



Koppers Inc.

Scope: US Only Document No.: K-SHE-024

Revision No.: 3 Effective Date: 3/1/2014

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SH&E Responsible Care Visitor Facility Access

1.0 Purpose:

This policy provides direction on managing the SH&E implications of visitors to Koppers manufacturing facilities.

2.0 Policy Summary:

This policy provides instructions on identifying and managing the Safety, Health, Environmental & Security (SHE&S) aspects that may be impacted by visitors while on a Koppers manufacturing facility.

This policy is responsive to Section 4.4.2 and 4.4.6 of the Responsible Care Management System Manual.

3.0 Definitions:

Visitors – non-Koppers personnel, other than contractors, who enter a Koppers facility for purposes such as delivery, pick-up, inspection, transportation, meetings, etc.

4.0 Procedure:

Koppers recognizes that visitors come to our facilities for various reasons including regulatory, mail pick-up and delivery, tours, etc.

All visitors will be made aware of the Koppers SHE&S policy, applicable security and emergency procedures, and applicable facility rules to visitors. Notification of these rules and policies may be accomplished via signage, Koppers SH&E Pamphlet (K-SHE-040), letters to companies, notifications on invoices/purchase orders, notices to individuals, etc.

In addition to this general information, the facility will assess the nature and potential impact of the visitor as it relates to a significant aspect. If the facility manager determines any visitor has a potential to impact a significant aspect, the facility may require the visitor to complete additional requirements such as formal orientation or review of competency and qualifications.

4.1 General visitors

Visitors such as mail carriers, regulators, auditors and delivery personnel may have minimal potential to impact a significant hazard or aspect and accordingly need not complete a formal orientation process however, all visitors to a Koppers facility must adhere to all Koppers rules and policies.

4.2 Transporters

While transporters may be considered visitors to our facility, the potential impact associated with transportation of hazardous materials (i.e. products, waste, recyclables, etc.) and equipment will vary between facilities, depending on the on-site activities. Facilities should consider, in advance, identifying routes of entry/exit, use of emission control equipment (where applicable),

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supervision during loading/unloading, emergency procedures for releases and securing the load prior to departure. At a minimum, the facility develops notifications and qualifications for transporters commensurate with the potential impact of the onsite activities. In addition to the notification methods above, the facility should consider letters to contracted companies, notifications on contracts/purchase orders, and notices to individual drivers, etc. Qualifications may include proper identification, licenses, permits etc. Visitors must present such documentation upon request.

5.0 Responsibilities:

5.1 Corporate Environmental Department:

- Develops and maintains this policy.
- Reviews facility compliance with this policy during audits.

5.2 Facility Manager or his/her designee:

- Communicates Koppers Responsible Care policy and applicable security and emergency procedures to all visitors.
- Assesses the nature and potential impact that a visitor may have on significant aspects.
- Communicates specific facility requirements, if applicable (wood preservative user safety requirements, etc.).
- Monitors compliance with this policy through periodic auditing/observations and contacts.
- Maintains records to document compliance with this policy.

6.0 Recordkeeping:

All forms and records used by the facility in conjunction with this policy will be maintained in accordance with applicable Koppers Records Retention Policies.

7.0 References:

Koppers SH&E Pamphlet (K-SHE-040) Koppers General Safety Practices Policy (K-SHE-043)

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| Revision Number | Date | Summary of Changes |
|--------------------|----------|--|
| 1 | 6/1/06 | Incorporated the changes in the ISO 14001:2004 standard regarding contractor competency Added safety component Added contractor form Added requirement for review prior to PO issuance |
| 2 | 01/13/12 | Revised Contractor Letter Template (Attachment B) to incorporate language addressing FIFRA wood preservative chemical user safety requirements Added FIFRA wood preservative chemical user safety requirements to plant manager and project manager responsibilities. |
| 3 | | Overhaul of policy to remove contractor references (RC Implementation) |