

October 11, 2017

Jeff Nee
GATX Corporation
2200 Caribou St. W.,
Moose Jaw, SK
CAN, S6H 4P4

SUBJECT: REGISTRATION PROGRAM

Dear 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 Moose Jaw facility on Sep 06, 2017. 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,



Bruce Godshall
SAI Global Team Leader
Encls.

SAI Global Confidential

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MANAGEMENT SYSTEM AUDIT REPORT

REPORT CONTENTS

- Section 1: Company Information**
- Section 2: Purpose**
- Section 3: Management System and Scope**
- Section 4: Audit Details and Results**
- Section 5: Audit Findings**

REPORT DISTRIBUTION

GATX Corporation
SAI Global File
Bruce Godshall

COMMERCIAL- IN – CONFIDENCE

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SECTION 1 - COMPANY INFORMATION

Company Name: GATX Corporation
Address: 2200 Caribou St. W.,
Moose Jaw, Saskatchewan
CAN, S6H 4P4
Client No.: 1691507
Contact Person: Jeff Nee
Title: VP, EHS

SECTION 2 – PURPOSE

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 report considers your organization's policies, objectives, and continual improvement processes. Comments may include how suitable the objectives selected by your organization appear to be in regard to maintaining customer satisfaction levels and providing other benefits with respect to policy and other external and internal needs. We may also comment regarding the measurable progress you have made in reaching these targets for improvement.

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.

This report has been prepared by SAI Global Limited (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, based on sampling of evidence provided and 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 as a result of or in reliance upon information contained in this report or certificate.

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: 4899 / I63.2

Scope of Registration

Providing lease financing and maintenance services to customers operating rail and other targeted assets. All sites are dependent on Chicago HQ file 1058468 for management and legal services and activities, design and planning.

Statutory and Regulatory Requirements Referenced

1. Describe the organization’s system for identification of statutory and regulatory requirements:
2. Identified requirements: 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 Sask.- Work Safe and SASK Sustainability Reserve department web site. 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, Moose Jaw, File No. 1691507-01. All sites are dependent on Chicago HQ file 1058468 for management and legal services and activities, design and planning.

SECTION 4 - AUDIT DETAILS AND RECOMMENDATION

Type of Audit: Registration Audit

Audit Dates: Sep 06, 2017 to Sep 08, 2017

Duration of Audit: **Person(s): 1 Day(s): 3.50**

Audit Team

Position	Name
Team Leader	Bruce Godshall

Stage 2 (Registration) 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 and 0 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.

- Site has implemented Preventive Stretching Program
- Excellent communication meeting with the EHS managers and sharing of information.
- Overall plant is cleaned and organized.
- Excellent follow up on injuries and participation from top management.
- 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 at **annual** intervals. A review of records of 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 annually.

Continual Improvement

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

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

Based on the results of this audit, the GATX Corporation management system has established, implemented and maintained procedures for the identification, evaluation and upkeep of “**environmental aspects**” and/or “**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/or relevant OHS hazards** is adequately demonstrated.

Emergency Preparedness and Response

GATX Corporation has identified the potential for spills, accidental releases and emergency situations and developed and tested response procedures. The last spill drill covered training and scenarios 12/11/16. Evacuation – 8/18/16, Derailment – 8/18/16, Severe weather – 8/18/16

Recommendation:

Based on the results of this Registration (Stage 2) audit and the results of the Stage 1 audit it has been determined that the management system of GATX Corporation is effectively implemented and meets the requirements the RCMS®:2013 standard relative to the scope of registration identified in this report; therefore, a recommendation for registration 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®:2013 standard for the functions, processes and areas listed below were reviewed.	
Function / Activity / Process / Area	Details
Summary of RCMS 2013 Changes	Scope, CIS, Logo Marks, significant changes – Initial audit Scope and CIS forms were reviewed with minor changes required. LOGO marks for SAI Global and ACC were reviewed with no issues. 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.
3.4 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 2017. Reviewed 7 persons and verified they had received or is scheduled for the identified training. Positive- All records were in good order and meet the intent of the standard.
Contractor Training	Contractor and Safety visitor Policy Rev 4 Attachments 10- Annually review all contractors and record on Attachment 10. Covers Basic introduction and PPE requirements. Contractor’s records are updated and resigned annually.

<p>Plant Tour</p>	<p>Moose Jaw EHS Manager provided a plant tour of the facility. Other GATX personnel in attendance were Jeff Nee – Corp Dir of EHS</p> <p>Reviewed areas -</p> <ul style="list-style-type: none"> • Cleaning • Internal Blasting • External Blasting • External Coating • Painting • Internal Lining • Rail Car Repair <p>Valve Rebuild</p>
<p>Annual Reporting</p>	<p>Positive- Transitioning the database for documents to SharePoint and available to all sites.</p> <p>Sustainability- working on projects-</p> <p>MOC – Need to ensure that new equipment has EHS involved in the initial stages of order new equipment.</p> <p>Good catch is used as method for identification of safety security or other issues.</p> <p>Good Participation by all site personnel.</p> <p>Goals are being established at the site level</p> <p>EHS supervisor is continuing the Preventive Stretching Program</p> <p>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.</p> <p>Focus on Energy Savings</p> <p>Contractor training including evacuation is covered for all visitors.</p> <p>JSAs are Generic and established</p> <p>Shop portals are used to record date and provide information on JSAs.</p> <p>MSDS updated every 3 years-</p> <p>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.</p> <p>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>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,</p> <p>Manual is dated 6/16/2017. 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 10.2017 provides top level and reporting for EHS.</p> <p>Job descriptions for key responsibilities are under 1.4 in the Policy Manual.</p> <p>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. Ammonia liquid and gas- car cleaning, caustic for boiler treat, asbestos removal. Meets the intent of the standard.</p>
	<p><u>2. Planning-Planning (2.1 through 2.5)</u></p> <p><u>2.1 / 2.2 – HSS&E Hazards and Risks identification and Evaluation</u></p> <p>GATX Rail EHS&S Risk Assessment 12-20-11</p>

	<p>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.</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 2017. New products, processes and changes are handled through corporate. No new processes in the last 2 years.</p>
Permits	<p>2.3 / 4.2 Legal Compliance Evaluation Utilize People Soft and corporate provides guidance and overview for all legal and other requirements. Compliance Calendar- Reviewed for 2017. All action items are current. One - Permit Authorization (02032020, PO15-010, File # 527025-50) and covers all wastes, air and hazardous wastes. Annual report last submitted – 3/22/2017</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 – 7/12/17 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 2016, Parkland GEO provided results, 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- Ae27057-2/27/17 Review the various shipments and verified that Solvent NOS does not need to be manifested.</p> <p>Fire Extinguisher- All conducted for 2017. Review a number of fire extinguishers, eye wash and showers. All had tags and were current through July. Lanyards- visual daily peruse, 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 Goals, Objectives and Targets 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 – 6 Majors 4 Repair also include Field Services, Rescar, Harbor Rail and GBW</p> <p>Safety Goals- are tracked and included in the Field Service Centers</p> <ul style="list-style-type: none"> • Dart – Actual = 0.00, Goal = 0.00 • TRIR – Actual = 8.22, Goal = 4.98 • WC \$\$ Incurred – Actual = N/A • Env. Releases – 0 • Good catches – 80 • Good Catches to Recordable Ratio (YTD) – 40 • Incident Report timeliness – 100% • YTD Identified Corrective Actions – 99 • YTD Closed Corrective Actions – 77 • EHS Compliance – 92% • YTD Training Schedule Completion – 100%
<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. Good catch program - Incentive program is tied to safety results.</p> <p>3.7 See section 4 for Emergency Response Plan rev 2, 8/11/16. Is updated annually and includes responsible persons, spill report date form. All typical emergencies are reviewed and people are trained. Consider addressing Medical and active shooter in the Emergency preparedness procedure. 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. No major spills over the last 2 years, Drills included Severe Weather / Rail evacuation – 8/18/16, Spill training – 12/27/16. Switching training given quarterly – 8/28/17 with authorized training given 8/22/17. Annual EHS planning with Corp occurred in December 2016. Includes review and setting up of training and drill schedule for RC / Environmental / Safety / Security.</p>
<p>Monitoring and Measuring</p>	<p>4.1 Monitoring and Measurement Organization monitors the O&T at the corporate and site level. GATX – Chicago monitors details monthly and determines trends based on key X metrics and trends.</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 The Safety Attendant is responsible for calibrating the Confined space meters and ensuring records are maintained. Reviewed records and showed bump test before use. Log sheet is utilized to track daily bump test. Calibration gas – EXP 11/18, reviewed monitors used for Confined Space permits – 0182688, 0182571, 0182454. No issues</p> <p>Repair / Cleaning / Internal & External Blasting / External Coating & Painting / Internal Lining / Rail Car Repair / Valve Rebuild Reviewed the above areas 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. Significant aspects and hazards vary with areas, switching is main risk with ergonomics, slip trip and falls working on tankers, spills, steam. Discussed Safe Start program, Discussed the Boiler operation – last inspected Nov 2016 due in 2 years.</p> <p>Review communication of RCMS and company policy and ensure employees are more familiar with the key points. Continuous Improvement B Blaster for valve repair.</p> <p>Review the PPE requirements when handling or working around chemicals.</p> <p>Reviewed calibration of gas monitors, multiple area and tank monthly and annual inspections, harnesses, lanyards, cranes. Waste blast is sent to landfill.</p> <p>Reviewed Hot Work, Confined Space, LOTO permits, fall protection inspections, hear conservation program inspections and surveys and mobile equipment training and driving evaluation. Follow-up items placed in CA Tracker</p> <p>Reviewed Hazardous, non-hazardous and universal waste storage, containers and handling of materials (used oils, waste paints, waste thinner, waste diesel fuel – hauled by GFL, monthly inspections) – no issues.</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 Tank car cleaning- Reviewed work order book and reviewed GATX 95591. fuel oil unload, JSA is available. Review the process for providing MSDS and Clean Recipes for persons unloading tank cars.</p> <p><u>SDS verification:</u> Interviewed the EHS in regards to the MSDS verification. Process- EHS 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 multiple SDS's. No issues.</p>
	<p>Reviewed maintenance records with numerous items and equipment. 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 August 2017.</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 10.2016 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).</p>
<p>Performance Measurement, CA/PA</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>4.3 Internal audits – Moose Jaw was conducted by the Corporate EHS in wk of June 2017 and all action items have been addressed. Action 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 and Periodically evaluate the effectiveness of its communication with its stakeholders. 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 June 2017, Led by the Director of EHS and included all site EHS people on a conference call. Metrics and issues were discussed,</p>

	<p>compliance reporting and upcoming reports due, Minutes are issued and posted at the sites.</p> <p>Management-Interviewed the Site Manager EHS communicates with the neighbors and discusses the chemical and products. Invite fire department in to visit- May 2017 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 Moose Jaw log entries Fire Dept., Neighbor communication- annual stakeholder communication , only one was a complaint and was in regard to smell of lagoon. 2017 entries- 1 YTD logged.</p> <p>Employee Survey by HR October 2016- feedback was reviewed and was one of the factors for establishing the behavior based program. Customer Service did survey – Q1 2017 Action items more communication, promote from within. Another is schedule for Q4 2017.</p> <p>4.6 Corrective/Preventive action 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. No issues or concerns.</p> <p>4.6 Accidents and Incidents- Procedure- 51914 was reviewed and updated. Utilizes 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. Reviewed multiple examples. Records indicate closed. Example – SF027- July 2017 Incident report was filled out – back injury while lifting a BOV 50# and turning. Management review of Incident was held 4/15/17 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.</p> <p>Action items are done immediately and if needed 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 2017 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). No issues or concerns.</p>
<p>Management Review- 5.1</p>	<p>Corporate function conducted annually. Last conducted in the first week of December 16, 2016. 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>

	All records appear to be in good order and meet the intent of the standard. No issues or concerns.
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Non-Conformances (NCRs): None

Opportunities for Improvement (OFI): None

Other Issues

During our next audit the issues identified as requiring attention will be reviewed to ensure they have been adequately addressed, as well as the following: None

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Next Scheduled Audit: TBD
Date(s): TBD to TBD
Type of Audit: TBD
No. of Persons: TBD
No. of Audit Days Required: TBD

Bruce Godshall
SAI Global Team Leader

Date: October 11, 2017