

ATTACHMENT D
INSPECTION SCHEDULES

1.0 INTRODUCTION

This section presents the inspection schedule as required by 40 CFR 270.14(b)(5). Additionally, VES's inspection program also meets the general requirements of 40 CFR 264.15 and the container requirements of 40 CFR 264.174.

As part of its weekly safety inspection and audit program, VES inspects facility areas, structures, and equipment to ensure proper condition and operation. The following is a list of the general safety items that are inspected regularly on a daily or weekly basis:

- Egress / Housekeeping
- Hazard Communication Systems (two way radios, Security alarm system)
- Material Storage / Handling and Process Equipment
- Electrical
- Fire Prevention
- Emergency Response
- Contractor Safety
- Jerome Meter
- Mercury Recovery Vacuum
- Storage Areas
- Containment System

An example of the weekly *Safety Inspection and Audit* form is provided in Exhibit D-1

2.0 INSPECTION REQUIREMENTS

VES conducts daily visual inspections and weekly documented inspections to check for equipment malfunctions, structural deterioration, and any other deficiencies that could threaten human health, safety, or the environment or cause a release of waste materials. The condition of items being inspected is noted along with corrective actions to be taken, the name of the inspector, and the date of the inspection. When a hazard is imminent or has already occurred, corrective action is taken immediately. The inspection form is reviewed by the Operations Manager to verify the completion of the inspection and that actions were taken, or were scheduled to be taken, to correct deficiencies. Completed inspection forms are maintained in the compliance office by the EH&S Manager for at least three years from the date of the inspection.

The hazardous waste storage building is inspected weekly for containers that may be deteriorated (40 CFR 264.174). Loading, unloading, and process areas (or other areas subject to spills) are inspected daily when in use (40 CFR 264.15(b)(4)). In addition to the storage areas 1, 2, and 3, and the items listed on the Safety Inspections and Audit forms included in this permit attachment, VES inspects the following listed items:

- Jerome Mercury Monitor is inspected on a weekly basis to ensure it is functioning properly. This monitor is also gauged and inspected by the manufacturer on annual basis.
- Air handling equipment in Building 1 is inspected weekly to ensure that carbon does not exhibit break through;
- Smoke detectors are inspected for proper functioning;
- First Aid Kit is inspected to ensure that it is properly stocked and is in place;
- Alarm system is inspected for malfunction;
- Fence, barbed wire, and gates are inspected for any tear or break;
- All plumbed eye washes are inspected for proper and effective water flow.

VES maintains Inspection logs for all the above monitoring and inspection items, including inspection logs for storage areas are maintained in the facility for three years, In accordance with requirements of condition E.13.b of Permit Part I. A sample of Safety Inspections and Audit form for the storage areas is provided in Exhibit D-1.

Table D-1 “Inspection Schedule” provides a list of problems that may be encountered during the daily or weekly inspections. The recommended frequency of inspection is also presented in Table D-1. The inspection forms are maintained in the compliance office by the EH&S Manager.

3.0 MAINTENANCE MANAGEMENT PROGRAM

3.1 INTRODUCTION

VES's maintenance program is designed to identify and correct conditions relating to equipment and systems that can cause environmental degradation or endangerment of public health and safety before the equipment or system fails. These preventive maintenance policies and procedures are required to be followed by VES personnel at VES's facility in Phoenix, Arizona.

The preventive maintenance program is facilitated through the daily and weekly inspection programs. Inspection results are reviewed and approved by the Operations Manager. The equipment and systems listed in the weekly inspection form are, on a weekly basis, inspected, tested, adjusted, repaired, cleaned, lubricated, etc. Replacement parts must be purchased and be readily available for such equipment and systems.

3.2 Objectives

The objectives of the maintenance program are as follows:

- To ensure that the facility operations are safe;
- To determine what maintenance work must be performed; and
- To document and confirm the actions taken and to measure their effectiveness.

3.3 Maintenance Notification System

Because VES's recycling processes rely heavily on properly functioning equipment and machinery, our employees are trained to quickly identify any malfunctions and subsequently notify the appropriate personnel so that corrective action may be taken. Upon identification of a problem, the employee who discovers the problem immediately notifies the Operation Plant Lead. The Operation Plant Leads are responsible for assessing the situation and notifying the Operations Supervisor of the malfunction. Once the Operation Supervisor has dispatched personnel to the work area where the malfunction has occurred, he will work with the Operations Supervisor and the General Manager to take the necessary corrective actions. Depending on the nature of the problem, corrective actions will vary.

Because VES relies on immediate notification of problems in order to maintain operations, problems are identified quickly and resolved in as timely a fashion as possible, depending on the nature of the problem. In order to document facility maintenance throughout the year, VES maintains a Corrective Action Log (Exhibit D-2). This log contains information regarding the nature and date of the identified problem, a description of the corrective actions taken, and the date the problem was remedied. Each entry into the log is signed off by the General Manager, who is responsible for reviewing the log. The Corrective Action Log is maintained in the compliance office along with the Weekly Inspection Logs.

3.4 Housekeeping Program

The purpose of VES's housekeeping/daily visual inspection program is to perform housekeeping practices that will reduce the possibility of accidents, including spills, and safety hazards to facility personnel. It is essential that the facility be operated in a manner providing the greatest degree of safety for employees and visitors. Proper housekeeping assists significantly in providing safe operating conditions. It is the responsibility of each individual to contribute to

proper housekeeping by correcting deficiencies where feasible and informing supervisors of housekeeping needs beyond their individual capability. In addition to those items identified on Exhibit D-1, housekeeping issues include the following:

OUTSIDE AREA:

1. Perimeter fence/wall will be maintained in a good state of repair.
2. Grass, trees, shrubs inside and outside the fence/wall will be cut and trimmed.
3. Outside storage of spare construction materials and equipment are to be positioned neatly for easy retrieval. The materials stored will be periodically reviewed to ensure there is a need for retention.
4. The bulk trash container areas will be kept neat with all trash in the container. If there are large items to be discarded which cannot be put in the trash container, they will be neatly stacked near the container. Additional trash pick ups will be arranged if required.
5. Outside lights are to be maintained in good operating order
6. Roadway and parking areas are to be maintained in good order.

ADMINISTRATIVE AREA

The entry/reception area, lavatories, and offices will be kept clean at all times.

The administrative area is to be cleaned daily.

FACILITY OPERATIONS AREA

1. Ensure proper and orderly storage of all pallets and containers
2. Provide for proper containment and regular refuse pickup and disposal
3. Maintain all areas in a clean condition
4. Ensure proper storage of containers, equipment, tools, etc. Ensure that there are no obstructions of walkways, pathways, or roadways.
5. Restrooms, showers, lockers, and lunch areas must be clean and orderly.

4.0 CORRECTIVE ACTION

Once a problem is identified as a result of an inspection, the Operations Manager is immediately notified of the problem. If necessary, the General Manager may also be notified of the problem. The nature of the problem is to be recorded in detail directly on the inspection form. Information to be included is the date the problem was identified, the inspector, and a detailed description of the problem. Once the appropriate corrective action has been taken, the person responsible for the corrective action will document their actions on the inspection form for the date the action was taken. Corrective actions requiring immediate attention include malfunction of any ventilation systems or emergency response systems that would jeopardize the health and safety of the employees within their work environment. All other corrective actions usually will be taken in as timely a fashion as possible.

All corrective actions are documented in the yearly Corrective Action Log presented in Exhibit D-2. This log includes information concerning the nature of the problem identified, the date the problem was identified, the corrective action taken, and the date the problem was remedied. This log is maintained in the compliance office, along with the Weekly Inspection Log.

TABLE D-1
INSPECTION SCHEDULE

Area/Equipment	Specific Item	Types of Problems	Frequency of Inspection
Safety and Emergency Equipment	Phone System	Malfunction, power failure	Weekly
	Public Announcement System	Malfunction, power failure	Weekly
	Two-Way Radio System	Malfunction, power failure	Weekly
	Security System	Malfunction, power failure	Weekly
	Electric Powered Alarms	Malfunction, power failure	Weekly
	Fire Extinguishers	Needs recharging	Weekly
	Eye Wash Stations	Safety seal removed, expired, discolored, Water Flow	Weekly
	Spill Kit/Vacuum	Missing supplies	Weekly
	First Aid Kits	Items out of stock or expired	Weekly
	Emergency Light/Batteries	Power supply expired, malfunction	Weekly
	Exit Signs and Doors	Sign unreadable, closure/lock malfunction	Weekly
	Walkways	Debris/material blocking walkway	Weekly
	Electrical Mains	Damaged, cover missing	Weekly
	Fences	Damaged	Weekly
	Gates	Damaged, unlocked	Weekly
	Truck Checking Areas	Asphalt erosion, material residue	Weekly
	Warning and Safety Signs	Sign unreadable, missing	Weekly
Smoke Detectors	Malfunction, power failure	Weekly	
Container Storage Area	Storage containers	Containers not locked, improper aisle spacing, housekeeping	Weekly
	Drums	Deterioration, breach of integrity, missing labels	Weekly
Lamp and Mercury Processing Area	General area housekeeping inspection	Broken glass, lamp debris on floor	Weekly
	Containment drums	Missing drums, missing hazardous waste labels	Weekly
	Exhaust fans	Malfunction, improper ventilation	Weekly
	Rotex screener	Malfunction	Weekly
	Conveyors	Malfunction	Weekly
	Platform scale	Malfunction	Weekly
	Jerome mercury analyzer	Malfunction	Weekly
Process Equipment	Malfunction	Weekly	

EXHIBIT D-1
WEEKLY SAFETY INSPECTION AND
AUDIT FORM

SAFETY INSPECTIONS AND AUDIT
BUILDING 1
LAMP-SIDE / STORAGE AREA

Inspector Name: _____		Signature: _____			Date: _____
ITEM	Y	N	N/A	COMMENT	
EGRESS/HOUSEKEEPING					
Walkway, routes, exit doors clearly marked?					
Access to egress points clear and free of obstructions?					
Thresholds under overhead fire doors free from any obstructions?					
Access to emergency equipment clear and free of obstructions?					
Are doors and openings that are not exits clearly marked "NOT AN EXIT"?					
Are walking surfaces clear and not slippery?					
Are walkways/aisles clear and free of obstructions and debris?					
Is housekeeping neat and free of broken glass?					
Are walking and working areas adequately illuminated?					
Is unloading Dock #1 clean and free of debris?					
Is dock 1 gate closed and working correctly?					
HAZARD COMMUNICATION					
Security gate operable and warning signs posted?					
Are PPE requirements posted where necessary?					
Are hazard labels present on hazardous materials?					
Are MSDSs for ALL materials available and in a central location?					
STORAGE AREA					
Are satellite containers in good condition, closed, clearly labeled and contain less than 55 total gallons?					
Containers in good condition, labeled, and properly secured?					
Area free of leaks, spills, and debris?					
Are containers stacked properly?					
Storage area properly labeled?					
Proper aisle space maintained and container labels inspectable?					

Inspector Name: _____				Date: _____
ITEM	Y	N	N/A	COMMENT
MATERIAL STORAGE/HANDLING				
Are inspections up to date on material handling equipment?				
Are stacked materials at least 18 inches below sprinkler heads?				
ELECTRICAL				
Are extension cords being used as permanent wiring?				
Are electrical outlets overloaded?				
Do circuit breaker panels identify the circuit they control?				
Are electrical panel doors closed?				
Is there free access to electrical panels?				
Are flexible cords in good condition, free from splices, frays, exposed wiring, or insulation separation?				
FIRE PREVENTION				
Are emergency exits labeled?				
Are inspection tags on fire extinguishers up to date?				
Are fire extinguishers in their proper locations?				
Are fire extinguishers fully charged and operable?				
EMERGENCY RESPONSE				
Are all communication devices operable and accessible?				
Are there any visible spills or leaks?				
Is emergency response/spill equipment in its proper location and properly labeled?				
Is the supply of emergency response equipment adequate?				
Is Contingency Plan Posted and Accessible?				
Are inspection tags on eyewashes up to date?				
Does eyewash station have adequate water pressure for use?				
CONTRACTORS				
1. Are contractors informed of hazards in work area?				
2. Are contractors adhering to VES "Contractor Safety Rules"?				
ADDITIONAL COMMENTS / CONCERNS				
1.				
2.				
3.				

Note: All discrepancies must be documented and reported on a separate sheet to a responsible party.

**SAFETY INSPECTIONS AND AUDIT
BUILDING 1
RETORT / MERCURY SIDE / STORAGE AREA**

Inspector Name: _____	Signature: _____			Date: _____
ITEM	Y	N	N/A	COMMENT
EGRESS/HOUSEKEEPING				
Walkway, routes, exit doors clearly marked?				
Access to egress points clear and free of obstructions?				
Access to emergency equipment clear and free of obstructions?				
Are doors and openings that are not exits clearly marked "NOT AN EXIT"?				
Are walking surfaces clear and not slippery?				
Are walkways/aisles clear and free of obstructions, debris?				
Is housekeeping neat?				
Are walking and working areas adequately illuminated?				
HAZARD COMMUNICATION				
Are Mercury Warning signs posted?				
Are PPE requirements posted where necessary?				
STORAGE AREA				
Containers in good condition, labeled, and properly secured?				
Are storage containers in good condition, closed, clearly labeled with date of accumulation and secured with straps?				
Area free of leaks, spills, and debris?				
Are containers stacked properly?				
Storage area properly labeled?				
Proper aisle space maintained and container labels inspectable?				
ELECTRICAL				
Are extension cords being used as permanent wiring?				
Are electrical outlets overloaded?				
Do circuit breaker panels identify the circuit they control?				
Are electrical panel doors closed?				
Is there free access to electrical panels?				
Are flexible cords in good condition, free from splices, frays, exposed wiring, or insulation separation?				

Inspector Name: _____				Date: _____
ITEM	Y	N	N/A	COMMENT
FIRE PREVENTION				
Are emergency exits labeled?				
Are inspection tags on fire extinguishers up to date?				
Are fire extinguishers in their proper locations?				
Are fire extinguishers fully charged and operable?				
EMERGENCY RESPONSE				
Are all communication devices operable and accessible?				
Are there any visible spills or leaks?				
Is emergency response/Spill equipment in its proper location and properly labeled?				
Is the supply of emergency response equipment adequate?				
Is the Mercury vacuum clean and operable?				
CONTRACTORS				
1. Are contractors informed of hazards in work area?				
2. Are contractors adhering to VES "Contractor Safety Rules"?				
ADDITIONAL COMMENTS / CONCERNS				
1.				
2.				
3.				

Note: All discrepancies must be documented and reported on a separate sheet to a responsible party.

EXHIBIT D-2
CORRECTIVE ACTION LOG



Corrective Actions
Completed by Inspection Personnel

1. _____

ACCOUNTABILITY FOR CORRECTIVE ACTIONS

<i>Corrective Action</i>	<i>Person Accountable</i>	<i>Completion Date</i>
1. _____	1. _____	1. _____
2. _____	2. _____	2. _____
3. _____	3. _____	3. _____
4. _____	4. _____	4. _____

DEPARTMENT MANAGER COPIES ALL ACCOUNTABLE PERSONS AFTER VERBAL NOTIFICATION

SIGNATURES OF PERSONS PREPARING REPORT

<i>Employee's name:</i>	<i>Signature:</i>	<i>Date:</i>
_____	_____	_____
<i>Supervisor's name:</i>	<i>Signature:</i>	<i>Date:</i>
_____	_____	_____

SIGNATURES OF PERSONS REVIEWING REPORT

<i>Department Mgr.:</i>	<i>Signature:</i>	<i>Date:</i>
_____	_____	_____
<i>Health & Safety Mgr.:</i>	<i>Signature:</i>	<i>Date:</i>
_____	_____	_____
<i>General Mgr.:</i>	<i>Signature:</i>	<i>Date:</i>
_____	_____	_____