

**TULSA CEMENT LLC
TULSA, OKLAHOMA**

**PERMIT ATTACHMENT 2
INSPECTION PLAN**

SECTION F-2 – INSPECTION PLAN

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SECTION F-2 – INSPECTION PLAN

1.0 INSPECTION PLAN

A written inspection plan has been developed for the timely detection of equipment malfunctions or deterioration, operator errors and waste discharges at the CPCC Plant to meet the requirements of 40 CFR 264.15 and 270.14(b)(5).

The plan provides for inspecting:

- Monitoring equipment,
- Safety and emergency equipment,
- Security devices, and
- Operating and structural equipment.

The inspection plan is kept at the plant and is designed to ensure there are no incidents or releases that could potentially threaten or harm human health or the environment. Table F2-1 shows the inspection schedule for hazardous waste management units at the CPCC plant.

CPCC ensures that records of inspections are entered in the inspection log and operating record. The inspection logs are maintained for daily and weekly inspections. The inspection logs include the following information:

- Date and time of the inspection,
- Name of the inspector,
- Items to be inspected
- Notation of the observations made, and
- Date and nature of any repairs made, or other corrective actions undertaken.

The inspection records are maintained at the facility for at least three years from the date of inspection.

If inspections reveal that non-emergency maintenance is needed, it 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 is initiated immediately.

In the event of an emergency involving the release of hazardous constituents to the environment, efforts are directed toward containing the hazard, removing it, and, subsequently, decontaminating the affected area.

The frequency of the various inspections depends on the anticipated rate of deterioration in each system and the probability of an incident if the deterioration or operator error goes undetected between inspections. Inspection frequencies may be altered in the future based on the plant's actual operating experience. Plant personnel remedy any problems found during an inspection, documenting the date and resolution. Problems with equipment covered by the leak detection and repair program are corrected as stipulated in the program. Management review and oversight is maintained to ensure problems are corrected.

Inspections are conducted by CPCC employees or Systech employees.

1.1 Safety and Emergency Equipment

Safety and emergency equipment at the CPCC plant is inspected per the schedule in Table F2-1. Inspections of this equipment are also performed following an emergency event that requires its use. Timely execution of these inspections ensures the health and safety of employees and the protection of the environment should an emergency occur.

1.2 Security Devices

Security devices at the CPCC plant are inspected per the schedule in Table F2-1.

1.3 Operating and Structural Equipment

The portions of the operating and structural equipment at the CPCC plant that are inspected include all hazardous waste conveyance equipment. This equipment consists of pipes, flanges, and valves.

For aboveground segments of piping that supply hazardous waste fuel to the kilns, daily inspections are conducted unless the system has secondary containment (i.e., the piping used to contain hazardous waste has been replaced as double-walled piping). Fittings and valves are monitored according to 40 CFR Part 264, Subpart BB, the leak detection and repair program (LDAR), which is discussed in Section L-2.

The inspection schedule for operating and structural equipment is included in Table F2-1.

TABLE F-2-1 INSPECTION SCHEDULE

TYPE OF EQUIPMENT	ITEM	CRITERIA	FREQUENCY
Safety and Emergency Equipment	Communications equipment	Functional	Weekly
	Protective clothing (coated full-body coveralls, gloves, and boots)	Adequate supply, no deterioration	Weekly/after use
	Emergency shower and eyewash	Functional, leaks	Weekly
	First aid equipment and supplies	Adequate supply	Monthly and After use
	Emergency alarm	Proper function	Weekly
	Face shields	Adequate supply	Weekly
	Half-face respirators	Adequate supply	Weekly
	Organic vapor monitor	Functional, calibrated	Weekly, available at Systech
	Hand-held radios	Functional	Weekly
	Fire extinguishers	Need for recharging, adequate supply	Monthly
	Empty 55-gallon drums	Adequate supply	Monthly, available at Systech
	Absorbent	Dry, sufficient quantity	Monthly

TYPE OF EQUIPMENT	ITEM	CRITERIA	FREQUENCY
Security Devices	24-hour surveillance system – CCTV Systech and Kiln	Proper function	Daily
	Warning signs	Legibility	Weekly
Operating and Structural Equipment	Piping, braided hose	Leaks, gaskets, broken/inoperative gauges, proper operation	Daily
	Valves	Leaks, proper function, deterioration	Daily
	Fittings	Leaks, deterioration	Daily
	Piping, thickness	Corrosion, integrity	Annually