



Contractor Environmental and Safety Program/Statement

MI Metals strives to provide a safe and healthful workplace for its employees and be good stewards of the environment and the local community; as such MI Metals wishes to hire contractors who hold the same values. To accomplish this MI Metals has established this Contractor Environmental and Safety Program. This program is intended to give an overview of the hazards, both safety and environmental, associated with our operations and outlines some of the requirements associated with those hazards which we expect our contractors to meet, *it in no way is intended to be the contractors sole source of information for their safety program and is not all inclusive of hazards that contractors or their employees may encounter while performing services for MI Metals, Inc.*

MI Metals expects contractors to comply with all local, state, and federal regulatory requirements associated with their employees or their tasks. At no time will MI Metals or its associates assume responsibility for a contractor's safety or environmental program or their responsibility to meet regulatory requirements. Should MI Metals associates observe a contractor or its employees performing unsafe or environmentally prohibited acts they shall report said unsafe acts to MI Metals management who will then bring these concerns to the attention of the contractors' on-site supervision. Should the contractor or its employees be observed performing unsafe or environmentally prohibited acts and refuse to correct said acts then they shall be asked to leave MI Metals property, any resulting work stoppage or costs shall be the responsibility of the contractor. Should a contractor be asked to leave they shall not be allowed to return until MI Metals management is confident that they can meet all safety and environmental requirements.

MI Metals facilities operate an ISO 14001 approved Environmental Management System, and we closely monitor all aspects of our business which could have an adverse effect on the environment. Our facilities operate under strict local and state air and wastewater permits which closely

regulates air emissions and water which is discharged to the local sewage treatment facility additionally, our facilities are managed as Large Quantity Generators of hazardous waste. If your work requires that you discharge air emissions, discharge any substances down the sanitary sewer, or creates any waste products these must be evaluated to ensure that our site can maintain compliance in these areas while the work is proceeding. Please identify any processes which you have that could affect the air, water or ground at our facility BEFORE proceeding.

By signing below the contractor agrees with the above statement, has read and agrees with the requirements in the attached program and affirms that they are in compliance with all regulatory requirements regarding Environmental, Safety and Health.

Contractor Printed Name	License Number
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Contractor Signature	Date
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MI Metals Representative Printed Name	Title
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MI Metals Representative Signature	Date
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1)

PURPOSE – To inform contractors performing work on MI Metals property of hazards present, to ensure that the contractors are aware of their responsibilities to provide required safety and environmental training and equipment to their employees and to inform contractors of safety requirements for their employees while working at MI Metals.

2) RESPONSIBILITIES:

a) Plant Manager – Is responsible for:

- i) Informing the contractor of this program.
- ii) Ensuring that the contractor is informed of hazards present in MI Metals (see paragraph 3 of this program) must also brief contractor regarding site specific hazards and environmental concerns which may be encountered.
- iii) Ensuring that the contractor is aware of the requirements placed on their employees while working at MI Metals (see paragraph 4 of this program).
- iv) Providing contractors with a copy of this program.
- v) Obtaining the signature of the contractor or their authorized representative in the space provided on the cover (page 1) of this program.

b) **Contractor – Is responsible for:**

- i) The contractor shall at all times be responsible for the safety of their employees, at no time shall MI Metals or its representatives assume responsibility for the safety or the safe work practices of the contractors' employees.
- ii) Ensuring that their employees are, as a minimum, wearing Personal Protective Equipment as required by everyone entering an MI Metals facility (see paragraph 4 of this program).
- iii) Ensuring that they and their employees are trained and complying with all federal, state and local regulatory requirements pertaining to the environment and the health and safety of their workers.
- iv) Providing MI Metals with Safety Data Sheets for any hazardous chemicals brought onto MI Metals property, as described in 29CFR1910.1200. BEFORE they are brought on site.

3) HAZARDS PRESENT AT MI METALS, INC.

a) General Hazards – The following hazards are present in the manufacturing facility in general

- i) *Noise* – Noise surveys have been conducted and it has been determined that the noise at this facility exceeds the OSHA action level of 85db on an 8 hour time weighted average, therefore earplugs are required for all employees on the manufacturing floor.
- ii) *Material Handling Equipment* – Contractors are NOT permitted to use MI Metals material handling equipment unless given specific authorization and, if used, shall be responsible for the safe usage of said equipment as per regulatory requirements.
 - (1) *Forklifts* – Forklifts are used throughout the facility. Forklifts pose a hazard to both personnel and equipment. Everyone in our facility must watch out for

forklifts and if work is being performed in a main forklift aisle way then that aisle way must be blocked or there must be someone directing the traffic around the individual or equipment performing the work.

- (2) *Cranes* – Cranes are used in numerous areas in all of our facilities. Be aware of the cranes and if asked to move, do so immediately. At no time shall loads be lifted over people. If you see a load moving toward you then the operator may not see you, stop what you are doing and get out of the way.
 - iii) *Flying debris* – Several operations in our facility generate flying debris such as saws, grinders, sweepers, etc. In order to protect both our employees and visitor eyesight everyone who enters our facility must be wearing approved safety glasses.
 - iv) *Machinery in general* – There are numerous machines in MI Metals including saws, grinders, presses, cranes, forklifts, etc. Contractor employees must not operate these machines unless they have been specifically trained on their operation and they have received authorization to operate them from the plant manager and their foreman. Contractor employees must not approach an MI Metals employee while that employee is operating a machine, if the contractor needs to communicate with the machine operator they must wait until the present task is finished and then approach safely or contact the plant manager.
 - v) *Heat* – There are several processes within our facility which generate heat and hot metal. It is the standard policy in our facility that individuals who are not familiar with our operations do not handle metal until an MI Metals representative approves it. Aluminum does not change color as it heats up, touching hot metal can result in serious burns.
 - vi) *Chemical* – MI Metals uses numerous hazardous chemicals in our facilities including but not limited to Acids, Caustics, Flammable, Other Corrosives, etc. Some are listed below. These chemicals can be in solid, liquid, powder, or gas forms.
 - (1) All chemicals and chemical containers are labeled as per requirements in OSHA 29CFR1910.1200 and other regulations.
 - (2) All hazardous chemicals are listed in our SDS Master Listing and SDSs are readily available for all our chemicals.
 - vii) *Confined Spaces* – There are numerous permit required confined spaces at our facilities. Only personnel trained to do so and following a written confined space entry program, as described in 29CFR1910.146 are allowed to enter permit required confined spaces.
- b) Specific Hazards – Along with the general hazards in our facility there are areas that have specific hazards which must be addressed.
- i) Cast House (Oldsmar, FL): *The foundry is a high hazard area. Personnel that do not have a need to be in the foundry must stay clear unless escorted by an authorized MI Metals representative. Contractors who must work in or near the foundry must receive specific briefings and training on the hazards associated with the foundry.*
 - (1) Molten Metal – Molten metal is highly hazardous and reacts violently in certain

situations. No one may handle or operate any process involving the smelter or its associated equipment unless specifically trained to do so and unless they have the specific consent of the cast house manager.

- (2) Scrap Aluminum – The foundry uses scrap aluminum in its process of recycling and reusing this material. Scrap may be found throughout the foundry area and has the following hazards
 - (a) Loose scrap poses a tripping hazard and has many sharp edges protruding use caution when walking or working in this area.
 - (b) Bailed scrap is stacked, is heavy, and has sharp edges. Do not walk or stand near bailed scrap, if it falls over or a forklift/bobcat begins to move it, it sometimes falls over and presents a crush hazards.
- ii) Anodizing (Oldsmar, FL): The anodizing area presents the following hazards
 - (1) Chemical – There are large quantities of both acidic and caustic chemicals in use in the anodizing area. SDS's are available next to the time clock and are available upon request. Contractors must provide their employees all required HAZCOM and other training if they are working in this area.
 - (2) Confined Spaces – All of the tanks and pits in the anodizing are considered permit required confined space. As such if anyone enters into these confined spaces then they must meet all regulatory requirements for permit required confined spaces.
 - (3) Exposed Electrical Circuits – There are exposed electrical conductors on and behind the anodizing tanks. Employees working in these areas must be informed of these circuit and how to safe them or avoid them.
- iii) Paint Line (Prescott Valley, AZ – Smyrna, TN – Millen, GA) – This area presents several hazards including chemical, falling metal, entrapment, heat, etc.
 - (1) The paint room/spray booth areas are off limits, unless you are specifically contracted to work in them. These areas are extremely hazardous.
 - (2) The washers and ovens present chemical, heat and entrapment hazards and should not be entered unless specifically authorized to do so by the plant manager.
- iv) Extrusion Press (All Facilities) – *Due to the nature of the press no contractor personnel will work on or around the press unless the press is down, they are escorted at all times by MI Metals personnel, or they have received specific documented training regarding extrusion presses.* The extrusion press is a horizontal hydraulic extrusion press and operates at very high pressures and temperatures as such the following hazards are present.
 - (1) Flying debris – at any given time flying debris in the form of molten aluminum, steel from a broken die, oil, etc. may exit the press.
 - (2) Saws – there are numerous saws in action at the press that present both cutting hazards and flying debris hazards.
 - (3) Ovens – the press uses hot aluminum and dies, there are several ovens in the

press area that are always very hot and pose a burn hazard.

- v) Die Shop (All Facilities) – The die shop area hazards include caustic chemicals and anhydrous ammonia, possible flying debris and heavy items being lifted by cranes. Should contractor personnel be required to enter into this area they must first be trained in the hazards associated with these chemicals.

4) **PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIREMENTS – MI Metals shall not provide contractor employees with PPE.**

- a) Everyone who enters an MI Metals facility **must** be wearing safety glasses and hearing protection. Anyone in the facility not wearing these required items will be asked to leave and shall not be allowed to return until they have and are wearing these items.
- b) Other PPE required i.e. respirators, boots, gloves, etc. must be provided to employees as needed by the contractor and specific regulatory requirements pertaining to them (such as respiratory protection) must be met by the contractor.

5) **Environmental Aspects** – Before beginning work you **MUST** evaluate the processes which you will be performing for the following.

- a) ANY process water or waste that you will be discharging down any drain in the facility must be evaluated and MI Metals must be informed **BEFORE** it is allowed to be discharged to ensure that our wastewater permit will not be violated.
- b) ANY air discharge from painting or local exhausts must be evaluated before work begins to ensure that it is allowed or captured as per our Air Permit.
- c) ANY Wastes created must be evaluated **BEFORE CREATION** to evaluate if they are hazardous wastes under the Resource Conservation and Recovery Act (RCRA). This includes ANY liquid waste, wastes that may be reactive, or waste that may contain hazardous constituents under the act. (oil, paints, light bulbs, dust, batteries, ballasts, etc.).
 - i) **If RCRA Hazardous Wastes are generated on MI Metals property you MUST inform MI Metals and proper handling and disposal must be accomplished as per regulatory requirements.**

6) **DISCLAIMER**

MI Metals and its associates are not and will not be held responsible for the contractor's safety or environmental program nor the enforcement of said program. It is the contractor's responsibility to provide for the safety of their employees, environmental compliance of its operations/tasks and enforcement of their programs. Should a contractor violate regulatory requirements or have an incident resulting in injury, death, environmental non-compliance/violations, or regulatory enforcement action by a local, state, or federal agency they shall be held solely responsible for any and all repercussions of said incident.