

1.0 SCOPE

This work instruction describes the Environmental Management System (EMS) requirements for independent contractors, performing work on-site, at any Jernberg Industries, Inc. facility.

2.0 INDEPENDENT CONTRACTOR ENVIRONMENTAL REQUIREMENTS

- 2.1 Jernberg Industries, Inc. has established and implemented an Environmental Management System (EMS) that meets the requirements of ISO 14001, a Quality Management System (QMS) that meets the requirements of ISO/TS 16949 and a Safety System. An important consideration of this EMS /QMS relates to independent contractors, who are required to comply with Jernberg's policies and procedures.
- 2.2 Independent contractor's activities have a significant potential to affect the environmental performance and regulatory compliance of the facility. Independent contractor personnel must not only comply with all applicable and relevant federal, state and local laws and procedures, but they must also comply with Jernberg's Tri-Policy (Attachment A), Environmental Objectives and Targets, significant Aspects and Impacts and protection of the environment.
- 2.3 Independent contractors must be aware of their roles and responsibilities in conforming to the policies, procedures and requirements of the Management Systems, as well as understanding the potential consequences of noncompliance.
- 2.4 This Environmental Guidelines Document has been established to define Jernberg's EMS requirements and expectations, for independent contractors, and to document potential independent contractor impacts on the facility. The hiring manager has the responsibility to send a copy of this Work Instruction, with the Purchase Order and/or Contract, for review and signature by the independent contractor.
- 2.5 Each independent contractor is required to complete the Independent Contractor Data Sheet and return it to Jernberg, Attention: Environmental Management Representative (EMR), with the Purchase Order and/or Contract. In addition, each independent contractor is responsible for communicating the information in this Contractors Guideline Plan to all independent contractor personnel.
- 2.6 Independent contractors, working at Jernberg Industries, are required to comply with the Environmental Management System requirements and the Environmental Policy. The following environmental requirements provide general information on the Environmental Management System, which are supplemented with the safety and health requirements defined in sections four through six.

- 2.6.1 Independent contractors shall properly label, accumulate and dispose of all waste materials, generated from their activities, in accordance with Jernberg's procedures or guidance.
- 2.6.2 Independent contractors shall not allow discharges to drains and/or sewers without prior written approval from the EMS Management Representative.
- 2.6.3 Independent contractors shall provide adequate spill/release prevention.
- 2.6.4 Independent contractors shall immediately notify the EMS Management Representative, the project representative and the area supervisor of any spills, releases or other environmental incidents.
- 2.6.5 Independent contractors must be sensitive to the effects of noise, odor, light and traffic moving within the facility and in the local community.
- 2.6.6 Independent contractors shall prepare and maintain records, pertaining to the work performed, in accordance with environmental regulatory requirements, including record retention requirements.
- 2.6.7 Independent contractors shall ensure protection of the natural environment surrounding the work area.
- 2.6.8 Independent contractors shall ensure that all employees are properly trained and competent to perform the assigned work and tasks, including the proper handling of materials and equipment, proper response to incidents involving their material and general information relating to the Jernberg Environmental Management System.

3.0 INDEPENDENT CONTRACTOR DATA SHEET

- 3.1 The independent contractor shall prepare and maintain the Independent Contractor Data Sheet defined in Attachment B, regarding independent contractor activities, which outlines the work to be performed and the method utilized for minimizing environmental impacts and maintaining compliance with environmental regulations.
- 3.2 Each independent contractor must complete the Independent Contractor Data Sheet and return it to Jernberg Industries, Inc. EMR. In addition, each independent contractor is responsible for communicating the information in this Environmental Requirements Document and the Independent Contractor Data Sheet to all independent contractor personnel and maintaining records of this communication.

4.0 HAZARD COMMUNICATION

- 4.1 As required by OSHA's Hazard Communication Standard (29 CFR 1910.1200), Jernberg will make material safety data sheets (MSDS's) readily available to independent contractors for those chemicals to which their employees may be exposed during normal working conditions or foreseeable emergencies such as a spill or release. MSDS's will be provided to the independent contractor, if requested. It is the responsibility of the independent contractor to train its employees on the MSDS's available from Jernberg Industries, Inc.
- 4.2 Conversely, MSDS's must be supplied by the independent contractor to Jernberg, for any chemical they bring on site. These MSDS's must be forwarded to the Hiring Manager and the EMR and added to the MSDS master file. Approval for the use of any chemical must be received from Jernberg Industries prior to it being brought on site by independent contractors.
- 4.3 Independent contractors must ensure that all containers brought on site are labeled, tagged or marked with the chemical or product name and appropriate hazard warnings.

5.0 EMERGENCY RESPONSE PLAN

- 5.1 Independent contractors are required to check in at the designated area as defined below by location, and be escorted, by a Jernberg Industries employee, to their assigned work area.
 - 5.1.1 Jernberg Main Plant – Security Office
 - 5.1.2 Jernberg Pershing Plant – Security Shack, then Main Office.
 - 5.1.3 Jernberg Bolingbrook Plant – Main Office.
- 5.2 In the event that an unannounced alarm activates within the Jernberg Industries plant, independent contractors should either evacuate the building or proceed to their tornado shelter areas as defined on the Visitor Pass. The fire alarm and / or the PA System is used to signal independent contractors that an evacuation of the Plant is warranted. Independent contractors will be notified of an emergency that does not require an evacuation (i.e., tornado, natural disaster) by word-of-mouth.
- 5.3 Once emergency response personnel have determined that it is safe to re-enter the building, the EMR will issue an all-clear signal. The all-clear signal for the plant will be verbalized to independent contractors by simply saying loudly, "all clear, you may re-enter the building" or "all clear, you may return to your workstations", depending on the type of emergency.

6.0 OCCUPATIONAL HEALTH and SAFETY ADMINISTRATION (OSHA)

- 6.1 Jernberg Industries is regulated by the Occupational Health and Safety Administration (OSHA), which provides for specific standards and regulations

affecting employee safety and health. The OSHA Act requires all independent contractors working on our property to comply with the standards and provisions of the OSHA Act, including specific safety and health standards, accident reporting, employee training requirements, as well as general intent of the OSHA Act. Copies of the OSHA standards and requirements are available from the regional OSHA offices. All employees of independent contractors must provide proof of OSHA training, upon request.

- 6.2 Because the OSHA Act is a safety and health act, some of the work independent contractors perform may not be addressed in the OSHA standards. When the OSHA act is silent, independent contractors are expected to comply with other applicable or relevant federal, state and local standards as well as all Jernberg Industries Job Safety Procedures (JSP). Regulations, such as the National Electronic Code and the Associated General Contractors Accident Prevention Manual, and state and local safety and health rules and regulations, must be reviewed and followed where appropriate.

6.3 **Training and Personal Protective Equipment (PPE)**

- 6.3.1 The independent contractor is responsible for providing all necessary and required safety equipment and training to their employees. Further training may be required if insufficient or lack of training seriously affects the independent contractors ability to perform its work safely. Training records may be requested and inspected by Jernberg Industries anytime. Safety glasses, hearing protection, metatarsals and hard hats must be worn in plant areas at all times. All independent contractor personnel, when in the manufacturing areas, must follow the PPE rules as defined on the Visitor Pass. All independent contractors shall wear long sleeve shirts when working in the Plant. Other personal protective equipment such as respirators shall be used when requested by the company representative and/or posted signage. All independent contractors are required to furnish all equipment, tools, and personal protective equipment necessary and required to perform their work in a safe, healthful and efficient manner.

6.4 **Lockout/Tagout**

- 6.4.1 The independent contractors are responsible for the electrical and mechanical lockout/tagout of Jernberg Industries equipment they are working on.

6.5 **Mobile Equipment**

- 6.5.1 Independent contractors shall wear seat belts at all times while operating or riding within passenger vehicles or mobile equipment.

6.5.2 Equipment defects, affecting safety, must be corrected before the equipment is used. If unable to be repaired, the equipment must be tagged out to prevent use.

6.6 Hazard Warnings

6.6.1 Every consideration must be given to personnel safety by the use of Flasher lights, barricades, etc. Proper signs shall be posted and maintained in good condition.

6.7 Property Damage

6.7.1 Property or equipment damages are to be reported to the company representative immediately.

6.8 Security

6.8.1 Independent contractors shall provide adequate security to protect and secure independent contractor owned tools, equipment, materials, supplies and third party equipment supplied by the independent contractor.

6.8.2 Independent contractor employees and their subcontractor employees shall remain in or around their designated work areas at all time with the exception of traveling, by the most direct route, to and from the worksite during shift changes or in company provided and designated break areas. Any independent contractor employee found wandering, loitering, sleeping, driving around or in any area anytime, which is not expressly authorized by the company representative, shall be escorted off the company property and not allowed to return to work without Jernberg's authorization. Jernberg Industries shall not be liable for any reimbursement to the independent contractor or its employee for the independent contractor employee's shift for the day the violation occurred, and up to the time of the independent contractors employee's return to work, if authorized and approved, by the company.

6.9 Housekeeping, Cleanup and Disposal

6.9.1 Independent contractors shall keep all work areas clear and free of debris. Upon completion of the scope of work or at the end of the shift, the independent contractor shall leave the worksite clean and free of all tools, equipment, waste, rubbish, packaging and all other debris. All such waste, rubbish, packaging and debris shall be disposed of, off-site, by the independent contractor, unless expressly specified in the scope of work, and in compliance with all applicable laws, rules, regulations and company policies and procedures.

6.9.2 All drums and containers must be marked/labeled as to their specific contents.

6.10 Work Area Inspection

6.10.1 Independent contractors shall thoroughly examine each work area before work proceeds, for conditions which may adversely affect safety and health of their and Jernberg Industries employees. Any unsafe conditions shall be corrected promptly and reported to the hiring manager.

6.11 Drug and Alcohol Testing

6.11.1 Independent contractors and their employees agree to submit to drug and alcohol testing "for cause". When Drug and Alcohol Screening is required by Jernberg Industries, "for cause", the actual cost of the tests will be billed to the independent contractor, with no markup. Failure to submit to such testing "for cause" shall result in the independent contractor's employee being escorted off the company property and not allowed to return to work without company authorization. Jernberg Industries shall not be liable for any reimbursement to the independent contractor or its employee for the independent contractor employee's shift for the day the failure to submit occurred, and up to the time of the independent contractor employee's return to work, if authorized and approved, by the company. Confirmation testing, when positive results are present, will be also be billed to the independent contractor, with no mark-up.

6.12 Accident Reporting

6.12.1 Independent contractors, working on Jernberg Industries property, shall report all injuries, to the Jernberg Industries Human Resources Department as soon as possible. The independent contractor shall furnish Jernberg with a copy of the Injury and Illness Form and a copy of the Incident Form, for all reportable injuries requiring medical attention; however, submission of a more detailed accident investigation report must be made available, upon request, in the event of a serious accident.

6.12.2 Independent contractors shall make arrangements to provide emergency medical care for their employees who may be injured while on the job. This shall include notification to Jernberg Industries, community paramedics or rescue teams and providing on-site trained employees.

6.13 Environmental & Safety Inspections

6.13.1 Jernberg Industries will monitor independent contractor performance. Jernberg Industries reserves the right to conduct periodic inspections with emphasis on impacts to the environment, safety and health. Independent contractors are required to take prompt and appropriate action to correct any and all unsafe conditions and/or work practices.

6.13.2 Jernberg Industries also reserves the right to halt any or all specific work, performed at a construction site or area, if unsafe conditions or work practices are observed or if any violation of company policies are observed and reported by or to the independent contractor.

6.14 **Hot Work**

6.14.1 No burning, cutting, brazing, welding or grinding is authorized in any area until it is approved in writing by approved by Jernberg Industries. This approval does not relieve the independent contractor of any liability for any damage caused in performing the scope of work.

6.14.2 No burning, cutting, brazing, welding or grinding is authorized in any area until equipment has been properly covered with non-flammable material. The independent contractor shall provide its own non-flammable tarps.

6.14.3 When burning, cutting, brazing, welding or grinding, the independent contractor shall provide a fire watch. The independent contractor shall ensure water or carbon dioxide (CO₂) fire extinguishers are available in the immediate area. If the independent contractor uses a CO₂ fire extinguisher, the independent contractor shall advise appropriate company personnel.

7.0 **CONFIDENTIALITY**

7.1 **Confidentiality**

7.1.1 In consideration for the granting of permission to enter the property owned by Jernberg Industries, Inc., the independent contractor agrees that all knowledge and information acquired or otherwise obtained, relating to the operations of Jernberg Industries, shall be and remain the confidential and proprietary information of Jernberg Industries and that such information may not be used for any purpose or divulged to any person other than authorized representatives of Jernberg Industries, without the express prior written consent of Jernberg Industries. While on the property owned by Jernberg Industries, the use of photographic or video equipment or similar technology is prohibited without the express prior written consent of Jernberg Industries, Inc.

8.0 INDEMNITY

8.1 Indemnity

8.1.1 The independent contractor, in consideration for the granting of permission to enter upon the property owned by Jernberg Industries, Inc., releases and agrees to hold harmless and indemnify Jernberg Industries, Inc., its affiliates, officers, employees and agents from and against all claims and liability for any and all injuries, losses and damages to any person or property arising out of the entry onto Jernberg Industries Inc. property from the date the Environmental Requirements Document and Independent Contractor Data Sheet is signed.

9.0 RECORDS

9.1 Records

9.1.1 Independent Contractor Data Sheet

Attachment A

Jernberg Industries, Inc. Tri - Policy

Safety Policy

We will provide a safe working environment by making safety an integral part of our business.

We will consistently strive to achieve higher standards, promote continuous improvement and set goals that meet or exceed current industry standards and regulatory requirements.

We will make safety the foundation of our operating system because it is the right thing to do.

Quality Policy

We will continually improve the effectiveness of our system in order to perform defect free work on time, for our customers, internal and external.

We will clearly state and fully understand the requirements of our customers, our jobs, and the systems that support us.

We will conform to these requirements at all times.

Environmental Policy

We will protect the environment by continually improving processes in order to minimize waste and pollution.

We will set and monitor the performance of realistic objectives and goals that meet or exceed legal and regulatory requirements.

We will integrate environmental considerations into all applicable phases of planning and decision making.



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Attachment B

INDEPENDENT CONTRACTOR DATA SHEET

Independent Contractors must complete and return sections I through V

Section I

Full Company Name: _____ Date: _____

Street Address: _____ P.O. Box: _____

City & State: _____ Zip: _____

Telephone: _____ Fax: _____

Completed By: _____ Title: _____

Section II Service or Activity to be Performed

Please Indicate with a checkmark by double clicking the appropriate box.

Material/Chemical	Corrosives	<input type="checkbox"/>	Metal Organics	<input type="checkbox"/>	Other:	<input type="checkbox"/>
	Solvent/IPA	<input type="checkbox"/>	Lubricants, Oils, Grease	<input type="checkbox"/>		<input type="checkbox"/>
	Cleaner	<input type="checkbox"/>	Janitorial	<input type="checkbox"/>		<input type="checkbox"/>
	Maintenance	<input type="checkbox"/>	Gases	<input type="checkbox"/>		<input type="checkbox"/>

Facilities/Construction	Electrical	<input type="checkbox"/>	HVAC	<input type="checkbox"/>	Other:	<input type="checkbox"/>
	Mechanical	<input type="checkbox"/>	General Contractor	<input type="checkbox"/>		<input type="checkbox"/>
	Structural	<input type="checkbox"/>	Roofing	<input type="checkbox"/>		<input type="checkbox"/>

Industrial Services	Maintenance	<input type="checkbox"/>	Environmental Consult.	<input type="checkbox"/>		<input type="checkbox"/>
	Janitorial	<input type="checkbox"/>	Engineering	<input type="checkbox"/>		<input type="checkbox"/>
Other		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>



**ENVIRONMENTAL PROCEDURE
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Section III Environmental Management System Expectations

Please review each of the following Environmental Management System Expectations, listed on the following page, and initial in the space provided to acknowledge that your organization understands the requirements and intends to ensure compliance by all independent contractor employees and subcontractors.

Environmental Management System Expectations	Contractor Initials
Independent contractor understands its roles and responsibility in complying with all relevant and applicable federal, state and local laws and the Environmental Policy, procedures and requirements of the Environmental Management System, as well as the potential consequences of noncompliance.	
Independent contractor acknowledges receiving the Jernberg Industries Environmental Policy, as well as any applicable procedures and work instructions.	
Independent contractors shall properly label, accumulate and dispose of all waste materials generated from its activities in accordance with Jernberg Industries procedures or guidance.	
Independent contractors shall not allow discharges to drains and/or sewers without prior written approval from the EMS Management Representative. Independent contractor shall provide adequate spill/release prevention.	
Independent contractor shall immediately notify EMS Management Representative, project engineer and area supervisor of any spills, releases or other environmental incidents.	
Independent contractor shall prepare and maintain records pertaining to the work performed in accordance with environmental regulatory requirements, including record retention requirements.	
Independent contractor shall ensure protection of the natural environment surrounding the work area.	
Independent contractor shall ensure that all employees are properly trained and competent to perform the assigned work and tasks, including the proper handling of materials and equipment, proper response to incidents involving its material and general information relating to the Jernberg Industries Environmental Management System, Quality Management System and Safety Policies and Procedures.	
Independent contractor shall obtain, prior to commencing work, all necessary licenses, environmental approvals or permits and provide copies of such to the EMS Representative.	



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Independent contractor was informed of actions to be taken in case of an emergency.	
Independent contractor understands that Jernberg Industries may inspect and interrupt independent contractor activities that violate company policies and/or legal requirements.	

Section IV Environmental Management System Compliance Statement

Work Description
Briefly describe the work to be performed while on-site.

Air Emissions
Will the work performed by the independent contractor produce or cause the release of any air emissions?
Yes: <input type="checkbox"/> No: <input type="checkbox"/>
If yes, list the air emissions and methods for preventing impact to the environment.

Water Discharges
Will the work performed by the independent contractor produce or cause the release of any wastewater?
Yes: <input type="checkbox"/> No: <input type="checkbox"/>
If yes, how will the wastewater be handled?



ENVIRONMENTAL PROCEDURE

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Materials

What materials, chemicals and/or equipment will be brought on-site to perform the scope of work, by the independent contractor?

Training

Independent contractor employees must be trained in the proper handling of materials and equipment and the proper response to the incidents involving these materials. Describe the training independent contractor employees receive.

Waste Generation

Will the work performed by the independent contractor result in any wastes?

Yes: No:

If yes, lists the types of ways expected and the proposed disposal method.

Other

Are there any other ways in which the scope of work performed by the independent contractor will affect/threaten the environment?

Yes: No:

If so, please describe below



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Section V

ACKNOWLEDGEMENT OF RECEIPT

Contractors Guideline Plan

COMPANY NAME: _____

COMPANY ADDRESS: _____

NAME OF CONTACT PERSON: _____

PHONE: _____

This is to signify that the above reference company has received a copy of the Jernberg Industries, Inc. Contractors Guideline Plan and all documentation necessary to comply with these guidelines. We understand that we are responsible for instructing our workers and ensuring compliance of these rules. We also recognize that failure to comply may result in removal from the job being performed and may jeopardize future projects with Jernberg Industries.

Receipt of this package does not guarantee acceptance of any proposed bid.

SIGNATURE: _____

NAME: _____

TITLE: _____

PHONE: _____

DATE: _____