

4.3 Inspection Schedule

Ref: 40 CFR Part 270.28
40 CFR Part 270.14(b)(5)

The owner or operator must inspect his facility for malfunctions and deterioration, operator errors, and discharges that may be causing, or may lead to:

- (1) Release of hazardous waste constituents to the environment; or
- (2) A threat to human health.

The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

GCD managers utilize the surrounding property and conduct regular casual inspections of the closed impoundment for conditions that may lead to the post closure release of hazardous waste or hazardous constituents in concentrations that may adversely affect human health and the environment. The security of the monitoring system is also evaluated. During annual groundwater monitoring events additional post closure inspections are performed. GCD managers ensure that all work required by the post closure activities will be conducted by qualified and appropriately trained individuals.

The types of malfunctions and deterioration that could reasonably be expected to occur at the closed surface impoundment include:

- Surface erosion
- Breach of security
- Dead or stressed vegetation
- Poorly maintained vegetative cover
- Establishment of deep rooted woody species
- Settlement
- Seepage
- Damaged monitoring wells

The closed impoundment was not designed with a separate leak detection system; therefore, inspection of liquid levels in collection sumps is irrelevant. Based upon the expected rate of deterioration and the improbability of an incident, GCD has scheduled formal visual inspections of the above described inspection elements on an annual basis.

Observations and comments from the inspection shall be recorded on an inspection form (or equivalent), dated, and signed by the inspector. Discrepancies shall be repaired or remedied as soon as possible, in some cases immediately. Certain remedies (e.g. over-seeding) may require action during a favorable growing season.

An example inspection checklist is provided on the following page.

GCD believes these inspection procedures fulfill the intent and technical requirements of 40 CFR Parts 264.15 and 264.303.

GCD RESOURCES, LLC
 POST CLOSURE INSPECTION CHECKLIST
 Closed Impoundment and Monitoring System

	Inspection item	Acceptable (Y/N)	Corrective Action
1	Surface erosion (Check final cover for formation of gullies)		
2	Breach of security (Check integrity of fence and gates)		
3	Dead or stressed vegetation (Not related to seasonal life cycles)		
4	Poorly maintained vegetative cover (Less than 75% cover)		
5	Establishment of deep rooted woody species (Avoid penetration of the final cover)		
6	Settlement (Good positive drainage and no sizable depressions)		
7	Seepage (Chemical releases from the top or sloped sides)		
8	Damaged monitoring wells (Broken bollards or casing)		
Inspection conducted by: _____ Date: _____ Time: _____ <i>File: retain for 3-year minimum</i>			Corrective action cross-reference: