



TOGETHER. STRONGER. GOPHER

Environmental Health & Safety Department



Innovative Recycling Solutions Since 1946

Rev. 11/19/2018

Welcome

TO GOPHER RESOURCE EHS Contractor Training

Instructions:

1. Watch the Lead Awareness Video.
2. Review the site specific contractor training slides.
3. Print out the site specific test and return to the job site and submit to Gopher EHS Team.
4. Complete the Contractor/Service Provider Checklist for approval.
5. This must be completed prior to job site visit.
6. This is an annual requirement.

Training Overview

This training is required for any unaccompanied contractor/service provider.

- This procedure describes how independent contractors and their employees are informed about the **environmental, health and safety** aspects of work activities at Gopher Resource.
- You will also learn what is expected to meet the requirements of the Environmental Management System that Gopher Resource employs to manage those aspects and their potential impacts.
- The following procedures applies to all independent contractors, their employees and subcontractors performing work at the Gopher Resource Tampa Facility.
 - Must sign in and out every time you enter or leave the facility
 - Must be clean shaven to allow respirators to seal properly
 - Must complete site safety training **annually**
 - No personnel vehicles allowed inside the gate without approval by Gopher Resource management.

Cardinal Rules

Gopher Resource Cardinal Rules

1. **Knowingly bypass or fail to follow **Lock, Tag, and Try** (i.e., Lockout Tagout) procedures.**

Note: This does not include a deviation such as failing to place a tag on a lock.

2. **Failure to follow **Confined Space** permitting procedures.** This would include entering a confined space without obtaining a confined space permit. It would also include not following the specific instructions on a confined space entry permit.
3. **Failure to follow the **Fall Protection** procedures** set forth by each location. This includes failing to wear required life-critical, personal protective equipment (PPE) in areas where designated, or where such tasks require. This also, includes, but is not limited to, fall protection or fall restraint devices when performing tasks at unprotected heights (above **four** feet).

Gopher Resource Cardinal Rules

4. **Deliberately removing or failing to use a machine guard, circumventing a safety device or failing to use mechanical equipment intended to prevent an injury.** This would include the act of bypassing or removal of critical safeguards, including, but not limited to: interlocks, limit switches, light curtains, pressure sensitive safety mats, and physical guards.
5. **Unauthorized use of a motorized vehicle (including but not limited to: forklift, aerial lift, loader, sweeper, water truck etc.) or operating mobile equipment in a manner that endangers one's self or others.**
6. **Failure to follow molten metal safety procedures** (where applicable).
7. **Failure to follow truck & rail car loading/unloading safety procedures** (where applicable).

Gopher Resource Cardinal Rules

8. **Willfully falsify EHS records** such as but not limited to: environmental sampling or monitoring results, work related injury/illness records, reports to any governmental or regulatory body (e.g., US OSHA logs, US EPA records, etc., or company data bases). This would include the failure or refusal to give willing, truthful and timely information regarding an incident

Any employee or contract employee who violates any Cardinal Rule will be subject to disciplinary action, up to and including termination and banishment from the site.

Lead Recycling

Gopher Resource is a recycler of lead. Processes at the facility may introduce lead dust, fumes and other hazardous materials into the workplace, creating the potential for lead exposure to individuals working at the facility. The following topics and information are reviewed:

Content of the **OSHA Standard on Lead for general industry 29 CFR § 1910.1025 and for construction 29 CFR § 1926.62.**

Content of Appendices A, B, and C to the above Lead Standards, and subsequent Appendices, as necessary.

The operations and areas at Gopher Resource which could result in exposure to lead, and an explanation where lead levels are highest.

Engineering and work practice controls to control employee exposure in place at Gopher Resource

Personal protective equipment, and safe work and hygiene practices to be used to protect employees and their families from exposure to lead. (Emphasis on **no eating, smoking or drinking in the plant, proper hygiene care before leaving Gopher, including how to prevent exposing young children at home from lead in the work place**).

Availability of respirators and the restrictions regarding the issuance or use of respirators.



Hazard Communication

Contractors must comply with all aspects of OSHA Standard 29 CFR § 1926.59 Hazard Communication. The content of this Standard is reviewed.

Do not bring any chemical onsite unless you have a **Safety Data Sheet (SDS)** to provide to the Gopher Safety Manager or Safety Assistant. SDS's are due to Gopher Resource Safety within 24 hours after orientation training. The copies of SDS's for all chemicals on this jobsite will be maintained by the Gopher Safety Department and are available for your review upon request. Periodic Audits: Contractors have 1 hour to provide an SDS in the event they are audited by Gopher Resource or a regulatory agency.

A copy of the written **Hazard Communication Program** is located in the Gopher Safety Office and is available for your review. You should be properly trained by your employer on the hazards associated with any substance you may encounter while working on this site. All containers must be properly labeled.

Contractor Compliance

It is the contractor's duty to comply with all federal, state, local and Gopher Resource environmental, health and safety regulations and rules.

As the owner of the property and the company contracting for services, Gopher Resource retains the responsibility to monitor independent contractors for compliance with applicable rules and regulations and its procedural requirements. If contractor or subcontractor employees fail to comply with applicable rules and regulations and procedural requirements set forth in this document, Gopher will promptly notify the contractor so that it may take corrective action. Should the contractor fail to take satisfactory corrective action, Gopher shall remove the contractor from the job and Gopher property.

Environmental Management System

Gopher has a developmental Environmental Management System (EMS) that contains certain core elements including the following:

- An Environmental Policy
- Identification of aspects that have an impact on the environment
- Clear assignment of responsibilities, training and the tools to accomplish these responsibilities (including document control)
- A corrective action program for appropriate corrections
- Basic elements of Management review

Gopher's Environmental Policy is posted throughout the facility. Contractors play an important role in environmental, health and safety issues at Gopher and need to be aware of how their actions can have significant impacts on these issues. These include damage to the environment through lack of training or poor techniques, affecting the facility and/or its workers through their conduct, using hazardous materials improperly, not being aware of the proper procedures followed at the facility or not being aware of hazards or hazardous condition at the facility.

Aspects and Impacts General Overview

- **Aspects:** are normally considered a verb, and action, process, or job within the operation
 - Examples: “recycling of lead acid batteries”, “use of a chemical in refining”, “use of a coke breeze in the reverb furnace”, “spill of soda ash”, etc.
- **Impacts:** are considered what happens when you perform the aspect (action, process, or job) **i.e., what are the potential consequences on the environment when that action is taken**

Depending on...

- How long the impact lasts
- The severity of the impact
- Regulations around the impact

... the EHS team ranks the **impact** for each **aspect**.

- Aspects ranking 60 % or greater is considered “**Significant Aspect**” and will require monitoring, measuring, and controls.

Departmental Significant Aspects

RMPC Significant Aspects

Lead – Acid Batteries

- Unloading / loading operations, transportation, warehouse storage, battery breaking operation.

Ni/cad and other non-lead - acid batteries

- RMPC Operations, storage & shipment off-site ad universal waste.
- If added to our system we will violate our permit and it was release cadmium in our system which is a carcinogen and difficult to remove from the system.

Overflow of reactors – Desulfurization process

- RMPC operations, desulfurization process, maximum height of the fluid in the reactors.
- Causes material to accumulate in the pit which is against waste and storage tank operating permits.

Departmental Significant Aspects

Facility (includes RMPC, WWT, Furnace, Refining, Maintenance, General Plant)

Fugitive emissions of lead – Outside

- Leaving exterior doors open.
- Not cleaning all equipment before exiting the facility (forklifts, golf carts, dollies, etc...).
- Leaving the facility and not washing boots before walking up to boot wash / locker area.
- Doing maintenance on a piece of equipment without proper controls.

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Policies

Environmental Policy

“We are committed to environmentally safe recycling through continuously improving our Environmental Management System.

To be recognized for our leadership in pollution prevention through the use of objectives, targets and a commitment to meet or exceed all environmental regulations and requirements.

Our community and all State and Federal regulators will view Gopher Resource as a company in the forefront of excellent environmental management.”

Every contractor is expected to follow our Environmental Policy in order to protect all employees and reduce risks of significant aspects outside the plant.



Quality Policy

We are committed to achieving customer satisfaction by producing quality products in an environmentally safe manner.

Our Mission

To supply quality products and services to our customers through environmentally safe recycling.

To be recognized as a leader in implementing innovative process improvements.

To enable all employees to realize personal and professional development through company-wide involvement, teamwork, open communications, and training, within a safe working environment

Every contractor is expected to follow our Quality Policy in order to protect all employees and the interests of our customers and stakeholders.



Requirements

Discipline Policy

All Gopher employees have the authority to correct an unsafe act and stop an imminent danger situation or situation that may impact the environment. Violation of our procedures will be handled in the following manner:

- **1st violation** will result in a documented verbal warning;
- **2nd violation** will result in a written notice provided to both the employee and their employer outlining the problem, how to correct it and the result if compliance does not occur;
- **3rd violation** will result in suspension of the employee from Gopher property for a period of 30 days.
- **4th violation** will result in a permanent suspension from Gopher property.

Required PPE

The following PPE is required at all times on this site:

Respirators, Full Face

Safety glasses with side shields (working outside)

Hard hats

Steel-toed safety boots

Hearing Protection, inside of plant

Long Sleeve Shirt, Pants, inside of plant



You will be instructed on when additional personal protective equipment is required for certain tasks.

- All contractors are responsible for furnishing all required, specialized **personal protective equipment** including safety harnesses and lanyards

Drug-Free Workplace

This is a drug and alcohol free worksite. All employees may be subject to random drug/alcohol testing, and will be subject to post incident and reasonable suspicion drug/alcohol testing.

Refusal to submit to such testing will result in termination from this project. Alcoholic Beverages are not permitted on Gopher Property. This includes inside vehicles.



General Site Information

If in doubt regarding an unsafe or safe procedure, consult your foreman before acting.



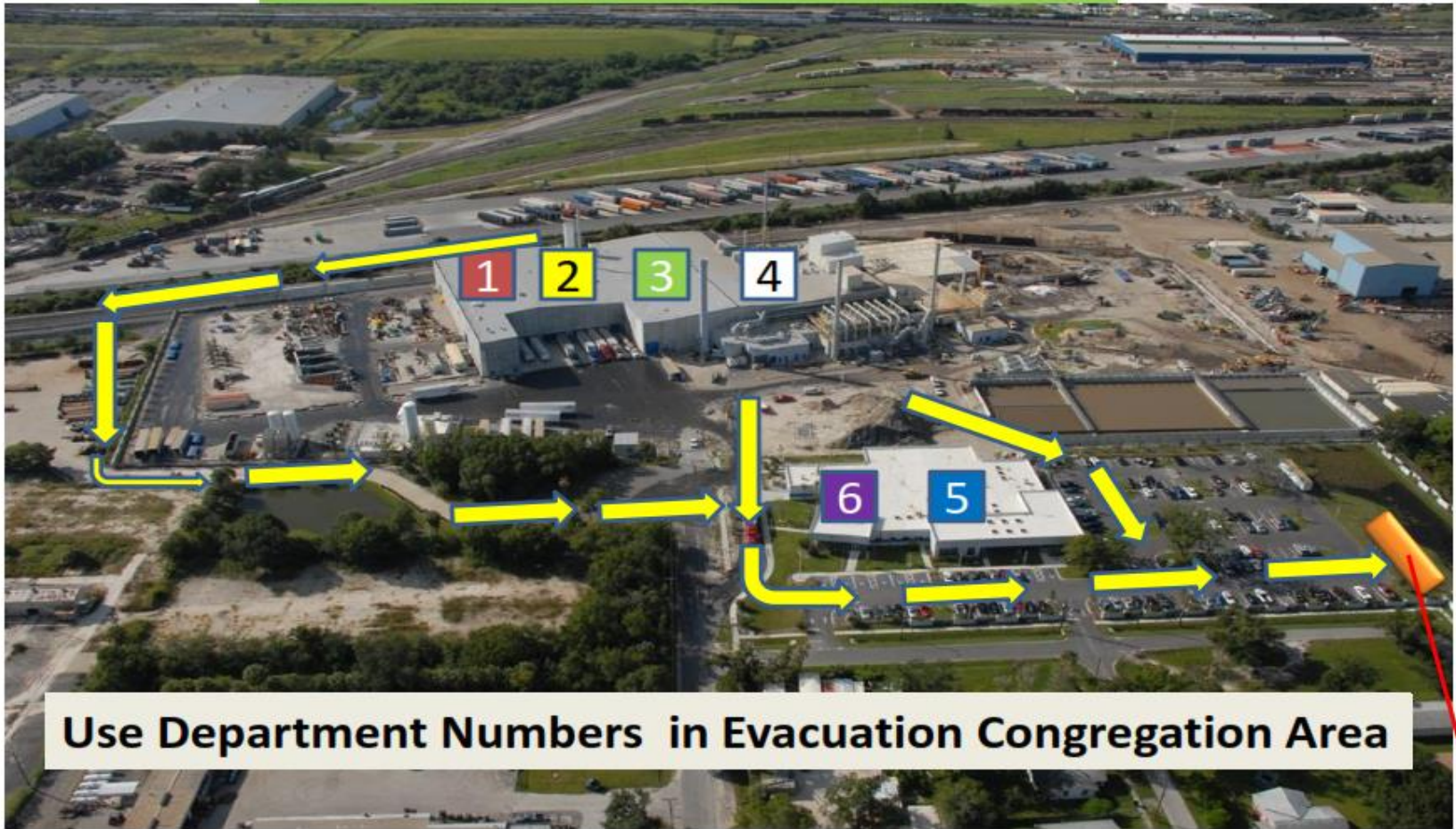
Emergency Evacuation

In the event of an emergency and/ or evacuation of this facility, your supervisor will be notified immediately and promptly inform all employees. Your company must report to the **designated assembly area** for accountability of personnel. If you notice any emergency situation inform your Supervisor immediately.

Note: *You are required to sign in and out of the plant at either the front desk or at the entrance to the bootwash area.*



EVACUATION MAP



Use Department Numbers in Evacuation Congregation Area

1. RMPC/WWT
2. Maintenance./ Shipping & Receiving

3. Reverb/Furnace
4. Refining

5. Hygiene/Office
6. Contractors/Visitors

**EVACUATION
CONGREGATION
AREA**

Lead Safety

What is a safe Lead Level for Adults?

- The U.S. Department of Health and Human Services recommends that BLLs among all **adults** be reduced to **<10 µg/dL**. as of May 11, 2018

Exposure Prevention

- Employees and contractors must be clean shaven daily when reporting to work.
- Respirators are required to be donned prior to leaving the boot locker area.
- Employees and contractors must wear gloves at all times this includes:
 - ✓ Beginning of each shift prior to donning boots
 - ✓ During all work activities

Exposure Prevention

Decontamination:

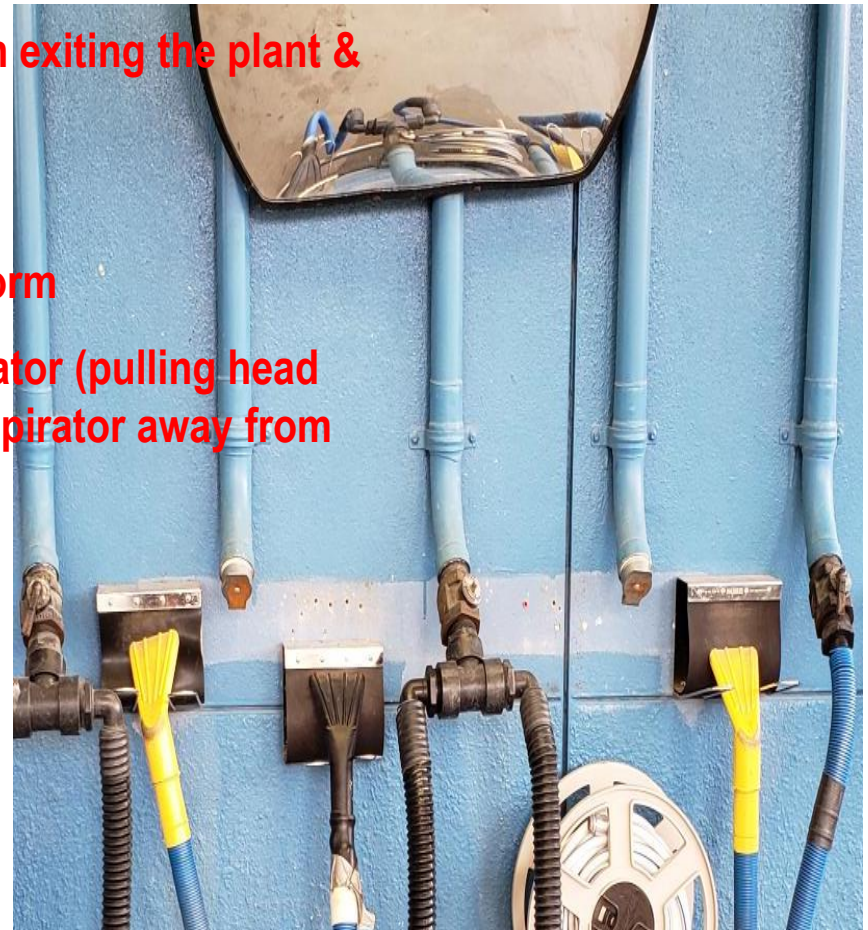
- Employees and Contractors must wash their boots when exiting the plant area:
 - ✓ Refining boot wash outside
 - ✓ RMPC door
- Never remove your respirator until you have vacuumed thoroughly at the boot locker area



Decontamination continued

When leaving the plant YOU MUST, & in the following order:

1. Leave respirator and nitrile gloves on upon exiting the plant & navigating to the boot patio
2. Wash boots at boot wash station
3. Completely & Thoroughly vacuum off uniform
4. Proceed to boot locker, and remove respirator (pulling head harness from back to front, and pulling respirator away from the face)
5. Remove boots
6. Remove nitrile gloves
7. Store ALL PPE in your boot locker
8. Enter Hygiene building



Decontamination continued

Once you enter the hygiene building and proceed to the wash basin, the following is required:

1. **WASH: FACE, ENTIRE NECK, COLLAR BONE AREA, EARS, ARMS UP TO ELBOWS,**
2. Enter dirty locker room, remove plant uniform
3. Put on break uniform
4. Rewash hands
 - You are not permitted to leave the property during breaks, **NO EXCEPTIONS**
 - Uniforms must never leave the property
 - Showering at the end of the shift is required
 - **It is NEVER acceptable to skip or omit any portion of the decontamination process; this includes smoke breaks**



Work Requirements

General Site Information

- Report all injuries, accidents, property damage, chemical spills or near misses, regardless how minor, immediately to your foreman/leadership.
- Do not start and stop any operating equipment at this facility unless authorized to do so.
- Site waters are non-potable, do not drink water from any hose or faucet etc.
- Locate the nearest **emergency shower/eyewash** prior to working in your area. Check it to make sure it is working properly.

Gopher Behavior Expectations

- Weapons are not permitted within the Gopher building or plant.
- Making or starting a false claim or report will not be tolerated and is prohibited.

Gopher Behavior Expectations

- Gopher employees will not interfere with contractor's areas unless authorized
- Contract employees may not visit other employees during work hours and may not leave jobsite or work area without notice to the foreman.
- You are permitted to be in your immediate work area only; you may not wander into other areas of this facility.

Vehicle Requirements

- Private vehicles are to be parked outside of the property, in the lot West of the property. Gopher is not responsible for any damage to private vehicles.
- All personnel will adhere to all traffic control devices and speed limits. Speed limit inside of property is **5** mph.
- There will be no riders on equipment such as forklifts, backhoe, pay-loaders or other industrial equipment, OR on the bed of flat bed trucks or in the back of pick-up trucks unless on permanently installed seating.
- Respirators **must** be worn while driving or riding on mobile equipment.

Vehicle Requirements

- Any equipment taken into operational areas may be contaminated with lead.
 - **All contaminated equipment must be thoroughly cleaned prior to leaving this facility (Fugitive Lead Significant Aspect).**
 - Pressure washers and vacuum sites are available in various locations on-site for cleaning.
- All equipment must be shut down and/or de-energized while re-fueling or being serviced, regardless of the type of fuel used.

Housekeeping/Waste Disposal

- All work areas are to be maintained in as neat and orderly a condition as possible.
- Debris should be kept cleared from work areas, passageways and stairs.
 - **Remove debris on a daily basis during the course of your job or service.**
- Dispose of all hazardous waste in accordance with Gopher Policies and Procedures (Contact your Gopher Contact or Gopher EHS team for instructions of disposal).

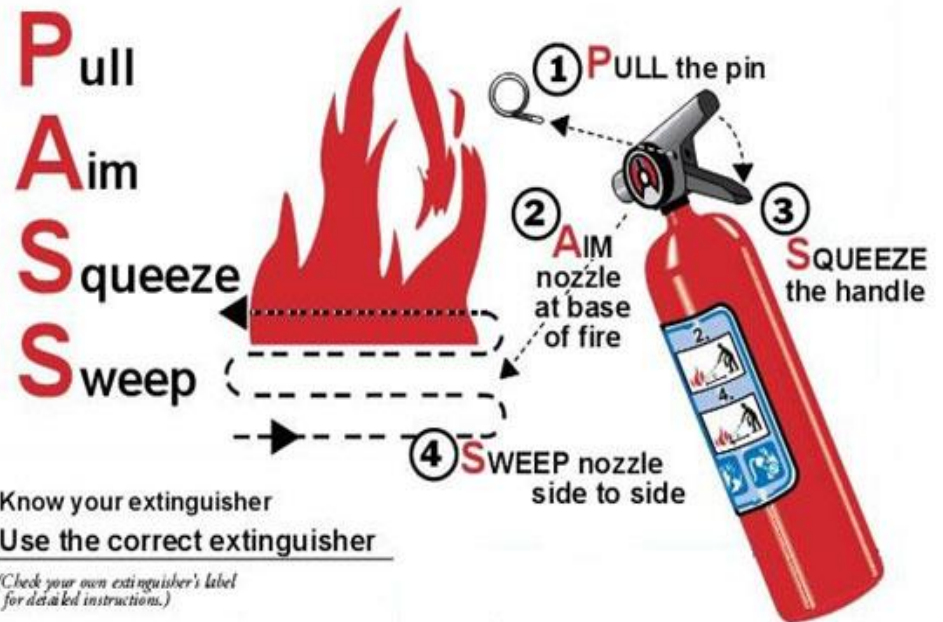
Hot Work

- Fire Watches is required in areas where hot work (welding/cutting/brazing etc.) is being performed. You will be instructed when Fire Watches are required. All Fire Watches must be properly trained.

Fire Preparation

- Unless you are trained in the use of fire extinguishers, you are not permitted to use one. All fire extinguishers brought on site will have current inspection tags.

To operate an extinguisher:



Flammable Fuel Storage

- Store and use all flammable/combustible substances properly. Use only approved metal safety cans.
- Plastic safety cans are not permitted on site.



Barricading/Excavation

- All hazardous outside openings or excavations must be barricaded and lighted at night when travel is permitted in the area.
- Excavations will be inspected by a competent person daily.
- Soil piles/equipment will be kept 2 feet back from edge. Means of egress will be provided every 25 feet.
- Soil piles will be kept covered at all times.



Compressed Gas

- Acetylene, oxygen or other compressed gas cylinders are to be stored and used properly. **Store acetylene and oxygen cylinders 20 feet apart or with the proper fire rated barrier.**
- All cylinders must have protective caps on during storage. Secure all cylinders during use and storage. Do not lay cylinders down on the ground.

Vehicle explosion caused by an improperly transported acetylene tank.

Compressed and liquid gas cylinders shall be secured in a safe manner. 30 CFR [77.208 \(d\)](#).



Welding Hoods and Hard Hats

Soft hood welding shields will not be permitted when overhead hazards are present. Hard Hat attached shields are then required. Hard Hats are required at all times while in the plant.



Work Scope Notification Critical Tasks

- Prior to performing any lockout/tagout, hot work, confined space entry, excavating, chemical line breaking etc. your Gopher Contact and or Gopher Safety Manager **must** be notified.
- All guards, handrails and protective devices must be replaced each day and at the conclusion of work.

Fall Protection

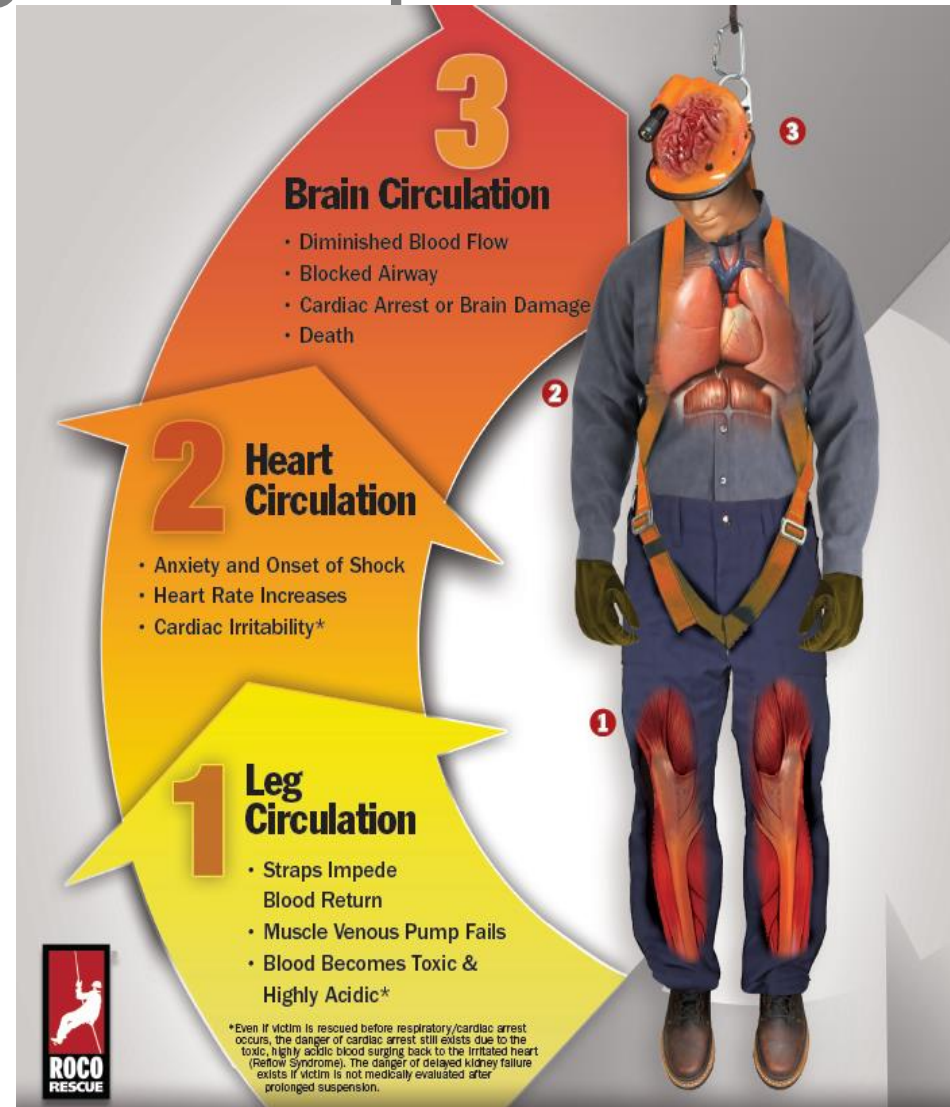
- There is a 100% tie off policy. Fall protection must be used when performing work at a height of **4 feet or greater** above a level surface. Safety harnesses are required. Safety belts are not permitted.
- The proper Fall Protection must be used when in all aerial lifts with a self retracting lanyard. Only those employees trained in the proper use of fall protection will use this protection. **Do not use a harness unless you have received the proper training.**



Falls Resulting in Suspension

While suspended in a harness, your leg straps act as a tourniquet. Blood supply is being reduced to your legs.

Develop a rescue plan as a preparation.



LOTO Requirements

- Contractor(s) brought into the facility must comply with the lockout/energy control procedures; non-compliance with the procedure will result in ramifications which may include dismissal & banishment from the property.
- Contractors must have the following legibly printed on the tag:
 - Contract Company's Name
 - Contract Employee's First and Last Name
 - Contract Employee's Phone Number
- Contractors are responsible for supplying their locks (see lock image)



Contractor locks must be the following:

- Blue
- Plastic or steel material

****Aluminum locks are not permitted on GR property***

Work Area Requirements

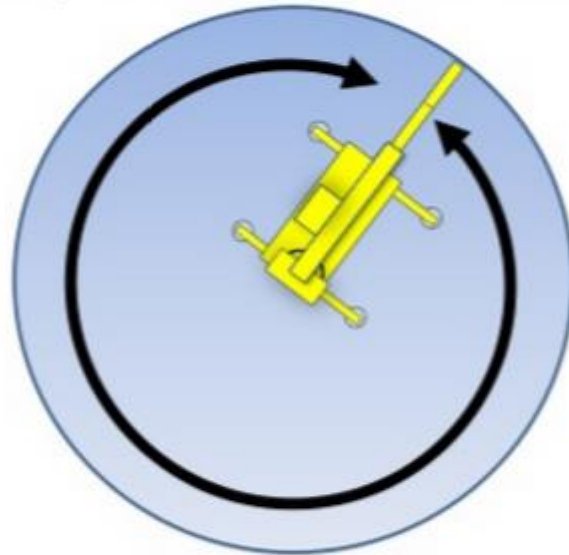
Guidelines must be flagged where they cross the travel space or paths, walkways or roadways.



Know the Safe Work Zone

Upon entering an area with a crane – Stay clear of the lift zone, and boom. Make visual eye contact with crane operator for authorization to pass through. Observe and respect barricades.

Identify the Crane's Work Zone



Work Zones are defined as 360° Around the Equipment

Crane Lift Safety

Tag lines must be used on all lifts.



Overhead Loads

**DO NOT PLACE YOURSELF
UNDER AN OVERHEAD
LOADEVER!!!!**



Confined Space Entry

Authorization for entry must be cleared by Gopher HS.

Confined spaces are potentially deadly if the proper precautions are not taken.

Complete a confined space work permit. Ensure that you have communicated the entry need to Gopher Management.

The local fire department must be contacted to ensure their availability for rescue.



Confined Spaces

Have all the hazards been identified? Ensure proper ventilation, scope of work is well known and communicated.

Flash overs, deprived oxygen spaces can all take place in a matter of a few seconds.

Make sure you have a clear and understood rescue plan, as the insurance that you hope you never need.

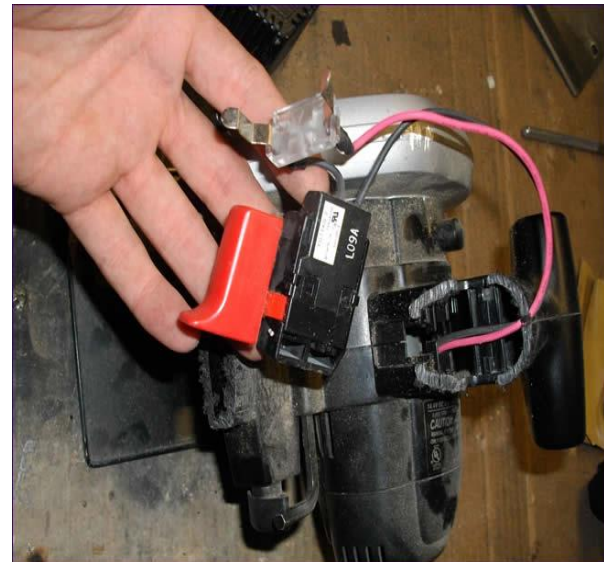


Tools & Equipment

- All equipment brought on site (cranes, earth moving equipment, high-reach etc.) shall have current inspection records.
- Ground Fault Circuit Interrupters (GFCI) shall be used with all portable electric tools and equipment.
- Only qualified and experienced individuals shall operate tools and equipment

Tools & Equipment

- Only portable tools and equipment in good working order may be used on this jobsite. Know the rating of the tools and equipment, and only use them for the purpose for which they were designed. Ensure manufacturers machine guards are in place before each use.



Scaffolding

- Only trained persons shall be used for scaffold erection. A competent person prior to use shall inspect scaffolds for safe conditions.



Review

- You must be clean shaven at all times when reporting to the job site.
- You are responsible for personal protective equipment.
- No personal vehicles are allowed through the gates.
- Stay in the areas that you are authorized to work, don't wonder in other areas of the plant.
- Keep your respirators on at all time inside the plant
- Drink from authorized area only (cool down rooms).
- Fall protection is required when working 4ft or greater and when operating boom and scissors lifts.

Work Safe Be safe

Contractor Training

Training is complete...

Thank you in advance for your
cooperation.