

Project No. 1658176-01

June 20, 2014

Mr. Jeff Nee
GATX Corporation
222 West Adams Street
Chicago, IL
USA, 60606

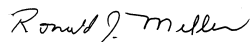
SUBJECT: REGISTRATION PROGRAM

Dear Mr. Nee:

Please find attached the Audit Report documenting the results of our Registration Audit of your management system to the RCMS®:2013 standard conducted at your Red Deer facility on Jun 17-20, 2014. The Recommendation at the end of Section 4 of this report provides a status of your registration.

We thank you and your organization for the support and co-operation provided during the audit and if you have any questions, please contact the undersigned.

Best Regards,



Ron Miller
SAI Global Team Leader
Encls.

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MANAGEMENT SYSTEM AUDIT REPORT

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REPORT DISTRIBUTION

GATX Corporation
SAI Global File
Ron Miller

COMMERCIAL- IN – CONFIDENCE

The contents of this report must not be disclosed to a third party without the agreement of the SAI Global Client

DISCLAIMER:

This report has been prepared by SAI Global (SAI Global) in respect of a Client's application for assessment by SAI Global. The purpose of the report is to comment upon evidence of the Client's compliance with the standards or other criteria specified. The content of this report applies only to matters, which were evident to SAI Global at the time of the audit within the audit scope. SAI Global does not warrant or otherwise comment upon the suitability of the contents of the report or the certificate for any particular purpose or use. SAI Global accepts no liability whatsoever for consequences to, or actions taken by, third parties.

SECTION 1 - COMPANY INFORMATION**Company Name:** GATX Corporation**Address:**

Red Deer, Alberta

CAN, T4P 3P7

Client No.: 1658176**Contact Person:** Mr. Jeff Nee**Title:** EMS**SECTION 2 – PURPOSE**

The purpose of the audit was to evaluate the extent of conformance to the referenced standard, confirm the effective inter-action between the elements of the system audited, and verify demonstrated commitment to maintain the effectiveness of the system. The purpose of this audit report is to summarize the degree of conformance with relevant criteria, as defined within this report, based on the evidence obtained during the audit of your organization.

This audit was performed in accordance with the requirements of SAI Global procedures which reflect the requirements and guidance provided in recognized international standards relating to audit practices such as ISO/IEC 17021, ISO 19011 and other normative criteria. SAI Global Auditors are assigned to audits according to industry, standard or technical competencies appropriate to the organization being audited. Details of such experience and competency are maintained in our records.

In addition to the information contained in this audit report, SAI Global maintains files containing details of organization size and personnel as well as evidence collected during preliminary and subsequent audit activities relevant to the application for initial registration of your organization. Such information includes details of your primary contact persons and site addresses. Please take care to advise us of any change that may affect the application and/or registration or may assist us to keep your contact information up to date, as required by our Terms and Conditions.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

SECTION 3 - MANAGEMENT SYSTEM AND SCOPE

Audit Standard: RCMS@:2013

US SIC / NACE Codes: 6289 / J67.1

Scope of Registration

Providing lease financing and maintenance services to customers operating rail, air, marine and other targeted assets.

All sites are dependent on the Chicago HQ (file 1058468) for Management and Legal services and activities, design, and planning.

Statutory and Regulatory Requirements Referenced

The site EHS and Corporate Director of EHS identify legal and other requirements using web sites "OSHA Act Regulations and Code books and web site, Gov of Alberta- Work Safe and Alberta Sustainability Reserve department web site, Alberta Industrial Railroads. Site Manager is involved with the committees of the Industrial Railroad group which is involved in tank car and railroad legislation. A master list of legal requirements is maintained at each site.

It appears that all legal and other requirements are Identified and included in the site compliance calendars.

Dependency Note

This company's Registration is dependent on the continued registration of GATX Corporation, Chicago File No. 1058468.

Sites included in the registration for this cycle are:

HQ- 1058468-02 Chicago IL USA- Q2 2016

Red Deer, Alberta June 2014- Service Center Canada
 Kansas City, Kansas –August 2014- Field Service
 1069173-01 Colton, CA- Q2 2015- Service Center Canada
 105472-01- Plantersville, TX-Q2 2015-Field Service

SECTION 4 - AUDIT DETAILS AND RECOMMENDATION

Type of Audit: Registration Audit and upgrade to the RC14001:2013

Audit Dates: Jun 17, 2014 to Jun 20, 2014

Duration of Audit: **Person(s): 1 Day(s): 3.5**

Audit Team

Position	Name
Team Leader	Ron Miller

Re-Assessment Audit

Executive Overview

The organization has established, implemented and maintained a Responsible Care Management System: 2008 that meets the requirements of the standard. Improvements continue to be made in developing structured systems and procedures are effectively controlled, implemented and shared at the Field Service sites. As a result of the audit no Nonconformances, 10 Area of Concerns and 9 Opportunities for Improvement have been identified.

Positives noted :

- Transitioning the database for documents to SharePoint and is available to all sites.
- “Good Catch” is utilized to identify near misses and opportunity for Improvements.
- EHS supervisor is working on developing and Preventive Stretching Program
- Excellent communication meeting with the EHS managers and sharing of information.
- Overall plant is cleaned and organized. Maintenance area extremely clean and organized.
- Excellent follow up on injuries and participation from top management in presenting the company concern focus.
- Safe Start is an excellent program for communicating safe practices and behavior.
- 5 C Process is utilized for continuous Improvement projects.
- Corporate is working on establishing a Corporate web based PM data base. (Hippo).
- All training records were in good order and meet the intent of the standard.

Management System – Main Components

Management System Documentation

The management system manual revision was reviewed and found to be in conformance with the requirements of the RCMS@:2013 standard.

Management Review

Management review meetings are conducted annually. A review of the records of the most recent management review was performed and found to meet the requirements of the RCMS@:2013 standard.

Policy

Based on the results of this audit, the GATX Corporation management system is effectively implemented and fulfils the stated policy.

Objectives

Based on the results of this audit, the GATX Corporation management system is effectively implemented and the stated objectives are being met.

Internal Audits

Internal audits are being conducted at planned intervals to ensure conformance to planned arrangements, the requirements of the RCMS@:2013 standard and the established management system.

Compliance Evaluation

GATX Corporation has implemented processes for periodically evaluating its compliance with applicable legal and other requirements. Compliance evaluations are conducted by corporate and is done annually as part of the internal audits conducted by corporate.

Continual Improvement

GATX Corporation is implementing an effective process for the continual improvement of the management system by the use of the policy, objectives, audit results, data analysis, corrective and preventive actions and management review.

Past Performance - Client and SAI Global Audit Review

This is the first audit at the Red Deer facility since 2006 and no major issues had been identified at the last audit.

Review of Changes

The RCMS program has been integrated into the corporate sampling plan and now includes all the sites from Canada and the USA.

Previous Audit Issues

None were identified.

Usage of Marks, Logos and Certificate

The organization has complied with the control requirements for marks logos and certificates. Responsible Care marks and Logo are used on letterhead, web page and business cards and on sales literature. The certificates are available upon request.

Environmental and/or Health and Safety Management System Components**Site Inspection**

The audit team toured the site and concluded that the conditions of the site reflect an effectively implemented management system.

Aspect and Hazard Identification

Implementation of necessary operational, monitoring and measurement controls for the organization is adequately demonstrated. These procedures and controls for the site activities were reviewed during the audit and at previous Service Center and Field Service audits.

Based on the results of this audit, the GATX Corporation management system has established implemented and maintained procedures for the identification, evaluation and upkeep environmental aspects and OHS hazards and the associated impacts and risks.

Operational Controls, Monitoring and Measurement Processes

Implementation of necessary operational, monitoring and measurement controls for audited significant environmental aspects and relevant OHS hazards is adequately demonstrated. The program collectively identifies the risk related to the work conducted at the Field Service and Service Centers.

Highest ranked OHS risks were: Confined Space, Working with tools and equipment, Using ladders, Entry into rail cars, Switching in the yard, Switching in building or structures, General switchman operations, Site access by unauthorized personnel, working at heights, operating track mobiles and locomotives.

Highest ranked EHS:

Mostly related to the chemicals in the tanks. Others include Painting operations, Flaring LPG and Ammonia.

Emergency Preparedness and Response

GATX Corporation has identified the potential for Fire, Severe Weather, Medical, Spills, and other standard emergencies situations and developed and tested response procedures. Drills are conducted 4 times a year for confined space entries and annually for emergency preparedness. The last drill covered an evacuation and was conducted May 26, 2014. Last confined space drill was conducted June 10, 2014.

Recommendation:

The results of this Assessment and upgrade audit have confirmed that GATX Corporation:

- Continues to effectively implement a management system that meets the RCMS®:2013 standard for the scope of registration identified in this report.
- Ensures the management system remains effective considering internal and external changes.
- Demonstrates a commitment to maintain the effectiveness and improve the management system in order to enhance overall performance.
- Operates the management system to ensure the achievement of the stated policies and objectives.

Therefore, as a result of this re-assessment, a review of the performance of management system during the previous three years and a review of relevant customer complaints, a recommendation for re-registration to the RCMS®:2013 standard for the scope of registration identified in this report will be submitted to SAI Global's review team.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

SECTION 5 – AUDIT FINDINGS

Functions, Activity, Processes and Areas Audited	
All of the applicable requirements of the RCMS®:2008 standard for the functions, processes and areas listed below were reviewed.	
Function/Activity/Process/Area	Details
Summary of RCMS 2013 Changes	The Corporate EHS Director had set a matrix to address all of the changes and reflects how these changes are to be addressed. Includes Tech Spec Element, Summary of 2013 changes, GATX RCMS Response /Modification, Policy /Program /Form change. Energy Efficiency will be addressed in the year end Risk assessment and will be updated in December 2014. PSM requirements 2 scenarios apply to GATX- Residual Commodity Cleaning activities and GATX engineering, maintenance and quality programs that have ability to impact release of chemicals from a rail car not under GATX control. GATX is addressing all new requirements and has an action plan for all gaps. Meets the intent of the new standards at this time. No issues or concerns.
Training	SharePoint is utilized to track the identified training and reflect what job category receives what training. GATX 2014 Annual training Plan. The EHS Supervisor has set up a matrix that tracks each person at the site and what training based on the training plan they are required to take 2014. Reviewed 7 persons and verified they had received or is scheduled for the identified training. Examples for 2013 and 2014 Completed 2013 2014YTD

	CS	WHMIS	Fit Test	EMR
2 nd Shift - - Painter- Safety Attendant – August Yasinski –Fit Test Shaun Wilson- Boiler Operator Florin Trainee- Boiler and Tank clean Steve Sully Paint Line Dale Rossi- Finishing – Supervisor Rick Schott Crane☑	x x x x x x x	x x x x x x x	x x x x x x x	x x x x x x x
Competency is based on OJT for all new employees and long time employees who are experienced are grandfathered based on job experience. Trent is EHS Supervisor Jeff Nee Corporate EHS Tyler Yates -Production Supt Positive- All records were in good order and meet the intent of the standard.				
Contractor Training	<p>Contractor and Safety visitor Policy Rev 4 Attachments 10- Annually review all contractors and record on Attachment 10. Covers Basic introduction and PPE requirements. Examples of new contractors Contractors- 1)Conestoga –Rovers Associated Ltd. – Ground Water sampling-signed 6/3/14 2) A&B Rail- 6/18/14 Rail repair Old CANEM- Electrical-6/3/2014 Flint Electrical- Electrical contractor used in the past Kone- June 4, 2014☑ Century V.- FX- Aug 13, 2013☑ Independent Control System- HVAC- 6/9/14☑ A. Liquide 12/6/2014 Prime Boiler- May 15, 2014 Contractor’s records are updated and resigned annually. AOC: Review the contract review section of the contractor program and ensure inspections are completed or procedure updated to reflect current practices. (Annual review of Contractors). Ensure records are being maintained.</p>			
Plant Tour	<p><u>Bay 5&6-</u> Ladder in front of FX Storage shed /hose in front of shed and door not balanced correctly- Housekeeping <u>Bay 4 –</u> Fire hose- no longer present- consider painting over Rack label for load limit rating Flammable cabinet- move 2 quarts of materials <u>Repair B-</u> Reviewed confined space inspections☑ Safe Start- Air Test compressed gas for breathing masks- checked every 6 months 5/30/14 due 11/30/14☑ <u>Repair-</u> Posted Monthly safety meeting minutes in the plant- 3/5/14, 4/14/14, and May 5. Each worker has a JSA and book. Interviewed the Safety Attendant – August Yasinski Reviewed 4 confined space inspections and all recorded on form SF007 dated 9/12/11. 0075855, 0075858, 0075861, 0075859. Log book is used to record all units. Calibrated unit 2360 is utilized to bump test the units before used.</p>			

	<p>Discussed Policy, legal and other requirements, hazards, communication, and emergency preparedness and response. Safety attendant is also the site incident commander and on the response team.</p> <p><u>Finishing-</u> -MOC for Grit recycle unit- MOC for Interior lining 6/9/14 approved. Paint Room-MEK Interviewed 2nd Shift operator-Nelson M.- Painter Discussed policy, hazards, communication, operational controls, Objectives and targets. Both persons interviewed did an excellent job of communicating the policy, hazards, operational controls and emergency preparedness. . Continuous Improvement – 5 C process is utilized to work on projects. Curing Furnace Replacement- No issues or concerns.</p>
<p>5.2 Annual Reporting</p>	<p>Positive- Transitioning the database for documents to SharePoint and available to all sites.</p> <p>Sustainability- working on projects- New variable air compressor has arrived and is to be installed Q4 2014. MOC – Need to ensure that new equipment has EHS involved in the initial stages of order new equipment. Wireless- installed new wireless system- trench in the outside track area. Good catch was brought up to cordon area and also was part of a tool box meeting. Goals are being established at the site level EHS supervisor is working on developing a Preventive Stretching Program Trent is EHS Jeff Corporate EHS Service centers Hearne, TX, Waycross, GA, Colton CA. Canada Montreal Moose Jaw SK, Red Deer AB Field Service Terre Haute IN, Sarnia, Freeport LA, Plantersville TX. 2 notices of compliance Hearne Annual Air Compliance Cert June 2013, and Waycross Air missing record. Focus on Energy Savings Contractor training including evacuation is covered for all visitors. JSAs are Generic and established Shop portals are used to record date and provide information on JSAs. Currently have 45 for repair nearly 100 for the corporation. Piloting a job portal- Site specific JSA 006 dated 6/5/13- Raising and lowering a car- jacking. MSDS updated every 3 years- Interviewed the Office Clerk and discussed the MSDS process for ensuring current copy (last 3 years) is obtained. In some cases a letter from the chemical manufacturer has been accepted. Consider a more formalized process for defining the process for notifying the offices (Montreal, Calgary or Chicago) that an updated SDS /MSDS are required. Previously identified in Terra Haute audit and is a corporate responsibility.</p>
<p>1.0 Policy and Leadership</p>	<p>Policy and Leadership – Policy communicated to all employees thru daily stand ups, good catches thru network, new employee orientation-RC segment, Customer letters are sent each year, letterhead, web site, Fire Marshall communication. Stakeholder communication- examples- local feed mill, and local plants, fire marshal annual tour, Manual is dated 6/16/2014. Now includes the CIAC Partners in Canada in the RCMS program -Updated with the new positions and changes related to RCMS: 2013(Process Safety Code- Clean commodities and chemical containment and sustainability in regards to energy.</p>

	<p>Organization chart date 10.29.13 provides top level and reporting for EHS. Job descriptions for key responsibilities are under 1.4 in the Policy Manual. Business Scope- Executive overview- GATX bulk of business is the rail car leasing business.</p> <p>Policy dated Feb 13, 2013 - Key Points- Meet or exceed customer requirements, drive CI (Operational Excellence), employee EHS, Security, prevent injuries and pollution prevention. Guiding principles, Supplier partnerships.</p> <p>Understanding- Regulatory requirements. Continuous improvement, Objectives and Targets- to their specific areas. EHS and awareness of high quality product and supplier partnerships.</p> <p>Ammonia liquid and gas- car cleaning, caustic for boiler treat, asbestos removal. Meets the intent of the standard.</p>
<p>Plant tour</p>	<p>Red Deer EHS Manager provided a plant tour of the facility. Other GATX personnel in attendance were Jeff Nee – Corp Dir of EHS</p>
	<p><u>2. Planning-Planning (2.1 through 2.6)</u> <u>2.1 – HSS&E Hazards and Risks identification and Evaluation</u> GATX Rail EHS&S Risk Assessment 12-20-11 Highest ranked risks– Working with tools and equipment, Using ladders, Entry into rail cars, Switching in the yard, Switching in building or structures, General switchman operations, Site access by unauthorized personnel, working at heights, operating track mobiles and locomotives. Factors Deviation, consequences, safeguards, risk based on worst injury and likeliness.</p> <p><u>MOC/JHA</u> Example 1- Hi VAC installation- MOC initiated 1/8/14 Move High Vac system and place unit on stilts alongside the side of blast bay (improve returning grit into system and reduce ergonomic issues with shoveling). Utilize MOC form. JHA form also filled out to review any new hazards as a result of the move or new location. JHA 4/1/14 not signed. Attendance and Example 2 Remove exterior from exterior jacket 3/28/14. AOC: JHA require signatures by the attendees. Ensure signatures are obtained and records maintained as part of the JHA process.</p> <p><u>Environmental Aspects Evaluation</u> In the context of the HAZOP the departments and Service centers. Updated every 3 years or as changes take place. Section 3-10. Last updated May 2012 and due for updating. Service Centers including Terre Haute. New products, processes and changes are handled through corporate. No new processes in the last 2 years.</p>
<p>Permits</p>	<p>Legal Compliance Evaluation</p> <p>Utilize People Soft and corporate provides guidance and overview for all legal and other requirements.</p> <p>Compliance Calendar- Reviewed June- 2014. All action items are current. <input checked="" type="checkbox"/></p> <p>One- Permit Authorization and covers all wastes, air and hazardous wastes. Approval # 1089-02-00 Application # 004-1089 issued Jan 1, 2011 expires Dec 2020. <input checked="" type="checkbox"/></p> <p>Annual report last submitted- 2/21/14 <input checked="" type="checkbox"/></p> <p>2 Underground Storage tanks- monthly breach tests- 4/4 <input checked="" type="checkbox"/></p> <p>GATX weekly Haz waste Storage area – 10/10 <input checked="" type="checkbox"/>. Monthly by EHS Manager 5/5 Weekly- 12/12 Cranes inspection Monthly in house 2 25 tons and jibs and hoists – 7/12/13</p>

	<p>2013 inspections 25 Ton East and 25 Ton West and 7 hoists and jibs units. Kone Crane Annual- Nov 2013 Ground water wells- sample annually- Last sampled June 4, 2014. Parkland GEO provided results from June 5, 2013. <input checked="" type="checkbox"/> SVA dated 5/27/14 Rev C.</p> <p>Lift Trucks- Daily inspections for the forklifts reviewed All records in good order. Daily Hazards Waste Manifests- Only has about 1 a year. Hazardous Waste- Ae27057-2/27/13 Review the Aug 2, 2013 shipment and verified that Solvent NOS does not need to be manifested.</p> <p>Jack Stands 32 units and new ones are being built and older ones taken out of service. Review the process for maintaining records for the jack stands. Last annual inspection was done Sept 13, 2013 for 4 hydraulic units but records were not specific to all units inspected. AOC: Jack Stand inspections- Ensure annual inspections for new and existing jack stand and records are maintained.</p> <p>Fire Extinguisher- All conducted for 2014. Review a number of fire extinguishers, eye wash and showers. All had tags and were current through May. <input checked="" type="checkbox"/> Lanyards- visual daily preuse- Annual- Fork Lift, Track mobile<input checked="" type="checkbox"/></p> <p>2.4 Stakeholder perspective is the employees, contractors, neighbors and customers. Site management has weekly meetings to discuss any issues or concerns. Any customer or community complaints are forwarded to corporate for EHS.</p>																																													
<p>2.5<input checked="" type="checkbox"/></p>	<p>Goals, Objectives and Targets</p> <p>The organization shall establish Responsible Care® goals, objectives, and targets based upon its prioritized risks, stakeholder input and regulatory, legal and other Responsible Care® related requirements to which it subscribes with time frames and responsibilities for accomplishment. These goals, objectives and targets shall be established for each relevant function and shall reflect the organization's commitment to continuous improvement.</p> <p>Goals and Objective: Monthly scorecards for corporate and includes all sites for Field Services includes - 5 Fast Tracks, and 6 on site and 13 mobile crews. Safety Goals- are tracked and included in the Field Service Centers 15.</p> <table border="1"> <thead> <tr> <th></th> <th>Goal 2013</th> <th>Corporate</th> <th>Red Deer-Goal</th> <th>YTD</th> </tr> </thead> <tbody> <tr> <td>TIR</td> <td></td> <td>5.92</td> <td></td> <td></td> </tr> <tr> <td>LTI</td> <td></td> <td>1.18</td> <td></td> <td></td> </tr> <tr> <td>Restricted Work</td> <td></td> <td>1.58</td> <td></td> <td></td> </tr> <tr> <td>Incident Rate</td> <td></td> <td>2.76</td> <td></td> <td></td> </tr> <tr> <td>Days off Work</td> <td></td> <td>641</td> <td></td> <td></td> </tr> <tr> <td>Red Deer</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Dart</td> <td>3.0</td> <td></td> <td>6.55</td> <td>4.55</td> </tr> <tr> <td>Good catches to Dart Ratio</td> <td>12</td> <td></td> <td>12</td> <td>49</td> </tr> </tbody> </table> <p>All sites have made great improvements in reporting Good Catch to DART ratio.</p> <p>Recordable 0 0 4.55</p> <p>Safety Incentive Program Full payout each site pay out quarterly. No payout in 2013 on target for 2014.</p>		Goal 2013	Corporate	Red Deer-Goal	YTD	TIR		5.92			LTI		1.18			Restricted Work		1.58			Incident Rate		2.76			Days off Work		641			Red Deer					Dart	3.0		6.55	4.55	Good catches to Dart Ratio	12		12	49
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	<p>92% Workers Comp were related to Sprains and Strains of in US and 62% DART injuries worldwide were related to Strains and Sprains. Employee Participation- Site is rolling out a Preventive Stretching program.- Safety Attendant and employees brought up program. Developing the program and started in June 2014.</p> <p>Continuous Improvement Projects- Corporate</p> <ol style="list-style-type: none"> 1) Network wide initiative to reduce ergonomic injuries 2) EHS Policy ad Training Program Improvements – 6 total programs 3) Implement First Aid reporting- In place and tracked on the local First Aid log- and data is inputted into SharePoint. Example 2014-06-03T10_30_00_CGRD- Scrape elbow and minor cut. Line of fire. 4) Safe Start Execution – EAU1 and EAU2 – Tool box talk and general awareness training for all employees- 5 core units – training and then every 6 months a new module is presented. All present employees are trained and new employees are scheduled to be trained. One module a month.☑ 5 Additional facility L2 or department L3 specific initiatives <p>Continuous Improvement Projects- Red Deer</p> <ol style="list-style-type: none"> 1) Preventative Stretching program – EHS manager – July 2014 2) Valve repair- ergonomic- August 2014 3) Switching Alarm installed paint and lining area adding alarm lights for switching movement. 4. Motor down on the makeup air and shuts down the air guns.(Interlocked) 5 <p>All goals and objectives are tracked and part of the corporate goals. No issues or concerns.</p>
<p>Implementation Operation and accountability</p>	<p>3.1 – Documentation is controlled from corporate and is the same for all Service Centers.</p> <p>3.2 Management system is driven from corporate and risks, goals and OSHA programs are part of the corporate program. All change is handled through corporate. Responsible Care Principles- Mange prioritized risks, ensure safe operations and maintenance, Protect workers, environment and create a safe and secure environment, Manage change for processes and activities.</p> <p>3.3. Organization chart is established at corporate. Job descriptions are written for the key positions and an organization chart is on the system.</p> <p>/3.5 Weekly meetings are conducted by management with the site employees. Discussions are around issues concerning health safety, security and working conditions. Suggestions are encouraged and examples were provided of suggestions made and improvements made.</p> <p>3.5.1 Safety information is provided to all employees. Customers have on line information and can track their specific car with all specification and regulations through the GATX web site. The web site is used for customer feedback and a customer service group answers any questions that are submitted. This was reviewed at GATX – Chicago earlier in the week.</p> <p>The “Tanker Trainer” is a proactive approach to communicating best practices for tank car use and unloading and training customers and training was being conducted in the area.</p> <p>3.5.2 Information is available through the corporate web site and GATX customer service department. Any questions at the local level are addressed and forwarded to corporate. A log is utilized to record these request.</p> <p>3.5.3 Mutual assistance is difficult with the small work force and limited resources at the site level. A local fire department is nearby and would be called for any emergency. The Tank trainer was brought to the area to train people on tank car basics and rescue information.</p> <p>3.6 The corporation recognizes individuals who make positive suggestion and are rewarded with gift certificate.</p>

	<p>Good catch program - flashlights and shirts for good suggestions. Incentive program is tied to safety results.</p> <p>3.7 See section 4 for Emergency Response Plan dated Feb 13, 2014. Is updated annually and includes responsible persons, spill report date form. All typical emergencies are reviewed and people are trained.</p> <p>Consider addressing Medical and active shooter in the Emergency preparedness procedure.</p> <p>Confined space entry is reviewed 4 times a year. Appropriate response to raw material, product, and Process waste and transportation incidents are addressed. No cars are allowed to be serviced unless they have been emptied and fall under the category of cars that are allowed to be serviced at the small service centers. Procedures are in place that define these parameters and are part of the documented system.</p> <p>The last drill covered an evacuation and was conducted May 26, 2014. Last confined space drill was conducted June 10, 2014.</p> <p>No issues or concerns.</p>
<p>Monitoring and Measuring</p>	<p>Monitoring and Measurement</p> <p>The organization shall regularly monitor and measure the key characteristics of its operations, products and activities that can have a significant effect on health, safety, security and the environment. This shall include the recording of information to track performance, relevant operational controls, and conformance with the organization’s Responsible Care® goals, objectives, metrics and targets.</p> <p>Calibration</p> <p>The Safety Attendant is responsible for calibrating the Confined space meters and ensuring records are maintained.</p> <p>4 Electrogas units’ records were reviewed and show bump test before use. Log sheet is utilized to track daily bump test.</p> <p>Calibration gas in lot #958800 expires June 2014.</p> <p>Extra unit to test propane cars and test gas cylinders in Boiler house not in the system. (Ibid 08120T9-001).</p> <p>AOC: Review the use of this instrument and determine calibration requirements and records that need to be maintained. Also ensure compressed calibration gas cylinders are secured.</p> <p>LEL meter used in the boiler house. Review the use of this instrument and determine calibration requirements and records that need to be maintained.</p> <p>SCBA tank inspection- SF038 Attachment -014 Attachment 13 SF051 Monthly SCBA and emergency use respiratory Reviewed 2 units on site. Regulator SN 7850050/Cylinder T142559- 12/9/2013 –Hydro 5/10 Regulator 7820188 /Cylinder- 7830228 1024/2013. Last hydro was 8/10 , 2 units and 2 tanks located in Emergency cabinet and at the cleaning rack Monthly inspections are done by the EHS supervisor for the SCBA. Hydrostatic test Steel tanks every 5 years for hydrostatic test for Canada. Re 02/17/12 Respiratory program.</p> <p>Repair & Cleaning</p> <p>Interviewed Car Repair Persons one boiler operator/cleaner, one person in training.</p> <p>Discussed Policy, Emergency preparedness, Hazards and Risks, Near miss, Community Involvement, Training and orientation, Operational Controls, communication(tool box, Day Board, Bulletin Boards), and Continuous Improvements- new boiler and new compressor to be installed.</p> <p>Significant hazards are Anhydrous Ammonia cars, ergonomics, slip trip and falls working on tankers, spills, steam.</p>

	<p>Discussed Safe Start program Discussed the Boiler operation – last inspected Nov 2013 due in 2 years. Observed Boiler operator conducting test for water hardness. Tanks with Molybdenum/water and old Caustic tank half full without labeling of material and associated hazards.</p> <p>Review communication of RCMS and company policy and ensure employees are more familiar with the key points.</p> <p>Continuous Improvement B Blaster for valve repair. Valve Repair- MOC in Boiler house</p> <p>Review the PPE requirements when handling or working around chemicals- No glasses were worn by the operator in the Utilities building.</p> <p>Monitoring – Fluke 35024 Sept 24, 2013 calibration Sept 2015.</p> <p>Reviewed operations of the oil water skimmer by the operator. A number of new trainees are in the utilities building and the tank unloading area. Consider a work instruction for best practices for skimmer operation. Tank car cleaning- Reviewed work order book and reviewed GATX 95591. fuel oil unload, JSA is supposed to be available but has to be Review the process for providing MSDS and Clean Recipes for persons unloading tank cars. Check sheet reflects but not always available. <u>MSDS verification:</u> Interviewed the Office Clerk in regards to the MSDS verification. Process- Clerk reviews the “MIS” information -list of cars in route from CNR and CPR. The cars have MSDS attached and are reviewed. If MSDS is not current an e-mail is sent to the office in Montreal, Calgary or Chicago to update the MSDS. Reviewed GATX 205075, GATX and 205096. Petroleum Road oil. Consider a more formalized process for defining the process for notifying the offices (Montreal, Calgary or Chicago that an updated SDS /MSDS are required.</p> <p>No issues or concerns</p>
	<p>Review maintenance records 1 Lift trucks 4 units Yale, Toyota, Clark- out of service and Selig- daily inspections are done by maintenance and PM for trucks is being developed at a corporate. Records are in the EHS office and up to Sept 2013.</p> <p>Consider a network database for preventive maintenance and tracking spare parts.</p> <p>1)FX- monthly 10/10 <input checked="" type="checkbox"/> 2) Slings- 4/4 3) Platform lifts 3 units all inspected monthly and current. 4) Ladder 10.3 4/18/14 Fall protection program- currently annual inspection and pre use inspection before use. EHS persons will be trained as a competent person for ladder inspection. Scheduled to be done. The maintenance area and all maintenance records were in excellent order. Corporate is working on establishing a Corporate web based PM data base. (Hippo). AOC: Ensure tag out is fully implemented as part of the LOTO program.</p>
<p>Performance Measurement, CA/PA</p>	<p>4.1 Organization monitors the O&T at the corporate and site level. See GATX – Chicago audit for the details and determination of trends based on key X metrics and trends.</p>

	<p>4.2 Compliance is reviewed by corporate and follows standard auditing protocol. Internal audit checklist is utilized and a report is generated. 32 action items were identified and entered into Action tracker. RC lead auditor training certificated for Jeff Nee verified-2013 by Verrico & Associates.</p> <p>-Evaluate its compliance- All sites have a comprehensive audit on EHS&S annually conducted by corporate. Also have site weekly inspections done at the site. EHS site compliance Calendar is set up for all of the sites and is reviewed during the audits. Compliance tracking tracking program lists all routine equipment calibrations test, inspection permits and reporting. Conducted at the site level during the May internal audit. Reviewed the list of Audits. Audit report includes compliance and management system findings.</p> <p>5.3 Internal audits- Red Deer was conducted by the Corporate EHS in wk of May 21, 2014 and all action items have been addressed. 32 items were identified. Action items are tracked on Corrective action Tracker. Audits are conducted at least every year for the Service Centers and Field Services. The US field services and mobile repair units shall be audited at least every 2 years. No issues or concerns.</p> <p>4.4. Process to work with customer concerns, suppliers, carriers, distributors contractors 3rd party logistics. These activities are handled through corporate and were reviewed during the GATX – Chicago in previous audits</p> <p>4.5/2.4 Effectiveness of its communication program- <u>4.6 Periodically evaluate the effectiveness of its communication with its stakeholders.</u> Report in the annual report- Annual report was issued March 17, 2014 and provided to ACC. Sent and approved by ACC. <input checked="" type="checkbox"/> Employees-Encourage more engagement of employees though meetings, safety committees, Safe Start program. JHSC. Monthly EHS meeting held 6/17/2014 Lead by the Director of EHS and included all site EHS people on a conference call. Metrics and issues were discussed, compliance reporting and upcoming reports due, Minutes are issued and posted at the sites. Management-Interviewed the Site Manager Scheduled the Tank Trainer for 2015 EHS communicates with the neighbors and discusses the chemical and products. Invite fire department in to visit- May 2014 Sites- Community events- Tanker Training- customer good feedback. <u>Process for handling complaints or concerns-</u> with communities or neighbors Each site maintains a list of community Contacts –Reviewed Red Deer- QF 120 2013 Log entries-11 total-RCMP, Fire Dept., Neighbor communication- annual stakeholder communication , only one was a complaint and was in regard to smell of lagoon. 2014 entries- 2 YTD logged. AOC: Ensure stakeholder concerns are entered into the system and recorded on the QF121 form for Community Concerns or Complaints. (Neighbor complaint on odor was not logged.</p> <p>Employee Survey by HR October 2012- feedback was reviewed and was one of the factors for establishing the behavior based program. Customer Service did survey – Q1 2012 Action items more communication, promote from within. Another is schedule for Q4 2014.</p> <p>4.6 Corrective/Preventive action</p>
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	<p>SharePoint database is utilized to track corrective preventive actions, incidents and near misses. Started late 2012 and all action items are entered into the system.</p> <p>No issues or concerns.</p> <p><u>4.6 Accidents and Incidents-</u> Procedure- 51914 was reviewed and updated. Utilize the 5 Why defining Root Cause. Reporting and documentation is defined. A teleconference will involve for DART injuries VP of Operations, GM, Corporate EHS, HR, Production Mgr. Responsible Supervisor and affected employee for all incidents as defined in the procedure.</p> <p>Final incident report must be signed off by a high level cross functional team. Utilize the SF-027EHS&S Incident Investigation Report-</p> <p>Goal SF 027 form – in SharePoint - Implement First Aid reporting- In place and tracked on the local First Aid log- and data is inputted into SharePoint. Example 2014-06-03T10_30_00_CGRD- Scrape elbow and minor cut. Line of fire. Example – SF027- 7/4/14 Incident report was filled out – back injury while lifting a BOV 50# and turning. Mgt review of Incident was held 4/15/14 and required persons were in attendance. 5 action items and are closed or auctioned. Excellent follow up on injuries and participation from top management in presenting the company concern focus. Example 2013-08-14- Eye injury. - went to doctors only minor irritation. Closed</p> <p>Action items are done immediately and if need more follow up are put on the action tracker. Reviewed corrective action tracker and all actions are addressed and closed out in a timely manner.</p> <p>4.7 records QF1602- Dated Jan 17/2014 <input checked="" type="checkbox"/></p> <p>Records Directory- The organization has established and maintained a procedure for the identification, maintenance and disposition of RCMS records, Sampled Air Permits(Permanent), Mgt Reviews records Internal audits(5 on site 5 at remote), Contractor records(current plus past year), Drill records(5) , training(Length of Service), MSDS(Permanent).</p> <p>No issues or concerns.</p>
<p>Management Review-5.1</p>	<p>Corporate function conducted annually. Last conducted in the first week of December 2013</p> <p>Reviewed Internal audit, corrective actions and management responsibility. An agenda is utilized to cover all requirements and action items are tracked and followed up until closed. The management review is conducted and in Chicago and all sites are represented by the corporate EHS Director presentation.</p> <p>All records appear to be in good order and meet the intent of the standard.</p> <p>No issues or concerns.</p>

Non-Conformances (NCRs):

All of the applicable requirements of the RCMS®:2013 were audited and considered to be adequately implemented

None identified.

Areas of Concern (AoC)

AOC 2014-01 Management of Change:

Management of Change

- 1) Ensure that new equipment includes EHS review in the initial stages of ordering new equipment or making changes. New compressor to be installed-
- 2) Ensure attendee signatures are documented and records maintained as part of the JHA process.

AOC 2014-02 Operational Control

- 1) Jack Stand inspections- Ensure annual inspections for new and existing jack stands are conducted and associated records are maintained.
- 2) Review the PPE requirements when handling or working around chemicals- No glasses were worn by the operator in the Utilities building.
- 3) Ensure tanks in the boiler house/building are properly labeled. (Molybdenum/water and old Caustic tank half full without labeling of material and associated hazards).
- 4) Ensure tag out is fully implemented as part of the LOTO program.

AOC2013-03 Policy

Review communication of RCMS and company policy and ensure employees are more familiar with the key points.

AOC 2014-04 Stakeholder Communication

Ensure stakeholder concerns are entered into the system and recorded on the QF121 form for Community Concerns or Complaints.

AOC 2014-05 Contractors

Review the contract review section of the contractor program and ensure inspections are completed or procedure updated to reflect current practices. (Annual review of Contractors).

AOC2013-06 Monitoring and Measuring.

Review the use of this instrument and determine calibration requirements and records that need to be maintained. LEL meter used in the boiler house was not in the system. Also ensure small compressed calibration gas cylinders are secured.

Opportunities for Improvement (OFI)

- Consider 5 S for the Storage shed and the platform in Paint area
- Consider providing load limit rating for racking the repair area.
- Consider repainting Repair location where Fire hose was previously used and has been removed.
- Consider removing sharp edges on the hinged lid cover in repair.
- Consider electronic access to MSDS, work instructions and Cleaning Recipes.
- Consider addressing Medical and active shooter in the Emergency preparedness procedure and consider training on active shooter.
- Consider attaching a go-no-go 1/8" gauge to the bench grinders as a best practice to periodical verify safe gap between grinder wheel and tool guard/rest.
- Consider a work instruction for best practices for skimmer operation.

Other Issues

During our next audit the issues identified as requiring attention will be reviewed to ensure they have been adequately addressed in regards to the RCMS 2013 requirements.

Next Scheduled Audit: Kansas City, Kansas
Date(s): August 6-7, 2014
Type of Audit: Reregistration
No. of Persons: 1

No. of Audit Days Required: 2 days

Ron Miller
SAI Global Team Leader

Date: June 24, 2014