

Appendix J

Inspections

J-1. Purpose. This appendix establishes the inspection requirements for installation activities.

J-2. General.

a. Inspections. Inspectors are not required to give prior notice. Access to all Hazardous Materials (HMs) storage areas, Universal Waste storage areas, and Hazardous Waste (HW) accumulation sites must be available at all times.

b. Federal and State inspectors may inspect Fort Eustis or Fort Story at any time. If a Federal or State inspector arrives for inspection, do not delay the inspector; however notify DPW-ENRD as soon as possible.

c. Activities will make corrections on the spot or take immediate action to correct efficiencies noted during the inspection.

J-3. Inspection Scheduling or Frequency.

a. Inspections from Federal, State, and other agencies external to the installation may be scheduled or unannounced and occur periodically at the discretion of the inspecting agency. Typically the VDEQ conducts HW inspections of each installation on an annual basis.

b. Activities will ensure that the following inspections are conducted and will maintain an inspection log to track the various inspections:

(1) At least quarterly inspections of their HMs & UW storage areas; motor pools; Solid Waste collection areas; Recycling Areas, and HW accumulation sites using the checklist at TAB 1. The AEC will normally be the individual conducting these inspections. The Activity will be re-inspected by the AEC within 30 days of any inspection or re-inspection that shows one or more deficiencies. A memorandum for record (MFR) signed by the Commander or Director having appointing authority for the AEC will be attached to each re-inspection citing the deficiencies, corrective actions taken, and how this will be prevented in the future.

(2) At least weekly (within 7 calendar days) inspections of SASs and TSSs by the AEC, HWC, or HWS using the inspection checklist, Figure K-4.

(3) At least monthly (within 30 calendar days) inspections of each Hazardous Material storage areas by the AEC, HWC, or HWS using the inspection checklist, Figure K-1, Side 1.

(4) At least monthly (within 30 calendar days) inspections of each Universal Waste Site by the AEC, HWC, HWS, HWH, or UWH using the inspection checklist, Figure K-1, Side 2.

c. DPW-ENRD will inspect generating activities periodically.

(1) The inspection checklist at TAB 1 will be used. The inspection criteria are referenced back to specific paragraphs in this Regulation unless otherwise specified. A copy of the inspection results will be given to the activity at the end of the inspection. A second copy will be given to the Activity Environmental Coordinator (AEC). If major (training, storage, or accumulation start date deficiencies) or numerous deficiencies (five or more) are noted, the second copy will be sent through the Garrison Commander to the Commander or Director. Inspection records will be kept for 3 calendar years from date of inspection.

(2) Activities will send a memorandum to DPW-ENRD through their Commanders or Directors within 30 days of the date of inspection specifying the steps taken or planned to correct all deficiencies. If this memorandum is not received by DPW-ENRD within 30 calendar days, a memorandum will be sent through the Garrison Commander to the Commander or Director.

d. HWAF Inspections Prior to Receipt of Wastes: The HWAF staff will inspect all containers and conduct a site evaluation for compliance. Containers failing to meet all turn-in requirements will be rejected.

(1) On-the-spot corrections for some administrative requirements may be possible.

(2) Only AECs and HWCs can turn-in HWs and NHWs. Trained Coordinators are the only personnel authorized to sign the turn-in documentation's certification (CCLs and DD Form 1348-1As). This is an automatic rejection.

(3) Containers will be opened during the inspection. Activity personnel will assist during this process and must bring appropriate Personal Protection Equipment. At a minimum this will include eye protection and gloves.

(4) All activities that have containers rejected for any reason, will receive a letter of rejection from DPW-ENRD. The first time an activity gets a rejection letter, it will go to the Battalion level Commander or Director. The second time an activity gets a rejection letter, it will go through the Garrison Commander to the Commander or Director. Activities receiving numerous on the spot corrections for a single turn-in or always requiring corrections over multiple turn-ins will get a letter from DPW-ENRD.