

CORRECTIVE ACTION PLAN

Destiny Phase I Vapor Control System

This Corrective Action Plan will become part of the Destiny Phase I Site Management Plan (SMP).

The purpose of this Corrective Action Plan (CAP) is to ensure that the vapor control system of the Destiny Phase I engineering remedy is operated in accordance with the requirements of the Brownfield Program and Brownfield Agreement. To that end, the CAP will accomplish the following:

- Ensure that all compliance measures are properly implemented;
- Ensure that the applicable compliance criteria are met;
- Ensure that recordkeeping is consistent and in compliance with the SMP; and
- Ensure that deviations from compliance are properly documented and corrected.

Compliance Measures

The measures specified for compliance with the Brownfield Agreement consist of the system design as presented in the Final Engineering Report with subsequent modifications (moving vacuum equipment to the roof), and implementation of the system operating and recordkeeping procedures in the SMP. The compliance measures require continuous operation of the vacuum equipment. To meet this standard, the following measures are included in the system operating plan:

- Electrical power for the vacuum system will be connected to the Facility emergency backup power circuit.
- A minimum of one backup vacuum pump will be kept in the Facility maintenance inventory in operating condition, ready to be installed when necessary to replace a malfunctioning vacuum pump or when a vacuum pump is removed from service for periodic maintenance.
- A minimum of three backup pressure gauges will be kept in the maintenance inventory to replace malfunctioning or damaged gauges.

Compliance Criteria

- Minimum of 2 inches H₂O vacuum pressure at all times on all six zone risers.
- Documentation of pressure readings for the three control manifolds and six zone risers.
- Documentation of scheduled vacuum pump maintenance in accordance with manufacturers recommendations;
- Documentation showing that a backup vacuum pump and gauges are in the Facility maintenance inventory throughout the reporting period.

Documentation showing that the pressure readings are in compliance with the compliance criteria constitutes sufficient evidence that the vacuum equipment is in good operating condition.

Recordkeeping

Pressure readings will be recorded on the forms included in this plan. Readings will be made on all six risers and three control manifolds on a weekly schedule. The reading frequency will be increased to daily after any Corrective Action is required for a period of one week.

Documentation of any event that causes failure of the Compliance Measures to meet the Compliance Criteria will be documented as described below. Corrective Action documentation will become part of the record for the reporting period.

At the end of each reporting period, recordkeeping documentation will be compiled and transmitted to the engineer preparing the Periodic Review Report. The documentation will be transmitted with a completed Management Certification (see attached).

Corrective Action Documentation

The following events are not considered Corrective Actions:

- Installation of a backup vacuum pump to allow scheduled maintenance on the primary vacuum pumps.

Deviations requiring Corrective Action include the following events:

- Vacuum pump failure;
- Any gauge reading less than 2 inches H₂O vacuum pressure; and
- Missing pressure readings on the recordkeeping forms

A description of any/every deviation event and the corresponding corrective action will be provided on a Deviation/Corrective Action form (attached).

Annual Review

On an annual basis, the Facility Management will conduct a review of this plan and all Compliance Measures to evaluate the effectiveness of the plan. The Plan and Compliance Measures will be modified as necessary to ensure they remain effective. Revisions to this plan and Compliance Measures will be incorporated into the Site Management Plan.

DESTINY VAPOR CONTROL SYSTEM

MANAGEMENT RESPONSIBILITY AND ANNUAL CERTIFICATION

Monthly

- Confirm gauge readings are recorded
- Transmit gauge readings to the Certifying Environmental Engineer

Annually

- Arrange vacuum pump maintenance according to manufacturer's recommended schedule
- Transmit Annual Management Certification to the Certifying Environmental Engineer

As Needed

- Ensure Corrective Actions are resolved and documentation filed
- Transmit Corrective Action reports for each occurrence to the Certifying Environmental Engineer

Annual Certification (Check all that apply)

- ☐ Gauge readings have been recorded in accordance with the Site Management Plan
- ☐ Corrective Actions Reports have been addressed
- ☐ Vacuum Pump maintenance has been completed
- ☐ Backup vacuum pump and gauges are on site and in operable condition
- ☐ Pressure Monitoring Logs, Corrective Action Reports and Pump Maintenance documentation is on file in the Facility Management Office
- ☐ The Corrective Action Plan and Compliance Measures have been reviewed for effectiveness. Revisions ☐ have been made and the SMP has been updated
☐ are not needed at this time.

Management Signature / Date

DESTINY VAPOR CONTROL SYSTEM
DEVIATION / CORRECTIVE ACTION REPORT

DATE: _____

ZONE: _____

ZONE 1 : HEAT PUMP ROOM 303
ZONE 2 : HEAT PUMP ROOM 310
ZONE 3 : HEAT PUMP ROOM 318

(check applicable items)

- ☐ BLOWER MALFUNCTION
- ☐ GAUGE READINGS LESS THAN 2.0
- ☐ OTHER UNUSUAL CONDITION

DEVIATION

Reported by: _____

CORRECTIVE ACTION

Resolved by: _____ Date: _____

KEEP A COPY OF THIS REPORT ON FILE IN THE FACILITY MANAGER'S OFFICE. TRANSMIT A COPY OF THIS REPORT WITH THE FACILITY MANAGEMENT ANNUAL CERTIFICATION TO THE CERTIFYING ENVIRONMENTAL ENGINEER FOR INCLUSION IN THE PERIODIC REVIEW REPORT.

IN THE EVENT OF A GAUGE READING LESS THAN 2.0, OR OTHER INDICATION OF BLOWER MALFUNCTION, NOTIFY R. SCHOENECK IMMEDIATELY, DOCUMENT REASON FOR LOW READING OR BLOWER MALFUNCTION, AND DOCUMENT CORRECTIVE ACTION.

CONTROL PANEL ZONE : 1 (Heat Pump Room 303)

Year _____

MINIMUM FREQUENCY: WEEKLY

Month _____

[illegible]

Year _____
Month _____

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IN THE EVENT OF A GAUGE READING LESS THAN 2.0, OR OTHER INDICATION OF BLOWER MALFUNCTION, NOTIFY R. SCHOENECK IMMEDIATELY, DOCUMENT REASON FOR LOW READING OR BLOWER MALFUNCTION, AND DOCUMENT CORRECTIVE ACTION.

CONTROL PANEL ZONE : 3 (Heat Pump Room 318)

Year _____
Month _____

MINIMUM FREQUENCY: WEEKLY

[illegible]