


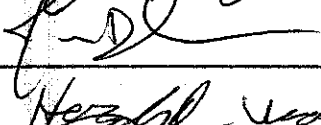
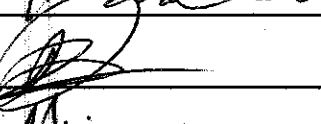
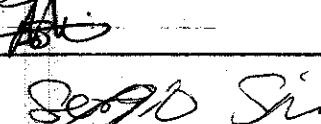
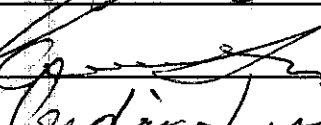
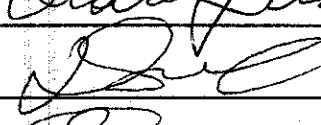
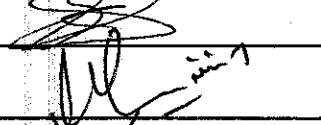
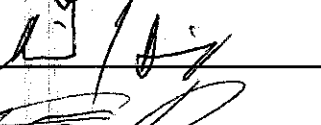
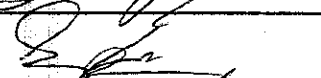
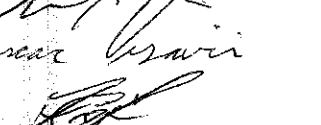

KELLY TRACTOR CO.




SAFETY MEETING ATTENDANCE ROSTER

WASTE HANDLING AND EMERGENCY PROCEDURES

DATE 12-28-2012

Presented By: MIKE ISOM Presenters Signature: Mike Isom

NAME (PRINT)	EMPLOYEE NUMBER	DATE	SIGNATURE
CHARLES K. ORRETH	003816	12-28-2012	
Jean Daula	3706	12-28-2012	
Harold Leonard	001651	12-28-12	Harold Leonard JR
Adail Pastrana	003776	12-28-12	
Andrew S. Hopwood	003809	12-28-12	
SERGIO SILVA	003647	12-28-12	Sergio Silva
Kesner Toussaint	003817	12-28-12	
Cedric Lube	0432	12-28-12	Cedric Lube
DOMA'S, SAGALIE	001275	111	
GUSTAVO MURILLO	003164	12/28/12	
Winston Williams	976302	12/28/12	
David Gomez	003754	12/28/12	
Michael Duran	0448	12/28/12	
ENRIQUE SANCHEZ	0366	12/28/12	

WILLIE DAVENPORT	0509	12/28/12	
Oscar Gaviria	3784	12/28/12	Oscar Gaviria
LIVAN GUERRA	2374	12/28/12	
DONATA DENEZ	2271	12/28/12	

WASTE HANDLING AND EMERGENCY PROCEDURES

Presented By: MIKE ISOM Presenters Signature: Mike Isom

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MIAMI GL SERVICE

WASTE HANDLING AND EMERGENCY PROCEDURES

Kelly Tractor Co. is expected to operate this business without any harm to human health or the environment. We must comply with the federal and State of Florida regulations

Today we are going to talk about non-hazardous waste and Hazardous Waste and what you can do to help Kelly Tractor comply with rules of the federal and state government. We are going to start with basics for the newer people and for those of you who have a lot of experience here at Kelly, this will serve as a good review.

Trash Cans and Small Yellow Dumpsters (marked GL Service)

As you all know we have non-hazardous waste so first we will talk about trash cans in the shops for paper trash and next it is trash in the yellow dumpsters (marked GL Service) on the outside edges of the shop. I think most of you know those yellow GL Service dumpsters are for boxes, used air filters, garbage, lunch wrappings, plastics and old parts that are not scrap metal. (Five gallon plastic paint containers with a thin, dry coating of paint can also be placed in those GL Service dumpsters.) The dumpsters are not for oily, greasy paper towels and rags, used absorbent pads, used liquid filters like oil filters, fuel filters and coolant filters. They are not for one quart, one gallon and 5 gallon plastic oil containers unless they have been turned upside down on an oil drain cart and allowed to drain. If they have been drained properly then they can go in a yellow GL Service trash dumpster. To clarify further no aerosol cans, absorbent pads, paper towels or rags that have been used with aerosol liquid or mineral spirits can be placed in a GL Service dumpster. No oil sample bottles, caps, test tubes and sample tubing with oily residue can go in a GL Service dumpster. No one gallon plastic anti-freeze containers can go in a GL Service dumpster unless thoroughly drained into a Used Anti-freeze cart or drum.

Small Yellow Scrap Metal Dumpsters:

We have yellow dumpsters marked Scrap Metal at the outside edges of the shops and when full they must be dumped in the large scrap metal roll-off container at the back of the property. It is the Service Departments responsibility to dump the scrap metal into the roll-off container. All used aerosol cans will be punctured in the tool room because that equipment provides the best location for the puncture and any remaining gas can help push out the liquid. Also the gas

is captured in a filter. Aerosol cans that have been punctured go into the Scrap Metal dumpsters. (One gallon metal paint cans with a thin, dry coating of paint can be put in a yellow dumpster marked Scrap Metal.) Only scrap metal is placed in a Small Yellow Scrap Metal Dumpster.

Plastic Drums for Non-Hazardous Material:

For non-hazardous drums we have plastic barrels supplied by FCC Environmental. They are either colored blue or black. We have plastic barrels marked Used Oil Filters for used oil filters, used fuel filters, used coolant filters and spin on filters from our parts washers. These liquid filters need to be drained properly into a used oil drain cart or a used anti-freeze drain cart or drum before placing them into the barrel marked Used Oil Filters.

The Oil Analysis Lab (SOS) has plastic drums for used sample bottles, caps, test tubes and sample tubing with oily residue. The Lab people fill those plastic drums.

We have plastic drums marked Used Anti-freeze. This used anti-freeze will be transported to a recycling center.

Most all of the plastic drums furnished by FCC Environmental are in the 'Drum Storage Area' next to the Main Shop. This is the ideal place for storage of empty drums and drums in process of being filled because the drums are not in the sun and rain. The identification labels must always be facing outward and easy to see and read.

There are a few plastic drums kept in the main shop and in the hydraulic cylinder repair shop to cut down on walk time.

There is only one product in a drum, no mixing, and the product inside must match the label on the outside.

Some of the plastic drums furnished by FCC Environmental have had the same label on the outside of the drum for many years and like we said earlier these are handled as non-hazardous containers and as a reminder no hazardous materials should be put in them. If you have a question ask me or any supervisor.

55 gallon Steel drums

Kelly Tractor Co. owns steel, 55 gallon drums. These steel drums are heavy duty and more durable than plastic. Some of these drums are used for non-hazardous materials like wash rack sludge (oily, greasy, watery dirt). Steel drums filled with non-hazardous material must have a white label and have an 'accumulation start date' shown on the label even though it is marked non-hazardous. (If a drum still has an old label from handling, storing or transporting at an

earlier time, the old label needs covered, removed or letters marked through with a black permanent marker so the current label is the one noticed.) Wash rack sludge (oily, greasy, watery dirt) comes from the east side of the wash rack which is used for washing off oil, grease, oily dirt, greasy dirt. This east side is on a close loop filtration and oil skimmer system. The west side of the wash rack is used only for washing off dirt from machines because there is no oil skimmer system on the west side. Normally there are several wash rack sludge drums waiting for pick up in the 'Drum Storage Area'. These steel 55 gallon wash rack sludge drums are hauled away by FCC Environmental and later returned to us empty so we can use them again. These 55 gallon drums have a removable lid/cover with a lock ring and hardware and FCC won't haul them if the lock ring and hardware is not positioned downward or the lid/cover won't seal to the drum.

There is another steel drum we need to mention in the 'Drum Storage Area' and it is labeled Old Grease. This drum may be 30 gallon or 55 gallon. Old grease is non-hazardous. Sometimes on the wash rack large amounts of grease accumulate and should be placed in the drum rather than allowing to mix in with otherwise clean dirt. When working on track adjusters and large quantities of grease accumulate, this grease must be placed in the Old Grease drum.

To summarize about non-hazardous material, it is important to please be careful when moving any of the material on our property. Wash rack sludge being moved in 55 gallon drums from the wash rack to the 'Drum Storage Area' could cause a big spill and mess. If spills, leaks and a mess have to happen it is best to happen within the shop where we can contain it. We definitely don't want any spills or leaks on the shop aprons even though they are concrete. All of the drums plastic and steel must have the lids/covers closed all the time except when removed to add more material.

Hazardous Waste:

Hazardous Waste can be a solid, liquid or gas that can pose a substantial or potential hazard to human health or the environment when improperly managed.

What is a Hazardous Waste? A waste is hazardous if it has any of the characteristics described below:

Ignitable – Ignitable wastes are easily combustible or flammable. If they have a flashpoint of less than 140 degrees F or an alcohol content of 24% or more. Examples include some paints, paint solvents, other solvents and degreasers.

Corrosive – Corrosive wastes corrode metals or other materials or burn the skin. These liquids have a pH of less than or equal to 2 or greater than or equal to 12.5. Examples include rust removers, acid or alkaline fluids and battery acid.

Reactive – Reactive wastes are unstable and react rapidly or violently with water or other materials. Examples include bleaches, oxidizers, cyanides and explosives, such as sodium azide (airbag initiators) and compressed gases.

Toxic – Wastes are toxic if they contain certain heavy metals, such as chromium, lead or cadmium, or toxic organic chemicals. Examples include parts cleaners (MEK), chromium-bearing paints, mercury containing devices, and spray booth filters.

Here are a few ways to identify hazardous wastes: Obtain and read Material Safety Data Sheets (MSDS). Talk to product suppliers and manufacturers and read product labels.

Aerosol liquid wastes are ignitable and therefore a hazardous waste. There is new 'Aerosolv' equipment in the Tool Room for puncturing the aerosol cans and the waste will be captured in a 55 gallon steel drum. The gas will be captured in a filter. The aerosol can must be empty or near empty. Appropriate PPE (Safety Glasses) are required to operate this equipment. All aerosol cans when empty must be brought to the Tool Room. The 55 gallon drum has a yellow and white Hazardous Waste label and the accumulation start date is written on the label. Because this drum contains hazardous material it must be transported away before 180 days. The start date is the cradle and this drum will go to the grave. This drum will not be returned to us.

Sodium Hydroxide in our Aja-lif Parts Washers is an alkaline fluid (lye)(caustic soda) and its use may produce a hazardous waste so we consider it a hazardous waste. We have two Aja-lif Parts Washers in the Specialization Shop and one in the Track Shop. Appropriate PPE (Safety Glasses and a full Face Shield) are required to work with these Aja-lif tanks loading and unloading parts to be cleaned. Request from the Tool Room an apron or rain suit or rubber gloves if you so desire.

We store and handle Paint Related Wastes (liquid) the paint and thinners from cleaning the paint gun and equipment in the paint shop. This is hazardous waste and is in a 55 gallon steel drum. We also store and handle Paint Related Wastes (solid) the paint rags, paper towels, masking paper and masking tape. This is hazardous waste and is in a 55 gallon steel drum therefore two 55 gallon drums will always be in use next to the paint booth. These drums will have yellow and white Hazardous Waste labels with accumulation start dates written in and they will have to be transported away before 180 days. The lids/covers will be closed at all times except when material is being added and then promptly closed. Our spray booth filters currently have passed analytical tests and are considered non-hazardous.

Mineral Spirits are hazardous and the parts washer lids must be closed at all times except when parts are being cleaned, then promptly closed. Each parts washer has a spin on filter (wash unit has a 15 micron filter) (finish unit has a 6 micron filter). Each parts washer also has two sock

filters. The used spin-on filters are placed in the Used Oil Filter 55 gallon plastic drum. The used sock filters are placed in the Related Paint Waste (solid) Hazardous Waste 55 gallon steel drum located next to the paint shop. Mineral spirits are considered a useable product until it no longer will clean. Then the entire amount in a parts washer is emptied into a 55 gallon steel drum with a yellow and white Hazardous Waste label with the accumulated start date written in. This drum will be hauled away when full or before 180 days, cradle to grave.

Our Sandblasting Material is aluminum oxide. Analytical tests of the waste detected chromium so therefore it is a hazardous waste. There are always 3 – 55 gallon steel drums located under the filter bank, outside of the east wall of the sandblast room. These drums have the yellow and white Hazardous Waste labels with the accumulation start dates written on the label so the 180 day rule is in effect. Normally one drum will fill first and it will be hauled away by FCC Environmental - - cradle to grave.

Old batteries are moved to the parts warehouse loading dock and from there parts department employees will guide you to the storage area inside the warehouse. The batteries will be stored there until they are transported to a recycling center. These batteries would be hazardous waste if not recycled.

Mercury bulbs are handled by the Building Maintenance personnel and stored for pick up then transported by a recycling company. These bulbs would be hazardous if thrown in the trash but are not hazardous waste because they will be recycled.

Emergency Response Procedures

Fires, explosions and chemical spills are among the many occurrences that may require emergency evacuation of Kelly Tractor facilities. The continuous sound and flashing of fire alarm horns and strobes in any Kelly Tractor Co. facility is the evacuation signal. Everyone who is alerted by the alarm is required to evacuate the facility as quickly and calmly as possible.

Hazardous Materials, Chemical Spills and Responding to Oil Spills – Preventive Maintenance Technicians, Used Oil Transporters or any of our Technicians could be responsible for a spill. Ismael Vargas is the person to contact. He is the Emergency Coordinator 786-402-4073. Joaquin Canamero is the Alternate Emergency Coordinator 786-368-3480 if Ismael Vargas is not available. When possible and safe to do so undertake immediate measures to eliminate, control and contain the release and as a responsible party you must move promptly to contain and clean up the spill. KCO Enterprise personnel will help if they are available. If needed contact FCC Environmental at 954-785-2320. They are capable to handle anything in the state of Florida.

State law requires we notify immediately the state warning point 1-800-320-0519 of any spill of a petroleum product over 24 gallons. Ismael Vargas will handle that, or Joaquin Canamero.

Any unplanned or uncontrolled release or discharge of any hazardous or regulated material into the air, water or soil must be reported immediately to Ismael Vargas at 786-402-4073. If a release cannot adequately be controlled or contained or if it poses an immediate danger to life, health or environment, the following steps must be followed.

• Determine the nature and extent of the spill

Chemical(s) involved

Amount released

Any injured people involved

Source and cause of the release

Area of population affected

Other special considerations (weather, fire etc.)

The Emergency Coordinator will contact the fire department when the situation is serious. He will file a report with the Southeast District of the Florida Department of Environmental Protection in West Palm Beach at 561-681-6722.

In the event of fire, explosion, or other release that could threaten human health outside the facility, or if you know the spill has reached surface water: Call the National Response Center at (800) 424-8802.

End

This training reviewed with the appropriate personnel at least once each year.

Supervisor _____ Date _____ Attendee _____
(print) (print)

Signature _____ Signature _____