



SERVOSTEEL

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SUB CONTRACTOR ENVIRONMENTAL RESPONSIBILITY PACK

Dear Sub Contractor,

Welcome to Servosteel's Sub Contractor Environmental Responsibility Pack. This pack has been designed to provide Sub Contractors working on Servosteel's sites with guidelines for ensuring that your Environmental Impact will be controlled. Servosteel operates an Environmental Management System in accordance with ISO 14001:2004 and has an Environmental Regulations Permit (Integrated Pollution Prevention Control) Permits for its Dudley site.

As a Sub Contractor working on our site, you could have a negative environmental impact, as work you conduct could result in the following

- Fugitive Emissions to Air
- Generation of Waste
- Noise Emissions
- Potential Pollution

As a result, we need to take steps to mitigate these possible impacts, hence the issue of this pack.

This pack consists of the following:

1. Request for Method of Work Statement (* if required)
2. Risk Assessment (*if required)
3. Environmental Contract
4. Environmental Policy Statement
5. Duty of Care Leaflet
6. Accident Plan
7. Health and Safety Responsibility

Upon receipt of a signed Environmental Contract and Method of Work Statement (*if required), a Permit to Work will be issued. Only when a Permit to Work has been issued will you be allowed to commence work on site. Please ensure that this pack is forwarded to your Health and Safety/Environmental designate without delay. Please address any correspondence to me directly so that I can arrange issue of your permit to work.

Yours sincerely

Wayne P. Roden
Environmental and Quality Assurance Manager

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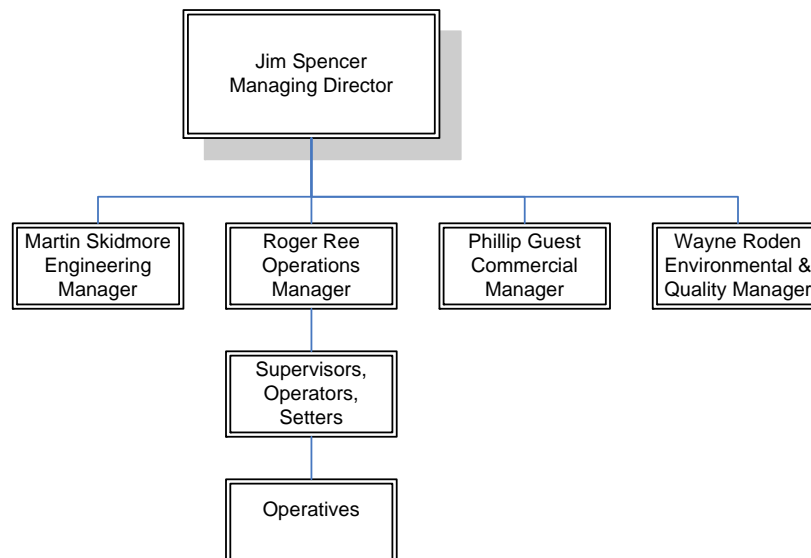
OAKSIDE SOLUTIONS LIMITED TRADING AS SERVOSTEEL

HEALTH AND SAFETY POLICY

ORGANISATION FOR HEALTH AND SAFETY

Mr. J. Spencer, Managing Director

Has overall responsibility for health and safety throughout the company. The company structure us attached and outlines clear lines of communication for reporting defects and health and safety issues.



- Emergency Spill kits located around the exterior and interior perimeter of the factory.
- Emergency Shut Off Valve to Fens Pool Outlet.

Should you have or witness a spillage of any kind, contact a member of staff immediately. Protection of the drainage network is of paramount importance!

Litter

Please ensure that all items of litter are safely deposited in waste bins located around the site. If you are unable to find a waste bin, please contact a member of our workforce and they will point you in the right direction. Be advised, we operate a “zero tolerance” policy for offences of fly tipping and unauthorised waste disposal.

Do's and Don'ts

Do act in an environmentally responsible manner.

Do clear up any waste/debris that your activities create.

Do inform management of any spillages as soon as possible.

Do wear adequate personal protective equipment

Do ensure that you have assessed the risks both environmental and health safety prior to conducting any work

Do not empty any substance into any site drains

Do not dispose of any waste without permission from a senior manager.

Do not light fires or burn waste

Do not drop litter

Smoking is limited to the three smoking points and forbidden anywhere else.

Failure to comply with our regulations will result in your expulsion and subsequent prohibition from working on this site.

Any Questions?

Should you have any questions regarding this information, or any other subject, the following contacts are available:

Health & Safety, Works Management	Phillip Guest	Ext 500
Maintenance & Engineering	Martin Skidmore	Ext 600
Quality & Environmental	Wayne Roden	Ext 700

Health, Safety and Environmental Procedures for Visitors

Welcome to Servosteel.

Please do not proceed past the reception area until you have read and understood the information contained in this leaflet. Should you need further information concerning your visit to Servosteel, your host or the manager accompanying you will take pleasure in helping you.

General Site Rules.

1. Minimum Personal Protective Equipment (PPE) requirements for this site are Hard Hat, Ear Protection, High Visibility (HI-VIZ) vest, safety footwear and safety gloves. Eye protection is required for designated areas.
2. Please sign the visitor's book and wear your visitors badge at all times whilst on our site. Please sign out and hand in your visitor badge upon departure.
3. Contractors are bound by our method statement and permit to work procedure, and will not be allowed to commence work until the necessary formalities have been completed and a permit to work had been issued.
4. Smoking is not permitted anywhere within the office block, gatehouse and one of the welfare portacabins. However, smoking is permitted outside the buildings at designated points. Your host will inform you where they are.
5. You must be accompanied by your host at all times whilst on site, unless you are a contractor with a Servosteel Permit To Work.
6. There are continuous crane, fork lift and other traffic movements within the works. You are instructed to keep to designated walkways at all times unless allowed to take a different route authorised by your host.
7. Floor areas painted red are exclusion zones which you must not enter whilst vehicles are being loaded, or there is any other activity being carried out in the area. You must not deviate from green walk ways (with yellow borders) unless escorted by your host and wearing safety foot wear. No liability will be accepted for injuries which could have been avoided by wearing safety shoes.
8. Wherever there are safety equipment signs, personal protective equipment must be used/worn. As a matter of course, hard hats, high visibility vests must be worn at all times whilst within the factory.
9. Your host must give you information about the location of first aid facilities and toilets.
10. Site speed limit is 5 mph.
11. You must adhere to all safety signs whilst on our site.
12. Any steel material samples must be taken by Authorised Servosteel Operatives only. Gloves must be worn whilst carrying samples.

Emergency Procedures

1. To obtain First Aid Assistance, go to the nearest production line and ask for a first aider to assist you.
2. To report a fire, go to the nearest production line and report to the nearest operator who will set the alarms in motion.
3. Emergency evacuation procedures are posted on each production line and on all notice boards within the factory, offices and gate house. Please familiarise yourself with these procedures upon your arrival on site.

Fire Safety

1. The fire alarm is a distinctive siren similar to an air horn. If you hear the siren, please leave the building by the nearest exit or as directed by your host.
2. Do not delay or return to collect any personal belongings.
3. Assemble on the tarmac outside the building or at an assembly point as instructed by your host
4. Do not re-enter the building until you are told to do so by your host.
5. At Servosteel, we have trained and competent fire wardens and first aid personnel. Do follow any instruction which you may be given and do not do anything which may interfere with the operation of these items.

Environmental

The management of this site is committed to:

- An ISO 14001 Environmental Management System

This has the ultimate aim of:

- Preventing pollution
- Controlling our environmental impacts
- Continuous improvement
- Complying with our applicable legal requirements

Applicable legal requirements for this site include:

- Integrated pollution prevention control permit for our pickling activity
- Consent to discharge to sewer for trade effluent
- Consent to discharge to controlled water for surface water
- Duty of care for waste

It is essential and a contractual obligation that you act in an environmentally responsible manner for the duration of your visit.

Waste Management

Servosteel takes its environmental responsibility very seriously, and this includes control and disposal of waste from the site. As a visitor to our site, it is your responsibility to dispose of any waste materials, which **should only be disposed of in our waste skips if permission has been granted by the Operations Director or Environmental Manager.**

All skips on site are labelled with acceptable waste types. A summary of the skips in use on this site is listed below:

<p>Oil Contaminated Waste</p> <p>For any waste which has or is suspected to be, contaminated with oil.</p>
<p>Commercial Waste</p> <p>For disposal of general, non hazardous waste, which is suitable for landfill.</p>
<p>Filter Cake</p> <p>For metal hydroxide filter cake only.</p>
<p>Paper</p> <p>For office paper, leaflets and envelopes.</p>
<p>Metal Scrap</p> <p>For steel banding, steel off cuts, steel scrap bobbins and any other metallic waste.</p>
<p>Veolia Roll on Roll Off</p> <p>For bulk disposal of non hazardous waste, including site clearance.</p>
<p>Waste Oil</p> <p>For disposal of waste oil and water/oil mixtures.</p>

Spillages

This site borders the Fens Pool Site of Specific Scientific Interest (SSSI), which is protected by law. All surface water from this site (car park drains and building drains) drains to the Fens Pool SSSI, so anything spilt on our roadways has the potential of contaminating surface water draining to the Fens Pool SSSI. In order to mitigate any accident hazards, we have:

- Emergency Drain Covers, located in our weighbridge and in the Effluent Treatment Plant

Introduction.

This introduction booklet contains the basic guidelines for safety in the various types of work undertaken within Servosteel.

This booklet should be studied and understood by every employee. It should always be borne in mind however, that safe operation is a result of following safe working practices. The health and safety at work act imposes a clear duty on every employee to take utmost care for the health and safety of himself/herself and of other persons who may be affected by what he or she does or does not do at work. This duty implies not only avoiding recklessness, silly or unsociable behaviour, but by taking positive steps to understand the hazards in the work place, to comply with safety rules, safe working practices and procedures, and to ensure that nothing he or she does, or fails to do, puts himself/herself or others at risk. Failure to comply with this duty lays the individual and the company open to prosecution and civil claims for damages. Therefore safety starts with oneself and concerns everyone. Safety is discussed in every management team meeting, during every morning meeting and within the health and safety committee. The minutes of the health and safety committee are placed on the notice boards for your information. If you have any comments or observations, please contact one of the committee members who will bring it to the next meeting.

Safety is an ongoing issue. Comments on safety or potential hazards shall be forwarded immediately through your supervisor or manager to the managing director or brought forward during the review meeting or health and safety meetings.

Responsibilities.

The Managing Director has overall and final responsibility for health and safety and will ensure that adequate resources are made available to fulfil the statutory obligations of the company.

The Management Team is responsible for supporting the company policy on health and safety and ensuring its full implementation at their locations. Ensuring that individuals are aware of their responsibilities and carry them out.

Stimulating interest in health and safety amongst every employee.

Giving assistance in the light of experience at their location in the regular review of this policy.
Ensuring that health and safety matters are given consideration at all meetings dealing with future planning and policy.

Carrying out inspections to ensure policy is being followed.

Ensuring that new staff is familiarized with policy during their induction together with completion of all required forms etc. and compliance with statutory reporting procedures and other statutory requirements concerning health and safety.

Arranging training/retraining for first aiders in accordance with statutory requirements.

Managers

Each Manager is responsible for:

1. Ensuring that he and his staff are familiar with contents of this policy and that it is conformed to/complied with.
2. Ensuring that all plant and equipment is properly maintained and repaired by competent persons and that records are maintained of this work.
3. The conduct of all contractors coming on site and ensuring that they have adequate Public and Employers Liability Insurance.
4. Ensuring other visitors follow laid down procedures.

5. Ensuring that all his staff are properly trained and a competent person supervises them and that staff under instruction on any piece of equipment at all times supervised.
6. Maintaining a register of which staff are trained for which equipment and ensuring staff are aware of which tasks they may carry out unsupervised.
7. Ensuring statutory notices are displayed.
8. Ensuring that his staff are fully aware of and follow operating procedures. Ensuring the accident book is properly entered and maintained.
9. Ensuring adequate fire fighting equipment is available and properly maintained.
10. Organising and logging regular checks on fire alarm systems and evacuation procedures.
11. Ensuring first aid boxes are provided in accordance with statutory requirements and the contents are replaced as required.

Supervisors

Each Supervisor is responsible for:

1. Ensuring that their staff are familiar with the contents of this Policy and that it is conformed to/complied with.
2. Ensuring that only properly trained staff operates equipment and those they do so in a safe manner.
3. Ensuring staff under training.1s properly supervised.
4. Regularly inspecting plant and equipment ensuring that faulty equipment is not used, that any faults are reported and remedial action taken.
5. Ensuring that safety clothing/equipment/devices provided are available and worn/used as required.
6. Ensuring locations for first aid facilities and the identity/location/phone number or first aider(s) are known.
7. Maintaining a good standard of housekeeping at all times.
8. Ensuring accidents or dangerous occurrences are reported immediately in accordance with the procedure outlined.

Employees

All employees:

1. Should make themselves familiar with and conform to the Health and Safety Policy at all times.
2. Shall observe all safety rules.
3. Shall make proper use of any safety equipment or devices provided by the Company in addition to those required by legislation.
4. Will conform to all instructions given by Managers and others with a responsibility for Health and Safety.
5. Will report all accidents/dangerous occurrences and damage, whether persons are injured or not.
6. Will be encouraged to participate in Health and Safety matters.
7. Must report all (potential) hazards to their supervisor.

Contractors and Permits to Work

Contractors working on site are to be instructed:

1. To observe the Company Safety Rules and any instructions relating to safety given by any employee on behalf of the Company.
2. Not to work on the premises until authorized by the relevant Manager and issued with a "permit to work".
3. Not to work on the premises unless covered by insurance against risk.
4. The person engaging the contractors should ensure that these instructions have been complied with.

Visitors

Visitors should:

1. Be instructed to report to the reception and be issued with badge and any necessary safety equipment.
2. Should not be allowed to walk around unescorted unless approved by a member of the Management Team.
3. Be instructed in any necessary safety regulations prior to entering the area concerned.

Safety Committee

Each site has a Health and Safety Committee reporting to the Managing Director. The names of the persons in the Safety Committee, who are volunteer representatives from each area of the Company, are displayed on the notice boards.

First Aid

The following information is displayed on the notice boards. The names, locations and telephone numbers of trained First Aider (s) and the person responsible for maintaining the First Aid Box(es).

GENERAL GUIDANCE

Personal protective equipment (PPE) must be used wherever the Company has so stated. Whatever operation, function or duty employees are carrying out for the Company it must be done in accordance with the safety working procedure laid down by the management team and in accordance with national and local Health and Safety regulations.

Horseplay, skylarking and throwing of any article is dangerous and is strictly forbidden.

Unsafe conditions must be reported promptly to your immediate superior.

Good housekeeping is essential to the maintenance of safe and healthy conditions. Work areas must be kept clean and free from rubbish.

If illness is felt, or any other condition that may affect your safety or the safety of others, your immediate supervisor must be informed.

All injuries at work, however slight, must be reported immediately to your supervisor. A person who has been suitably trained should treat injuries.

Make sure you know the location of emergency equipment such as fire extinguishers, fire alarm points and telephones in your area and that you are aware of the correct procedure to adopt in any likely emergency.

Always use the recognised aisles and gangways. Short cuts can often lead to danger and should not be used.

Do not climb on the steel stock.

Only approved means of entrance and exit may be used.

Glass of any description shall not be placed in waste paper baskets.

Do not experiment with unfamiliar equipment.

All spillages (coffee, teas, water, oil or solvents, etc.) must be cleaned up immediately.

Animals could be dangerous in our working environment; therefore employees shall not bring animals into the workplace or encourage a stray. Any animals introduced by the Management into the workplace (e.g. guard dogs etc.) will be the responsibility of the Management. Any employee who introduces an unauthorised animal into the workplace will be liable for any accident, injury or damage caused by or attributed to the animal.

Children are only allowed on site with the specific permission of the Managing Director or a member of the Management Team. If permission is granted they must be supervised at all times.

Working on site or driving Company vehicles whilst unfit to do so because of alcohol or drug usage is dangerous and will result in disciplinary action being taken.

Local instruction will be given regarding the requirement to use protective equipment and the areas in which various items must be used.

Drivers of Company vehicles will comply with Road Traffic legislation requirements and drive in a proper and safe manner.

No one may work alone on the site other than for the purpose of carrying out management/administration functions in the offices area only, however, one person in Security is permitted anywhere on the site.

Lifting and Handling, including fork lift trucks

Many injuries are caused by the use of improper lifting methods. Make sure of proper balance by correct positioning of the feet, bent legs and a straight upright back. Lift without twisting the body. (See safe working procedures regarding manual operations regulations 1992 from your respective manager).

Do not attempt to lift a load that is too heavy ask for assistance. Unauthorised equipment must not be used for lifting.

Lifting equipment must not be altered, modified or repaired, except by the manufacturer, a professional repair company or personnel authorised by the Works Manager/Supervisor.

Lifting equipment must not be used to lift loads in excess of the marked weight.

It is essential that any defect observed in any item of lifting machinery or tackle should be reported without delay to your immediate superior.

Every 6 months the Company's Insurers will carry out a full inspection on all lifting equipment. Once inspected it will be coded for that period of 6 months.

Transport

Drivers are responsible for the safe loading of their lorries, and the state of load chains, etc.

It is the responsibility of the driver or operator of any Company vehicle to report defects in that vehicle to his/her supervisor without delay.

Petrol/diesel spillages must be cleaned up immediately and reported to the Environmental Manager.

Drivers should ensure their lorry is fitted with a reversing buzzer and only reverse into loading bays when instructed to by an authorised person.

Electrical Equipment

Only professional electricians or personnel authorised by the Works Manager or Supervisor may install, alter or repair electrical equipment or installations. Danger cards or safety cards placed by electricians must not be removed except by the person who placed them.

Instructions and conditions of any danger card must be strictly observed. All portable electrical equipment will be tested according to current regulations. Do not allow electrical cables to cross the floor over gangways etc.

COSHH

Fuel and chemicals such as bleach, cutting oils etc. should be handled with caution in accordance with the manufacturers instructions. If you have any doubts about the procedure to be followed ask your supervisor before handling.

Means of Access, Gangways, Ladders and Stairways

All gangways and stairways are clearly defined and must be kept clear of obstruction.

Material and equipment must not be placed in a position where they obstruct any part of the aisle or gangway.

Unsafe conditions on gangways, Stairways or other means of access should be reported without delay to your immediate superior.

Ladders, stepladders etc. whether fixed or portable, must be kept in good condition.

Ladders with obvious defects such as missing rungs, cracks in rungs or uprights must not be used. The defects must be reported to your immediate superior without delay. No person should climb a ladder other than one, which is securely fixed to a building or structure unless it is well positioned and firmly held by another person. Properly constructed creeper ladders or crawling boards must be used for access and works on roofs are sloping or made of fragile materials.

Guards and other Safety devices

Guards and safety devices are provided for your protection. Make sure you know how safety devices operate, how to check their operation and report any defect to your immediate superior.

Always check that guards and safety devices are in position and in good order starting work; Guards and safety devices must not be removed from any machine whilst in motion. Guards and safety devices must not be altered, modified or re-positioned except on the instructions of a suitable qualified person and authorised by Works Manager/Supervisor.

Personal Protective Equipment (PPE)

Suitable and correct clothing for your job should be worn. Loose clothing can be caught in machinery. Long hair must be covered on controlled near moving machinery. In certain areas and for defined operations, PPE (e.g. helmets, goggles, ear defenders, gloves etc.) is provided and must be used. Safety shoes and boots are issued to all employees and must be worn. Do not enter such area unless you are using the correct PPE.

Compressed Air

It can be dangerous if it is improperly used.

It must never be used for practical Joking. Any such misuse will be regarded most seriously and may result in instant dismissal.

Compressed air lines should not, in any circumstances, be pointed at another person.

Compressed Gases

Compressed gases used for cutting, such as oxygen and propane, must be carefully handled and treated with respect and only by authorised personnel. They must be properly identified and fixed to the wall or caged. Ensure valves, regulators and pipes are kept free from grease as this condition can cause ignition and explosion. No smoking is permitted in the vicinity.

Appropriate safety equipment, as defined locally, must be used. Misuse will result in instant dismissal.

Fire Precautions

Good housekeeping and tidiness are essential parts of fire prevention. All employees are requested to keep work areas clean and tidy and to avoid unnecessary accumulations of rubbish

In departments where an accumulation of waste occurs it must be placed in the receptacles provided.

Fire exits must be kept clear at all times. They must not be locked shut whilst people are present on site.

Highly flammable substances and liquids must be handled with care and in accordance with instructions.

If there is cause to use a fire extinguisher you must ensure that your immediate superior is aware that it needs re-charging.

Do not return it to its station empty your life may depend on it in the future. Learn how to handle fire-fighting equipment correctly read the instructions. Fire extinguishers must always be clearly visible. Do not hang garments etc. on the extinguishers.

No smoking where it is forbidden.

No naked/open flames are allowed near any flammable or explosive substances. In the event of fire, the alarm should be raised by the person discovering the fire, all staff should leave the building quickly and calmly by the quickest safe means.

Do not stop to collect personal possessions. No one should take any risk in attempting to extinguish the fire. Do not return to the building until advised that it is safe to do so.

Do not use fire extinguishers to prop open doors.

Warning Signs

Signs and notices are displayed for your protection, **OBEY THEM AND BE ON YOUR GUARD.**

Accident Investigations

The reasons for investigating accidents are legal, humane and economic. The results will be applied to improve this Health and Safety policy so as to prevent re-occurrence of similar accidents. The objective of an investigation will not be to apportion blame so please cooperate.

The scene of any accident will be visited immediately by the supervisor together with the relevant Manager to take statements from any witnesses and to make a thorough investigation of the circumstances of the accident, with a view to recommending means of avoiding further similar accidents. All accidents must be reported to the Director (Manufacturing) as soon as possible.

Accident Reporting

In the event of accidents which result or may result in injury and which may result in a person being absent from work, procedures laid out in the current Report of Injuries, Diseases and Dangerous Occurrences Regulations must be followed, a copy of these regulations will be held in the Health and Safety File. Copies of all records must be held on file.

The measures taken to ensure Health and Safety at work do not completely eliminate every hazard and prevent all injuries. Accidents that do occur, whether they cause injury or not will be investigated to prevent recurrence. Employees are instructed in the interest of their own, and other people's Health and Safety to report all accidents and hazardous situations to their supervisors.

Office Safety

1. Keep all working areas clean and tidy.
2. Smoking is allowed in designated areas only.
3. If you smoke use a proper ashtray not a dustbin full of paper.
4. Do not put cables or telephone leads across the floor where they could become a trip hazard.
5. Before plugging equipment into the mains, ensure that the plug and cable are in good condition. Do not use unauthorised equipment, e.g. heaters which may overload the circuits.
6. Do not attempt to repair electrical equipment unless you are properly qualified but report it to your manager.
7. Always unplug equipment before leaving the office (except for certain equipment e.g. computers etc., which requires to be run overnight).
8. Unauthorised electrical equipment must not be used.
9. Do not overload shelves and cupboards so that the contents are likely to fall. Have one drawer only of a filing cabinet open at any time to prevent it from tipping over.
10. Do not leave papers, boxes, equipment etc. lying on the floor as a trip hazard.
11. Do not leave drawers open unattended.
12. Waste paper is a fire hazard and should be properly disposed of from the offices on a daily basis.
13. Keep fire exits clear at all times. Do not store flammable material close to fire exits.

Display Screen Equipment

The use of all computer equipment must comply with the display screen equipment directive. Do not operate DSE unless authorised to do so by the appropriate Manager/Supervisor.

In working with DSE it is important to get the environment right, and to ensure that the DSE is correctly adjusted. Any work which involves staying in the same position and concentrating for a long time can cause problems. The risks can be minimised in work with DSE by following these instructions:

1. Screen: readable and stable image, adjustable, glare free.
2. Keyboard: usable, adjustable, key tops legible.
3. Surface: allow flexible arrangement, spacious, glare free, document holder as appropriate.
4. Work chair; appropriate adjustability. Footrest if required.
5. Leg Room and Clearances: to facilitate postural change.
6. Lighting: provision of adequate contrast, no direct or indirect glare or reflections.
7. Distracting noise minimised.
8. No excessive heat: adequate humidity.

9. Software: appropriate to the task and adequate to user capabilities, provide feedback on system status, no clandestine monitoring.

Storage of Material

1. Ground stored material must only be placed on firm level ground. Timbers used as dunnage must be of adequate size and strength for the weight imposed and in sound condition.
2. Material should only be stacked to a height that is safe. This will vary according to the type of material. Safe heights will be defined locally for each product group.
3. Unsafe stacks must be immediately notified to the Production Manager or Supervisor and the surrounding area cleared of personnel. Rectification work should be carried out under his instruction and supervision.

Operation and Material Handling by Crane

Do not operate cranes unless you are authorised to do so by the Works Manager or Supervisor.

Ensuring the following:

1. In all lifting operations, care should be taken to ensure that the safe working load capacity of the equipment is not exceeded.
2. Care should be taken to ensure that in all stages of lifting a load it remains in a stable condition.
3. Where an operation requires more than one person to handle the sling or guide the load, it is good practice that one person gives signals to the driver. This does not apply in the case of the emergency stop signal, which can be given by anyone. It is essential that everyone on a particular site use the same signals to avoid confusion.
4. Do not place any part of your body underneath a load. Make sure you have control over the load and keep other people away from it at all times.
5. It is not permitted to travel on loads or equipment unless the equipment is specifically designed for this purpose.
6. Equipment is to be used in the manner specified by the manufacturer. No modifications may be made to equipment unless allowed by the manufacturer. In particular, bolts etc. should not be placed between links to shorten chains.
7. Do not use the banding wire to lift a bundle of steel.
8. On large bundles keep the chain around the bundle while breaking the binding. Break the centre band first, then the outside, stand clear and lower the bundle.
9. Ensure that you will not be trapped against an adjacent stack should something untoward happen.
10. Loading onto vehicles should be carried out by two people, one to operate the crane, the other to be the driver of the vehicle to place the material load on the vehicle.
11. Special care should be taken to avoid collision where two or more cranes are operating on the same track.
12. Where additional equipment such as vacuum or magnet lifting equipment is fitted to a crane local instruction will be issued for its safe usage.
13. Report any problems or defects immediately to your Supervisor.

Remote Control of Cranes

Do not use remote control equipment unless you have been authorised to do so by the Production Manager or Supervisor. Ensure that you understand the following in addition to the section on crane operation and material handling.

1. When controlling a remote control crane, always watch where it is going. Do not turn away to look at something else or allow yourself to be distracted.
2. Ensure that loads moving down a bay under a remote controlled crane are hoisted high enough to clear any obstacle, which they have to pass over.
3. Do not move a crane unless you are in the same bay as it is.
4. If you need to put down the transmitter, remove the key to prevent unauthorised usage.
5. Do not lower a load to the ground or a lorry deck unless you are in the position to see that it will be landed safely.

Fork Lift Trucks

Do not operate forklift trucks unless authorised to do so by the Works Manager or Supervisor.

Ensure you understand the following:

1. All Fork Lift Truck operators to be tested and certified.
2. At the start of each shift, carry out the checks recommended by the equipment manufacturer.
3. Be careful to avoid pedestrians. Sound your horn at every possible danger point, but remember this does not give you the right of way. Also do not run over unprotected cables etc.
4. Drive with the forks down, approximately 6"/150mm from ground level and the mast tilted slightly backwards.
5. Do not pick up a load when anyone is standing nearby. Do not allow people to walk underneath the load.
6. Do not exceed the safe working load of the equipment. The use of attachments, e.g. fork extensions may alter the characteristics of the truck. This should be checked with the equipment manufacturer. Unauthorised attachments must not be used,
7. On slopes take care to ensure that the load will not slide off the forks. Sometimes it may be necessary to travel in reverse 'to ensure this. Do not stack and un-stack on inclines as the truck may become unstable.
8. Passengers must not be carried unless the equipment is so designed.
9. When not in use the equipment should be parked in the designated area with the engine off and brakes on.
10. Report any problems or defects immediately to your supervisor.

Coil Processing Equipment

Do not operate equipment unless authorised to do so by the Works Manager/Supervisor.

Ensure you understand the following:

1. Before starting equipment ensure all guards are in place and working correctly.
2. Ensure you have all the relevant safety equipment and clothing.
3. Check all hydraulic and pneumatic pipe work for leaks.
4. Keep working area clear of obstructions and maintain a good standard of housekeeping.
5. Check data sheets for oil used on steel surface. Avoid skin contact.

6. Follow safe working procedures as load down by Works Manager and in accordance with National and Local Health and safety Regulations.
7. Report any problems or defects immediately to your supervisor.

Repairs and Maintenance to all equipment except computer hardware which is under the jurisdiction of the Financial Director.

Do not carry out repair or maintenance work unless authorized to do so by the Works Manager. Ensure you understand the following:

1. Do not work on equipment that you do not understand or are not competent to repair.
2. All work must be carried out to the standards required by the manufacturer of the equipment using good quality spare parts.
3. On completion of work, all safety equipment such as guards must be in place and functioning~ before a machine may be put into service.
4. It is a requirement of the Factories Act that when a person is working on a crane track no-one may bring a crane within 6 metres of them. Therefore, you should ensure that there are blocks on the tracks of that the cranes are disconnected from the power prior to commencing work and that this continues until the work is completed.
5. When working on electrical equipment, ensure that the power is isolated before starting work. You should ensure that it is not possible for someone else to reconnect the power until you have finished.
6. Use the proper tools and equipment. Have too~ services etc., as required so they are serviceable when needed.
7. Do not use unsteady or damaged ladders. Ensure that ladders are properly secured prior to using them.
8. Observe all instructions/recommendations from the manufacturer of the equipment
9. When working with someone else, ensure that all communication is clearly understood. If unsure, ASK, especially in situations where, for example, you think, but are not certain, that your colleague has asked you to turn on the power or start up a machine.

Power Tools

Before using power tools ensure you understand the following:

1. Only 110-volt appliances to used.
2. Tools may only be used for the tasks for which they are designed and in accordance with the manufacturer's instructions.
3. Do not use power tools in damp environments. Keep the equipment & leads dry.
4. Avoid using extension cables if possible. If they are essential, ensure they are of the correct rating, in good condition & not placed so as to expose to the possibility of damage.
5. Tools should be properly serviced & repaired to the manufacturer's specification.
6. When not in use, tools should be properly stored.
7. Appropriate equipment, as defined locally, must be used.
8. Report any problems or defects immediately to your supervisor.

Hand Tools

1. All hand tools (Knives, spanners, etc.) must be kept in good & safe conditions.

2. Defective hand tools & similar equipment must be repaired or replaced.
3. Hand tools must only be used for the purpose they were designed & intended.
4. Hand tools must be used in a safe & proper manner.

Risk Assessments.

1. Risk assessments will be carried out on any new equipment or process (including movement of display screen equipment).
2. Risk assessments will be reviewed to identify risks & to monitor standards & procedures together with any necessary follow-up action.

Training.

In accordance with the HASAW 1974, Oakside Solutions limited TA Servosteel provides both instruction & basic job training with follow up training when changes occur & for periodical awareness updates.

Environmental

The management of this site is committed to:

- an ISO 14001 Environmental Management System

This has the ultimate aim of:

- preventing pollution
- controlling our environmental impacts
- Continuous improvement.
- complying with our applicable legal requirements

Applicable legal requirements for our sites include:

- Integrated pollution prevention control permit for our coil pickling and rod pickling operations
- Consent to discharge to sewer for trade effluent
- Consent to discharge to controlled water for surface water (Servosteel Dudley)
- Duty of care (EPA 90 Section 34)
- Town and country planning
- Water industries act
- Producer responsibility obligations (packaging waste)
- The control of asbestos at work regulations
- Water resources act
- Control of pollution (oil storage) (england) regulations
- Hazardous waste (england and wales) regulations
- Environmental protection act part III statutory nuisance

- The groundwater regulations
- The town (environmental impact assessment) regulations
- Controlled waste regulations
- List of wastes (england) regulations
- Control of substances hazardous to health regulations
- Waste electrical and electronic equipment directive
- Restriction of hazardous substances directive
- Environmental protection (prescribed processes and substances) regulations
- The trade effluents (prescribed substances and processes) regulations
- The special waste regulations
- The surface waters (dangerous substances) (classification) regulations

As a result, the following sections have been produced to ensure you are aware of our operational requirements. Please ensure that you read this information. It is essential and a contractual obligation that for the duration of your time on both sites that you act in an environmentally responsible manner.

A copy of our Accident Plan is available on our company notice boards throughout the factory, and a copy can be made available to you on request.

Should you require any further information relating to any area of Environmental Management of our site, please contact Wayne Roden, who can be contacted on Extension 700 via the reception phone in the office building.

Environmental policy

All our employees recognise their duty of care with respect to the environment. It is our declared policy to minimize the effects of our activities on the environment as outlined below. We will:

- Assess the environmental effects of our activities on the surrounding environment both locally and globally.
- Be committed to a programme of continuous improvement and pollution prevention.
- Maintain awareness of any developments designed to improve the environment and apply best available technology where economically viable.
- Communicate an understanding of the policy to employees and interested parties.
- Comply will all environmental legislation and regulations relating to our activities.
- Set definable and measurable Environmental Objectives and Targets.
- Effectively manage the consumption of Energy, Water and Fuels.
- Limit the amount of waste produced to water, land and air and adopt re-use or recycling of materials where possible.
- Maintain contingency plans to be followed in the event of a significant environmental incident.
- Train all employees so as to raise awareness of environmental matters.
- If requested, we will provide information and assistance to customers on environmental issues arising from our products and services.

Duty of Care for Waste

Servosteel complies with the Duty of Care requirements of the Environmental Protection Act 1990. All waste materials produced at Servosteel are properly handled, stored and managed, so as to prevent their release to the environment, until such time as they are collected by registered or exempted waste carriers for treatment or disposal at properly licensed or exempted waste facilities.

In particular, the following are adhered to:

- all wastes, whether regular arising or one-offs, are identified and characterised to ensure that they can be appropriately disposed of and adequately described for waste transfer purposes;
- all wastes are contained, handled and stored in such a manner that they cannot "escape from the control" of the company or other parties involved in the disposal chain (e.g. drums are sealed, IBC's remain intact);
- Servosteel ensures that all contractors used to dispose of waste are registered with the Environment Agency as waste carriers, or are legally exempt.
- a properly completed Duty of Care Controlled Waste Transfer Note, or, in the case of Special Waste, a Special Waste Consignment Note, is produced (by the waste contractor on behalf of Servosteel) for each waste consignment or series of consignments and a copy of this is kept by Servosteel for a minimum of two years for Duty of Care Controlled Waste Transfer Notes and three years for Special Wastes;

Environmental Management Controlled Waste Disposal

Servosteel is committed to achieving and maintaining standards of safety, health, hygiene, environment and quality at both sites.

In accordance with and compliance to the Environmental Protection Act of 1990, you have a duty of care to dispose of waste materials whilst working on this site by adhering to the following procedure.

1. Any hazardous waste including liquids that you may find must be reported to the Health and Safety Officer who will arrange for its identification and disposal under controlled conditions. This includes Fluorescent Tubes and Electrical Equipment, which may contain hazardous materials.
2. All waste paper, timber, plastic, cardboard, cable, piping must be placed into the Green Waste Skip.
3. All waste oil rags, oil dry granules, used plastic & material gloves, rubber belting, rubber shavings, rubber oil supply pipes, canvas and carpets must be placed into the Onyx Environmental Skips.
4. Any and all waste oil that you may need to dispose of must be reported to the Health and Safety Officer who will arrange for it to be disposed of under controlled conditions.
5. Any waste chemicals either identified or otherwise found or used must be reported to the Health and Safety Officer who will arrange for its controlled disposal.
6. All metal waste must be placed into the Blue (EMR) Waste Skips.
7. Please ensure that waste is segregated as above. Plastic cups etc should not be put in metal scrap bins, or filter cake skips. **USE THE CORRECT SKIP!**

Bins and skips to accommodate the waste are located around the sites at strategic positions and it is your responsibility to familiarise yourself with their identity.

Spillages

Our site at Servosteel Dudley borders the Fens Pool SSSI, which is protected by law. All surface water from this site drains to the Fens Pool SSSI, so anything spilt on our roadways has the potential of contaminating surface water draining to the Fens Pool SSSI. All of our surface water from Servosteel Stourbridge drains to the Stourbridge Canal. In order to mitigate any accident hazards, we have:

- Emergency Drain Covers, located in our weighbridge and in the Effluent Treatment Plant

- Emergency Spill Kits located around the exterior perimeter of the building at Servosteel Dudley, and one within the Pickle Plant at Servosteel Stourbridge.
- Emergency Shut Off Valve to Fens Pool Outlet at Servosteel Dudley.

Should you have a spillage of any kind, contact a member of staff immediately. Protection of the drainage network is of paramount importance!

Litter

Please ensure that all items of litter are safely deposited in waste bins located around the site. If you are unable to find a waste bin, please contact a member of our workforce and they will point you in the right direction. (Also see Controlled Waste Disposal).

Finally

PLEASE ENSURE THAT YOU BEHAVE IN AN ENVIRONMENTALLY RESPONSIBLE MANNER WHILST ON OUR SITE.

Emergency procedure.

In the event of an accident requiring emergency treatment, go to any internal telephone.

Dial 9 followed by 999, ask for Ambulance or any other emergency service required.

Safety starts with oneself & concerns everyone.

It is the company's policy that all aspects of the working environment, in each work area throughout the site, together with the key business processes, be maintained to an excellent standard.

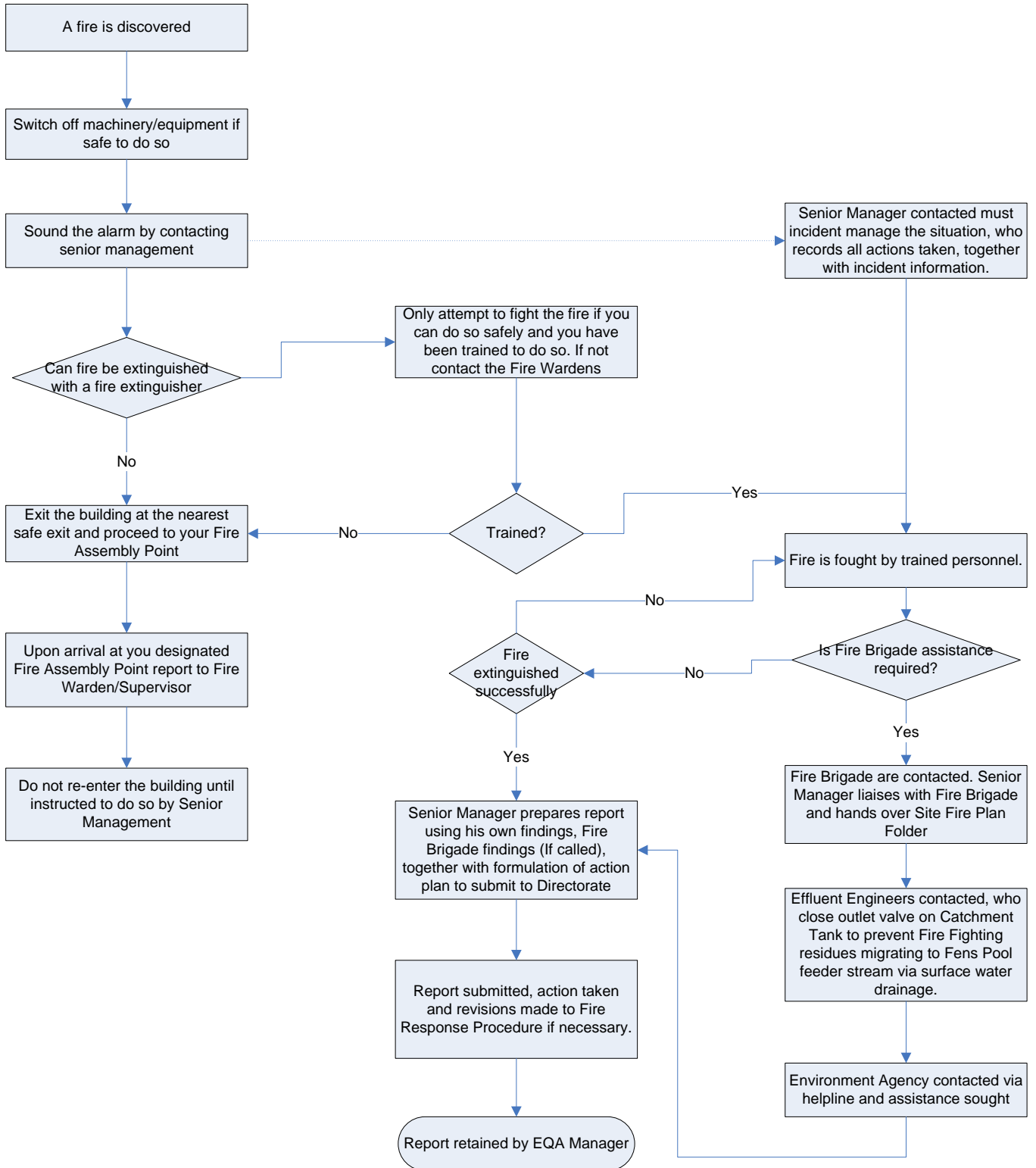
The managing director ensures that this high standard is upheld & carries out formal audits on areas such as noise, lighting, housekeeping & environmental issues together with reviewing any safety hazards on all sites. The results of all audits, together with appropriate actions are discussed by the health & safety committee & by the management team.

Last, but not least, all the safety procedures & practices mentioned in this policy must be complied with at all times & any breach of this may result in disciplinary action being taken.

Remember, safety begins with oneself & concerns everyone.

J. Spencer.

Managing Director, Servosteel.



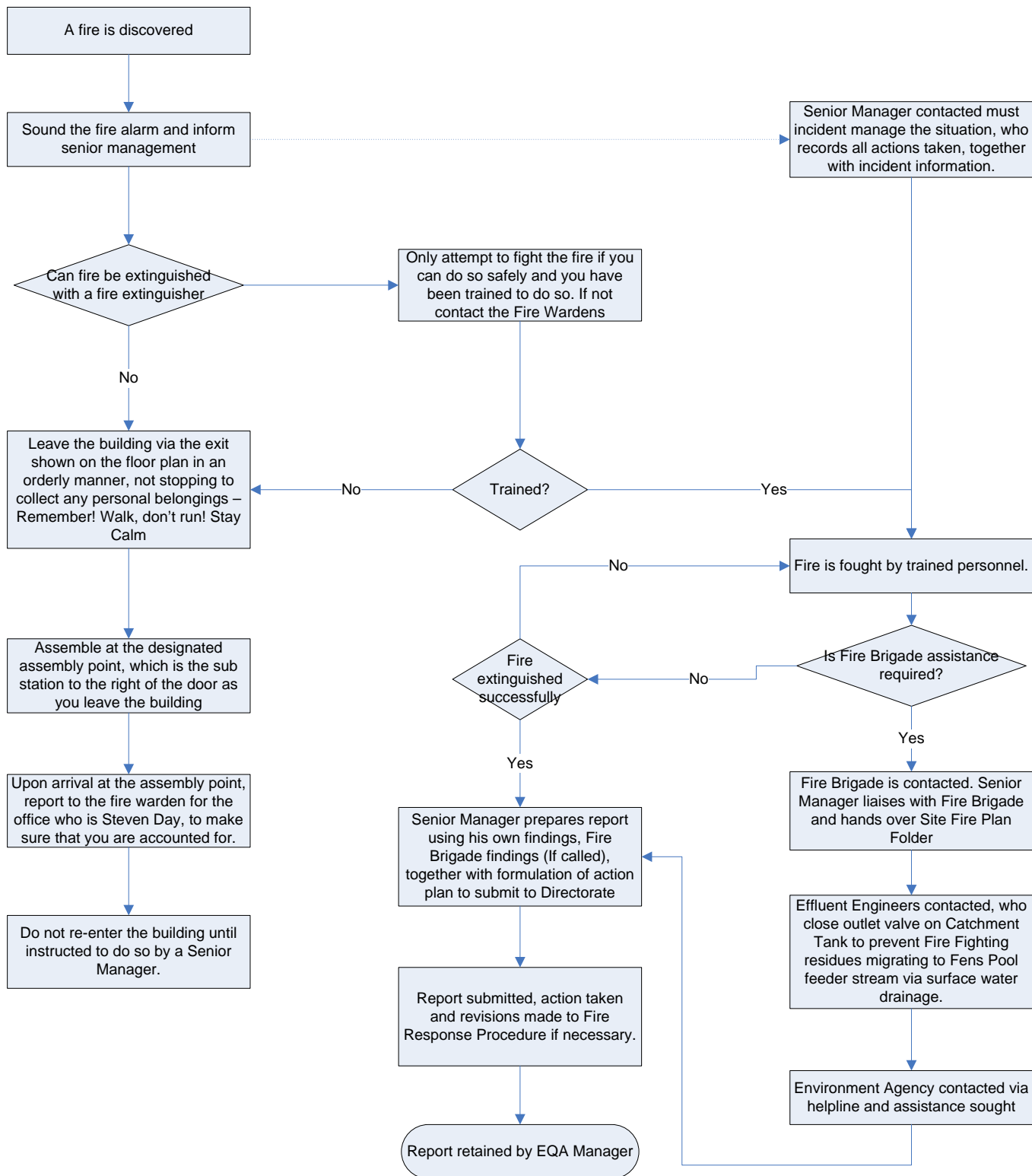
Important Information for Servosteel Dudley Site

Servosteel Dudley has been assessed as a low risk site by West Midlands Fire Service. However in the event of a fire on site, fire fighting foam could become a contaminant, as it would enter the surface water drainage system, which ultimately drains to the Fens Pool SSSI. As a result, in the event of a major fire outbreak on site, consideration must be afforded to the protection of the Fens Pool SSSI. This can be achieved by closure of the outlet valve on the catchment tank. In the event that this action was taken, specialist disposal of the solution would need to be arranged urgently.

Works Fire Response Procedure (Servosteel Dudley)

Responsibility: EQA Manager, Management Team, Supervisors, Fire Wardens (Ian Cole, Randy Bache, Richard Holloway)

Issue 2 31/10/2007 WPR



Important Information for Servosteel Dudley Site

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Office Fire Response Procedure (Servosteel Dudley)

Responsibility: EQA Manager, Management Team, Supervisors, Fire Wardens (Ian Cole, Randy Bache, Richard Holloway)

Issue 2 31/10/2007 WPR



SERVOSTEEL

PENNETT ROAD, DUDLEY, WEST MIDLANDS, DY1 2HA.



(01384) 471371



(01384) 471370 WWW.SERVOSTEEL.CO.UK

SUPPLIER/ SUB CONTRACTOR QUALITY QUESTIONNAIRE

CONTACT DETAILS

COMPANY NAME			
QUALITY CONTACT			
TEL: NO.		FAX NO:	
EMAIL ADDRESS:			
ENVIRONMENTAL CONTACT			
TEL: NO.		FAX NO:	
EMAIL ADDRESS:			

QUESTION	Please Tick Box	
	Yes	No
Q1. DO YOU OPERATE A QUALITY MANAGEMENT SYSTEM TO A NATIONALLY RECOGNISED STANDARD? IF YES, PLEASE ENCLOSE A COPY OF YOUR APPROVAL CERTIFICATE WITH YOUR REPLY		
Q2. DO YOU OPERATE AN ENVIRONMENTAL MANAGEMENT SYSTEM TO A NATIONALLY RECOGNISED STANDARD? IF YES, PLEASE ENCLOSE A COPY OF YOUR APPROVAL CERTIFICATE WITH YOUR REPLY		
Q3. ARE YOU PLANNING TO BE ASSESSED TO AN NATIONALLY RECOGNISED STANDARD (EMS OR QMS) IN THE FUTURE? IF YES, WHEN : _____		
Q4. DO YOU REGULARLY PERFORM MAINTENANCE/SERVICE WORK ON OUR SITE? IF YES, WHAT TYPE OF WORK DO YOU PERFORM: _____		

Signed:		Position:	
Date:			

PLEASE FAXBACK ON (01384) 471370, OR EMAIL: wayne.roden@servosteel.co.uk.



SERVOSTEEL

PENSNETT ROAD, DUDLEY, WEST MIDLANDS, DY1 2HA.



(01384) 471371



(01384) 471370 WWW.SERVOSTEEL.CO.UK

SUB CONTRACTOR ENVIRONMENTAL "CONTRACT"

As a Sub Contractor working on your site, we as a company could have a negative environmental impact, as work we conduct could result in the following

- Fugitive Emissions to Air
- Generation of Wastes
- Noise Emissions
- Potential Pollution

As a result, we have received a Sub Contractors Environmental Responsibility Pack which is designed to help take steps to mitigate these possible impacts.

I have received and read the following documents and will ensure that they will be communicated to my employees.

1. Request for Method of Work Statement (* if required)
2. Risk Assessment (* if required)
3. Environmental Contract
4. Duty of Care Leaflet
5. Accident Plan
6. Environmental Policy Statement
7. Health and Safety Responsibility

I have made my employees aware that they must not perform any act which has not been fully authorised by a member of Servosteel's management team.

Signed:		Print Name	
Position		Date	
Contact Tel:		Contact Fax:	
Email Address:			
Company Name			

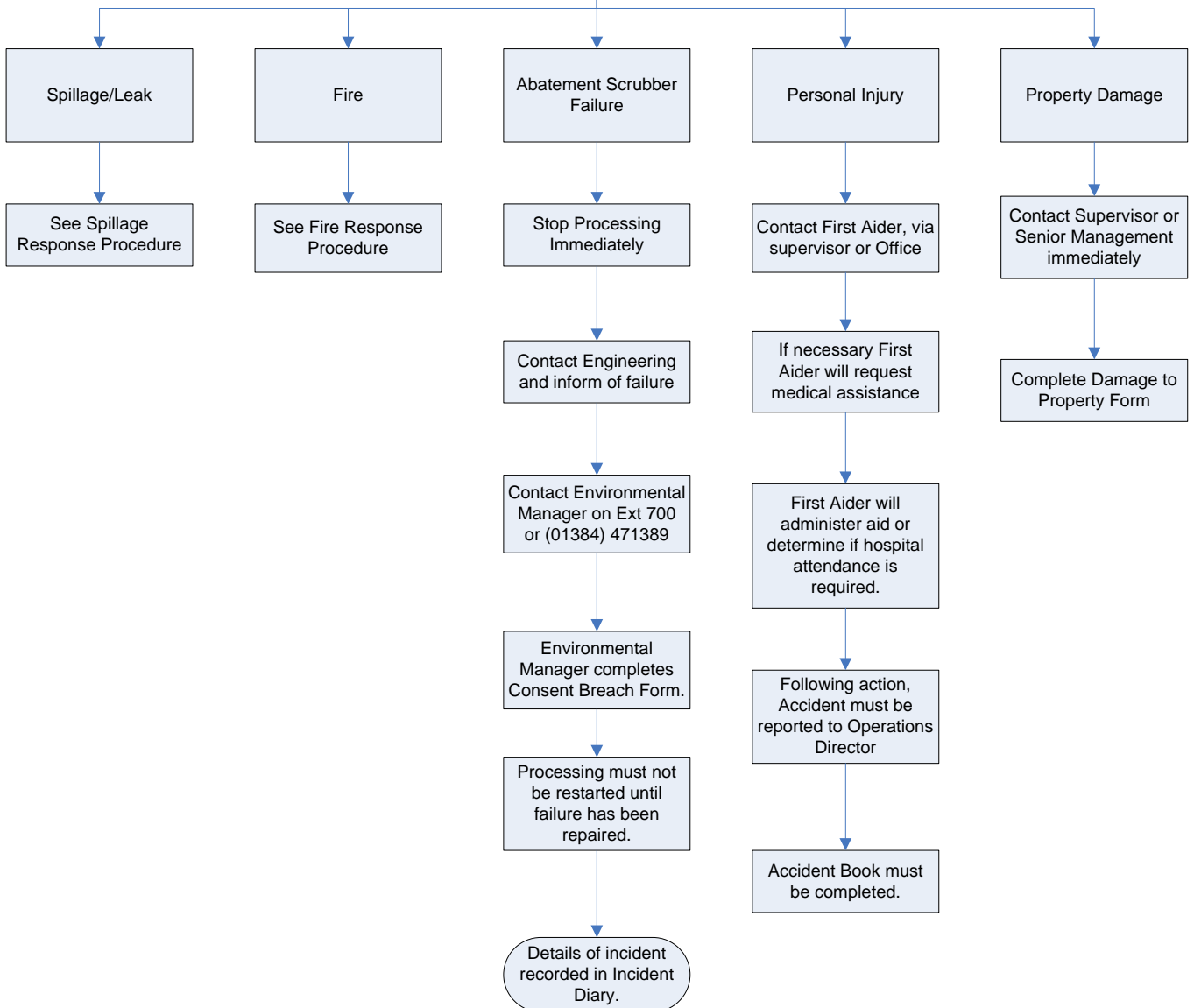
Please return your signed Sub Contractor Environmental "Contract" to Wayne P. Roden, either by email (wayne.roden@servosteel.co.uk) or by fax on (01384) 471370.

Issue 1 01/11/2004 WPR

Servosteel is a trading name of Oakside Solutions Limited

Company Registration Number: 04797346

Accident/Incident occurs



OAKSIDE SOLUTIONS LIMITED T/A SERVOSTEEL

ACCIDENT / INCIDENT PLAN

. IF YOU ARE IN ANY DOUBT, CONTACT EITHER PHILLIP GUEST OR WAYNE RODEN.

Issue 5 11/12/2007 WPR

STEP 1 – Assess the Risk

Safety is the number one priority, so when a spill happens the first thing to do is to assess the risk. What is the risk to:

1. Human Health
2. The Environment
3. Property

Identify the spilled material either from the container's label or from the Material Safety Data Sheet (MSDS) which is available via the Intranet in electronic form or in hard copy by contacting Wayne Roden

STEP 2 – Select PPE

Keeping Safety as your priority, choose the appropriate Personal Protective Equipment (PPE) to respond to the spill safely. This information will be available from the MSDS.

IMPORTANT: DON'T LEAVE ANYTHING OUT – EVERY PART OF THE BODY SHOULD BE CONSIDERED, FROM HEAD TO TOE!

STEP 3 – Confine the Spill

Limit the spill area by blocking, diverting or confining the spill using:

- * Seals and Booms
- * Drain Covers

Stopping the spread of liquid to a water source, protecting drains and minimising the spill area are priorities. If spillage is on roadways or near drains, ensure that the Catchment Tank is sealed as soon as possible. Request Assistance from the Effluent Engineers.

STEP 4 – Stop the Source

Once you have the spill confined, locate and stop the source by:

- * Righting containers which may have fallen
- * Closing valves if open
- * Plugging the leak in the damaged container

STEP 5 – Evaluate incident and clean up

Re-assess the incident and develop a cleanup action plan using absorbent pads or Chem Dry. If spill is large (in excess of an Intermediate Bulk Container, contact Phil Guest or Wayne Roden to arrange Specialist Assistance

Step 6 – Decontaminate and Complete Reports

Remember that all contaminated material will need to be disposed of correctly. Place in supplied bags and mark up with the contaminating substance. Contact Phillip Guest or Wayne Roden to arrange disposal.

Complete Spill Paperwork, which is available from Wayne Roden.

Spill Response Procedure

Responsibility: EQA Manager, Management Team, Effluent Engineers, Supervisors

Issue 3 31/10/2007 WPR



SERVOSTEEL

PENSNETT ROAD, DUDLEY, WEST MIDLANDS, DY1 2HA.



(01384) 471371



(01384) 471370

WWW.SERVOSTEEL.CO.UK

ENVIRONMENTAL POLICY

All our employees recognise their duty of care with respect to the environment. It is our declared policy to minimize the effects of our activities on the environment as outlined below. We will:

- Assess the effects of our activities on the surrounding environment.
- Be committed to a programme of continuous improvement and pollution prevention by:
 - Limiting the amount of waste produced to water, land and air and adopt re-use or recycling of materials where possible.
 - Effectively managing the consumption of Energy and Water
 - Implementing Pollution Prevention Best Practice
- Maintain awareness of any developments designed to improve the environment and apply best available technology where viable.
- Communicate the policy to employees and interested parties.
- Comply with **all** environmental legislation, regulations and other requirements relating to our activities, with particular reference to:
 - MCERTS Self Monitoring of Effluent Flow
 - MCERTS Emissions Monitoring from Emissions Point A1 (Permit KP3732PL)
 - Environmental Permitting Regulations (IPPC) Permit KP3732PL
- Set definable and measurable Environmental Objectives and Targets.
- Maintain contingency plans to be followed in the event of a significant environmental incident.
- Train all employees so as to raise awareness of environmental matters.
- If requested, provide information and assistance to customers on environmental issues arising from our products and services.



Jim Spencer
Managing Director

Date: 1st May 2009

Servosteel is a trading name of Oakside Solutions Limited

Sub Contractor Competence, Training and Awareness Form

Sub Contractor					
Date due on site		No of Days		Area of Work	
Task Description					
Competency required					
				Servosteel Staff Only	
Contractor Personnel Name (to be completed by contractor)	Competency/Training/Awareness Justification (to be completed by contractor)			Satisfactory?	If no, action required
Comments					
Completed by:				Date	

See reverse of sheet for guidance

Competence, Training and Awareness Form Help

	Guidance	Completed by
Sub Contractor	The name of the sub contractor who will be conducting a task on Servosteel's site	Servosteel
Date due on site	The date the sub contractor is expected to be attending on site. If this form is for a contract, then the date will be stated as the date that the contract begins	Servosteel
No. of Days on Site	The number of days that the contractor is expected to be on site. If this form is for a contract, then the number of days will be stated as "Ad Hoc"	Servosteel
Area of Work	The area in which the sub contractor will be working. For example "Effluent Treatment Plant"	Servosteel
Task Description	Description of the task that the contractor will be conducting. For example "Service and calibration of pH measurement equipment"	Servosteel
Competency required	Description of the competency required from the sub contractor and their personnel. This will range from a very simple competency such as understanding "Servosteel's Health Safety and Environmental Requirements" to very specific competencies such as "MCERTS Inspection of Self Monitoring of Effluent Flow Equipment Check"	Servosteel
Contractor Personnel Name	To be completed by the sub contractor, this will be the names of the actual personnel who will be attending site on the sub contractors behalf, i.e. Your Employee.	Sub Contractor
Competency / Training / Awareness Justification	To be completed by the sub contractor, this is the most critical field that must be completed. Servosteel establishes a competency that is required from the Sub Contractor. It is in this field that the Sub Contractor must justify how the personnel stated meets the competency required. For example, if the competency identified is "MCERTS Stack Monitoring Level 1" then the contractor would answer "Level 1 MCERTS Registration Number" and the relevant registration which would demonstrate that competence was achieved.	Sub Contractor
Satisfactory	Does the justification supplied by the sub contractor fulfill the requirements of the competency established by Servosteel. To be answered Yes or No	Servosteel
If no action required	If the answer is No, then the Sub Contractor is technically unqualified to perform the task stated in the task description. In some cases a dispensation can be issued. This would be recorded here.	Servosteel
Comments	To be completed by the sub contractor, any comments that they would like to make pertaining to the required competency, training and awareness of their personnel.	Sub Contractor
Completed by	To be completed by the sub contractor, the printed name of the person that has completed the form on the sub contractors behalf.	Sub Contractor
Date	To be completed by the sub contractor, the date that the Competence, Training and Awareness Form was actually completed by the sub contractor	Sub Contractor