



Midwest Regional Office
2500 S. Paulina St
Chicago, IL 60608

Telephone 773.650.6495
Facsimile: 630.929.8543
debbie.hays@simsmm.com
www.simsmm.com

April 4, 2024

Chicago Department of Public Health
2160 W Ogden Ave,
Chicago, IL 60612

Attn: Abraham Perez Kiamber

Re: Metal Management Midwest, Inc.
d/b/a Sims Metal
Large Recycling Permit Application
2500 S. Paulina Street
Chicago, IL 60608

Dear Mr. Kiamber,

In December of 2021 Metal Management Midwest submitted an application for a Large Recycling Facility Permit for the above mentioned address. Since that time, we have updated some policies/procedures as well as having added additional controls for potential fugitive dust on the property. In order to ensure that the CDPH has the most up-to-date information, I am including this supplement to our application for your review. Below is a listing of what is included in this update.

Inbound Material Control	3.10.10.3 Appendix T page 411	Policy	We changed header to show that this policy is meant for the Paulina Facility.
	3.9.5.4 – appendix D page 107	Location of unauthorized materials	See Platt of Survey, red blocks indication storage location for unauthorized materials.
	3.10.1.4 Appendix T	Corrective Action Plan (Incorrectly titled NVMTIS Sign off) See Inbound Material Control Program.	See Notice to all suppliers on monetary deductions for sending unauthorized materials.
Stacking Plan	3.9.13.2 Appendix M, page 243	Plan Update	We included a map showing where and how many trucks can queue at Paulina. N
Location of water sources	3.9.5.8 Appendix D	Platt of Survey	See Platt of Survey showing underground utilities



Characterization of Storage areas	3.9.11 App D and K	See Platt of Survey	Storage bins are created from concrete blocks. The Platt of Survey calls out the height of each storage bin, the scale on Platt can be used to determine length.
Stormwater Plan	3.9.18.1 – App O	Page 2 of plan was incorrectly filled out and has been corrected	See corrected pages of SWPPP
Stockpile Monitoring	3.10.4.7 App F	FLIR Cameras are being used	See updated Fire Prevention Plan
Cleaning Schedule	3.10.10.1; 3.10.10.6 App BB	Cleaning Schedule refinement	Please see revised Cleaning Schedule
Handling of Hazardous Materials	3.10.1.5 App G	Revision of Emergency Action Plan	See Revised Plan
Radiation Control Plan	3.10.1.5 App T	Site Specific Plan	The Header was changed to show that the plan is specific to Paulina. The Emergency Action Plan states who we need to call at IEMA.
Rodent and Vector Control	App Z	Change of Vendor	See outline of services for new Vendor.

If you have any questions or concerns, please don't hesitate to give me a call or drop an email.

Sincerely,
Metal Management Midwest, Inc.
d/b/a Sims Metal

Deborah Hays
Permitting and Compliance

GREMLEY & BIEDERMANN

A DIVISION OF
PLCS Corporation

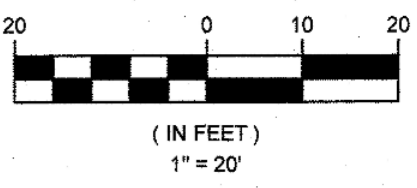
License No. 04-000332

PROFESSIONAL LAND SURVEYORS

4505 NORTH ELSTON AVENUE, CHICAGO, IL 60630
TELEPHONE: (773) 685-5102 EMAIL: INFO@PLCS-SURVEY.COM

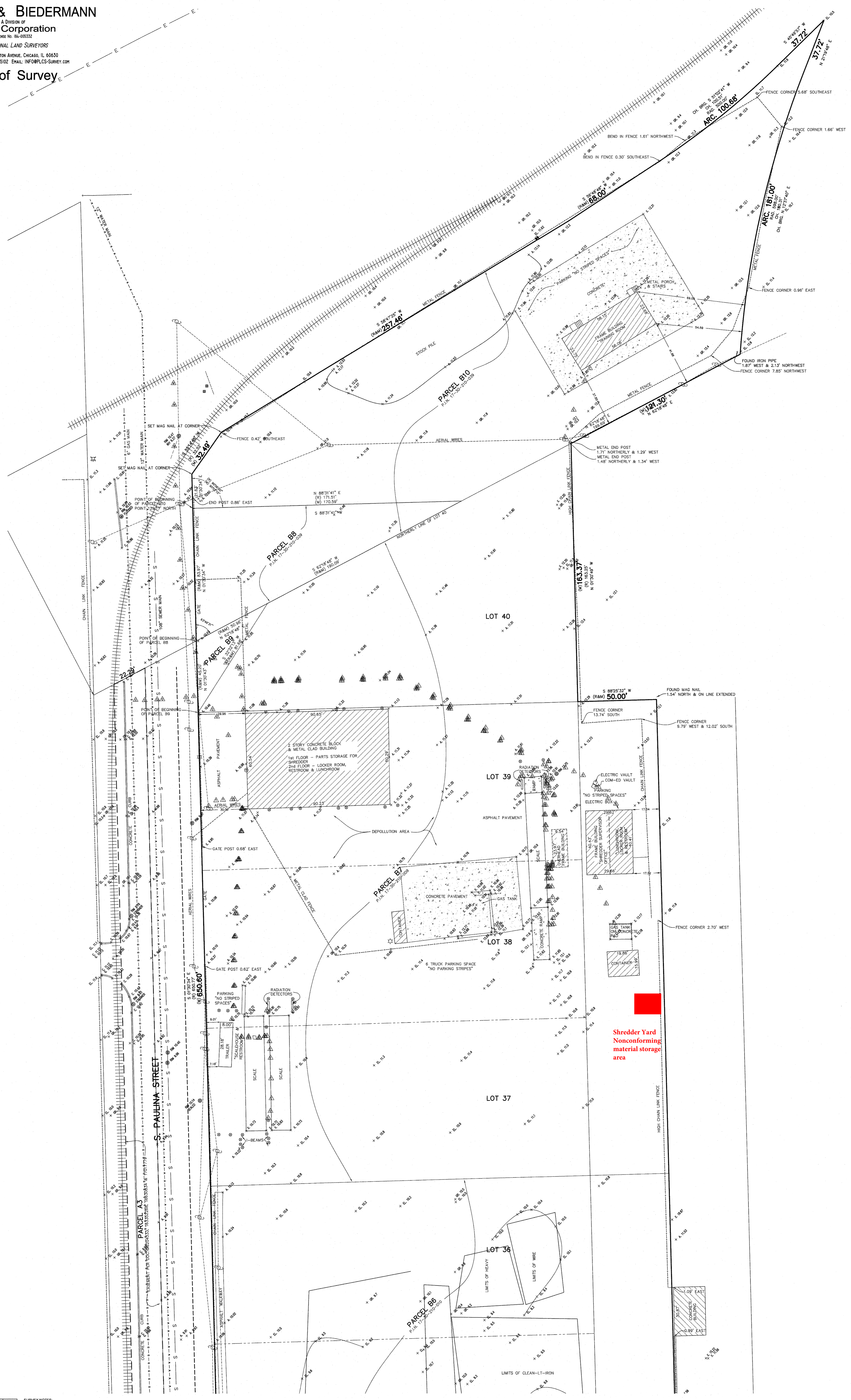
Plat of Survey

GRAPHIC SCALE



LEGEND

- ⊙ Storm CB
- ⊙ San MH
- ⊙ San Storm Combo MH
- ⊙ Water Buffalo Box
- ⊙ Water Fire Hydrant
- ⊙ Utility Pole
- ⊙ Electric Manhole
- ⊙ Electric Meter
- ⊙ Electric Light Pole
- ⊙ Electric Mounted Wall Light
- ⊙ Gas Buffalo Box
- ⊙ Gas Meter
- ⊙ Gas Valve
- ⊙ Gas MH
- ⊙ Sign Post
- ⊙ Bumper Post
- ⊙ Soil Boring
- ⊙ Unclassified Manhole
- ⊙ Flag Pole
- ⊙ Iron Pipe
- ⊙ Cut Cross
- ⊙ Cut Notch
- ⊙ JULIE Mark - Gas
- ⊙ JULIE Mark - Electric
- ⊙ JULIE Mark - Telephone
- ⊙ JULIE Mark - Water
- ⊙ Water
- A=ASPHALT ELEVATION
- GR=GRAVEL ELEVATION
- FF=FINISHED FLOOR ELEVATION
- W=WALK ELEVATION
- X=CONCRETE ELEVATION
- TOE=TOP OF SLOPE ELEVATION
- TOB=TOP OF BANK ELEVATION
- C=CURB ELEVATION
- G=GUTTER ELEVATION
- EL=ELEVATION
- TW=TOP OF WALL



Shredder Yard
Nonconforming
material storage
area

ORDERED BY: METAL MANAGEMENT INDUSTRIES	CHECKED: [initials]	DRAWN: [initials]
ADDRESS: 2505 S. PAULINA STREET		
GREMLEY & BIEDERMANN		
PLCS CORPORATION		
4505 NORTH ELSTON AVENUE, CHICAGO, IL 60630		
TELEPHONE: (773) 685-5102 EMAIL: INFO@PLCS-SURVEY.COM		
DATE: JUNE 21, 2020	SCALE: 1"=20' FEET	SHEET NO: 2 OF 7
PROJECT NO: 2021-28840-001		

SURVEY NOTES:
SURVEYORS LICENSE EXPIRES November 30, 2022
Note (R&M) denotes Record and Measured distances respectively.
Distances are marked in feet and decimal parts thereof. Compare all points BEFORE building by same and at once report any differences BEFORE damage is done.
For easements, building lines and other restrictions not shown on survey plat refer to your abstract, deed, contract, title policy and local building line regulations.
NO dimensions shall be assumed by scale measurement upon this plat.
Unless otherwise noted hereon the Bearing Basis, Elevation Datum and Coordinate Datum if used is ASSUMED.
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PRELIMINARY

GREMLEY & BIEDERMANN

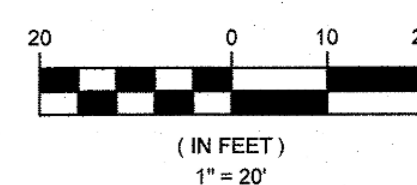
A DIVISION OF
PLCS Corporation

PROFESSIONAL LAND SURVEYORS

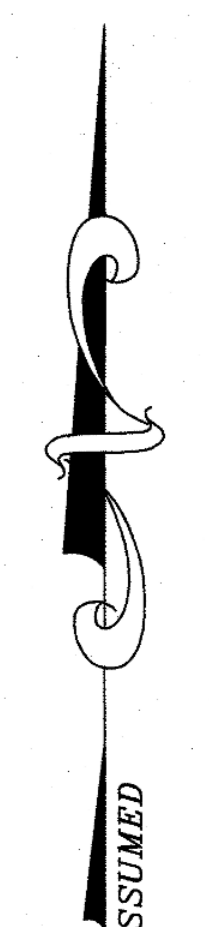
4505 NORTH ELSTON AVENUE, CHICAGO, IL 60630
TELEPHONE: (773) 685-5102 EMAIL: INFO@PLCS-SURVEY.COM

Plat of Survey

GRAPHIC SCALE

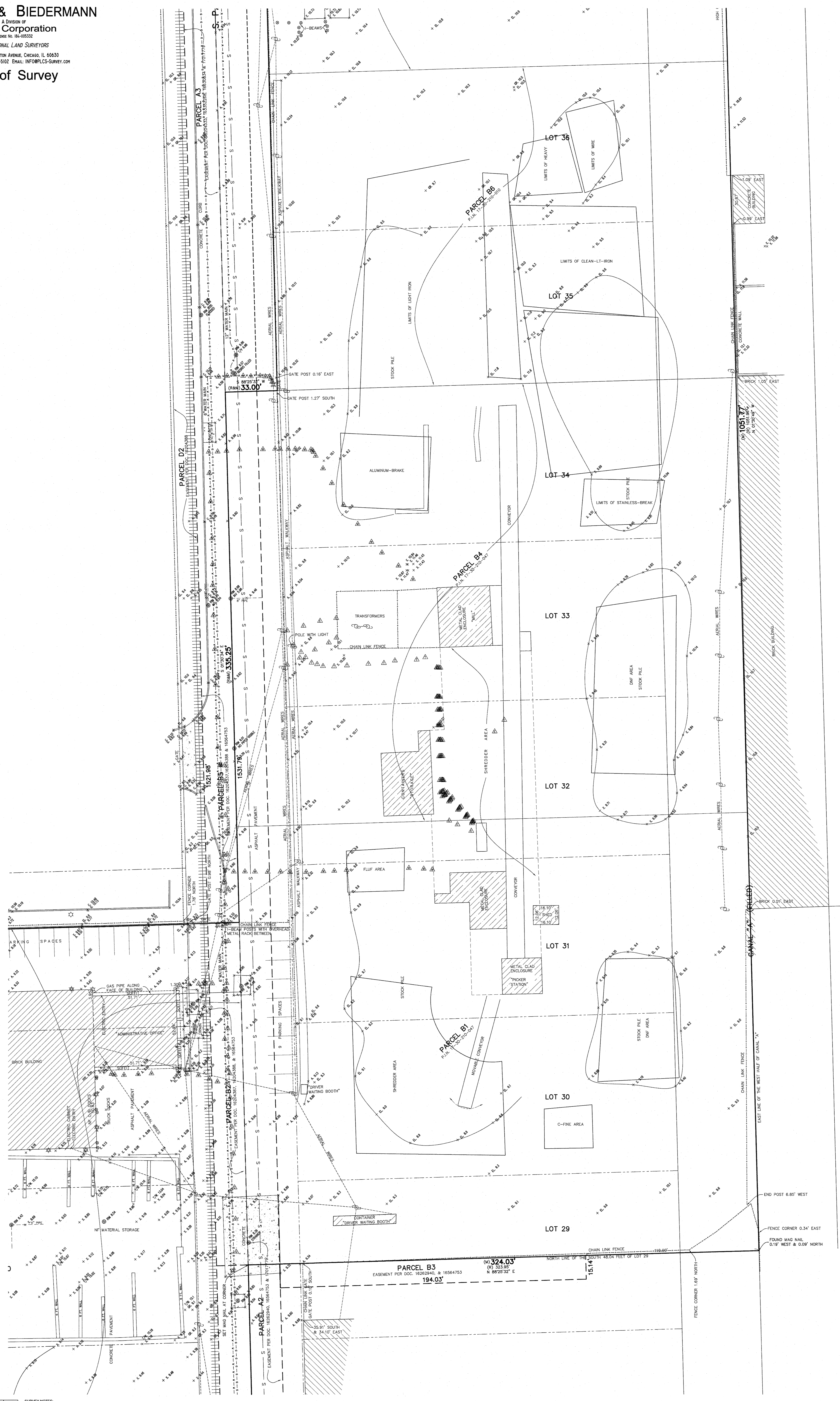


(IN FEET)
1" = 20'



LEGEND

- Storm CB
- Sun MH
- Sun Storm Combo MH
- Water Buffalo Box
- Water Fire Hydrant
- Utility Pole
- Electric Manhole
- Electric Meter
- Electric Light Pole
- Electric Mounted Wall Light
- Gas Buffalo Box
- Gas Meter
- Gas Valve
- Gas MH
- Sign Post
- Bumper Post
- Soil Boring
- Unclassified Manhole
- - - Flag Pole
- - - Iron Pipe
- - - Cut Cross
- - - Cut Notch
- △ JULIE Mark - Gas
- △ JULIE Mark - Electric
- △ JULIE Mark - Telephone
- △ JULIE Mark - Water
- A=ASPHALT ELEVATION
- GR=GRAVEL ELEVATION
- FFE=FINISHED FLOOR ELEVATION
- W=WALK ELEVATION
- X=CONCRETE ELEVATION
- TOE=TOP OF SLOPE ELEVATION
- TOB=TOP OF BANK ELEVATION
- C=CURE ELEVATION
- G=GUTTER ELEVATION
- EL=ELEVATION
- TW=TOP OF WALL



ORDERED BY: METAL MANAGEMENT HOLDING	CHECKED: DRAWN
ADDRESS: 2500 N. PAULINA STREET	DATE: JUNE 2, 2021
GREMLEY & BIEDERMANN	PLCS CORPORATION
4505 NORTH ELSTON AVENUE, CHICAGO, IL 60630	TELEPHONE: (773) 685-5102 EMAIL: INFO@PLCS-SURVEY.COM
2021-28840-001	3 OF 7

SURVEY NOTES:
SURVEYOR'S LICENSE EXPIRES November 30, 2022
Note (R&M) denotes Record and Measured distances respectively.
Distances are marked in feet and decimal parts thereof. Compare all points BEFORE building by same and at one report or otherwise BEFORE change is done.
For easements, building lines and other restrictions not shown on survey plat refer to your abstract, deed, contract, site plan and local building line regulations.
NO dimensions shall be assumed by scale measurement upon this plat.
Unless otherwise noted hereon the Bearing Basis, Elevation Datum and Coordinate Datum if used is ASSUMED.
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PRELIMINARY



LEGEND

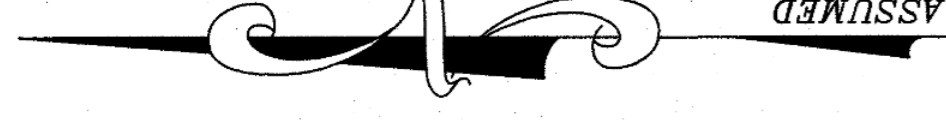
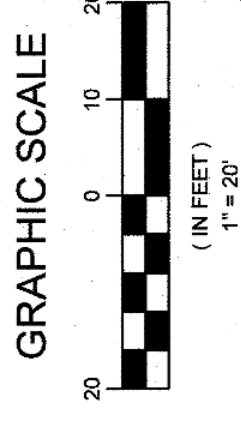
- Storm CB
- Soil Storm Combo MH
- Water Burial Box
- ⊕ Water Fire Hydrant
- ⊕ Electric Meter
- ⊕ Electric Light Pole
- ⊕ Gas Valve
- ⊕ Gas Burial Box
- ⊕ Gas Meter
- ⊕ Slip Post
- ⊕ Bumper Post
- ⊕ Soil Boring
- ⊕ Soil Boring and Hole
- ⊕ Flag Pole
- ⊕ Iron Pipe
- ⊕ Cut Cross
- ⊕ JULIE MARK - Gas
- ⊕ JULIE MARK - Electric
- ⊕ JULIE MARK - Telephone
- ⊕ JULIE MARK - Other
- ⊕ ASPHALT ELEVATION
- ⊕ GR-GRANITE ELEVATION
- ⊕ W-WALK ELEVATION
- ⊕ TOB-TOP OF BANK ELEVATION
- ⊕ G-GUTTER ELEVATION
- ⊕ E-ELEVATION
- ⊕ TYPICAL WALL



ORDERED BY: METAL MANAGEMENT CORP	PROJECT: 2021-28840-001
DATE: 05/25/2021	SCALE: 1" = 20'
DATE: 05/25/2021	SCALE: 6" = 7'
DATE: 05/25/2021	SCALE: 6" = 7'

GREMLEY & BIEDERMANN
 P.L.C.S. CORPORATION
 1635 NORTH EIGHTH AVENUE, CHICAGO, ILL. 60640
 TELEPHONE: (773) 682-5102 EMAIL: INFO@PLCS-SURVEY.COM

SURVEY NOTES:
 SURVEYORS LICENSE EXPIRES November 30, 2022
 Note: PLCS (PLCS) borrows Records and Measured Distances respectively.
 Distances are marked in feet and decimal parts thereof. Corners at points BEYOND building by name and all other points are marked in feet and decimal parts thereof.
 Contour lines are shown on survey plat only to show general character of the ground.
 NO dimensions shall be assumed by scale measurement upon this plat.
 Unless otherwise noted between the bearing, distance, elevation datum and coordinate datum used is ASSUMED.
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LEGEND

- Storm CD
- San MH
- San Storm Combo MH
- Water Buffalo Box
- Hydrant
- Utility Pole
- Electric Manhole
- Electric Meter
- Electric Meter Base
- Electric Mounted Wall Light
- Gas Buffalo Box
- Gas Meter
- Gas Meter Base
- Gas MH
- Sign Post
- Sumper Post
- Unclassified Manhole
- Flag Pole
- Con Pipe
- Cot Noach
- JULIE Mark - Gas
- JULIE Mark - Electric
- JULIE Mark - Storm
- JULIE Mark - Water
- A- ASPHALT ELEVATION
- P- FINISHED FLOOR ELEVATION
- W- WALK ELEVATION
- T- TOP OF SLOPE ELEVATION
- B- BASE OF BANK ELEVATION
- G- GUTTER ELEVATION
- T- TOP OF WALL



PRELIMINARY

GREMLEY & BIEDERMANN
 A Division of
PLCS Corporation
 LICENSE NO. 16-00332
 4505 NORTH ELSTON AVENUE, CHICAGO, IL 60640
 TELEPHONE (773) 685-5102 EMAIL INFO@PLCS-SURVEY.COM

2021-28840-001

DATE: JUN 2, 2021
 SHEET: 7 OF 7

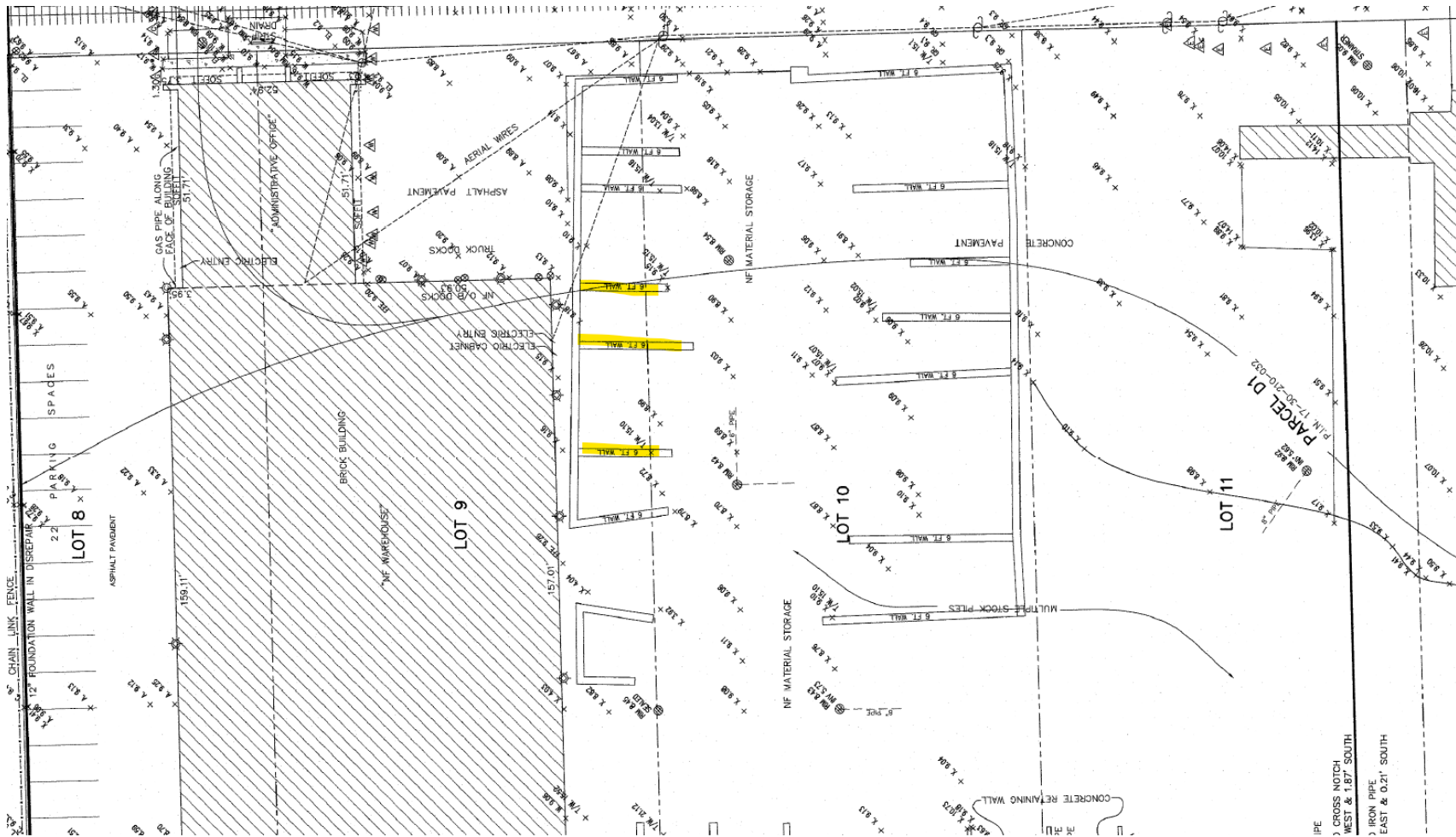
PLAT NO. 2021-28840-001

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SURVEY NOTES:
 SURVEY CYCLES LICENSE EXPIRES November 30, 2022
 Note: RMAA does not inspect and measure distances independently.
 Distances are marked to, but not obtained, signs placed. Compare all points BEFORE building by owner and at
 once report any differences BEFORE damage is done.
 For easements, building lines and other easements refer to survey plat when in survey plat when in your plat, and at
 once report any differences BEFORE damage is done.
 NO dimensions shall be assumed by owner measurement when this plat.
 Unless otherwise noted herein no bearing, block, elevation datum and coordinate datum is used in ASSUMED.
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Material Storage Bins Metal Management Midwest – Paulina Facility



On the Platt of Survey – the height of each material storage bin is shown. The length of each material storage bin can be calculated using scale measurement shown on Survey. The make-up of the walls at bins is interlocking concrete blocks.



INBOUND MATERIAL CONTROL

I) PURPOSE & APPLICABILITY:

- A) This standard (Standard) establishes minimum requirements for the acceptance of recyclable materials (Materials) at any Sims Metal (SM) recycling facility in the Midwest Region.
- B) The Facility Manager is responsible for implementing the elements of this Standard that pertain to operational practices and activities at the Facility.
- C) The Midwest Commercial Director is responsible for implementing the elements of this Standard that pertain to commercial practices and activities in that Region.

II) DEFINITIONS:

- A) **Material:** Depolluted end-of-life vehicles (ELVs), and other depolluted end-of-life thin gauge metal-bearing material, such as appliances (Light Iron, together with ELVs, Infeed Material), along with other depolluted metal-bearing material purchased by SM at a SM Facility.
- B) **Prohibited Material:** Those Materials described in **Attachment A** (Prohibited Materials Program, as may be amended).

III) MINIMUM REQUIREMENTS FOR INBOUND QUALITY CONTROL PROGRAM

- A) **Prohibited Materials:** Prohibited Material are not accepted at the Facility. There are limited exceptions, as agreed upon between SM and a Supplier, including whole ELV which SM agrees to depollute or lead-acid batteries which SM would handle and sell as a commodity without processing to a battery recycler.
- B) **Signage:** Each Facility entrance used by Supplier trucks / vehicles entrance shall have a sign listing selected Prohibited Materials, see **Attachment B** for an example.
- C) **Supplier Agreements:** All Suppliers of Materials that could potentially contain refrigerants (i.e., CFCs, HCFCs, etc.) or other Prohibited Materials are required to have a Scrap Acceptance Agreement (Supplier Agreement; **Attachment C**, as may be amended).
 - 1) **Commercial or Regular Suppliers:** The Senior Commercial Manager shall ensure that each applicable Supplier of Material has a Supplier Agreement on file, which shall be periodically updated.
 - 2) **New Suppliers & Other Suppliers without Supplier Agreements:** The Facility Manager shall subject any load of Material from an applicable Supplier without a Supplier Agreement on file to a detailed inspection for CFCs (see Section III.E.4, below). In addition, the Facility Manager shall provide that Supplier with a Supplier Agreement prior to completing the transaction for use with subsequent transactions.
- D) **Supplier Information Program** – All Suppliers with Materials potentially containing Prohibited Materials are provided written notice of SM’s Prohibited Materials Program, either by the Commercial Department or Facility management, upon establishing a business relationship with that Supplier and at least annually, thereafter. The written notice may be made by means of either a letter, flyer or hand-out and shall include the Prohibited Materials List.



INBOUND MATERIAL CONTROL

E) **Material Inspection/Screening Program** –The inspection/screening program consists of the following:

- 1) **Pre-Purchase Inspections:** The Senior Commercial Manager or designee notifies the Facility Manager (or designee) of Prohibited Material concerns observed by the Commercial Department during any pre-purchase inspections, and addresses such concerns with the Supplier.
- 2) **Pre-Pickup Inspections by Truck Drivers:** Where SM arranges to pick up Material from a Supplier's location, the Driver (whether SM or contractor) is to visually inspect the top of the load of Material being picked up for Prohibited Material concerns (subject to safety considerations). If Prohibited Material concerns are identified, the Driver is to contact the SM Dispatcher for instructions.
- 3) **Radiation Screening:** Each Facility screens all received loads of Inbound Material for radiation.
- 4) **Visual Inspections:** Each Facility shall have one or more inspectors inspect the visible portion of loads of Inbound Material for the presence of Prohibited Material (subject to safety considerations) during Material unloading, and if possible, at the inbound scale. Other operations personnel handling Inbound Material also shall inspect the visible portion of that handled Material for Prohibited Materials.
- 5) **Detailed Inspections** shall be conducted periodically for loads of ELV and/or Light Iron Material received at a Facility.
- 6) **Notifications of Identified Prohibited Material:** The Facility Manager and the Commercial Manager assigned to a Supplier account (if any) shall be notified of Prohibited Materials non-conformances by a Supplier identified during an inspection. The Facility Manager shall apply the Corrective Measures Program (see Section IV, below) applicable to the Facility.

IV) **Corrective Measures Program** – Each Facility, in cooperation with the applicable Commercial Manager, shall develop and implement a Corrective Measures program to address Suppliers which provide Material that does not conform to the Company's Inbound Material Program. See Attachment D for Paulina Corrective Action program.

V) **Training:** Employees shall receive the following training in Inbound Material Control.

A) **Initial Training**

- 1) All new Commercial Managers (i.e., Buyers), Scale Operators, Inspectors, Material Handlers, Loader Operators, Supervisors and Managers shall receive hands-on training in this Standard. This training shall be completed upon hire or transfer into one of the positions listed above;
- 2) Other new applicable employees shall receive orientation awareness training.

B) **Refresher Training** - All applicable Employees shall receive a refresher training at least annually. The training shall emphasize any changes to the Company's Inbound Material Control Program.

VI) **Assessments:** The EHS Department shall evaluate the effectiveness of this program as part of EHS Inspections.



INBOUND MATERIAL CONTROL

Attachment A: Prohibited Materials Program

The following Materials are prohibited from acceptance at all SMM Facilities except by special arrangement with SMM:

- 1 Non-Metalic Materials, including but not limited to dirt, asphalt, concrete, debris, tires, trash, etc.**
- 2 Non-Hazardous Free-flowing Liquids, including but not limited to water.**
- 3 Hazardous Free-flowing Liquids including but not limited to gasoline, diesel fuel, motor oil, hydraulic fluids, anti-freeze, oil, paint, other lubricants and petroleum products, except as contained in whole cars that SMM specifically purchased for vehicle depollution.**
- 4 Flammable and Combustible Materials**
- 5 Corrosive Materials such as soda ash, acids, and lead-acid batteries, unless purchased separately by SMM.**
- 6 Radioactive Materials of any type, e.g., military scrap, medical scrap, measuring devices, etc.**
- 7 Explosive Materials or potentially explosive materials of any type, such as sealed tanks, munitions scrap, etc.**
- 8 Chemicals or Poisons in solid, powder, liquid, or gaseous form including fertilizers.**
- 9 Infectious Materials (generally placed in red bags or marked by the “infectious” symbol).**
- 10 Pressurized Containers or Cylinders including propane tanks, compressed gas tanks, aerosol cans, and extinguishers, except when such items have been properly cut up and certified as being properly vented.**
- 11 Closed Containers Formerly Containing Non-Hazardous Materials, including bulk storage tanks and vessels, unless properly cut up or certified as having been properly vented.**
- 12 Containers Formerly Containing Hazardous Materials including drums, bulk storage tanks, process vessels, paint cans and aerosol cans, unless certified as empty per applicable law and properly cut open to allow thorough inspection to verify they are empty in accordance with SMM’s empty container requirements.**
- 13 Any Materials Containing CFCs, HCFCs or other Refrigerant Substitutes.**
- 14 PCB-containing materials such as capacitors, ballasts, certain underground cables and transformers.**
- 15 Asbestos-containing materials (ACM), such as pipe insulation, surfacing materials.**
- 16 Mercury-containing materials such as switches, fluorescent and mercury vapor lights, fixtures, bulbs and thermostats, except as contained in whole cars that SMM specifically purchased for vehicle depollution.**
- 17 Cathode ray tubes (CRTs), liquid crystal displays (LCDs) or any device containing a CRT or LCD’s such as computer monitors, laptop screens and television sets, except at a designated Electronic Material receiving area.**
- 18 Hazardous Waste – Any Material containing hazardous or toxic substances or wastes of any kind.**

OTHER REQUIREMENTS FOR CERTAIN COMMODITIES TO BE ACCEPTED BY SIMS METAL MANAGEMENT:

Automobiles (except when purchased by SMM for vehicle depollution) must have the following items removed prior to delivery: all fluids including motor oil, coolants, fuel, refrigerants, and hydraulic fluids) to the extent required by law, batteries, leaded battery cable ends, mercury convenience light switches and other mercury containing devices as required by law (in certain states mercury headlamps, back lit displays) and air bag cannisters as required by law.

Lead Acid Batteries are accepted at most SMM facilities, only as separate commodities – not within auto bodies or appliances, etc., unless cracked, broken, burned or with missing caps.

California – certain “Materials Requiring Special Handling” may remain in certain appliances if the SMM facility is serving as Certified Appliance Recycler for those materials.

Electronic Material – Each state has its own requirements regarding which of this material may be accepted and under what requirements (most states allow acceptance of certain “electronic devices” as “Universal Waste”). Please refer to your state regulations before accepting any electronic material.



INBOUND MATERIAL CONTROL

Attachment B Prohibited Material – Sign at Scales



PROHIBITED MATERIALS (MATERIALES PROHIBIDOS)

 NON-METALLIC (NON-METALICOS) Tires Asbestos Roofing Dirt Insulation Solid Waste Wood Fiberglass	 CORROSIVES (CORRISOVOS) Batteries***	 RADIOACTIVE MATERIALS (MATERIALES RADIOACTIVOS)	 PRESSURE VESSELS (RECIPIENTES A PRESIÓN) Compressed Gas Cylinders
 HAZARDOUS LIQUIDS (LIQUIDOS PELIGROSOS) Antifreeze Oil Paint	 EXPLOSIVES (EXPLOSIVOS) Firearms Ammunition Shells	 FLAMMABLE MATERIALS (MATERIALES INFLAMMABLES)	 PCBS Capacitors Transformers Ballast
 CFC/FREON (FREÓN) Air Conditioners Compressors Cars	 OTHER HAZARDOUS MATERIALS (OTROS MATERIALES PELIGROSOS) Pesticides Air Bags CRTs Florescent Oil Filters Lead Mercury Switches Lights	*** CHECK WITH SCALE REGARDING WHOLE, UNDAMAGED CAR BATTERIES	



**NORTH AMERICAN ENVIRONMENT, HEALTH & SAFETY
(EHS) MANAGEMENT STANDARD**

INBOUND MATERIAL CONTROL

Sims Metal - Paulina Facility

Date of Most Recent Revision: January 2023

Page 5 of 3

ATTACHMENT C – SCRAP ACCEPTANCE AGREEMENT

SELLER		RECEIVER	
Company Name:		Legal Name:	Metal Management Midwest, Inc.
Person Signing:		Doing business as:	d/b/a Sims Metal
Title:		Address:	2500 S. Paulina
Street Address:		Effective Date:	Chicago, IL
City, State, Zip		NMVTIS Number:	

This Scrap Acceptance Agreement ("Agreement") is entered into on the Effective Date set out above ("Effective Date") between the "Seller" and "Receiver" named above, dba Sims Metal Management under the following terms and conditions. The initial term of this Agreement shall commence upon the Effective Date and shall expire two years after the Effective Date, after which time a new Agreement should be executed; but if not so executed this Agreement shall be automatically extended on a year-to-year basis, on the terms and conditions set forth herein, until such time as the new Agreement is executed.

- 1) **PURCHASE CONTRACT; MATERIAL ACCEPTANCE:** This is not an agreement for the purchase or sale of recyclable materials ("Materials"). These are terms and conditions which apply to and are incorporated in any and all Weighmaster Certificates, Purchase Contracts and other such agreements (each a "Contract") Receiver agrees to buy Materials only upon each issuance to Seller of a Contract for the purchase of such Material and at the price specified therein, in accordance with the terms and conditions of both the front and reverse sides of that Contract, and of this Agreement, incorporated therein whether or not referred to therein. Receiver shall not be deemed to have accepted the Material purchased in accordance with this Agreement until such Material has been approved by Receiver at Receiver's facility. Receiver reserves the right to reject at any time any Material or load of Material not conforming to the quality and other requirements of SMM or this Agreement; whereby Seller shall remove from the Receiver's facility any such rejected Material and/or load containing such Material, at Seller's sole cost and risk. Under no circumstances will title to any Material transfer to Receiver which is not as warranted, certified or conforming to this Agreement.

- 2) **SELLER OF WHOLE AUTOMOBILES REQUIRING DEPOLLLUTION ("ARD"):** Seller of one or more whole automobiles requiring depollution is not required to remove prior to delivery any fluids or components ordinarily contained in an operating vehicle ("ARD Materials"), including fuel, motor oil, coolant, refrigerant), batteries, mercury convenience light switches, and air bag canisters.

- 3) **ALL SELLERS:** For all Sellers (except for ARD Materials (for ARD Sellers)):
 - a) **SELLER SHALL INSPECT FOR HAZARDOUS MATERIAL PRIOR TO DELIVERY:** Seller shall inspect prior to delivery and shall not tender to Receiver any Materials which are considered hazardous or toxic materials, substances, or wastes under any applicable Law (as defined herein), including without limitation any of those Prohibited Materials described in Exhibit A, attached hereto and incorporated herein by reference ("Hazardous Material"). Seller certifies that the Material is exempt from regulation as a hazardous waste in accordance with all applicable federal, state, and local laws, regulations and requirements, and any guidance and interpretation by any applicable regulatory agency and any orders and decisions of any applicable court (each and all a "Law).
 - b) **SELLER SHALL EVACUATE REFRIGERANT FROM ALL MATERIALS PRIOR TO DELIVERY:** Seller certifies that all refrigerants (including without limitation chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and hydrofluorocarbons (HFCs), or non-exempt refrigerant substitutes (and other non-CFC replacement refrigerants), and all other Class I and II substances, as defined in 40 Code of Federal Regulations Part 82, Subpart F, pursuant to §608 of the federal Clean Air Act, as amended) that have not leaked previously will be properly removed and recovered from all appliances or shipments of appliances (including without limitation motor vehicle air conditioners) to be delivered under the Contract and this Agreement prior to the delivery of those appliances to Receiver. Seller further certifies that Seller either will recover any remaining refrigerant from all appliances or shipments of appliances (including without limitation motor vehicle air conditioners) to be delivered under the Contract and this Agreement in accordance with 40 CFR Part 82.155(a) prior to the delivery of those appliances to Receiver, or verify that the refrigerant had been properly recovered prior to receipt by the Seller. In addition, Seller certifies that all PCB small capacitors as defined in 40 CFR Part 761.3, DEHP and other metal-encased capacitors (and other encapsulated PCBs or DEHP), batteries, used oil, liquids, auto convenience-lighting and non-automotive mercury switches and temperature control devices, unspent sodium azide canisters, and all other hazardous waste will be removed from all appliances or shipments of appliances and motor vehicles prior to delivery under the Contract and this Agreement and disposed of in accordance with Law. Seller is solely responsible for the condition and cleanup of the Material and any releases therefrom.

- 4) **INDEMNITY:** Seller agrees to defend, indemnify, release, and hold harmless Receiver and its owners, affiliates, and employees (each an "Indemnitee"), from and against any claim, penalty, fine, fee, cost, expense (including attorneys' and expert fees), loss, obligation, damages, enforcement actions, or any other liability of any kind sustained by any Indemnitee resulting or arising directly or indirectly, in whole or in part, from any breach of this Agreement or any certification herein by Seller or any act or omission of Seller, its subcontractor(s), or any of their respective employees or agents. All warranties, certifications, indemnities, and other obligations made by Seller shall survive the expiration of this Agreement.

- 5) The undersigned individual signing on behalf of Seller represents and certifies that he or she is duly authorized by the Seller to sign this Agreement and certification on behalf of Seller. Any acknowledgment or confirmation issued by Seller regarding any Contract or this Agreement shall be deemed as issued solely for administrative purposes but in no event shall any terms or conditions thereon govern.

AGREED: SELLER (as named above)

AGREED: SIMS METAL MANAGEMENT

Authorized Signature: _____

Signature: _____

Date: _____

Date: _____



ATTACHMENT D – CORRECTIVE ACTION PROGRAM



RE: Urgent Safety Matter – Closed Cylinders and Tanks

Dear Value Supplier,

At Sims Metal, we want all our employees, our suppliers and our steel-making customer employees to return home safely every day. As a valued scrap supplier, we are asking your help to make sure this happens.

Sealed units such as propane tanks, gas cylinders, and oxygen/acetylene tanks represent a serious hazard to our employees and equipment at our facilities and those of our steel-making customers across the globe. Incidents caused by sealed units in the scrap supply are fully preventable. It is not enough to expect our inspections process to find and remove all sealed units from daily purchases at our facilities. We need you to stop them at the source before they are shipped to our plants. A supplier should never knowingly ship a sealed unit to any Sims Metal facility and we asked that you have procedures in place to inspect your inbound and outbound scrap to prevent this from happening.

A supplier's failure to remove sealed units such as propane tanks, gas cylinders, and oxygen/acetylene tanks before they become part of the inbound scrap to our facilities may result in serious injury or property damage or impact to our reputation in the community.

As a result, Sims Metal is instituting a charge payable by you, the supplier, for sealed or otherwise pressurized propane tanks, gas cylinders and oxygen and acetylene tanks found in your loads of scrap. The charges for this non-conforming material are as follows:

1. Propane Tanks up to 20 gallons - Sims Metal will charge scrap supplier \$150 per tank
2. Propane Tanks over 20 gallons and large gas cylinders and oxygen and acetylene tanks - Sims Metal will charge scrap supplier \$500 per cylinder or tank

Sims Metal will not charge the supplier if the supplier takes back (secured in a truck) these cylinders or tanks at time of delivery. Sims Metal also reserves the right to reject any load that does not comply with our Scrap Acceptance Agreement and Inbound Source Control procedures including those regarding cylinders and tanks.

Sims Metal appreciates your cooperation and understanding in helping to keep these items out of the scrap material we receive. Please help us be safe and make sure that your scrap metal shipments are inspected in advance so that these cylinders and tanks are removed from your scrap metal loads before these shipments are delivered to Sims.

Please contact your Commercial Manager (Buyer) if you have any questions.

Thank You,

SIMS METAL



METAL MANAGEMENT MIDWEST - PAULINA FACILITY
STACKING PLAN

Paulina Facility

Purpose:

- To ensure that all trucks entering the Paulina facility, queue (stack) on Paulina facility and not queueing on Blue Island or other public streets.
- From the Rail Tracks at the north end of Paulina to the very southern end of Paulina, the facility should be able to queue 40 trucks. Around the shredder, 30 trucks theoretically should be able to queue.

Responsibility:

- It is the responsibility of the Transportation Manager to notify all Sims and Contract drivers of this requirement.
- It is the responsibility of Yard Supervisors and Yard Inspectors to ensure trucks coming into our facility understand the process of queueing.

Procedure:

- Shredder/MRP:
 - Trucks will come into the shredder yard to be weighed.
 - Once weight is recorded, and if the truck is for the shredder yard, the inspector will direct them to either the inside queueing area or the outside queueing area along Paulina.
 - Once the weight is recorded, and if the truck is for the MRP, the inspector and/or yard management will direct them to queueing area for the MRP along
 - See diagram below.
- Ferrous Trucks
 - Trucks will come south on Paulina to Ferrous Scale. If the yard is at a point where trucks must queue, the scale operator will notify trucks via 2 way radio.
- NonFerrous Trucks
 - NonFerrous Trucks can queue along Wood Street.
 - If loading at warehouse on Paulina, either the Supervisor or the Forklift Operator will instruct driver to queue along Railroad tracks until a dock becomes available.

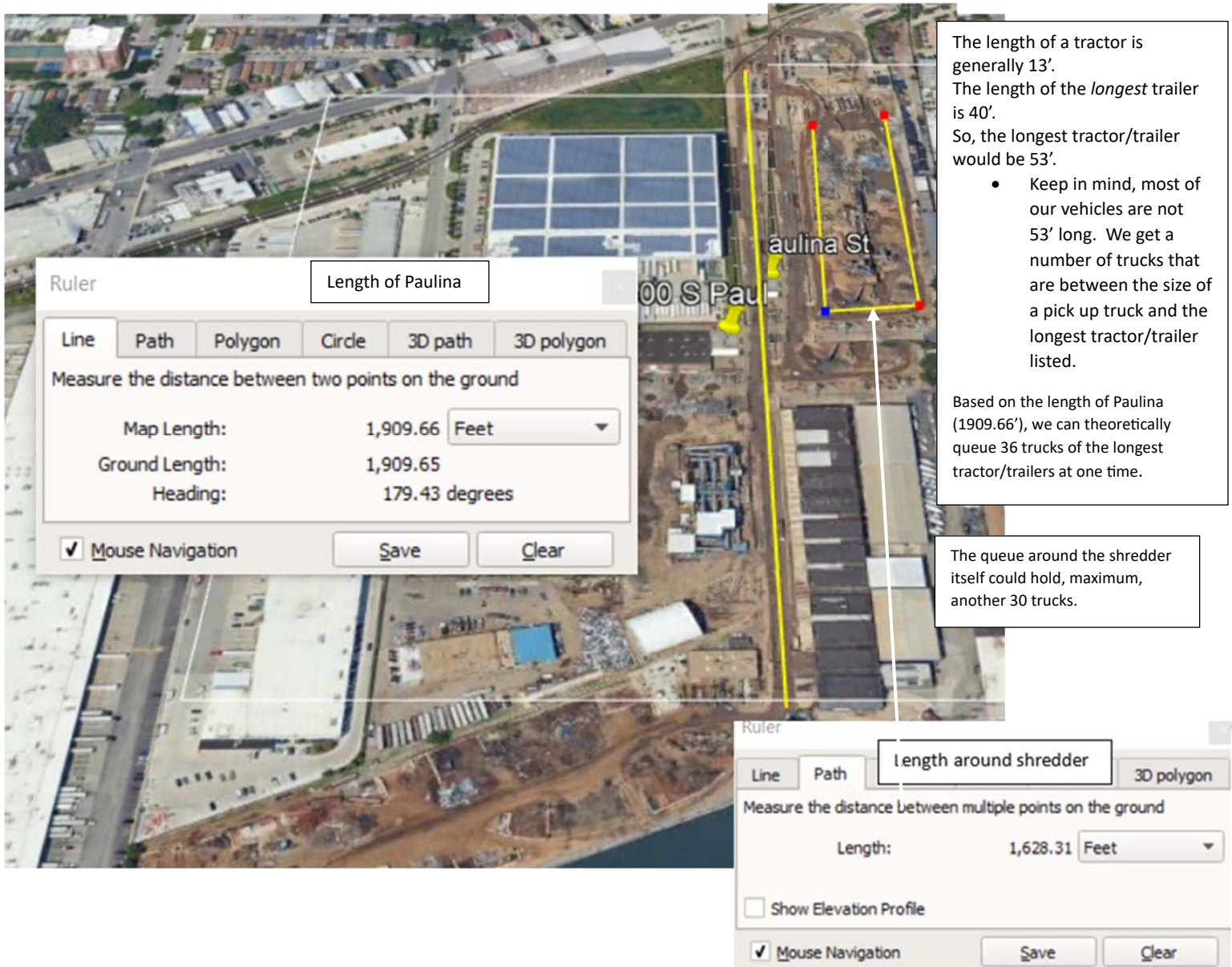


METAL MANAGEMENT MIDWEST - PAULINA FACILITY STACKING PLAN

Paulina Facility

In Appendix L - Traffic Volumes at table is presented which summarizes the average number of trucks per hour, over a 24-hour period, that entered the Paulina facility for what was the previous twelve months. In one month we had 42 trucks in one hour, the normal average across the entire campus is 29. This does not mean 42 trucks were here all at once, but that 42 trucks were in the Paulina yard over the course of 1 hour.

Based on the length of queing space, Paulina could queue 66+ trucks at one time.





METAL MANAGEMENT MIDWEST - PAULINA FACILITY STACKING PLAN

Paulina Facility



KEY:

Traffic Pattern	
Scale	
Queuing Area (shredder)	
Queuing Area (MRP)	
Queuing Area (Ferrous)	
Queuing Area (NF)	



No Idling Plan

(Paulina Facility)

DATE: 12/3/2019
Rev: 1

PAGE
1 OF 1

1.0 PURPOSE:

There are many benefits to instituting a “No Idling Policy”:

- Decreasing emissions that could potentially be harmful to the environment,
- Improving operator well-being by decreasing noise levels; and,
- Improving relationships with surrounding communities.

Additional benefits are:

- Decreasing fuel costs,
- Decreasing engine maintenance costs; and
- Extending engine life in trucks and operating equipment.

2.0 RESPONSIBILITY:

- 2.1 Managers at Paulina are to ensure they have “No Idling” signs in the areas where trucks queue as well as posters/notifications in scales and any other areas they feel it would be applicable.
- 2.2 The transportation group is to send by email an annual reminder of this policy to outside haulers used.
- 2.3 It is everyone’s responsibility to remind truck drivers as well as equipment operators at our Paulina facility, that this is a “no idling” facility and to shut their engine off.

3.0 PROGRAM ELEMENTS:

3.1 Communication of Program

- 3.1.1 “No Idling” signs throughout the property, see Appendix A for examples.
- 3.1.2 Notifications in Scale offices,
- 3.1.3 Letters to customers, contract and service drivers, and
- 3.1.4 Verbal reminders as we walk the yard.

3.2 Sims Equipment Purchases:

- 3.2.1 Ensuring that equipment, as purchased for use at our facility, has shut-off controls installed to prevent extended idling.

3.3 Exemptions:

- 3.3.1 Both Illinois Statute (625 ILCS 5/11-1429) and Chicago Ordinance 9-80-095 allow for idling when the temperature is above 80°F or below 32°F for the safety of the driver.
- 3.3.2 Emergency Vehicles, in the course of providing services, are exempt from this requirement.



No Idling Plan

(Paulina Facility)

DATE: 12/3/2019
Rev: 1

PAGE
1 OF 1

APPENDIX A



STORMWATER POLLUTION PREVENTION PLAN

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

Name of Facility: Metal Management Midwest, Inc. – Paulina Facility

Street: 2500 South Paulina Street

City: Chicago *State:* IL *ZIP Code:* 60608

County or Similar Subdivision: Cook

NPDES ID (i.e., General Permit tracking number): ILR005935

Primary Industrial Activity SIC code, and Sector and Subsector (ILR00, Attachment 1 Subpart and Sector): 5093, Subpart N and Sector N

Co-located Industrial Activity(s) SIC code(s), Sector(s) and Subsector(s) (ILR00, Attachment 1):
Not Applicable

Latitude/Longitude

Latitude: 41.851325° N (decimal degrees) *Longitude:* -87.668470° W (decimal degrees)

Method for determining latitude/longitude (check one):

USGS topographic map (specify scale): *GPS*
 Other (please specify): Google Earth

Is the Facility located in Indian country? Yes No

If yes, name of Reservation, or if not part of a Reservation: Not Applicable

Estimated area of industrial activity at site exposed to stormwater: 28 acres

Discharge Information

Does this Facility discharge stormwater into a municipal separate storm sewer system (MS4)?
 Yes No

If yes, name of MS4 operator: Not Applicable

Name(s) of surface water(s) that receive stormwater from your Facility: No Direct or Indirect Discharge of Stormwater Occurs.

Does this Facility discharge industrial stormwater directly or indirectly into any segment of an "impaired water" (ILR00 Part C.1.a.)? Yes No

If Yes, identify name of the impaired water(s) and segment(s), if applicable:

STORMWATER POLLUTION PREVENTION PLAN

Identify the pollutant(s) causing the impairment(s): N/A

Which of the identified pollutants may be present in industrial stormwater discharges from this Facility: See plan.

Has a Total Maximum Daily Load (TMDL) been completed for any of the identified pollutants: No

If yes, please list the TMDL pollutants: Not Applicable

Is there a Waste Load Allocation applicable to the Facility's stormwater discharge in the approved TMDL? Yes No

Are any of your stormwater discharges subject to effluent limitation guidelines (ILR00 Part B):

Yes No

If Yes, which guidelines apply: Not Applicable

2.2 Contact Information / Responsible Party

Facility Owner/Operator(s):

Name: Metal Management Midwest, Inc.

Address: 2500 South Paulina Street

City, State, Zip Code: Chicago, Illinois, 60608

Telephone Number: 773-650-6440

Email address: george.malamis@simsmm.com

Fax number: 630-929-8543

SWPPP Contact(s):

SWPPP Contact Name: Debbie Hays

Telephone number: 773 650-6495

Email address: debbie.hays@simsmm.com

Fax number: 630-929-8543


SWPPP Contact Name: Maria Medina

Telephone number: 773-650-6405

Email address: maria.medina@simsmm.com

Fax number: 630-929-8543

2.3 Stormwater Pollution Prevention Team

	SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY (EHS) MANAGEMENT	
	Fire Prevention and Preparedness Plan Requirements – PAULINA SHREDDER	
MIDWEST REGION	Written: January 2014 REV 4: 2/2024	Page 1 of 20

Fire Prevention and Preparedness Plan Requirements – SHREDDER

Table of Contents

1.0	PURPOSE	2
2.0	DEFINITIONS	2
3.0	RELATED DOCUMENTS.....	2
4.0	RESPONSIBILITIES	3
5.0	PLAN OUTLINE:	4
5.1	Recognizing and Reducing Hazards.....	4
5.2	Fire Response	4
5.3	Safety Inspections	4
5.6	Training	5
5.7	Security	5
6.0	PLAN CONTENT	6
	Fire Prevention Team.....	6
	North End of Yard	7
	Shredder and Downstream.....	10
	General Areas of Concern.....	15
	Shredder – North End of Yard (Diagram)	17
	17
	Shredder – Mill Area (Diagram) Sheet.....	18
	Light Iron Storage; ELV Storage, DNF.....	18
	APPENDIX A – Fire Prevention Inspection Checklist.....	19
	APPENDIX B - FLIR TEMPERATURE LOG	20



**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

1.0 PURPOSE

The purposes of this plan are to:

- A. minimize the causes of fires, and prevent loss of life and property by fire;
- B. comply with the Occupational Safety and Health Administration’s (OSHA) standard on Fire prevention, 29 C.F.R. 1910.39 and the SM standard; and,
- C. provide employees with information and guidelines that will assist them in recognizing, reporting and controlling fire hazards.

2.0 DEFINITIONS

- D. **“Working Pile”** means
 - 1.D.1. For a Shredder Infeed stockpile, the Shredder Infeed material available to supply a shredder for processing, at industry standard, during a maximum scheduled shift.
 - 1.D.2. For a DNF stockpile, the material available to supply the DNF plant during daily scheduled operations.
- E. **“Non-Working Pile”** means a Shredder Infeed, DNF or ASR overflow or feeder yard stock piles.
- F. **“Shredder Infeed”** means car bodies and other light iron scrap material.
- G. **“DNF”** means debris non-ferrous material (e.g. unprocessed non-ferrous shredder residue).
- H. **“ASR”** means auto shredder residue designated for landfill or beneficial reuse (e.g. alternative daily landfill cover).
- I. **“Fire Watch Personnel”** means those personnel trained to (i) detect fires when Hot Work is being conducted, (ii) survey the stockpiles with the infrared sensor referenced in Exhibit E, and (iii) record readings from that infrared sensor.
- J. **“Hot Work”** means any activity that creates heat, flame, sparks, or smoke, and includes one or more of the following activities: (i) torch-cutting, (ii) welding (gas or arc), (iii) soldering, (iv) other cutting, and/or (v) hot tar operations.
- K. **“BMP”** means best management practice.

3.0 RELATED DOCUMENTS

No.	Name	Effective
1.	SM Fire Response Plan Requirements	DRAFT
2.	Inbound Material Control Standard	October 2010
3.	Facility Stormwater Pollution Prevention Plan (SWPPP)	
4.	Spill Containment, Control and Countermeasure Plan	
5.	Hot Work Operations Procedure	March 2011




**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

4.0 RESPONSIBILITIES

Fire safety is everyone's responsibility.

- All employees should ensure that they receive training on how to prevent, prepare for and respond to fires (both what they can do and the limits of what they can do),
 - Upon hire; as an annual review; and whenever there is a change in the plan
 - Training should include
 - when an employee should call “911”
 - what type of fires are considered “incipient”
 - How to use a fire extinguisher
 - How to use water hoses
 - All employees are responsible for adhering to SM requirements regarding fire prevention, preparedness, and response.
 - All employees should work to implement the company’s Inbound Material Control Standard
- Regional/Operational management is responsible for:
- Ensuring that this facility has prepared a facility-specific Fire Prevention and Preparedness Plan that effectively identifies the fire risks and the procedures and equipment in place to reduce the risk of fires. This Standard sets forth the minimum requirements for those facility-specific plans.
 - Providing adequate resources and training for its employees to reduce the risk of fires, prepare for fires and engage in the safe response to fires.
- Facility Managers are responsible for
- Ensure compliance with the requirements of this plan,
 - Provide training on this plan
 - Implement this Fire Prevention & Preparedness Plan,
 - Ensure that facility’s fire control equipment and systems are properly maintained;
 - Ensure that the facility’s fuel source hazards are controlled.
 - Develop a team of employees and clearly defining their responsibilities for:
 - (a) maintaining fire prevention and response equipment and systems,
 - (b) controlling potentially hazardous fuel sources, and
 - (c) the control and accumulation of flammable or combustible material;
- Each facility’s EHS Specialist is responsible for:
- Managing this Fire Prevention & Preparedness Plan,
 - Ensuring that records pertaining to plan are being maintained,
 - Developing fire prevention and preparedness training programs, see section 5.4

	SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY (EHS) MANAGEMENT	
	Fire Prevention and Preparedness Plan Requirements – PAULINA SHREDDER	
MIDWEST REGION	Written: January 2014	REV 4: 2/2024
		Page 4 of 20

5.0 PLAN OUTLINE:

5.1 Recognizing and Reducing Hazards

Each facility will develop a plan that addresses potential fire hazards within buildings and operational areas of their site.

5.2 Fire Response

- It is the policy of Sims Metal (“SM”), and this facility, that fire-fighting by an employee is considered a voluntary activity and that by signing off on this plan you agree to the voluntary nature of this task.
- It is the policy of SM and this facility that response to fires will be
 - limited to fires at incipient (early) stages and only with the use of fire extinguishers and hose systems, and only with properly trained personnel;
 - limited to participation on a strictly voluntary basis by employees, not as a condition of employment;
 - **when there is doubt about the facility’s ability to safely extinguish an early, incipient stage fire – or whenever a fire goes beyond incipient stage - to call “911”** or the local Fire Department, from a landline phone if possible

5.3 Safety Inspections

- Managers must ensure that stockpiles and mobile and stationary equipment are inspected regularly to: (a) ensure smoldering does not occur, (b) detect buildup/release of oil and grease from hoses and engine compartments; and (c) ensure identified hazards are mitigated.
- See Appendix A for facility inspection points.

5.4 Pile Management (everyday including holidays and other non-production days) –

- Fire Watch Personnel should check each stockpile at least once at the end of day on Friday and at least once each weekend day using a thermal imaging monitor, document the reading, and report to management if a reading is more than 100°F higher than the most recent prior reading or otherwise at a temperature of concern. If more than 100° higher than previous reading, either call out the water truck to water down pile or turn on misters to wet down pile.



**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

- Reduce stockpile quantity to the maximum extent feasible on the Friday before the weekend. Same for the day before a weekday holiday or other non-production day.
- If the Working Pile or any Non-Working Pile of Shredder Infeed exceeds 1000 tons by the end of day on Friday, run the shredder on Saturday. Same for the day before a weekday holiday.

5.5 Fire Breaks –

- Fire break between Shredder Infeed stockpile and another Shredder Infeed or any DNF or ASR stockpiles: 30 feet.
- Fire break between any stockpile and shredder: 25 feet.
- Fire break between any DNF or ASR stockpile and another DNF or ASR or other combustible material stockpile or processing equipment other than the shredder: 20 feet or appropriate barrier firewall.

5.6 Training

Managers must ensure that operators and supervisors are properly trained in fire prevention and preparedness plan requirements that include:

- 5.6.1 Providing basic fire prevention training to all employees by facility management (with documentation of the training) –
 1. At their initial assignment;
 2. Annually through toolbox talks; and
 3. When changes in work processes necessitate additional training;
- 5.6.2 Review of 29 CFR 1910.38 (including how to obtain a copy);
- 5.6.3 The facility-specific Fire Prevention Plan (including where the plan is located);
- 5.6.4 housekeeping practices;
- 5.6.5 Proper response and notification in the event of a fire;
- 5.6.6 instruction on proper use of portable fire extinguishers, hoses and water cannons (as applicable); and
- 5.6.7 Recognition of potential fire hazards associated with the specific materials and processes to which employees may be exposed.

5.7 Security

- 5.7.1 When a processing facility is shut down and employees absent, the security guard (if used by the facility) should:
 1. conduct a periodic fire watch on stockpiles and plant equipment;



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 6 of 20

2. conduct hourly inspections of all areas of the facility that may be susceptible to fire (whenever feasible using designated security “rounds” verification stations); and
3. be trained in appropriate response to any observed smoke or flame.

Confirm that the facility is fenced and gated, when applicable

6.0 PLAN CONTENT

Fire Prevention Team

Name	Title	Responsibility
Chris Daniels	EHS Specialist	See page 3
Theodore Moore	Operational Manager	See page 3
Sam Flores	Plant Manager	Coordinates Maintenance Activities on shredder Performs Plant Inspection Respond to corrective actions Inbound Material Periodic Inspections Review of Monthly Fire Extinguisher Check
Manuel Quintero James Curry Brandon Schmid Joseph Cihak Pablo Montelongo	Supervisors	Performs Plant Inspection Respond to corrective action Signs off on Hot Work Permits Takes Thermal Images of Material Stock piles Tank and Dike Inspections
	Material Inspectors	Inbound Material Acceptance; Inbound Material Tear Down Inspection
	Mill Laborer	Monthly Fire Extinguisher Inspections
	Shredder Operator	Daily Water/Foam System Check
	Equipment Operators	Daily/Pre-Shift Equipment Inspections
	Equipment Operators	Fuels Equipment
	All Employees	Housekeeping
Maria Medina	Maintenance	Mobile Equipment Maintenance issues
	Security Guards	After hours Fire Watch of stockpiles
A. Reliable Fire	Third Party	Annual Fire Extinguisher Inspections
Calumet City Plumbing	Third Party	Quarterly Fire Hydrant testing/maintenance



**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

North End of Yard

Hazard Type	Fire or Explosion
Location of Hazard	Sheet Iron pile at Peddler Drop off area
Possible Ignition Source	Batteries/Compressed Gas cylinders/ordinance/cigarettes/
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Inspection of all inbound loads per Inbound Material Acceptance Policy. o Immediate segregation or return to customer of an unacceptable item; o Buckets in area for the collection of batteries; o “No smoking” signs o Housekeeping of area must be maintained; o Thermal imaging of the pile, looking for a rise in temperatures, occurs daily; o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Fighting equipment	Fire Extinguishers located at the inspectors station as well as the peddler scale house.
Location of FF equipment	The water truck is parked at the south end of this yard. Water Bombs are surrounding piles. Follow policy on fire breaks. Enforcer foam is available within the area.

Hazard Type	Fire or Explosion
Location of Hazard	Auto Depollution – ELV storage area and Depollution Rack
Possible Ignition Source	Fuel, Smoking, Sparks from tools
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Inbound Material Inspection for leaking gas or other petroleum product as tows of “wet” ELVs come into facility. o Tools used in Depollution area must be manufactured as “non-sparking” tools o No Smoking signs posted in area o Gasoline tanks must be grounded; o Storage tank levels must be monitored continuously during operation to prevent spills from overfilling; o Batteries must be removed from vehicles prior to removal of fluids; o Contaminated rags must be stored in covered metal containers; o Loaders operators must pick up and handle vehicles in a manner that prevents rupture of fuel tank; o Fuel spills must be cleaned up immediately;



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 8 of 20

	<ul style="list-style-type: none"> o Fluids built up under floor grates must be removed. o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Extinguishers:	Fire Extinguishers are located at the depollution station; the storage shed to the west of the depollution rack, within the parts storage building, and at the operations office.
Other Fire Fighting Equipment	One 300 lb fire extinguishing system is located in this area Water truck is parked at the south end of the Shredder yard, Enforcer foam is available within the area.

Hazard Type	Fire
Location of Hazard	Part Storage Building (inside and outside for equipment plug in)
Possible Ignition Source	Faulty Electrical – smoking – flammable/combustible materials
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Ensure worn wires are replaced; o Never using extension cords as substitutes for wiring improvements; o Using only UL or FM approved extension cords; o Checking wiring in hazardous locations where risk of fire is high; o Checking that electrical equipment is properly grounded or double insulated; o Ensuring adequate spacing while performing work; o Ensuring that flammable or combustible materials is not on or around electrical equipment or space heaters; o Ensure space heaters are electrical and have tip over protection; o Ensuring “No Smoking” signs are posted throughout the building; o Storage of flammable liquids must be stored in a flammable storage cabinet; o Storage of flammable liquids must be away from ignition sources; o Storage of contaminated rags must be maintained in a covered metal container; o Limit the indoor storage of combustible materials such as cardboard boxes or pallets to 6 feet or less high; o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Extinguishers	Fire Extinguishers are located throughout this building.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 9 of 20

Other Fire Fighting Equipment	Water Truck is located at the south end of the Shredder Yard. Enforcer foam is available within the area.
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Hazard Type	Fire - Explosion
Location of Hazard	Fuel and Oil Storage Area
Possible Ignition Source	Sparks; cigarettes; faulty grounding; faulty electrical
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Special protections need to be put in place, as per Hot Work Permit, prior to any hot work being performed in area. o “No Smoking” signs must be posted in area; o Ensuring that flammable or combustible materials is not on or around electrical equipment; o Ensure nozzles provided are automatic shut off; o Ensure the operator remains with the equipment while it is being fueled; o Spills are to be cleaned up immediately; o Ensure worn wires are replaced; o Never using extension cords as substitutes for wiring improvements; o Using only UL or FM approved extension cords; o Checking wiring in hazardous locations where risk of fire is high; o Checking that electrical equipment is properly grounded or double insulated; o Grounding cables for fuel and oil tanks must be periodically inspected for integrity; o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Extinguishers	Fire extinguishers are located within the petroleum storage area as well as the operations office and inbound scale house.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Enforcer foam is available within the area.



**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

Shredder and Downstream

Hazard Type	Fire - Explosion
Location of Hazard	Sheet Iron and ELVs active piles
Possible Ignition Source	Sparks from Hot Work; cigarettes; compressed gas cylinders; batteries stored within materials; ordinance
Means taken to reduce the hazard:	<ul style="list-style-type: none"> ○ Inspection of all inbound loads per Inbound Material Acceptance Policy. ○ Follow detailed inspection protocol of inbound loads as outlined in Inbound Material Acceptance Policy ○ Immediate segregation or return to customer of an unacceptable item ○ Buckets in area for the collection of batteries; ○ “No smoking” signs ○ Strict adherence to Hot Work Policy and Permit; ○ Thermal imaging of the pile, using a hand held FLIR gun looking for a 100° + rise in temperatures, occurs daily ○ Periodic EHS/Mgmt audits of compliance in this area ○ Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Extinguishers	Fire extinguishers are located within the motor control building; within the guard station west of the sheet iron pile.
Other Fire Fighting Equipment	If FLIR Camera shows readings 100 ° + higher than last reading – Sstock piles are to be watered down. The water truck is parked at the south end of this yard. Water Bombs are surrounding piles. Misters should be on at all times wetting down piles. Follow policy on fire breaks. Enforcer foam is available within the area.

Hazard Type	Fire
Location of Hazard	Throughout the area of the Mill and Downstream
Possible Ignition Source	Faulty Electrical
Means taken to reduce the hazard:	<ul style="list-style-type: none"> ○ Ensure worn wires are replaced ○ Never using extension cords as substitutes for wiring improvements ○ Using only UL or FM approved extension cords ○ Checking wiring in hazardous locations where risk of fire is high ○ Checking that electrical equipment is properly grounded or double insulated



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 11 of 20

	<ul style="list-style-type: none"> o Ensuring adequate spacing while performing work o Ensuring that flammable or combustible materials is not on or around electrical equipment o Ensure space heaters are electrical and have tip over protection o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	Extinguishers can be found in the electrical trailer; storage trailers east of downstream; within the motor control building and on posts under picker station as well as within picker station.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Water Bombs are surrounding piles. Misters should be on at all times, when above 32°F, wetting down piles. Maintain fire breaks in accordance with standard. Enforcer foam is available within the area.

Hazard Type	Fire - Explosion
Location of Hazard	Throughout the area of the Mill and Downstream
Possible Ignition Source	Flammable/Explosion material being shredded
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o High lighting in area so that operator has the chance to see material that might be flammable or explosive prior to it being placed on infeed conveyor. o Double Inspection of material; one MH operator inspects material prior to second MH operator feeding to the mill. o Fire Breaks between material storage piles on infeed side of mill (See Appendix E in Policy) o Housekeeping of mill area maintained; o Storage limitations of material over weekends and holidays (see Appendix E in policy). o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be addressed immediately.
Fire Extinguishers	Extinguishers can be found in the following nearby locations: electrical trailer; storage trailers east of downstream; within the motor control building and on posts under picker station as well as within picker station.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Water Bombs are surrounding piles. Misters should be on at all times, when above 32°F, wetting down piles. Maintain fire breaks in accordance with standard. Enforcer foam is available within the area.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 12 of 20

Hazard Type	Fire
Location of Hazard	DNF Storage Piles
Possible Ignition Source	Heat from process; undeployed air bags; cigarettes;
Means taken to reduce the hazard:	<ul style="list-style-type: none"> ○ Deploy air bags during depollution process; ○ Perform Thermal imaging of the pile daily; ○ Ensure Water misting of piles occurs when temperatures are above 40°F; ○ Ensure visual inspection of piles is performed during the course of the shift ○ Ensure that material piles are moved away from machinery during the operation; ○ Ensure that material is moved to MRP, for further processing, within 24 hours; ○ Ensure worn wires on equipment are replaced immediately; ○ Never using extension cords as substitutes for wiring improvements ○ Using only UL or FM approved extension cords ○ Checking wiring in hazardous locations where risk of fire is high ○ Checking that electrical equipment is properly grounded or double insulated ○ Ensuring adequate spacing while performing work ○ Ensuring that flammable or combustible materials is not on or around electrical equipment ○ Periodic EHS/Mgmt audits of compliance in this area ○ Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	Extinguishers can be found in the following nearby locations: electrical trailer; storage trailers east of downstream; within the motor control building and on posts under picker station as well as within picker station. Enforcer foam is available within the area.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Water Bombs are surrounding piles. Mistors should be on at all times, when above 32°F, wetting down piles. Maintain fire breaks in accordance with standard. Enforcer foam is available within the area.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 13 of 20

Hazard Type	Fire
Location of Hazard	Picking Station
Possible Ignition Source	Mill Explosion; Faulty Electrical; smoking
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Ensure deluge function is checked daily; o Ensure ease of access to fire extinguishers; o Ensure worn wires are replaced; o Never using extension cords as substitutes for wiring improvements; o Using only UL or FM approved extension cords; o Checking wiring in hazardous locations where risk of fire is high; o Checking that electrical equipment is properly grounded or double insulated; o Ensuring adequate spacing while performing work; o Ensuring that flammable or combustible materials is not on or around electrical equipment; o “No Smoking” signs on doors of picking station building; o Periodic EHS/Mgmt audits of compliance in this area; and o Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	Numerous fire extinguishers are maintained within the picking station as well as on support beams under the picking station.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Water Bombs are surrounding piles. Misterters should be on at all times, when above 32°F, wetting down piles. Maintain fire breaks in accordance with standard. Enforcer foam is available within the area.

Hazard Type	Fire
Location of Hazard	Hot Work
Possible Ignition Source	Torching/Welding
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Hot Work (excluding torch-cutting) must be performed under a Hot Work permit, authorized by a manager. o Hot Work permit conditions should require the use of Fire Watch Personnel: (a) whenever combustible materials cannot be safeguarded from potential ignition sources, and (b) to verify the area fire hazard-free for 30 minutes after Hot Work has ceased. o For torch-cutting work, (a) Fire Watch Personnel should verify the area fire hazard-free for 30 minutes after Hot Work



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 14 of 20

	<p>has ceased and (b) the supervisor in charge of the torch-cut work area should inspect the area after the end-of-shift.</p> <ul style="list-style-type: none"> ○ Hot Work should not be performed within 25 ft of stockpiles containing combustible materials. ○ Hot Work should only be done by authorized personnel in designated torch-cutting, cutting and welding areas whenever possible. ○ Hot Work should be prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations. ○ Cutting and welding should be prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or having combustible covering. ○ Torches, regulators, pressure-reducing valves, and manifolds should be UL listed or FM approved. ○ Oxygen-fuel gas systems should be equipped with listed and/or approved flash arrestors and pressure-relief devices. ○ Pre-work inspection that should check that: (a) all fuel tanks, hoses and torches are in good condition; (b) scrap materials do not contain flammable, combustible or pressurized components; and (c) torch-cutting areas are free of combustible materials. ○ Maintaining a safe distance or approved barrier between stored fuel and oxygen, in accordance with EHS requirements – as provided by applicable EHS documents or the EHS representative. ○ Ensuring that adequate fire extinguishing equipment is always available. ○ Periodic EHS/Mgmt audits of compliance in this area; and ○ Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	Numerous fire extinguishers are maintained within the work area
Other Fire Fighting Equipment	<p>Water access at the downstream. The water truck is parked at the south end of the shredder yard. Enforcer foam is available within the area.</p>



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 15 of 20

General Areas of Concern

Hazard Type	Fire
Location of Hazard	Mobile Equipment – General
Possible Ignition Source	Spark or flame
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Follow a preventive maintenance program for the equipment; o Daily/Pre-shift inspections of equipment must be performed; <ul style="list-style-type: none"> o Leaks of fluids are addressed as soon as possible o Never leave a piece of equipment during fueling; o When equipment is not in use; the key should be removed o Equipment should be parked at least 25 feet (if feasible) from buildings, process equipment or stockpiles o Periodic EHS/Mgmt audits of compliance in this area o Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	A fire extinguisher is maintained within each piece of equipment
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Enforcer foam is available within the area.

Hazard Type	Fire
Location of Hazard	Office and Scale houses – General
Possible Ignition Source	Portable heaters; faulty Electrical; cigarettes
Means taken to reduce the hazard:	<ul style="list-style-type: none"> o Portable heaters must be approved by management o Fuel fired heaters are prohibited o Heaters must have tip over protection that automatically shuts off the unit o Adequate clearance of the heater from combustible materials or other materials must be maintained at all time; o Housekeeping must be maintained at all times in offices; o Overloading of circuits is prohibited o “No Smoking” signs posted at entrances to buildings; o Ensure worn wires are replaced o Never using extension cords as substitutes for wiring improvements o Using only UL or FM approved extension cords o Checking wiring in hazardous locations where risk of fire is high o Checking that electrical equipment is properly grounded or double insulated o Ensuring adequate spacing while performing work



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 16 of 20

	<ul style="list-style-type: none"> ○ Ensuring that flammable or combustible materials is not on or around electrical equipment ○ Ensure space heaters are electrical and have tip over protection ○ Periodic EHS/Mgmt audits of compliance in this area ○ Audit findings, and related corrective actions, associated with areas of fire potential must be immediately addressed.
Fire Extinguishers	Fire extinguishers are maintained within each scale house and office building.
Other Fire Fighting Equipment	The water truck is parked at the south end of the shredder yard. Enforcer foam is available within the area.



**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

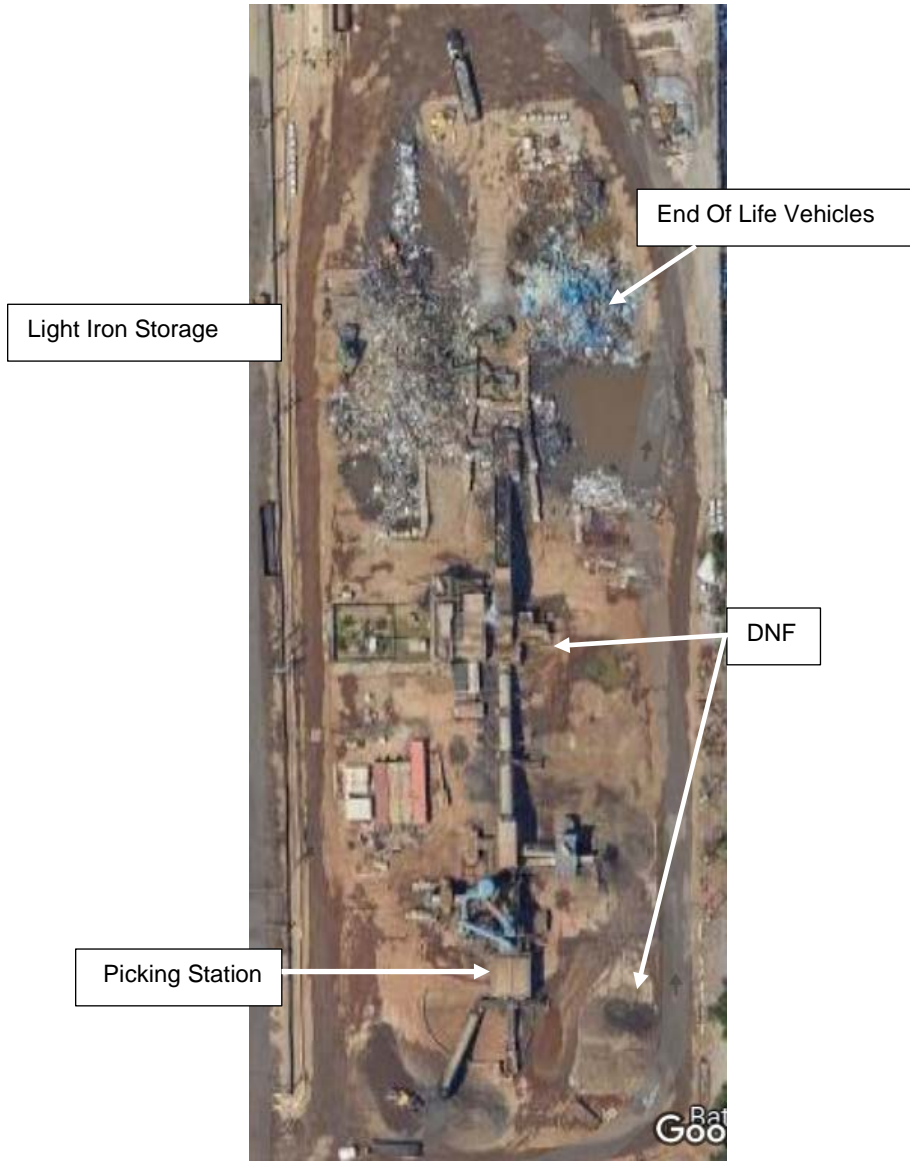
Shredder – North End of Yard (Diagram)





**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

Shredder – Mill Area (Diagram) Sheet
Light Iron Storage; ELV Storage, DNF





**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 19 of 20

**APPENDIX A – Fire Prevention Inspection Checklist
Operating Facilities**

Area	No.	Fire Prevention and Suppression: Processing Systems, Mobile Equipment and Stockpile Management	Complete (Y/N)
All	1	Confirm that the Inbound Material Control Standard is properly implemented, including the battery removal requirements for car bodies.	
All	2	Regularly conduct routine housekeeping: to remove debris and potentially combustible materials from around the facility, especially around the processing plants (e.g. Shredder and DNF Plants).	
All	3	Supervisors must verify that hot work areas are inspected and hosed down after hot work is performed.	
S	4	Adjust shredder schedules to accommodate feed stock inventory.	
S, DNF	5	Run material off in feed and downstream conveyors until all belts and equipment are empty or cleared at end of every shift.	
S, DNF	6	Clean off DNF/ASR residue from operating equipment during shifts (excess residue build-up as needed) and after shifts.	
DNF	7	Confirm that process outfall material (excluding shredded steel) is moved away from process drop points to designated stockpile area at end of shift.	
DNF	8	At the end of every shift, the Supervisor should conduct a thorough DNF Plant walk-through and inspection.	
DNF	9	DNF produced on the shift prior to a non-production day, weekend or holiday should be stockpiled separately from any backlog pile of DNF.	
All	10	Confirm mobile equipment is parked at least 25 feet away from process buildings and stockpiles when not operating.	
All	11	Maintain a 24-hr fire watch or security detail to patrol stockpiles (excluding finished ferrous products) during non-operating weekends and holidays.	
All	12	Confirm that fire lanes are maintained between stockpiles which are appropriate for the yard and that access roads are kept clear of objects that could impede traffic flow.	
All	13	Confirm access to a pressurized water system (eg, fire hydrant, pond and pump system, water truck with fire hose, etc.)	
All	14	Confirm hoses are stored properly for rapid access and connection to pressurized water supply.	
All	15	Confirm fittings match Fire Department equipment for trouble-free connection.	
All	16	Confirm water cannons, if installed, are in proper operating condition.	
All	17	Confirm all necessary personnel are trained on fire extinguisher/ water cannon use and know their locations.	
All	18	Confirm that fire extinguishers are full and in working order.	



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
(EHS) MANAGEMENT**

**Fire Prevention and Preparedness
Plan Requirements –
PAULINA SHREDDER**

MIDWEST REGION

Written: January 2014

REV 4: 2/2024

Page 20 of 20

APPENDIX B - FLIR TEMPERATURE LOG

SIMS METAL MANAGEMENT THERMAL IMAGE LOG YARD 10			MONDAY	TUESDAY	WEDNESDAY	THURSDAY	Friday	Saturday	Sunday
WEEK OF:									
Wet Cars									
Clips									
SI									
HULKS									
DNF									
SHRED									



**Cleaning Schedule
Metal management Midwest –
Paulina Facility**

	Indoor Areas cleaned ¹		Cleaning Products/Tools
1 pay rolled Janitress	Monday	Administrative Office, Shredder Scale Office, Shredder Op's office (including locker and restroom area) Ferrous Dept	Household cleaning agents and disinfectants, brooms, dust pans, vacuum, mops, dust clothes and or paper towels.
	Tuesday	Transportation Office, Truck Shop Dept., Wood St. Peddler Scale Office, MRP Breakroom, Shredder Breakroom [behind Shredder Operations Office], Shredder Weld Shop (including locker and restroom area as applicable), Ferrous dept	
	Wednesday	Administrative Office, Commercial Dept., Non-Ferrous Dept. (including locker and restroom area as applicable), Ferrous dept.	
	Thursday	Transportation Office, Wood St. Peddler Scale Office, Shredder Scale Office, Shredder Operations Office (including locker and restroom area as applicable), Ferrous dept.	
	Friday	Commercial Dept., MRP Breakroom, Shredder Breakroom [behind Shredder Operations Office], Shredder Weld Shop (including locker and restroom area as applicable), Ferrous dept, Midwest Training Office [trailer] (as required)	
Hourly Employees	Mon – Sat	Each department will be responsible for daily cleaning of breakrooms and restrooms on the days that Janitress is not assigned to their department.	Household cleaning agents and disinfectants, brooms, dust pans, vacuum, mops, dust clothes and or paper towels, trash bags

¹ What is presented in this document is a generalized schedule; certain circumstances may affect the schedules as shown.

Outdoor Areas cleaned			Page 2 of 2
			Cleaning Products/Tools
Cleaning Crew²	Morning M-F	Paulina train tracks North to Blue Island; Blue Island to the West bus stop; Blue Island to the East bus stop	Brooms, rakes, shovels, dust pans, wheel barrels, weed whacker, scrapers, trash bags.
Cleaning Crew	Morning M-F	Paulina South of train tracks East and West side of street to admin building; shredder walkway	
Cleaning Crew	Morning M-F	Paulina South of admin building to end of Paulina East and West side of street leading to Scale 1 building	
Cleaning Crew	Afternoon	Trucking fence line; NFW fence line	
Cleaning Crew	Bi-weekly	Ferrous Yard Fence Line; Northern Fenceline at Shredder	
Cleaning Crew	Weekly	Wood St parking lot to Trucking	
Hourly Employee	Saturday	Emptying of drums used as trash receptacles throughout Paulina	
Cleaning Crew	Saturdays as needed.	Yard cleanup or completing an off -site cleanup	Same tools as listed above.
Cleaning Crew	As Needed	Grainger Parking lot	Based on visual review by Sims Mgmt or upon direct request. Same supplies as listed above.
Cleaning Crew		City of Chicago Streets and Sans Parking Lot	
Cleaning Crew		Boat Yard	
Cleaning Crew		Ashland from Blue Island to Battaglia	
Cleaning Crew		Manjares Parking lot	
Cleaning Crew		Battaglia Parking lot (fenced area)	
Cleaning Crew		Battaglia/Boat yard entrance	
Hourly Employee (s)	Multiple times per day documented on sweeping and watering logs	Street Sweeping	This activity can be weather dependent. Hot, dry summer days will have water truck out all day. Days below freezing, we are unable to employ the water truck. Rainy/snowy days may restrict usage of both.
Hourly Employee (s)		Water Truck (s)	

² Cleaning Crew consists of 3 workers and 1 supervisor.



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 1 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

1.0 PURPOSE:

To detail the written and oral Emergency Action Plan (EAP) at the Paulina Campus Facility located at **2500 S. Paulina St., Chicago, IL, 60608**. The purpose of an EAP is to facilitate and organize employer and employee actions and response during workplace emergencies.

2.0 TYPES OF EMERGENCIES

Emergencies include – but are not limited to:

- Fire
- First Aid and Medical situations
- Chemical spills and splashes
- Radioactive Material
- Severe weather such as tornados, heavy rain and lightning
- Guns, Ammunition and Weapons found in scrap
- Bomb Threat and Explosions
- Workplace Violence
- Electrical Emergencies
- Person overboard in water
- Receipt of Hazardous Materials

3.0 RESPONSIBILITY:

An emergency action plan must be in writing, kept in the workplace, and available to employees for review.

4.0 PLAN COORDINATOR:

The Emergency action plan will be coordinated by:

Christopher Daniels – EHS Specialist (708) 446-5602

5.0 SITE COORDINATOR

The Site Coordinator is the Operations Manager. In an emergency situation the Operations Manager will be responsible for the safety of the employees and visitors on the site. In the event of an emergency the duties of the Operations Manager are¹:

- Determine the action to be taken based on the type of emergency encountered.
- Determine if the facility should be evacuated and sound the alarm.
- Make sure Emergency Services have been contacted, if deemed necessary

¹ Certain duties may be delegated to supervisory staff to ensure that responsibilities are met



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 2 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

- Ensure to the extent possible that all employees have been evacuated from the area in which the emergency is occurring and that a headcount is taken at the rally location.
- Act as a liaison with Emergency Personnel

If the Operations Manager is not here, or not able to perform their duties, the Alternate will take over.

Paulina Campus / Senior Management:

- Site Coordinator - Theodore Moore – Operations Manager – 312-502-8394
- Alternate Coordinator - Christopher Daniels – EHS Specialist – 708-.446-5602
- Alternate Coordinator - Debbie Hays – Environmental Specialist – 312.343.4549
- Alternate Coordinator - Ryan Smith – Asst. Director of Operations – 203.499.8446

6.0 EMERGENCY REPORTING

In the event of an emergency, the employee should immediately report the emergency to his/her supervisor. If the emergency is critical, the contacts below should be used based on the emergency type. The Operations Manager or their designee should either contact Emergency Services personally or confirm that the call has already been placed.

Fire, Medical, Bomb Threat, Violence	911 & Your Supervisor
Security Coordinator	Pete Knefel 312-343-4430
Poison	1-800-222-1222
Chemical Spill or Release	<p>Primary: EHS Specialist Christopher Daniels 708.446.5602</p> <p>Secondary: Environmental Specialist Debbie Hays 312.343.4549</p>
Radioactive Material	<p>IEMA 630 293 8286 Nuclear Regulatory Commission 217-785-9900 Kelly Grahn – IEMA - (630) 293-6348 Nuclear Regulatory Commission 217-782-2700</p>



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 3 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Hazardous Materials: 24-hour emergency services	<u>Notify Primary and Secondary contacts listed above.</u> <table><tr><td>Bartos, Mike Hygieneering Director, Environmental Services (630) 654-2550 Work (630) 742-6388 Mobile mbartos@Hygieneering.com 7575 Plaza Court Willowbrook, IL 60527</td><td>Alan Shapiro Hazchem Environmental Corp Vice President (630) 458-1910 Work (630) 918-7435 Mobile ashapiro@hazchem.com 1114 W. National Avenue Addison, IL 60101 www.hazchem.com</td></tr></table>	Bartos, Mike Hygieneering Director, Environmental Services (630) 654-2550 Work (630) 742-6388 Mobile mbartos@Hygieneering.com 7575 Plaza Court Willowbrook, IL 60527	Alan Shapiro Hazchem Environmental Corp Vice President (630) 458-1910 Work (630) 918-7435 Mobile ashapiro@hazchem.com 1114 W. National Avenue Addison, IL 60101 www.hazchem.com
Bartos, Mike Hygieneering Director, Environmental Services (630) 654-2550 Work (630) 742-6388 Mobile mbartos@Hygieneering.com 7575 Plaza Court Willowbrook, IL 60527	Alan Shapiro Hazchem Environmental Corp Vice President (630) 458-1910 Work (630) 918-7435 Mobile ashapiro@hazchem.com 1114 W. National Avenue Addison, IL 60101 www.hazchem.com		
Occupational Clinic	EHS Department or HR Concentra 3145 S. Ashland Ave Chicago, IL 773-254-5516		

7.0 EMERGENCY CONTACTS

Paulina Campus / Senior Management:

- Theodore Moore – Operations Manager – 312-502-8394
- Christopher Daniels – EHS Specialist – 708-.446-5602
- Debbie Hays – Environmental Specialist – 312.343.4549
- Ryan Smith – Assistant Director of Operations – 203.499.8446

Shredder/MRP Plant:

- Sam Flores – Plant Manger – 312.502.7768
- Manuel Quintero – Plant Supervisor– 312.343.4487
- James Curry – Plant Supervisor - 312-405-6851
- Brandon Schmid –Plant Supervisor– 773.896.4096
- Pablo Montelongo – Plant Supervisor– 312.343.0970
- Joseph Cihak– Plant Supervisor– 312.639.2329
- James Curry – Plant Supervisor - 312-405-6851

Non-Ferrous:

- Ricardo Jaime – Plant Manger – 312.502.7768
- Martin Avila – Plant Supervisor– 312.343.0970

Ferrous:

- Maria Medina – Plant Manger – 773.675.7647
- Bill Heath – Plant Supervisor– 773.410.6112
- Leslie Aguila – Plant Supervisor – 773.497.1203

CIM/Transportation:

- Kevin Post – Transportation Manager – 773.798.9012



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 4 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

8.0 TYPES OF EMERGENCIES

Fire

See Fire Prevention and Preparation Plan as enclosed at the end of this plan.

The first employee aware of a fire in the facility is required to notify a supervisor or manager immediately. Based on the severity of the event, the notified leader may deem to institute fire containment procedures to begin utilizing the equipment at the facility. If in the leader's opinion there is a danger to any employee, emergency personnel will be called immediately. Intervention activities are intended to prevent the spread of the fire until emergency services can arrive to extinguish the fire.

Based on the Leader's or Professional Emergency Service Personnel's opinion of the severity of the event a partial or full evacuation could be ordered. In the event that an evacuation is ordered, employees should move safely and orderly to the Rally Location(s). See Appendix I - Facility Diagram for extinguishers, fire exits and rally locations.

The Operations Manager is responsible for ensuring that all employees are at the rally point(s) as identified on the facility diagram. The Operations Manager, and/or their designee(s), are also responsible for locating customers or drivers on-site and moving them to the rally location based on the visitor sign in log at the administration office or the scale log. A head count must be performed. All persons that are unaccounted for will be communicated to Emergency Response.

Medical Events

In the event that an employee or visitor suffers an injury or medical condition, while on our property, the Operations Manager or their designee(s) will determine whether the condition requires outside emergency personnel (when in doubt call 911). The facility must have First Aid supplies and an AED available in a designated area. (See Appendix I - Facility Diagram for First Aid Cabinet locations)

Chemical Splashes and Spills

In the event that an employee suffers a chemical splash to his eyes or face, the operator must be able to access an eye wash station. Eye wash stations must be clearly marked and free from obstacles. Medical treatment will be supplied as necessary. (See Appendix I - Facility Diagram for eye wash locations).

If there is a chemical or toxic material spill/release, the spill/release may meet reporting requirements of the state. Reporting and clean up procedures should be followed as



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 5 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

outlined in the site's Spill Control and Countermeasure Plan (SPCC). If the site does not have an SPCC, then the spill procedures in the SWPPP will apply.

Radioactive Material

In the event that a load or object sets off the scale radiation detectors, a supervisor or manager must be notified. The load must be re-run through the detectors. Screening the load with the handheld radiation detector is needed to isolate it in the load. The load should then be segregated. The EHS department should be notified, and if necessary, the object should be reported to IEMA. (see policy on Radioactive Materials)

Severe Weather

In the event that severe weather occurs, such as a blizzard, tornado or lightning, certain operations in the Plant may be stopped based on the Leader's opinion of the severity of the event. Employees who have become aware of the approach of a tornado should immediately make their supervisor aware of the pending event. If a full or partial evacuation is ordered, employees and visitors will follow escape routes and meet in the designated shelter location(s) (see Appendix I - Facility Diagram for shelter locations).

Munitions found in scrap

In the event that munitions of any kind are found, it must be treated seriously and as if it is live or active. It must be reported to the Operations Manager who will initiate a response. If a full or partial evacuation is ordered employees and visitors will follow emergency escape routes to rally location. The Operations Manager or their designee(s) will contact the EHS department when munitions are found in scrap who will in turn notify the appropriate law enforcement officials to conduct an investigation and removal. Employees should not touch or move the object. Keep all personnel and visitors out of the area until the Operations Manager receives an "all clear" from the authorities.

Personal Threats, Bomb Threats and Explosions

In the event that a person comes on site with a gun or other weapon, the first person aware of this threat must notify their leader. The leader will call 911 and attempt to remove as many people as possible from the area in which the person is located. No one is to attempt to remove the weapon from this person.

If a bomb or bomb threat is suspected, it must be treated seriously. All suspicious packages or things that seem out of place must be reported to the Operations Manager to initiate responses to bomb threats. The person who receives the threat must fill out the checklist (see form), if possible. Evacuate the workplace and go to the identified rally location. Have law enforcement officials conduct the search and investigation. No one is to ever look for bombs! Keep all persons out of the area of concern until the "all clear" is issued from the police or bomb squad.

If a threat is received over the phone, the person getting the call must notify someone else in the office to call a supervisor and 911. The person who received the call must



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 6 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

keep the caller on the line for as long as possible asking any question possible and noting any details, such as if the caller is male or female; if there is an accent; if there are background noises such as traffic or a train, etc. Never hang up the phone even if the caller hangs up.

Workplace Violence

In the event that workplace violence occurs involving the use of weapons, all persons should evacuate the affected area and meet in the designated rally location. A member of management will place the call to 911, from a land line if at all possible.

Workplace violence such as acts of harassment and aggression, should be immediately brought to a leader's attention. Please refer to HR's Workplace Violence Rules for more information on this subject.

Electrical or Mechanical Emergencies

In the event that an electrical or mechanical incident arises, such as downed high voltage wires, all persons should evacuate the area and meet in the designated shelter location. If the downed lines fall on a vehicle or piece of mobile equipment the employees should remain in the vehicle unless a fire develops, or it becomes unsafe to do so. If you must exit the vehicle, and only in the event of fire or unsafe conditions exist inside the vehicle, jump as far as possible away from vehicle without touching metal pieces.

The Operations Manager or their designee will contact any necessary emergency service personnel.

Person Overboard into water

Personal flotation devices (PDF) and Life Rings with 100' of rope must be kept every 75 feet along the dock by rivers, canals and lakeshores where and when barges are being loaded or unloaded. Personal flotation devices and life rings should be readily available. All employees working on a barge must use company provided PFDs. Employees shall not work alone around water and will always work in pairs.

In the event that an employee falls overboard into the water, the life ring shall be thrown to them in water. No other employee should enter the water to rescue a employee. If necessary, deployment of a rescue boat will occur to reach the employee. It is important to consider the risk of hypothermia when water is cold. The Operations Manager or their designee will call rescue services as needed.



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 7 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Hazardous Materials:

- Potentially Asbestos Containing Material: If, for example, pipes or ductwork has been offloaded and we see that it has material wrapped around it; we will assume it is PACM until lab analysis comes back showing us it is not. DO NOT MOVE MATERIAL. Wet material down and cover with a tarp. Do not allow any other customer to off load in this area and place cones on the ground surrounding the area. Call emergency contractor, listed above, to come out and take a sample of material to send to lab to confirm if asbestos is present. If Asbestos is found to be present, emergency contractor is to immediately take any and all necessary notification steps to remediate and remove hazard from our property.
- Hazardous or Unknown substances in closed containers: DO NOT OPEN CONTAINER. Notate any identifying words, symbols, numbers, manufacturer, or any other information that will assist in determining content. Move container to area where “unacceptable materials” are stored. Protect container from contact with moving vehicles and contact customer to begin investigation into origin and identification of unknown substance. If origin and identification of substance is still unknown, contact environmental consultants and emergency contractor to come on site and work towards the determination of contents.
- Biohazards – should a container come in with “sharps” such as needles or razors, or another type of biohazard is encountered, never touch the material or object presenting the hazard. Move materials with shovels or the bucket of a skid steer and place inside a gaylord box or other type of holding container. Contact HAZCHEM listed above and they will be able to pick up and properly dispose of this type of material.

9.0 ELEMENTS OF AN EAP

a. Emergency Procedures

In the event that an evacuation is required in response to an emergency, all persons must exit according to escape routes through designated walkways and congregate at the identified rally location. No person(s) may leave the site until they have been accounted for by the Operations Manager or their designee.

Facility Evacuation and Escape Routes

In the event that the building should need to be evacuated, all persons should quickly and calmly follow the escape routes to the nearest exit. All exit paths, corridors, stairs and doors must be free from obstacles and clearly marked. Exit doors must have a closing mechanism that prevents them to be locked. Fire doors must be kept closed at all times. Once outside the building, all persons should move safely and orderly to the



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 8 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Rally Location using each facility's designated escape routes and walkways. Vehicles should follow designated traffic flows.

Rally Location

All persons should go to the rally location deemed appropriate by the Operations Manager or their designee based on the type and location of emergency.

Employees should remain clear of the gates to allow emergency vehicles entry. At the Rally Location an accounting of employees will be taken and any required basic first aid will be administered. Employees should remain in this location and not leave the premises and not return to the building. Whether employees are allowed to leave the property or should remain until an "All Clear" signal is given is the discretion of the Operations Manager and/or Emergency Personnel.

Sheltering in Place

Some emergencies (i.e. tornadoes) require that rather than exiting the building, employees take shelter in a windowless, interior room in a basement, if possible. Should the Operations Manager or their designee determine it is necessary to take shelter; employees should meet at the designated location. (see Appendix I - Facility Diagram for location).

Procedures to account for all employees, visitors and drivers during an evacuation:

Prior to an evacuation the Operations Manager or their designee must assign the duty of collecting the visitor log to an individual to be brought to the rally location. During an evacuation, employees must meet at the designated rally location for a head count. The Operations Manager will account for all employees based on who came to work that morning. No employee is allowed to leave the facility without the permission of the Operations Manager or their designee.

The Visitor Log will be used to account for contractors and other visitors at our facility. This log is maintained in reception area and if equipped the digital version may be utilized.

To account for drivers in the Plant: Within the SAI Scale program Scale Operators are to go to the Truck/Rail Scale Screen (8500 program) and create/print screen shot showing who is in the Plant. The scale operator is to bring this listing to the Operations Manager.

b. Procedures for assisting workers and visitors with disabilities:



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 9 of 15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

The Operations Manager or their designee will verify that all workers and visitors with disabilities are assisted during evacuation through a buddy system. It should be determined prior to an emergency who may need additional assistance in the event of an emergency. The person(s) assigned as a “buddy” will be apprised of his/her role through training prior to the evacuation.

c. Procedures to be followed by general employees and employees performing rescue or medical duties;

Employees not performing first aid should assist emergency personnel into the facility by directing them to the area of emergency. Employees will do this by stationing themselves from Blue Island Avenue to the facility’s front gate and to the area of emergency.

A first response team has been formed to assist in case of an emergency. A separate living document is maintained and available in the appendix.

d. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;

In the event of an evacuation, certain trained individuals may be required to remain behind to shut down critical equipment or ensure everyone has exited the building.

- **Operators** will perform a manual shutdown procedure before evacuating.
- The Plant Manager can designate a person to be the last one out, making sure all other individuals have exited the building.

The Plant Manager should have a cell phone and/or radio to communicate with Safety Personnel, Management and Employees.

e. Procedures for special situations, such as precautions involved with certain chemicals and equipment;

All fixed equipment and mobile equipment should be shut down and de-energized, if it is safe to do so.

- Shredder: Shut down and turn off.
- Mobile Equipment: shut down and turn off.
- Ferrous – Bonfig shut down and turn off.
- Non-Ferrous – Bailer, shut down and turn off.
- MRP – Shut down and turn off entire plant

10.0 EMPLOYEE NOTIFICATION SYSTEM:



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 10 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

An employer must have and maintain an employee notification system. The employee notification can be accomplished by alarms or verbal communication systems. Notification methods must be reviewed with all employees.

The notification systems used for the **Paulina Campus** will be:

- 2-way radio communication
- Cell phone and email communication
- Verbal command

11.0 TRAINING:

An employer must designate and train employees to assist in a safe and orderly evacuation of other employees. Review of the plan will be conducted by Operations Manager. Records of such reviews will be kept with Human Resources as well as within the electronic training database.

All employees at this location will be trained on this Plan:

- a. Upon hiring in (within 30 days),
- b. After reassessments / changes in the Plan
- c. When changes of responsibility occur
- d. Annually

12.0 REVIEW & VERIFICATION:

An employer must review the emergency action plan with each employee covered by the plan:

- When the plan is developed, or the employee is assigned initially to a job.
- When the employee's responsibilities under the plan change.
- When the plan is changed.

13.0 COMMUNICATION WITH OUTSIDE SOURCES

In order to maintain a consistent response and release of information to either the media or investigators following an emergency, employees should have the questions directed to the Government and Community Relations Manager.



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 11 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Record of Revisions

Date	Revision	Performed By
2/16/2023	<ol style="list-style-type: none"> 1. Update Section 6 table w/ Christopher Daniels information. 2. Update Section 9C to reflect first response team live document now located in the appendix. 3. Update section 7 Added Eric Carrasco. 4. Moved evacuation maps to separate appendix document. 5. Added Record of Revisions Log 6. Program Audited 	Christopher Daniels
11/10/2023	<ol style="list-style-type: none"> 1. Remove Eric Carrasco as supervisor in Section 7 2. Add Brandon Schmid to section 7 as a supervisor. 3. Theodore Moore Title change from Plant Manager to Operations Manager – Entire Document 4. Removed First Responder specific list and added live document to appendixes for all first responders 	Christopher Daniels
3/20/2024	Addition of Hazardous Materials Contractors and Section	Debbie Hays
3/25/2024	Merged all Plants at Paulina and Wood Street to a single EAP	Christopher Daniels
4/2/2024	Merged Appendix into document and added MERT& Bomb threat checklist	Christopher Daniels



**EMERGENCY ACTION
PLAN**
Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 12 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

EMERGENCY ACTION PLAN APPENDIX



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 13 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Evacuation Map

PAULINA CAMPUS EVACUATION MAP



- Rally Point
- First Aid Kit/AED
- Fire Extinguisher
- Rescue Ladder
- Shelter In Place
- Life Ring/Flotation Device



EMERGENCY ACTION PLAN

Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 14 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Medical Emergency Response Team (MERT)

	A	B	C	D	E	F	G	H
1	Course Date	Course	eCard Code	Instructor	First Name	Last Name	Email	Yard
2	2/15/2023	BLS Provider	235415057889	Christopher Daniels	David	Bradley	davidfbradley@gmail.com	Paulina
5	2/15/2023	BLS Provider	235415057892	Christopher Daniels	Leticia	Arellano	leticia.arellano@simsmm.com	Paulina
6	2/15/2023	BLS Provider	235415057893	Christopher Daniels	Samuel	Flores	sam.flores@simsmm.com	Paulina
7	2/15/2023	BLS Provider	235415057894	Christopher Daniels	Alejandro	Luna	valuva12151991balam@gmail.com	Paulina
8	2/15/2023	BLS Provider	235415057895	Christopher Daniels	Ricardo A	Jaime Jr	ricardo.jaime@simsmm.com	Paulina
9	2/15/2023	BLS Provider	235415057896	Christopher Daniels	Bill	Heath	bill.heath@simsmm.com	Paulina
10	2/15/2023	BLS Provider	235415057897	Christopher Daniels	Theodore	Moore	theodore.moore@simsmm.com	Paulina
11	2/15/2023	BLS Provider	235415057898	Christopher Daniels	Jose Luis	Villa	jose.villa@simsmm.com	Paulina
12	2/15/2023	BLS Provider	235415057899	Christopher Daniels	J Santos	Ramirez	santos.ramirez@simsmm.com	Paulina
15	2/15/2023	BLS Provider	235415057902	Christopher Daniels	Bryan	Perez	bperez0810@icloud.com	Paulina
16	2/15/2023	BLS Provider	235415057903	Christopher Daniels	Phillip	Laing	latgen1963@yahoo.com	Paulina
17	2/15/2023	BLS Provider	235415057904	Christopher Daniels	James	Curry	James.Curry@simsmm.com	Paulina
18	2/15/2023	BLS Provider	235415057905	Christopher Daniels	Ramiro	Gonzalez	superdoc7701@gmail.com	Paulina
19	2/15/2023	BLS Provider	235415057906	Christopher Daniels	Guadalupe	Padilla	guadalupe.padilla@simsmm.com	Paulina
20	2/15/2023	BLS Provider	235415057907	Christopher Daniels	Manuel	Quintero	manuel.quintero@simsmm.com	Paulina
21	2/15/2023	BLS Provider	235415057908	Christopher Daniels	Benjamin	Perez	benjamin.perez@simsmm.com	Paulina
22	2/15/2023	BLS Provider	235415057909	Christopher Daniels	Diana	Fuentes	diana.fuentes@simsmm.com	Paulina
24	2/15/2023	BLS Provider	235415057911	Christopher Daniels	Ryan	Smith	ryan.smith@simsmm.com	Paulina
25	2/15/2023	BLS Provider	235415057912	Christopher Daniels	Martin	Avila	martin.avila@simsmm.com	Paulina
29	2/15/2023	BLS Provider	235415057917	Christopher Daniels	Luis	Loera	luis.loera@simsmm.com	Paulina
30	2/15/2023	BLS Provider	235415057918	Christopher Daniels	Marcia	Farmer	marcia.farmer@simsmm.com	Corp
31	2/15/2023	BLS Provider	235415057919	Christopher Daniels	Orla	Kelly	orla.kelly@simsmm.com	Paulina
34	6/12/2023	BLS Instructor	11579486		Christopher	Daniels	chris.daniels@simsmm.com	Paulina



EMERGENCY ACTION PLAN

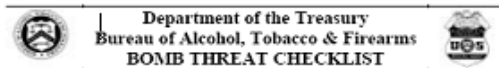
Paulina - Campus

Revision Date
03/21/2024

PAGE
Page 15 of
15

2500 S. Paulina St.
Chicago, IL, 60608
773-254-1200

Bomb Threat Checklist



Department of the Treasury
Bureau of Alcohol, Tobacco & Firearms
BOMB THREAT CHECKLIST

- When is the bomb going to explode?
- Where is the bomb right now?
- What does the bomb look like?
- What kind of bomb is it?
- What will cause the bomb to explode?
- Did you place the bomb?
- Why?
- What is address?
- What is your name?

EXACT WORDING OF BOMB THREAT:

Sex of caller: _____ Race: _____
 Age: _____ Length of call: _____
 Telephone number at which call is received: _____
 Time call received: _____
 Date call received: _____

CALLER'S VOICE

- | | |
|-----------------------------------|-----------------------------------|
| <input type="checkbox"/> Calm | <input type="checkbox"/> Nasal |
| <input type="checkbox"/> Soft | <input type="checkbox"/> Angry |
| <input type="checkbox"/> Stutter | <input type="checkbox"/> Loud |
| <input type="checkbox"/> Excited | <input type="checkbox"/> Lisp |
| <input type="checkbox"/> Laughter | <input type="checkbox"/> Slow |
| <input type="checkbox"/> Rasp | <input type="checkbox"/> Crying |
| <input type="checkbox"/> Rapid | <input type="checkbox"/> Deep |
| <input type="checkbox"/> Normal | <input type="checkbox"/> Distinct |

- | | |
|---|--|
| <input type="checkbox"/> Slurred | <input type="checkbox"/> Whispered |
| <input type="checkbox"/> Ragged | <input type="checkbox"/> Clearing Throat |
| <input type="checkbox"/> Deep Breathing | <input type="checkbox"/> Cracking Voice |
| <input type="checkbox"/> Disguised | <input type="checkbox"/> Accent |
| <input type="checkbox"/> Familiar (<i>If voice is familiar, who did it sound like?</i>) _____ | |

BACKGROUND SOUNDS:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Street noises | <input type="checkbox"/> Factory machinery |
| <input type="checkbox"/> Voices | <input type="checkbox"/> Crockery |
| <input type="checkbox"/> Animal noises | <input type="checkbox"/> Clear |
| <input type="checkbox"/> PA System | <input type="checkbox"/> Static |
| <input type="checkbox"/> Music | <input type="checkbox"/> House noises |
| <input type="checkbox"/> Long distance | <input type="checkbox"/> Local |
| <input type="checkbox"/> Motor | <input type="checkbox"/> Office machinery |
| <input type="checkbox"/> Booth | <input type="checkbox"/> Other (<i>Please specify</i>) _____ |

BOMB THREAT LANGUAGE:

- | | |
|--|---|
| <input type="checkbox"/> Well spoken (education) | <input type="checkbox"/> Incoherent |
| <input type="checkbox"/> Foul | <input type="checkbox"/> Message read by threat maker |
| <input type="checkbox"/> Taped | <input type="checkbox"/> Irrational |

REMARKS: _____

Your name: _____

Your position: _____

Your telephone number: _____

Date checklist completed: _____



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 1 of 7

1.0 BACKGROUND & PURPOSE:

- 1.1 It is not unusual for radioactive materials to be inadvertently mixed in with materials sent to scrap facilities for recycling. Common radioactive materials include gauges, static eliminators, and flow measurement devices, typically used in medical/dental and industrial process operations. It is also common to have some elevated radiation from mineral deposits in pipe which are naturally-occurring radioactive materials (NORM).
- 1.2 This document defines the company's requirements for detection systems and the procedures for managing situations when radioactive materials are detected.
- 1.3 The Facility Manager is responsible for assuring compliance with this procedure.

2.0 COMMUNICATION: Each Facility, in the Midwest, shall ensure that:

- 2.1 Appropriate employees shall be trained in radioactive materials detection and response initially, with annual refresher training thereafter. The training shall include training in this procedure, training in use of appropriate radiation detection equipment and in the visual detection of radioactive materials.
- 2.2 All persons in the following titles, at a minimum, shall receive training:
 - 2.2.1 Scrap buyers;
 - 2.2.2 Scale personnel;
 - 2.2.3 Inspection personnel;
 - 2.2.4 Torch cutters;
 - 2.2.5 Supervisors/Foreman; and
 - 2.2.6 Plant Managers
 - 2.2.7 Fleet Drivers
- 2.3 Suppliers shall be informed of the relevant portions of this procedure through each Facility's Inbound Quality Control Plan.

3.0 RADIOACTIVE MATERIALS ACCEPTANCE POLICY

- 3.1 Radioactive Materials Are **PROHIBITED** at all Facilities. Exceptions may only be made by the Regional President.

4.0 MINIMUM STANDARDS FOR RADIATION DETECTION:

- 4.1 **Requirement for Radiation Screening of Inbound Material:** All inbound materials received by the Facility shall be screened by at least one radiation detection system meeting the following requirements as outlined in section 4.2.
 - 4.1.1 In addition, "Suspect Materials" shall be individually screened with a handheld detector to confirm the absence of radioactive materials. "Suspect Materials" include medical/dental scrap, military scrap, aircraft scrap and industrial scrap with gauges or dial.



**FINAL RADIATION
DETECTION & RESPONSE**

4.2 **Scale, Gate Monitor and Other Panel Detection System Specifications** – The following detection system requirements apply to all radiation detection systems used at scales in SMM NA, regardless of the manufacturer (e.g., Radcomm, Thermo, Ludlum and Exploranium).

4.2.1 **Detector Systems**

4.2.1.1 **Truck Scale Detector Systems/Gate Monitors** – All scales, both inbound and outbound, shall have gate monitor detectors that meet the following requirements (i.e., equivalent to a Bicon 3000 or Radcomm RC4000):

4.2.1.1.1 Number of Panels: Minimum of two per scale.

4.2.1.1.2 Size of Panels: Minimum combined total of 3,000 cubic inches of plastic scintillator per scale system inbound scale and 6000 Cubic inches at rail scales.

4.2.1.1.3 Installation Requirements:

4.2.1.1.3.1 Detectors shall be installed according to manufacturer’s specifications/recommendations.

4.2.1.1.3.2 Detectors shall be positioned such that the panels vertically overlap with the vehicle bed that will hold the recyclable materials being delivered through that scale per manufacturer specifications/recommendations.

4.2.1.2 **Rail Scale Detector Systems/Gate Monitors**

4.2.1.2.1 Number of Panels: Min. of two per scale.

4.2.1.2.2 Size of Panels: Minimum combined total of 6,000 cubic inches of plastic scintillator per scale system (i.e., equivalent to a Bicon 3000 or Radcomm RC4000).

4.2.1.2.3 Installation Requirements:

4.2.1.2.3.1 Detectors shall be installed according to manufacturer’s specifications/recommendations.

4.2.1.2.3.2 Detectors shall be positioned such that the panels vertically overlap with the rail bed that will hold the recyclable materials being delivered through that scale.

4.2.1.3 **Platform Scale (4 x 4) Detector Systems (non-ferrous)**

4.2.1.3.1 Min. of one detector per scale.

4.2.1.3.2 Min. 450 cubic centimeters of plastic scintillator total.

4.2.1.3.2.1 Detector panel/media shall be installed according to manufacturer specifications.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 3 of 7

The Ludlum 375-600 and 3500-1000 meet, or exceed, these requirements.

- 4.2.2 Detector readouts shall be in close proximity to the weigh master and shall alarm for:
 - 4.2.2.1 Detection of radiation above background;
 - 4.2.2.2 For gate monitors, speed alarm (if vehicular traffic) set per manufacturer's recommendations, but in no case set higher than 5 mph; and
 - 4.2.2.3 Sensor failure.

5.0 MINIMUM STANDARDS FOR RADIATION DETECTION SYSTEM CHECKS

5.1.1 Weekly Checks of All Operating Systems

- 5.1.1.1 All systems shall be tested according to manufacturer's specifications. monthly by walking a five microcurie (5 uCi) to ten microcurie (10 uCi) source through the detector at the furthest point where scrap may pass through the detection system (e.g., for gate monitors, at the center of the scale or as otherwise specified by manufacturer. If the source is not detected, corrective actions should be taken. The date of this check shall be noted on a log.

5.1.2 Monthly Checks of All Operating Systems

- 5.1.2.1 All systems shall be tested according to manufacturer's specifications. monthly by walking a five microcurie (5 uCi) to ten microcurie (10 uCi) source through the detector at the furthest point where scrap may pass through the detection system (e.g., for gate monitors, at the center of the scale or as otherwise specified by manufacturer. If the source is not detected, corrective actions should be taken. The date of this check shall be noted on a log.

5.1.3 Tri-Annual Checks for All Operating Systems

- 5.1.3.1 All systems should be completely checked by the manufacturer or other qualified technician at least every two years. The check shall include a full evaluation of the system, and include a calibration check.
- 5.1.3.2 A report of this check shall be kept in the Facility's SHEC files.

5.1.4 Annual Checks for All Systems More than 7 Years Old

- 5.1.4.1 Place a five microcurie (5 uCi) to ten microcurie (10 uCi) source on a broom handle.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 4 of 7

- 5.1.4.2 Walk through the detectors at the furthest point where scrap may pass through the detection system with the source at the maximum height that scrap may pass through the detector (e.g., 13 feet for a truck scale). Verify detection.
- 5.1.4.3 Walk through the detectors at the furthest point where scrap may pass through the detection system with the source at the minimum height that scrap may pass through the detector (e.g., 2 feet for a truck scale that takes peddler traffic). Verify detection.
- 5.1.4.4 Walk through the detectors at the furthest point where scrap may pass through the detection system with the source at the approximate midpoint that scrap may pass through the detector (e.g., 7 to 8 feet for a truck scale). Verify detection.
- 5.1.4.5 If a system does not detect the source under any of the above scenarios, corrective actions should be taken. If system is greater than seven (7) years old it must be replaced by a system as defined in section 4.2 of this standard.
- 5.1.4.6 A report of this check shall be kept in the Facility's SHEC files.

6.0 RESPONDING TO A RADIATION DETECTION SYSTEM ALARMS

- 6.1 **Speed Alarm** – If a speed alarm goes off while a vehicle is driving through the radiation detection system, the vehicle shall be required to drive through the radiation detection systems again with no alarm before it can be accepted in the yard.
- 6.2 **Confirming a Radiation Alarm:**
 - 6.2.1 If a radiation alarm goes off while a vehicle is driving through the radiation detection system, first verify that the driver had not received any radiological treatments.
 - 6.2.2 If the driver has not received any treatments, the vehicle shall be required to drive through the radiation detector up to two (2) more times.
 - 6.2.2.1 If the radiation alarm is triggered by that vehicle twice, it shall be deemed a “Confirmed Radiation Detection”.
 - 6.2.2.2 If the radiation alarm is triggered by only one of the three passes, the initial alarm shall be considered a false reading.
- 6.3 **Responding to a “Confirmed Radiation Detection”** – The following shall be conducted in response to a confirmed radiation detection.
 - 6.3.1 **Characterize the Approximate Level of Background Radiation**
 - 6.3.1.1 Isolate the vehicle.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 5 of 7

- 6.3.1.2 Get a hand-held radiation detector, check calibration date, turn it on, check battery level indicator, check detector with check source to ensure it is reading correctly.
- 6.3.1.3 Move to a location at least 150 feet from the vehicle
- 6.3.1.4 Take the reading from the meter, this is background.
- 6.3.2 **Characterize the Maximum Level of Detectable Radiation at On the Vehicle**
 - 6.3.2.1 Slowly walk the handheld detector along all accessible sides of the vehicle and identify the approximate location on the vehicle where the radiation level is the highest.
 - 6.3.2.2 Return to the approximate area where the radiation level is the highest, and find the spot where the radiation reading is the highest. **NOTE: If at any time the radiation reading is more than 100 times background or 2,000 μ R/hr, STOP screening for radiation and call the Facility Manager and SHEC Manager.**
 - 6.3.2.3 Take the reading from the meter at this location. This is the maximum detectable radiation.

Note: Exposure to 2 mR/hour for an entire hour is equivalent to the additional radiation exposure that one would get from visiting Denver for a week. Exposure to 2 mR/hour for an entire hour is equivalent to the additional radiation exposure that one would get from visiting Denver for a week. This additional radiation exposure is caused by increased cosmic radiation, because you are closer to the sun.

- 6.4 **Make Appropriate Notifications to Company Personnel to Advise them that the Load Will Be Rejected**
 - 6.4.1 Call the Facility Manager and transmit the information.
 - 6.4.2 Call the Buyer for that Supplier.
 - 6.4.3 Site EHS Specialist will call State Radiation Control Office as required by state regulations. (see EAP for contact info for IEMA)
 - 6.4.3.1 All instruction on movement of material will now be at the direction of IEMA.
 - 6.4.4 Record all actions on incident report within Velocity.
- 6.5 **Reject the Load**
 - 6.5.1 Material Being Transported on a Company-owned or contracted vehicle:
 - 6.5.1.1 Complete the DOT Exemption Paperwork and Submit to IEMA
 - 6.5.1.1.1 See Attachment 2 for DOT Exemption form.



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 6 of 7

- 6.5.1.1.2 Print a DOT Exemption Form
- 6.5.1.1.3 Email to IEMA so a number can be assigned to exemption form.
- 6.5.1.2 Fill out the DOT Exemption Form
 - 6.5.1.2.1 A completed sample is on the web site for reference.
- 6.5.1.3 Email the completed DOT Exemption Form to the state official for your state.

NOTE: DOT Exemptions are only issued during normal business hours. Therefore, the vehicle may need to be parked if it is not normal business hours to wait for an approved DOT Exemption. Alternately, if the state authority allows, the Facility may choose to dump the load and isolate the source of the radioactivity. Then, the truck can be immediately put back in service.

- 6.5.1.4 Call the state official, and state that you are: “Calling to follow-up on a DOT Exemption Form that we just faxed”.
- 6.5.2 Material Being Transported on a Supplier owned or contracted vehicle
 - 6.5.2.1 The obligation for the DOT Exemption applies to the transporter, NOT the receiving facility. However, if a significant radiation source is identified, there is an obligation to notify appropriate regulatory agencies of the source so that it can be tracked to assure proper management. Therefore, the following applies
 - For very low-level sources (<100 times background or <1,000 uRem/hour and there is no visibly identifiable source)
 - 6.5.2.1.1 Ask the supplier if he would like us to obtain the DOT exemption for him.
 - 6.5.2.1.1.1 If he does not ask us to get the exemption, just reject the load and send letter found in ATTACHMENT 1
 - 6.5.2.1.1.2 If he asks us to get the exemption, follow above. When the exemption is obtained forward it to the supplier.
 - 6.5.2.1.2 For other sources (>100 times background or >1,000 uRem/hour or if there is a visibly identifiable source)
 - 6.5.2.1.2.1 Advise the supplier that we will be notifying the state agency of the presence of the radioactive source.
 - 6.5.2.1.2.2 Ask the supplier if he would like us to obtain



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL RADIATION
DETECTION & RESPONSE**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October, 2008

Page 7 of 7

the DOT exemption for him.

6.5.2.1.2.2.1 If he does not ask us to get the exemption, just reject the load but report to IEMA.

6.5.2.1.2.2.2 If he asks us to get the exemption, follow 6.5.1.1, above. When the exemption is obtained, forward it to the supplier.

NOTE: DOT Exemptions are only issued during normal business hours. Therefore, the vehicle may need to be parked if it is not normal business hours to wait for an approved DOT Exemption. Alternately, if the state authority allows, the Facility may choose to dump the load and isolate the source of the radioactivity with oversight by the state agency. Then, the truck can be immediately put back in service.

6.6 Receive the DOT Exemption and Reject the Load

6.6.1 Typically within 30 minutes, the State Radiation Official will return a signed copy of the DOT Exemption Form with an Approval Number.

6.6.2 Make a copy of the paperwork, give it to the vehicle driver, and send the truck on its way.

6.6.3 Record the Rejection on the Detailed Inspection Log.

6.7 Complete Company Incident Report

6.7.1 Complete an Incident Report - Attach a copy of the Approved DOT Exemption Form to the Report



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**FINAL DRAFT RADIATION
DETECTION & RESPONSE –
ATTACHMENT 1**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October 2008

Page 1 of 1

Dear Supplier:

Radioactivity was detected in the load of recyclable material you transported to our facility. We rejected this load, because we are not equipped to process radioactive materials at our facilities.

Under U.S. Department of Transportation (DOT) regulations (40 CFR 106, 107 and 171-180), radioactive materials may not be offered or transported by highway or rail without meeting DOT requirements. Under DOT Exemption E-10656, State Radiation Control Officials authorize the transportation of this material from our facility back to the facility of origin, without meeting all of the requirements for radioactive materials specified in DOT regulations. We will be contacting the State Radiation Control Officials to obtain an exemption, so that you can return this load legally to the facility of origin.

If you need additional information, the State Radiation Control Officials can be reached at:

We thank you for your understanding and being patient while we deal with this matter

Sincerely

DISCLAIMER: This scrap metal facility provides this letter as a courtesy, in an attempt to make it easier for our suppliers to manage a radioactive material that was brought to our facility. The information in this letter may be inaccurate or otherwise misleading, and we make no warranty regarding the information in this letter. We strongly recommend that you retain legal counsel to ensure that you are managing all radioactive materials safely, and in accordance with applicable laws and regulations.



SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE

**RADIATION DETECTION &
RESPONSE – ATTACHMENT 2
DOT EXEMPTION FORM**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October 2008

Page 2 of 3

Annex A DOT-SP 10656 SHIPMENT APPROVAL FORM

Approval Number _____ (Refer to SP 10656, paras. 8.a.-8.b.)

This shipment of scrap metal or related materials for recycle contains unidentified radioactive material causing low levels of radiation outside the transport vehicle. Shipment is under Special permit DOT-SP 10656 without a determination of materials meeting or not meeting the regulatory definition of radioactive material. The shipment is a minor radiological concern based on considerations of the U.S. Department of Transportation and the state official signing this shipment approval document.

In case of an emergency, notify the National Response Center @ 800-424-8802 and the **®** authorizing official and give the Special permit No. and Approval No.

SECTION 1 - DETAILS of DETECTION SITE, MATERIALS, ORIGIN, and DESTINATION

① Detection Facility

Facility name: _____ Type: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____

Description of scrap and release risks: _____

Radiation Measurement

Survey Date (YYYY-MM-DD): _____ Survey Time (HH:MM 24hr): _____

Bkg. reading: _____ Units: _____ Vehicle cab (max): _____ Units: _____

Load (max): _____ Units: _____

Location of highest reading on vehicle and additional info:

Instrument manufacturer/model: _____

Surveyor's name: _____ Organization: _____ Phone: _____

② Carrier

Company name: _____ Operator: _____

Mode: _____ Vehicle type: _____ Vehicle I.D. #: _____

Contact person: _____ Email: _____ Phone: _____

③ Shipment Origin

Company name: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____



**SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE**

**RADIATION DETECTION &
RESPONSE – ATTACHMENT 2
DOT EXEMPTION FORM**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October 2008

Page 2 of 3

SP-10656 Approval Number _____

④ Destination for Identification and Disposition Check if same as Shipment Origin ③

If carrier and shipper to this location are different than ②, provide their information in "Section 5 - Remarks, Other Information".

Company name: _____

Address: _____

Contact person: _____ Email: _____ Phone: _____

SECTION 2 - RADIATION CONTROL OFFICIALS

⑤ Origin State Official

Name: _____ Organization: _____

Phone: _____ Email: _____

⑥ Transit State(s) Official(s)*

Name: _____ Organization: _____

Phone: _____ Email: _____

Name: _____ Organization: _____

Phone: _____ Email: _____

*Additional Transit State information should be listed in the "Section 5 - Remarks, Other Information".

⑦ Destination State Official Check if same as Origin State Official ⑤

Name: _____ Organization: _____

Phone: _____ Email: _____

SECTION 3 - APPROVAL of SHIPMENT and SPECIAL CONDITIONS

⑧ Detection State Official Check if same as Origin State Official ⑤

Name: _____ Title: _____ Organization: _____

Phone: _____ Email: _____

Special Conditions:

Date: _____ Signature: _____

DOT-SP process initiated, but not completed. Provide comments in "Section 5 - Remarks, Other Information".



SAFETY, HEALTH, ENVIRONMENTAL & COMMUNITY
MANAGEMENT PROCEDURE

**RADIATION DETECTION &
RESPONSE – ATTACHMENT 2
DOT EXEMPTION FORM**

Metal Management Midwest - Paulina

Date of Most Recent Revision: October 2008

Page 2 of 3

SP-10656 Approval Number _____

SECTION 4 - IDENTIFICATION and DISPOSITION INFORMATION at DESTINATION

Identification Details: _____

Radionuclide: _____ Other (e.g. Lu-177): _____

Disposition Details:

Disposition State Official Check if same as Destination State Official

Name: _____ Date: _____

Title: _____ Organization: _____

Phone: _____ Email: _____

SECTION 5 - REMARKS, OTHER INFORMATION:

In case of an emergency, notify the National Response Center @ 800-424-8802 and the
authorizing official and give the Special permit No. and Approval No.

SECTION 6 - RECORD of TRANSMITTALS
(Circumstances may influence distribution)

Shipment Approval - Date sent by to ⑧ to ①, ②, ③, ④, ⑤, ⑥, and ⑦:

Record of Identification and Disposition - Date Sent by ⑨ to ⑤, ⑦, ⑧, and other:

Completed DOT SP Form - Date Sent or Uploaded by ⑨ to OED CRCPD & Other:

If "Other," please provide details in the "Section 5 - Remarks, Other Information".

Integrated Pest Management Service Program
By Guardian Pest Control

For

Sims Metal Management
9331 S Ewing Ave.
Chicago, IL 60608
February 2024

Scope of Service

Service Area

Areas covered include the areas listed below the interior of the facility and the immediate exterior up to three (3) feet from the structure as necessary for covered pests. Service areas include:

Delivery Area	Lounge Area	Shipping Area	Receiving Area
Dock Area	Processing Area	Shop Area	Break Area
Entrances	Production Area	Lobby Areas	Warehouse
Dumpster Area	Restrooms	Storage Areas	Office areas upon request

Targeted Pests

Guardian Pest Control inspects and applies pest management materials as necessary in the above mentioned service areas. to provide control of the following pests:

Rats mice roaches

We also assist in control of the management of:

Ants (pavement and thief) Ground Beetles Crickets

Additional pest management services are described in the Ancillary and are available on a cost per service basis.

Routine Service

Following the establishment of a preventive level of control, routine service begins. During routine service, Guardian Pest Control inspects interior service portions of Sims Metal facility on a regularly scheduled frequency detailed per target pest in the Service Specifications below.

Your Technical Service Representative evaluates sanitation and structural deficiencies conducive to a pest infestation. Any area of concern is detailed on the service report filed in the Pest Management Program Manual.

A detailed schematic of the facility illustrates the location of any pest management hardware (light traps, multi-catch traps, bait stations. etc.) installed. This schematic is maintained in the Pest Management Program Manual.

All hardware noted on the schematic is labeled and numbered to facilitate dating and initialing during each service rendered.

All applications and procedures are in accordance with industry best practices; as well as requirements and guidelines of relevant third party auditors and inspectors

Service Specifications

Insect: Management

Insect Management Frequency: Monthly

Service portions of the facility are inspected to determine if insect activity or evidence is present and to identify areas that require corrective sanitation and structural maintenance measures. Insect management procedures includes the use of insect monitoring devices, strategic placement of insect management bait, applications of insect management dust formulations, and/or crack and crevice applications of insect management materials and insect growth regulators.

Rodent Management

Interior Rodent Management Frequency: Monthly

Service portions of the facility is inspected to determine if any rodent activity or evidence is present and to identify areas that require corrective sanitation and structural maintenance Measures.

Rodent management equipment is maintained on the interior of the facility around entry points, along exterior walls, and in other appropriate areas. All traps are inspected and cleaned upon each visit as necessary,

Exterior Rodent Management Frequency: Monthly

Services are performed per the above mentioned frequency. Multi-catch traps and/or tamper resistant rodent bait stations are maintained in appropriate areas around the immediate exterior foundation of the facility. Exterior rodent bait stations are secured to the ground and/or building to keep them in place and locked to ensure tamper resistance. Rodent bait stations are inspected, cleaned, and maintained with fresh bait as necessary. Also, rodent burrows are baited as necessary, Rodent management device placement are in accordance with all internal, regulatory, outside, and client audit requirements and guidelines.

Documentation and Communication

A Pest Management Program Manual is furnished and maintained by Guardian Pest Control. The Program Manual consists of the following information:

- Guardian Pest Control contact information
- Quality assurance reviews
- Certificate of insurance
- Pest sighting reports/ trending reviews and report of findings
- Licenses and certifications
- Pest management device map
- Description of the service program
- Pest activity tracking reports
- Ancillary services
- Material usage reports
- Laws and regulations
- Labels and Material Safety Data Info
- Structural and sanitation information
- Service reports
- Annual Facility Assessments
- Trend Reports Survey Analysis

Guardian Pest Control places a strong emphasis on maintaining communication with designated personnel to assure proper implementation and success of the pest management program.

Total Quality Assurance

Regularly scheduled contact is maintained between your Service Center Manager and your key personnel to ensure that the described service program is meeting and exceeding expectations. This entails a thorough inspection of Sims Metal facility per year and maintaining open lines of communication with key personnel. Client Care Reports are completed by your Service Center Manager and submitted to our Quality Assurance Manager for review.

Random on-site Quality Assurance audits are performed by our Regional Quality Assurance Manager. This service is designed to ensure that our quality Standards are being maintained and are consistent throughout the company.

Insurance

Guardian Pest Control maintains adequate insurance coverage; including general liability, worker's compensation, and automobile liability. A copy of the current Certificate of insurance is available in the 'information' section of the Program Manual.

Time of Service

Services are rendered at an agreed upon time. Your Technical Service Representative will contact your personnel prior to initiating any work and will check out prior to leaving your premises. A service work order is left with your personnel upon completion of each Service.

Calls for Additional Service

In the event additional services are necessary between our regularly scheduled visits as long as its during normal business hours we usually can come out the same day or next day. However, this would be an additional fee. We also have a 24 hour emergency service at an additional fee if you would ever need service after hours.

Materials and Equipment

All labor, materials and equipment required to render the services described herein are be furnished by and remain the property of Guardian Pest Control with the exception of equipment already owned by client. Any damaged or missing equipment is replaced and charged to Sims Metal. Materials used and application methods are in accordance with regularly established practices and in compliance with Federal, State and local regulatory agencies. Pesticides used are approved by a designated facility representative before application. In the event of any changes to materials or services the facility will be notified by Guardian Pest Control of intended changes.

Training and Orientation

Guardian Pest Control in conjunction with Sims Metal, provides the following training assistance: On-site training with each service, effectively communicating structural and sanitation concerns related to maintaining an effective pest management program at your facility.

Attendance at Sims Metal meetings to create an exchange forum on pest management and sanitation concerns directly related to the success of an effective pest management program.

Guardian Pest Control also offers comprehensive information on pest management and safety practices.

Some of these services may require an additional cost.

Sanitation and Structural Deficiencies

Proper storage, clean up, and pest proofing of facility are factors which effect the quality of your pest management program. Your Technical Service Representative documents situations relevant to the overall success of your pest management program and needing your attention. Correcting these deficiencies will enhance the level of control at your facility and help maintain a pest free environment.

Certification of Applicators

In accordance with the amended Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and in compliance with State Law where required, pest management materials are applied by a Certified Applicator or an individual working under the direct supervision of a Certified Applicator. It is our policy that all of our service and supervisory personnel be certified in all states where pest management materials are applied.

Chemical or Service Emergencies

in case of Chemical or Service emergency please call 773-277-7378.

Terms of Contract

This program is accepted with an authorized signature as indicated below. and shall be subject to termination by either party with a 30 day written notice. Our terms of sale are "Net 30 Days" upon receipt of invoice. A 10% per month fee will be charged on all invoices past due.

APPROVED BY Ryan Wise

DATE 2/14/24

GUARDIAN PEST CONTROL APPROVAL _____

DATE _____

Integrated Pest Management Service Program
By Guardian Pest Control

For

Sims Metal Management
425 W 152nd St.
Chicago, IL 60608
February 2024

Scope of Service

Service Area

Areas covered include the areas listed below the interior of the facility and the immediate exterior up to three (3) feet from the Structure as necessary for covered pests. Service areas include:

Delivery Area	Lounge Area	Shipping Area	Receiving Area
Dock Area	Processing Area	Shop Area	Break Area
Entrances	Production Area	Lobby Areas	Warehouse
Dumpster Area	Restrooms	Storage Areas	Office areas upon request

Targeted Pests

Guardian Pest Control inspects and applies pest management materials as necessary in the above mentioned service areas. to provide control of the following pests:

Rats Mice Roaches

We also assist in control of the management of:

Ants (pavement and thief) Ground Beetles Crickets

Additional pest management services are described in the Ancillary and are available on a cost per service basis.

Routine Service

Following the establishment of a preventive level of control. routine service begins. During routine service, Guardian Pest Control inspects interior service portions of Sims Metal facility on a regularly scheduled frequency detailed per target pest in the Service Specifications below.

Your Technical Service Representative evaluates sanitation and structural deficiencies conducive to a pest infestation. Any area of concern is detailed on the service report filed in the Pest Management Program Manual.

A detailed schematic of the facility illustrates the location of any pest management hardware (light traps, multi-catch traps, bait stations, etc.) installed. This schematic is maintained in the Pest Management Program Manual.

All hardware noted on the schematic is labeled and numbered to facilitate dating and initialing during each service rendered.

All applications and procedures are in accordance with industry best practices; as well as requirements and guidelines of relevant third party auditors and inspectors.

Service Specifications

Insect Management

Insect Management Frequency: Monthly

Service portions of the facility are inspected to determine if insect activity or evidence is present and to identify areas that require corrective sanitation and structural maintenance measures. Insect management procedures includes the use of insect monitoring devices, strategic placement of insect management bait, applications of insect management dust formulations. and/or crack and crevice applications of insect management materials and insect growth regulators.

Rodent Management

Interior Rodent Management Frequency: Monthly

Service portions of the facility is inspected to determine if any rodent activity or evidence is present and to identify areas that require corrective sanitation and structural maintenance measures.

Rodent management equipment is maintained on the interior of the facility around entry points. Along exterior walls. and in other appropriate areas. All traps are inspected and cleaned upon each visit as necessary.

Exterior Rodent Management Frequency: Monthly

Services are performed per the above mentioned frequency. Multi-catch traps and/or tamper resistant rodent bait stations are maintained in appropriate areas around the immediate exterior foundation of the facility. Exterior rodent bait stations are secured to the ground and/or building to keep them in place and locked to ensure tamper resistance. Rodent bait stations are inspected, cleaned, and maintained with fresh bait as necessary. Also. rodent burrows are baited as necessary. Rodent management device placement are in accordance with all internal regulatory outside. and client audit requirements and guidelines.

Documentation and Communication

A Pest Management Program Manual is furnished and maintained by Guardian Pest Control. The Program Manual consists of the following information:

- Guardian Pest Control contact information
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- Certificate of insurance
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- Ancillary services
- Material usage reports
- Laws and regulations Service reports
- Labels and Material Safety Data Info
- Annual Facility Assessments
- Structural and sanitation information
- Trend Reports Survey Analysis

Guardian Pest Control places a strong emphasis on maintaining communication with designated personnel to assure proper implementation and success of the pest management program.

Total Quality Assurance

Regularly scheduled contact is maintained between your Service Center Manager and your key personnel to ensure that the described service program is meeting and exceeding Expectation. This entails thorough inspection of Sims Metal facility per year and maintaining open lines of communication with key personnel. Client Care Reports are completed by your Service Center Manager and submitted to our Quality Assurance Manager for review.

Random on-site Quality Assurance audits are performed by our Regional Quality Assurance Manager. This service is designed to ensure that our quality standards are being maintained and are consistent throughout the company

Insurance

Guardian Pest Control maintains adequate insurance coverage; including general liability, worker's Compensation, and automobile liability. A copy of the current Certificate of Insurance is available in the information section of the Program Manual.

Time of Service

Services are rendered at an agreed upon time. Your Technical Service Representative will contact your personnel prior to initiating any work and will check out prior to leaving your premises. A service work order is left with your personnel upon completion of each Service.

Calls for Additional Service

In the event additional services are necessary between our regularly scheduled visits as long as its during normal business hours we usually can come out the same day or next day. However, this would be an additional fee. We also have a 24 hour emergency service at an additional fee if you would ever need service after hours.

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Training and Orientation

Guardian Pest Control in conjunction with Sims Metal. provides the following training assistance: On-site training with each service, effectively communicating structural and sanitation concerns related to maintaining an effective pest management program at your facility.

Attendance at Sims Metal meetings to create an exchange forum on pest management and sanitation concerns directly related to the success of an effective pest management program.

Guardian Pest Control also offers comprehensive Client Learning Programs information on pest management and safety practices.

Some of these services may require an additional cost.

Sanitation and Structural Deficiencies

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Certification of Applicators

In accordance with the amended Federal insecticide Fungicide and Rodenticide Act (FIFRA) and in compliance with State Law where required, pest management materials are applied by a Certified Applicator or an individual working under the direct supervision of a Certified Applicator. It is our policy that all of our service and supervisory personnel be certified in all states where pest management materials are applied.

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APPROVED BY Ryan Wise

DATE 2/14/24

GUARDIAN PEST CONTROL APPROVAL _____

DATE _____

Integrated Pest Management Service Program
By Guardian Pest Control

For

Sims Metal Management
350 N Artesian Ave.
Chicago, IL, 60608
February 2024

Scope of Service

Service Area

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- Service reports Labels and Material Safety Data Info
- Annual facility Assessments
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Services are rendered at an agreed upon time Your Technical Service Representative will contact your personnel prior to initiating any work and will check out prior to leaving your premises. A service work order is left with your personnel upon completion of each service.

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Certification of Applicators

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APPROVED BY Ryan Wise
DATE 2/14/24

GUARDIAN PEST CONTROL APPROVAL _____

DATE _____

-