel who provide security coverage Monday through Friday from 6AM to 10PM at the main plant entrance (Elm Street). The main entrance is closed on Saturdays, Sundays, and holidays. Access to the second plant entrance, at Saratoga Street, is controlled by a Key Card activated security gate. Norlite personnel monitor the active portion of the facility and its operating conditions 24- hours per day, 365 days per year.

Norlite LLC complies with the security provisions of 6 NYCRR 373-2.2(f) as outlined below.

The following paragraphs describe applicable aspects of the plant security system.

2.1 24-Hour Surveillance System

Norlite operates its facility 24-hours per day, 365 days per year. During periods of normal kiln operation, at least three employees are on duty at the site at all times. Ample lighting is provided throughout Norlite's facility except for the quarry area which does not contain hazardous waste, and which does not operate at night. In addition, most plant areas are connected to an internal telephone system which is also used for communications outside the plant. During periods the kilns are not operated, at least one employee is on duty at the site at all times. Norlite employees conduct periodic inspections of the active portion of the facility.

2.2 Barrier and Means to Control Entry

Due to the large area of the site (200 acres), a facility security fence is not practical. However, Norlite has installed a security fence to control entry to the hazardous waste storage area which includes the drum storage, bulk storage, and loading/unloading areas. Norlite has installed a fence on the south end of the facility from the south gate to the quarry. The security fence is a six foot high chain link fence with 2" mesh size and a barbed wire topper. The chain link is buried.

The kiln area will not be provided with a security fence. However, this area is continuously monitored by Norlite personnel, to prevent unauthorized access.

Fenced areas will remain locked at all times except during periods of loading and unloading. During these times, Norlite personnel will be in attendance.

Employees are provided with key cards to gain access to the facility from South Saratoga Street. Guests who arrive from South Saratoga Street must contact the office from outside the gate using the intercom system that is provided. The gate is monitored by closed circuit video so the office personnel can visually observe the traffic. Employees and Guests may enter on the south side of the facility by way of Elm Street. This gate is secured by a manned guard shack and controlled access is possible 24-hours per day.

2.3 Warning Signs

Signs which are legible from a distance of 25 feet are posted at the entrance of the active portion of the Norlite facility, as well as the Liquid Low Grade Fuel (LLGF) storage tank area, drum storage area, unloading area, and the kiln area. These signs are visible from all angles of approach, and bear the legend "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT' and "No Smoking".

2.4 Waiver

The provisions of 6 NYCRR Part 373-2.2(f)(1) authorize a waiver from the security provisions of 6 NYCRR Part 373-2.2(f)(2) and (3) if a facility can demonstrate that unknowing or unauthorized persons or livestock would not injure themselves or cause a RCRA violation upon entering the active portion of the facility. Norlite does not request a waiver at this time.

3.0 INSPECTION

Norlite has developed and follows the inspection schedule in accordance with 6 NYCRR Part 373-2.2(g) and as detailed in Section 3.1.

3.1 Inspection Schedule

AREA/EQUIPMENT	SPECIFIC ITEM	TYPES OF PROBLEMS	INSPECTION
			FREQUENCY
Security Devices	Signs and locks	Removed, Dirty and Knocked Down	Weekly
	Fence and gates	Fallen over, cut, gates functional	Daily
Operating and Structural	Dikes	Erosion, Cracks, Deterioration	Weekly
Equipment	Tank Cover (shale)	Erosion	Weekly
	Ramps	Erosion, Uneven Settlement, Wet Spots	Weekly
	Circulating Pumps	Leaks, Loss of metal thickness,	Weekly
	TV 1 O D' '	Corrosion	*** 11
	Valves & Piping	Leaks, Packing, Deterioration, Corrosion	Weekly
	Concrete Pads, Holding	Cracks, Corrosion, Deterioration	Weekly
	Area	,	
	Structural Supports	Corrosion, Looseness	Daily
	Macerating Pump	Leaks, Corrosion	Daily
Container Storage Area	Container Placement &	Aisle Space and Stacking	Daily
	Stacking		
	Sealing of Open Containers	Open Lids or Bungs	Weekly
	Labeling of Container	Improper Identification, Data Missing	Weekly
	Containers	Corrosion, Leaking, Material Defects	Weekly
	Container Pad	Spills, Cracks, Uneven Settling, Wet Spots	Daily
	Dikes	Erosion, Wet Spots, Cracks,	Weekly
	Dires	Deterioration	Weekly
	Debris & Refuse	Aesthetics, Poor Housekeeping	Weekly
	Warning Signs	Damaged, Missing	Weekly
Loading/Unloading Area	Pad	Spills, Cracks, Uneven Settling, Wet	Daily
		Spots	
	Sealing of Open Containers	Open Lids or Bungs	Daily
	Debris and Refuse	Aesthetics, Poor Housekeeping	Daily
	Labeling of Containers	Improper Identification, Data Missing	Daily
LLGF Storage Building	ConcreteContainment	Spills, Cracks, Uneven Settling, Wet	Daily
Tanks 100 A, B, C & 200		Spots, Leaks	
A, B, C	Piping and Fittings	Corrosion, Leaks, Deterioration	Daily
	Valves	Leaks, Packing, Deterioration	Daily
EQ Tanks 102 A, B			
	Concrete Containment	Spills, Cracks, Uneven Settling, Wet	Daily
		Spots, Leaks	
	Piping and Fittings	Corrosion, Leaks, Deterioration	Daily
	Valves	Leaks, Packing, Deterioration	Daily

AREA/EQUIPMENT	SPECIFIC ITEM	TYPES OF PROBLEMS	INSPECTION FREQUENCY
Tank Storage and Ancillary	Containment Area	Liquid Build up Due to Tank or Pipe	Daily
Equipment (Tanks 300,		Break	
400, 500, 600)	Shale Cover	Erosion, Wet Spots, Settling	Daily
	Piping and Fittings	Corrosion, Leaks, Deterioration	Daily
	Valves	Leaks, Packing, Deterioration	Daily
	Debris and Refuse	Aesthetics, Poor Housekeeping	Daily
	Vegetation	Growth	Daily
External Tank	Tank Shell	Integrity Testing	Annual
Interior Tank	Tank Shell	Corrosion, Welds, Leaks, Bulges,	Annual
		Buckles	
Drum Processing Area	Concrete Containment	Spills, Cracks, Uneven Settling, Wet	Daily
		Spots, Leaks	
	Piping and Fittings	Corrosion, Leaks, Deterioration	Daily
	Valves	Leaks, Packing, Deterioration	Daily
Process Monitoring	LGF Flow Meter	Reading Malfunction	Daily
Equipment	Atomization Air Pressure	Reading Malfunction, Compressor	Daily
	Fuel System Panel	Reading Malfunction, Alarm	Daily
	Fuel Oil Leak Detection	Reading Malfunction, Alarm	Daily
	Tank Oxygen Monitor	Reading Malfunction, Alarm	Daily
	O ₂ /LEL System	Reading Malfunction, Alarm	Daily

3.2 General Inspection Requirements

Permittee complies with 373-2.2 (g) and follows the general inspections outlined below.

This inspection plan is intended to provide a mechanism to identify and prevent system malfunctions, equipment deterioration, and human errors which, if allowed to continue without correction or preventive action may lead to a release of hazardous waste constituents to the environment or create a threat to human health. The performance of periodic and effective inspection is essential if such events are to be prevented. To this end, Norlite has developed procedures for performing inspections so that substandard conditions and practices are identified, and appropriate actions are taken in a timely manner.

The inspection program is implemented by qualified individuals assigned the responsibility to detect any unsafe conditions at the facility and prevent adverse consequences. The designated individuals have the training and authority to: (1) implement the required inspections, (2) perform necessary evaluations and hazard assessments, and (3) recommend appropriate response actions.

Inspections are performed according to pre-determined schedules based on engineering knowledge and operational experience with the systems and processes involved. Each inspection

item has the content and frequency necessary to alert facility personnel prior to development of a serious problem. A trained inspector assesses each item noting any potential malfunction/deterioration of equipment or operator error through regular observation of the processes and procedures. The level of response and its timing is determined by the nature and seriousness of the problem identified – with protection of personnel and the prevention of adverse environmental impact being of paramount concern.

Permittee will remedy any deterioration or malfunction discovered by an inspection as required by 6 NYCRR Part 373-2.2(g)(3). Records of inspections are kept as required by 6 NYCRR Part 373-2.2(g)(4). Specific inspection schedules for the landfill, container storage areas, tanks, and incinerators are presented in each unit's specific section.

Any deterioration or malfunction of equipment or structures detected during inspection at the facility is remedied on schedule (immediately if necessary) to ensure that the problem does not lead to environmental or human health hazards. Specifically, any leaking container discovered is immediately lifted into an oversized recovery drum and sealed, and any leaked or spilled material is immediately absorbed by vermiculite and/or speedy-dry or managed in another manner acceptable to the Department. The facility's Inspection Log contains appropriate space for recording the date and nature of any repairs or other remedial actions taken in response to problems identified during facility inspections. Refer to the Integrated Contingency Plan (ICP) for description of responses to spills and emergency situations.

The inspection schedules for the facility and its hazardous waste management units are utilized to detect and correct malfunctions and deteriorations, operator errors, and discharges which may cause or may lead to the following:

- Release of hazardous waste constituents to the environment or,
- A threat to human health.

3.3 Types of Problems

The schedules identify the specific types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).

3.4 Frequency of Inspection

The schedules include inspection frequency that is based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, are to be inspected daily when in use.

3.5 Specific Process Inspection Requirements

Inspections of hazardous waste management facilities are the responsibility of the following Norlite personnel (in no order of priority):

- 1. Compliance Personnel
- 2. Kiln Field Operator
- 3. Safety Manager
- 4. Environmental Manager
- 5. Fuel Farm Operator
- 6. Burner Operator

Each person is responsible for regular inspections of various portions of the hazardous waste management facilities and initiation of corrective action if deficiencies are noted. These reports are submitted each day to the Safety Manager, Environmental Manager, Plant Manager, and all facility/supervisors. The Plant Manager has overall responsibility for prevention of hazards.

3.5.1 Kiln Field Operator's Shift LLGF Inspection Report

Three times each night shift, the Kiln Field Operator on duty is required to inspect the LLGF storage area and to record results of each inspection on the "Kiln Field Operator's Shift LLGF Inspection Report" form. Information required on the inspection report includes the Kiln Field Operator's name, date and time of inspection, item of inspection, problems encountered, and observations. A copy of the "Kiln Field Operator's Shift LLGF Inspection Report" is attached to this part as Figure F-1. A file of "Kiln Field Operator's Shift LLGF Inspection Reports" is maintained at the facility and are part of the inspection log.

3.5.2 Fuel Farm Operator's Daily LLGF Inspection Report

Daily, the fuel farm operator on duty is required to inspect the LLGF storage area including containers and LLGF pumps and lines and to record results of each inspection on the "Fuel Farm Operator's Daily LLGF Inspection Report" forms. Information required on the inspection report includes the fuel farm operator's name, date and time of inspection, item of inspection, problems encountered and observations. A copy of the "Fuel Farm Operator's Daily LLGF Inspection Report" is attached to this part as Figure F-2. A file of "Fuel Farm Operator's Daily LLGF Inspection Reports" is maintained at the facility and is part of the inspection log.

3.5.3 Burner Operator's Shift Log

The burner operator on duty is required to inspect the LLGF portion of the rotary kiln operation and to record results of these inspections on the "Burner Shift Log" form. Due to the nature of the burner position and the need to continuously monitor fuel usage, burning zone, temperatures, and overall operation of the rotary kiln (incinerator/energy recovery unit) to produce acceptable lightweight aggregate, the inspections are ongoing with operation of the kiln. Any potential problem will immediately be seen, and corrective action initiated. Information required on the report includes the burner operator's name, date, day, item of inspection, type of problem encountered and observations. A copy of the previous "Burner Operator's Shift Log" is attached to this part as Figure F-3. A file of current "Burner Operator's Shift Logs" is maintained at the facility and is a part of the inspection log.

3.5.4 Weekly Environmental (RCRA) Inspection Report

Weekly, the Compliance Section is required to make a comprehensive inspection of the LLGF storage area including containers, the LLGF pump area, the LLGF building, pipe tunnel, and the kiln burner area. The results of each inspection are recorded on the "Weekly Environmental and LLGF Inspection Report" form. Information required on the inspection report includes the Compliance Representative's name, date and time of inspection, item of inspection, problems encountered and observations. A copy of the "Weekly Environmental and LLGF Inspection Report is attached to the part as Figure F-4. Weekly Environmental and LLGF Inspection Reports are maintained at the facility and are part of the inspection log.

3.5.5 LLGF Tank Inspection Report

Bi-annually, based upon the schedule for tank cleaning, each shale covered bulk LLGF storage tank (i.e. tanks no. 300, 400, 500 and 600) is inspected and tested as described below:

- 1. Following the removal of tank sludges, each tank is visually inspected for structural integrity particularly noting evidence or signs of potential leaks, buckles, bulges or excessive corrosion.
- 2. Exposed tank appurtenances such as access ports, nozzles, joints, valves, and piping are inspected for signs of excessive corrosion, plugging, or leaks.
- 3. If a tank has not undergone integrity testing during the previous 24 months by an independent inspector utilizing the NFPA Publication Number 329 criteria, that tank will be pressure tested in accordance with the protocols outlined in Operations Plan.
- 4. Each tank shell is tested for thickness determination as described in the Operations Plan.
- 5. The results of the inspection programs are documented in an inspection report maintained on file at the facility.

On a bi-annual basis, each vertical inside tank is integrity tested utilizing the NFPA Publication Number 329 criteria. The six above ground tanks (i.e. tanks no. 100A, 100B, 100C, 200A, 200B and 200C) and the two equalization tanks (T102A and T102B) will undergo integrity testing once every five years by an independent inspector since they will be visually inspected on a daily basis for leaks. The results of the tests are maintained at the facility and are part of the operating record.

In addition to the RCRA Subpart BB monitoring, an integrity assessment is conducted on the transfer lines from the pumps to the kilns on an annual basis. The results of the tests are maintained at the facility and are part of the operating record.

Also, on an annual basis, the cathodic protection system on the four tanks (Tanks 300, 400, 500, and 600) is confirmed. The results of the tests are maintained at the facility and are part of the operating record.

On a bimonthly basis (i.e., every two months), the sources of impressed current to the cathodic protection system are tested and recorded. The results of the tests are maintained at the facility.

3.5.6 Tanks and Tank Storage Areas

The high-level switches, the level indicators, and the pressure gauges on the tanks are visually inspected daily and measurements are recorded in the Kiln Field Operator's Daily LLGF Inspection Report form. In addition, the secondary containment area surrounding the tank is inspected daily to detect obvious signs of leakage such as wet spots. The results are recorded in the Kiln Field Operator's Daily LLGF Inspection Report form. Also, the aboveground portions of the tanks including the piping, pipe fittings, and valves are inspected daily for deterioration, corrosion, and leakage and the results are recorded in the Kiln Field Operator's Daily LLGF Inspection Report.

3.5.7 Tank Storage and Secondary Containment

In addition to the secondary containment provided by the liners under the outside tanks (300, 400, 500, and 600), the LLGF building used for Tanks 100A, B, C and 200A, B, C, also serves as a tertiary containment system for the outside tanks. In the event that the secondary containment system fills, liquid will overflow through a pipe to the LLGF storage building. The containment volume of this LLGF building is 33,940 gallons. This volume is sufficient to hold the entire contents of any LLGF tank that should fail.

Inspection of secondary containment facilities will be conducted as follows:

Weekly - Containment areas are inspected weekly by the Compliance Section for the items listed in Section 3.1. Details of inspection items are recorded on the "Weekly Environmental (RCRA) Inspection Report" (Figure F-4).

Daily - The secondary containment for loading/unloading areas, container sampling areas and drums stored in the unloading areas will be inspected for any spills.

3.5.8 Container and Container Storage Area

Daily, the containers and container storage area are inspected to ensure proper aisle space, stacking, and closed lids. Weekly, the containers are inspected for proper labeling, leaking, deterioration and corrosion, and the secondary containment system is inspected for various signs of erosion, deterioration, cracks or leakage. Drums stored in the truck unloading area are sorted on pallets to facilitate inspection for leaks. The results are recorded in the "Weekly Environmental (RCRA) Inspection Report."

3.6 Remedial Action

If inspections reveal that non-emergency maintenance is needed, this will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred, remedial action will be taken immediately. Norlite personnel will notify the appropriate authorities in accordance with the Integrated Contingency Plan and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area.

3.7 Inspection Log

The Permittee records and maintains an Inspection Log containing Daily, Weekly, and Monthly Inspection Log Sheets. Each log sheet includes spaces for identifying the inspector's name and title, and inspection date and time.

All inspection log forms must contain the following information:

- a. the inspector's name and title;
- b. date and time of the inspection;
- c. items inspected;
- d. inspection parameters;
- e. procedures, structures, and/or equipment inspected;
- f. notation of any observations and/or problems;
- g. notation of any remedial or corrective actions taken or the schedule for corrective action if cannot be corrected before the next inspection; and
- h. date on which the corrective action was completed.

3.8 Records Retention

In accordance with the requirements of 6 NYCRR Parts 373-2.2(g)(4) and 373-2.5(c)(2)(v), inspection records for the Hazardous Waste Management Units (HWMUs) are maintained in the operating record. The inspection logs contain a list of inspection parameters as well as an inspection frequency. On each log sheet, the inspector must note the following information, at a minimum:

- Inspection Date
- Inspection Time
- Inspector
- Deficiencies
- Corrective Actions Taken and Date

The inspection records are retained on site for a minimum period of three years from their last entry.

4.0 GLOSSARY

<u>Term</u>	<u>Definition</u>
6 NYCRR	Title 6 of the New York Codes, Rules and Regulations
40 CFR	Title 40 of the Code of Federal Regulations
A.C.T.	Assess, Correct, Train
EMSI	Environmental Monitoring System Inspection
EWO	Environmental Work Order
HWMU	Hazardous Waste Management Unit
ICP	Integrated Contingency Plan
NACE	National Association of Corrosion Engineers
NFPA	National Fire Protection Act
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
SIP	Security and Inspection Plan
SWCI	Surface Water Control Inspection
WCM	Warning Coordination Meteorologist

FIGURES

Figure F-1

KILN FIELD OPERATORS SHIFT REPORT

NAME	DATE	SHIFT
SUPERVISORS SIGNATURE:		

KILN 1	OIL LEVEL OK	AMOUNT ADDED	SEAL OK	KILN 2		OIL LEVEL OK	AMOUNT ADDED	SEAL OK
PIER 1 NE				PIER 1	NE			
PIER 1 SE				PIER 1	SE			
PIER 1 NW	1			PIER 1	NW			
PIER 1 SW				PIER 1	SW			
PIER 2 NE				PIER 2	NE			
PIER 2 SE				PIER 2	SE			
PIER 2 NW	'			PIER 2	NW			
PIER 2 SW				PIER 2	SW			
NOTE PIER 1 IS DISCHARGE PIER		PIER 3	NE					
"NOTE PIER 1 15 DISCHARGE PIER"					SE			
				PIER 3	NW			
				PIER 3	SW			

DO OIL DRUMS NEED TO BE EMPTIED AT KILN 2?	PIER 1	PIER 2	PIER 3
DO OIL DROMS NEED TO BE EMPTIED AT KILIN 2:			
KILN 1 PIERS CLEAN			
KILN 2 PIERS CLEAN			
KILN 1 TRUNNION DRIP TRAYS CLEAN			
KILN 2 TRUNNION DRIP TRAYS CLEAN			

	NAME:	DATE:	SHIFT:
--	-------	-------	--------

BULL GEAR, PINNION GEAR AND DUST SEAL INSPECTIONS

	KILN 1	KILN 2	
KILN 1 BULL GEAR GREASED AND KILN 2 OIL LEVEL KILN 2 OIL LEVEL CHECKED			WAS OIL ADDED TO KILN2 GEAR
PINION BEARINGS (EAST AND WEST) GREASED			
# OF FEED SEALS MISSING			
# OF DISCHARGE SEALS MISSING			
KILN 1 ANY MAINTENANCE REQUIRED IN THIS	AREA		
KILN 2 ANY MAINTENANCE REQUIRED IN THIS	AREA		

RAW SHALE BELTS INSPECTION

	KILN 1 FEED	KILN 2 FEED				
SHALE BELTS AND SPLICES IN WORKING CONDITION	YES NO	YES NO				
ROLLERS AND RETURNS IN WORKING CONTITION	YES NO	YES NO				
WIPERS IN PLACE AND IN GOOD CONDITION	YES NO	YES NO				
HEAD PULLEYS AND TAIL PULLEYS GREASED	YES NO	YES NO				
KILN 1 ALL CONVEYOR COVERS AND GUARDS IN PLACE	YES NO	YES NO				
KILN 2 ALL CONVEYOR COVERS AND GUARDS IN PLACE						
ROTARY VALVE- SHALE FEED FOR KILN 1 REPORT CONDITION	_		ARE GUARDS IN	PLACE	YES	NO
ROTARY VALVE- SHALE FEED FOR KILN 2 REPORT CONDITION			ARE GUARDS IN	PLACE	YES	NO
ACCURATE FEEDER FOR KILN 1 REPORT CONDITION			ARE GUARDS IN	PLACE	YES	NO
ACCDURATE FEEDER FOR KILN 2 REPORT CONDITION			ARE GUARDS IN	PLACE	YES	NO
KILN 1 SHALE FEED- IS ANY MAINTENANCE REQUIRED IN	N THIS AREA		-		ı	
KILN 2 SHALE FEED- IS ANY MAINTENANCE REQUIRED IN THIS AREA						

NAME:	DATE:	SHIFT:

CLINKER BELTS AND TUNNEL INSPECTION

		KILN 1	KILN 2
BELTS AND SPLICES IN GOOD CONDITION	YES NO	YES NO	
HEAD PULLEYS AND TAIL PULLEYS GREASED AND GUARDED	YES NO	YES NO	
ROLLERS AND RETURN IN GOOD CONDITION AND GUARDED	YES NO	YES NO	
WIPERS IN PLACE AND IN GOOD CONDITION	YES NO	YES NO	
PUMP IN TUNNEL IN GOOD CONDITION	YES NO	YES NO	
WAS PUMP CHANGED OUT ON YOUR SHIFT	YES NO	YES NO	
CLINKER BELT WATER SPRAYS	ON OFF	ON OFF	
CLINKER BELT HEAD BOX WATER SPRAYS	ON OFF	ON OFF	
TUNNEL CLEAN AT START OF SHIFT	YES NO	YES NO	
TUNNEL CLEAN AT END OF SHIFT	YES NO	YES NO	
ALL CONVEYOR COVERS IN PLACE	YES NO	YES NO	
KILN 1 - ANY MAINTENANCE REQUIRED IN THIS AREA	1		
KILN 2- ANY MAINTENANCE REQUIRED IN THIS AREA			

APC BLOWERS FILTER CHECK

CHECK	GCT DUST BIN BLOWER 331.BL580	DUST BIN ARERATION BLOWER 331.BL705	DUST BIN BLOWER SILOS 331.BL715	BAGHOUSE TO GSA BLOWER 331.BL330 K1	BAGHOUSE TO GSA BLOWER 332.BL330
FILTER CHANGED					
FILTER CLEANED OFF					
AREA SWEPT AND FREE OF MATERIAL					
ANY MAITENANCE REQUIRED IN THIS AREA					

KILN 1 GCT WATE	R NOZZLES			
GCT WATER NOZZLES	NOZZLE 1	NOZZLE 2	NOZZLE 3	NOZZLE 4
WAS NOZZLE CHECKED				
WAS NOZZLE CHANGED				
MAKE SURE AIR AND WATER VALVE ARE WORKING PROPERLY				
ANY MAITENANCE REQUIRED IN THIS AREA				

DATE:_____

SHIFT:_____

NAME:_____

KILN 2 GCT WATER NOZZLES

GCT WATER NOZZLES	NOZZLE 1	NOZZLE 2	NOZZLE 3	NOZZLE 4
WAS NOZZLE CHECKED				
WAS NOZZLE CHANGED				
MAKE SURE AIR AND WATER VALVE ARE WORKING PROPERLY				
ANY MAITENANCE REQUIRED IN THIS AREA				

^{*}MAKE SURE YOU ARE WEARING THE PROPER PPE

^{*}MAKE SURE YOU ARE WEARING THE PROPER PPE

^{*}HAVE THE CONTROL ROOM OPERATOR OPEN AND CLOSE BOTH VALVES BEFORE CHECKING THE NOZZLES $\,$

2000		SUBJECT:	CHECKLIST #:	
	DEBE ROAD TO ZERO	Routine Cooler in-operation Inspection	INSPCHK#CLR-001	
IN-OPE	RATION INSPECTION CHECKLIST	AUTHOR:	Page 1 of 4	
	COOLER	REVISION LEVEL & DATE	ORIGINATION DATE:	
	OOCLLIK	1, 03/17/2020	03/17/2020	
APPROVAL:				
TITLE:				

1. REQUIRED MATERIAL OR EQUIPMENT:

- a) Hard hat
- b) Safety glasses
- c) Gloves
- d) Flashlight

2. RESPONSIBILITY

Execution	Kiln Group
Approval	CR Operator

3. FREQUENCY

Once every 24 hours. During the day shift.

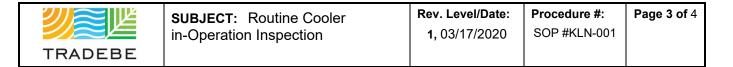
4. PROCEDURES:

	GREASE SYSTEM					
Task #	Description	OK/NOK?	Comment			
1	Cycle grease system (press button on controller) and observe all injector pins going up or going down (depending on cycle). Two employees needed (one to force the cycle and one to observe the injectors)					
2	Check pressure on reversing valve and record. Target value is 1,500PSI. Pump should build pressure in less than 20 seconds. If pump does not build pressure or it takes longer than 20 seconds, the system will require a more thorough inspection → Contact supervisor					

	SUBJECT: Routine Cooler	Rev. Level/Date:	Procedure #:	Page 2 of 4
	in-Operation Inspection	1 , 03/17/2020	SOP #KLN-001	
TRADEBE				

3	Inspect system for grease leaks / broken lines	
4	Check grease drum level and record. Refill needed?	
5	Confirm settings on grease system are 1 pulse every 60 minutes	
6	Grease crankshaft split bearings (once a shift)	
7	Check grease overflow barrel. If the grease is not contaminated with dust/water/oil transfer it back into the pump grease drum	

	UNDER GRATE				
Task #	Description	OK/NOK?	Comment		
1	Inspect Compartment 1 and 2 for any excessive fall through or large clinker (1/2" round or larger), flat pieces thinner than 1/4" will fall through normally.				
2	Open disc gates to drain any excessive fall through. It is important to not lock them open. It is always good to have some material in front of the gates to keep the air seal.				
3	Insure that all disc gates to the screws are closed completely and sealing properly.				
4	Look for any hot spots on grates or excessive fall-through				



5	Check for any air leaks in the cooler housing.	
6	Check all screw doors to insure they are sealed.	
7	Listen to screws. Excessive noise can indicate a worn hanger bearing or broken shaft.	

	FRONT (PRODUCT) BELT				
Task #	Description	OK/NOK?	Comment		
1	Request CCR to open the product belt water spray solenoid valve. Check water spray operation. Set water flow by adjusting manual valve upstream of the solenoid valve				
2	Piezometers → Check air supply to piezometer housing. Drain water from pressure regulator, pressure should be between 2-4 psi on the gauge. Measure temperature of the clinker with a temperature gun and confirm with CCR that reading is correct (+/- 15% is acceptable)				
3	WINTER → Inspect water discharge hose downstream of the solenoid valve. Hose MUST be discharging water at all times to prevent lines from freezing. Adjust manual valve as needed to keep a minimum flow through the pipes				

5. SIGNATURES

Cooler inspected	Inspected by:	Approved by:
К1		
K2	Date:	Date:

6. **REVISIONS**:

Figure F-2

DATE & TIME: _____ INSPECTED BY: _____

ITEM	OK / YES	NO	CORRECTIVE ACTION	DATE CORRECTED
LOWER PAD				
Pump 3				
Pump 4				
Pump 5				
Pump 6				
Tank 3 Circulators				
Tank 4 Circulators				
Tank 5 Circulators				
Tank 6 Circulators				
Pipe, Valves, Fittings				
Drip Pans				
Fire Extinguisher (2)				
Housekeeping				
Tank Pressure-300				
Tank Pressure-400				
Tank Pressure-500				
Tank Pressure-600				
Lights				
Containment Condition				
Other Remarks:				
LGF STORAGE BUILDING				
Pump 100A				
Pump 100B				
Pump 100C				
Pump 200A			OPERATIONALLY	OUT OF SERVICE
Pump 200B				
Pump 200C				
Pipe, Valves, Fittings				
Sump Level				
Fire Extinguisher (2)-Upper Level				
Eye/Body Wash-Upper Level				
Fire blanket (1)-Upper Level				
Fire Extinguishers (2)-Lower Level				
Eye/Body Wash-Lower Level				
Containment Condition				

DATE: INSPECTED BY:						
ITEM	OK / YES	NO	CORRECTIVE ACTION	DATE CORRECTED		
LGF STORAGE BUILDING						
TANK Pressure 100A						
TANK Pressure 100B						
TANK Pressure 100C						
TANK Pressure 200A						
TANK Pressure 200B						
TANK Pressure 200C						
HouseKeeping						
Aisleways Clear						
Lights						
Containment Condition						
Other Remarks:						
GROUNDS						
Fence and Gates						
Signs Maintained						
Trash Cans Empty						
Spill Station						
Travelways Clear						
Lights						
Other Remarks:						
				_		
BREAK ROOM						
Housekeeping						
Free of LGF Hazards						
Other Remarks:						
TANKER STAGING AREA						
Storm Water Removed						
Level On Gauge						
Free of Contamination Leaks						
Other Remarks:						

DATE: INSPECTED BY: ITEM OK / YES NO CORRECTIVE ACTION DATE CORRECTED **OFFLOADING PAD** Pump 104 Pump 204 Fuel Oil Pump 107 Muffin Monsters Offloading Filters Hoses Housekeeping Hazard Drums (# of Non Hazardous Drums (# of Fire Extinguisher Lights Containment Condition Other Remarks: DRUM STORAGE BLDG. Housekeeping Hazard Drums (# of Non Hazardous Drums (# of Fire Extinguisher (3) Fire Blanket (1) Eye/Body Wash Proper Aisle Space Proper Stacking Proper Labeling Lights **Containment Condition** Other Remarks: FUEL OIL TANK AREA Housekeeping East Pump West Pump Pipe, Valves, Fittings Fire Extinguisher (1) Lights Other Remarks:

DATE:	INSPECTED BY:						
ITEM	OK / YES	NO	CORRECTIVE ACTION	DATE CORRECTED			
UTILITY BUILDING OUTSID	E						
Fire Extinguisher (2)							
Lights							
UTILITY BUILDING-BOILER	ROOM						
Housekeeping							
Boilers							
Pressure Washer							
Other Remarks:							
UTILITY BUILDING - MCC R	ООМ						
Housekeeping							
All Electrical Covers Closed							
Fire System Panel							
Fuel Oil Leak Detector							
Tank Oxygen Monitor							
02/LEL System							
Other Remarks:							
UTILITY BUILDING-FIRE SY	STEM ROOM			_			
Housekeeping							
Other Remarks:							
OTHER							
Other Remarks:							

Figure F-3

BURNER OPERATORS LOG

SHIFT A B C D

DATE

KILN

BURNER

KILN COOLER **SPEC** TIME CLINKER FEEDER STONE **FLAME** BACKEND KILN HOOD LGF WASTE **NATURAL ATOM** COOLER EAST WEST FRONT **PRESSURE** GAS OIL WT SETTING TEMP TEMP TEMP OIL AIR COOLER COOLER **BARRON** 0 F ⁰ F °F "WC **GPM GPM** FAN SPEED LBS TPH **GPM** PSI **SPEED** FAN 19:00 20:00 21:00 22:00 23:00 0:00 1:00 2:00 3:00 4:00 5:00 6:00 BAGHOUSE/HEAT EXCHANGER **SCRUBBER OPTICAL QUENCH** RECYCLE TIME BLOWDOWN LIME DILUTION **HX EXIT** VENTURI DUCON I.D.FAN I.D.FAN FLOW INLET DIFF PSI OXYGEN CO CNT **TEMP FLOW** FLOW **FEED** DAMPER рΗ TEMP ° F AMPS "WC" D.P. "WC" D.P. "WC" SPEED SENSOR TEMP ° F PPM (gpm) ON/OFF % 0 F (scfm) **GPM** 19:00 20:00 21:00 22:00 23:00 0:00 1:00 2:00 3:00 4:00 5:00 6:00 **AVERAGE** REMARKS KILN **END END FRONT** BELT WEIGHT **RAW START** START SCALE SHALE TOTAL **TOTAL**

Figure F-4

WEEKLY ENVIRONMENTAL (RCRA) INSPECTION REPORT

Inspector(s):

Date & Time:

Area:	Fuel Farm		_	Supervisor((s):	
Attention Supervisor- You are requir	ed to review and o	correct th	is list. Comple	eted		
form must be returned to the Complia	ance Dept. for fili	ng (Permi	t Required).			
•		TABLE ¹		STATUS		DATE & EXPLANATION
ITEM	YES	NO	(or	OBSERVATI	ON) ²	OF ACTION TAKEN
A. PUMP PAD - TANKS 3 & 4					- ,	
A1. Secondary Containment	200000000000000000000000000000000000000					
A2. Drip Pans						
A3. Housekeeping						
A4. Pumps						
A5. Valves						
A6. Piping / Fittings						
A7. Fire Extinguisher (1)						
B. PUMP PAD - TANKS 5 & 6						
B1. Secondary Containment						T
B2. Drip Pans						
B3. Housekeeping						
B4. Pumps						
B5. Valves						
B6. Piping / Fittings						
B7. Fire Extinguisher (1)						
C. TANKS 3-6 GROUND COVER			Ī			T
C1. Vegetation						
C2. Erosion						
C3. Housekeeping						
D. SECURITY						T
D1. Fencing						
D2. Signs and Locks					1	
			Unloading Pad	Drum Room	IN USE	
E. CONTAINER STORAGE AREA						
E1. # of Non-haz drums						
E2. # of Haz Drums						
E3. (Max. 267 haz drums)						
E4. Corrosion/Leakage						
E5. Drainage						
E6. Container Pad						
E7. Housekeeping						
E8. Signs / Labeling						
E9. Fire Extinguishers (3)						
F. TANKER UNLOADING AREA #1 (no	orth)		1			
F1. Concrete Pad						
F2. Pumps						
F3. Piping / Fittings						
F4. Valves						
F5. Safety Shower (1)						
F6. Housekeeping						
Fa. TANKER UNLOADING AREA #2						
Fa1. Concrete Pad						
Fa2. Pumps						
Fa3. Piping / Fittings						
Fa4. Valves						
Fa5. Housekeeping						
G. TANKER STAGING AREA						
G1. Spills/Stains on Ground						
G2. Condition of Contained Water						
G3. Housekeeping						

¹ Note: If both YES and NO are checked, the item is considered to be marginally acceptable.

² If an item is acceptable (only YES checked) an entered observation does not imply a need for corrective action.

WEEKLY ENVIRONMENTAL (RCRA) INSPECTION REPORT

Date & Time:		Inspector(s):			
	l Farm	Supervisor(s):			
Attention Supervisor- You are requ					
form must be returned to the Comp			_		
	ACCEPTABLE ¹	STATUS	DATE & EXPLANATION		
ITEM	YES NO	(or OBSERVATION) ²	OF ACTION TAKEN		
H. ROLL-OFF CONTAINERS					
H1. Condition of Containers					
H2. Absence of Spills					
H3. Covered					
H4. Labels					
H5. Haz. Quantity (Max 160 cu y	ds.)				
I. LGF STORAGE BUILDING					
I1. Tank 100A					
I2. Tank 100B					
I3. Tank 100C					
I4. Tank 200A					
I5. Tank 200B					
l6. Tank 200C					
I7. Pump 100A					
I8. Pump 100B					
I9. Pump 100C					
I10. Pump 200A					
I11. Pump 200B					
I12. Pump 200C					
I13. Grated Trench & Sump					
I14. Secondary Containment					
I15. Housekeeping					
I16. Pipes, Valves, & Fittings					
I17. Fire Extinguishers (5)					
I18. Safety Shower (outside bldg	.)				
J. LGF PIPE BRIDGE & TUNNEL					
J1. Piping / Fittings					
J2. Fire Extinguishers (3)					
J3. Safety Showers (2)					
J4. Housekeeping					
K. FUEL OIL STORAGE TANK AREA	L				
K1. Physical Condition of Tank					
K2. Cracks, Corrosion, Thinning	?				
K3. Pipes, Valves, & Pumps					
K4. Housing & Foundation Integr	rity				
K5. Housekeeping					
K6. Leak detection devices					
(located in utility building)					
K7. Fire Extinguishers (2)					
Ka. F, M, R TANKS					
Ka1. Condition of Tanks					
Ka2. Cracks, Corrosion, Thinning	?				
Ka3. Pipes, Valves, & Pumps					
Ka4. Containment Condition					
Ka5. Housekeeping					
COMMENTS:	<u> </u>				
-					
* (NVL) No Visible I	aakina				

¹ Note: If both YES and NO are checked, the item is considered to be marginally acceptable.

² If an item is acceptable (only YES checked) an entered observation does not imply a need for corrective action.

WEEKLY ENVIRONMENTAL (RCRA) INSPECTION REPORT

Date & Time:	Inspector(s): Kiln Area Supervisor(s):							
Area:								
Attention Supervisor(s)- You								
form must be returned to the Compliance De	ent. for	filing	. (Per	mit R	(equired)			
		CEP			STATUS	DATE & EXPLANATION		
ITEM		ES		<u></u> 10	(or OBSERVATION) ²	OF ACTION TAKEN		
L. BAGHOUSE		K2			(or observation)	OF ACTION TAKEN		
L1. Structure Integrity	111	112	111	1112				
L2. Piping/Fittings								
L3. Housekeeping	+							
M. SCRUBBER BUILDING	K1	K2	K1	K2				
M1. Containment Area	K I	NZ	ΝI	N2				
	+							
M2. Pumps								
M3. Piping/Fittings	_							
M4. Valves								
M5. Housekeeping								
M6. SWMU 12 (asphalt cap)								
N. KILN	K1	K2	K1	K2				
N1. Backend Seal								
N2. No Dust or Emissions?								
N3. Trunnions								
N4. Not Leaking Oil on Ground?								
N5. Drip Pans in use? (if needed)								
N6. Shell								
O. BURNER FLOOR AREA	K1	K2	K1	K2	•			
O1. Piping, Fittings, & Valves								
O2. Pumps								
O3. Fire Extinguishers (1 ea. area)								
O4. Safety Shower (removed)								
O5. Housekeeping								
P. EXTRUDER ROOM								
P1. Housekeeping					Ī			
P2. Piping/Fittings								
P3. Drums	+							
P4. Number of Haz. Drums	n/a							
P5. Number of Non-Haz Drums	n/a							
Q. EQUALIZATION TANKS	n/a			101010101010101010101				
					T			
Q1. Tank 101A								
Q2. Tank 101B	_							
Q3. Tank 102A								
Q4. Tank 102B								
COMMENTS:								

¹ Note: If both YES and NO are checked, the item is considered to be marginally acceptable.

² If an item is acceptable (only YES checked) an entered observation does not imply a need for corrective action.

Date & Time:	Area: Kiln Area Supervisor(s):							
Attention Supervisor(s)- You are required to r								
form must be returned to the Compliance Dep								
ITEM		TABLE ¹	STATUS	DATE & EXPLANATION				
D. FOLIALIZATION ADEA	YES	NO	(or OBSERVATION) ²	OF ACTION TAKEN				
R. EQUALIZATION AREA		I	T	1				
R1. Sump in Basement R2. Secondary Containment								
R3. Pumps & Valves								
R4. Safety Shower (1)								
R5. Piping/Fittings								
R6. Fire Extinguishers (4)								
R7. Housekeeping								
R8. Drum Storage Area (<55 gals.)								
S. TUNNEL FIRE/LEL/O2 MONITOR AND (CONTROL	SYSTEM	(located in k1 control room)					
S1. Fire Protection Device								
S2. Smoke Detector								
S3. Oxygen and LEL Monitors								
S4. Automated AFFF System								
S5. Latest Calibration (Quarterly):								
T. KILN #1 GAS ROOM								
T1. Piping/Fittings								
T2. Housekeeping								
T3. Containment Pad								
U.								
V DUCT CTODACE CILOC								
V. DUST STORAGE SILOS		1						
V1. External Condition V2. Absence of Spills								
V3. Pipings/Fittings								
V3. Fipings/Fittings V4. Bag Vent Functional								
COMMENTS:								
OCIVIIVIEIVIO.								
Date & Time:			Inspector(s):					
Area: Lal	boratory		Supervisor(s):					
ITEM	ACCEPTABLE ¹		STATUS	ACTION				
I I E IVI	YES	NO	(or OBSERVATION) ²	ACTION				
W. LABORATORY								
W1. Condition of Containers								
W2. Condition of Labels								
W3. Absence of Spills / Leaks								
Date & Time:			Inspector(s):					
Area:	T			1				
ITEM	ACCEPTABLE ¹		STATUS	ACTION				
	YES	NO	(or OBSERVATION) ²					
X. UNIVERSAL WASTE STORAGE								
X1. Containers Labeled / Dated								
X2. Containers Closed Note: If both YES and NO are checked, the	l a itam is sa	neidorod t	o he marginally acceptable	1				
If an item is acceptable (only YES checked)				rective action.				
Production Manager		_	Laboratory Manager					
Plant Manager		=	Fuel Farm Manager					

Inspector