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1.0 INTRODUCTION and SCOPE

Koppers believes that the safety and health performance of our personnel and contractors is essential to the long-range success of our business. Koppers will only employ contractors that embrace our safety philosophy.

The elements of this Program apply to all contractors performing work at Koppers owned or leased facilities. This Program applies specifically to Koppers facilities and activities in the United States.

2.0 PURPOSE

This Program is intended to supplement the general conditions of a contract between Koppers and any contractor. Its purpose is to elaborate on areas of safety and health concerns routinely encountered at Koppers. This Program is not intended to replace contractors' safety and health programs, or reduce the contractors' responsibilities for all aspects of safe and healthy work conditions, procedures, equipment and materials for their personnel. This Program defines minimum requirements which contractors are expected to meet and/or exceed. If the contractor's procedures / programs exceed the requirements set forth in this Program they shall be followed.

Successful contractor safety performance is best accomplished by working with the contractor as a partner in safety. Koppers does not take control of its contractors' safety programs nor relieve them of their safety responsibilities. Instead, we support contractors to improve overall safety and health.

3.0 DEFINITIONS

Koppers facility: a storage, manufacturing or material processing site that is owned or leased by Koppers Inc.

Koppers Facility Management Team: supervisory personnel who have been designated by the Facility Manager to provide direction and guidance to contractors while working on Koppers facilities or property.

Regulated Areas: These areas are specific to our wood treating facilities where potential contact with chemical preservatives (creosote, pentachlorophenol, chromated copper arsenate) is possible. These areas may include but are not limited to, the wood treating department, the drip track, treated wood storage areas, waste water treatment area, etc.

4.0 CONTRACTOR SUPERVISOR / FOREMAN RESPONSIBILITIES

- a. Ensures on-site contractor personnel are in compliance with contractor's own safety program
- b. Ensures on-site contractor personnel are in compliance with this policy
- c. Stops, corrects and reports any unsafe work condition
- d. Participates in Pre-Construction/Pre-Job Safety Meeting
- e. Ensures that all accidents and occupational injuries / illnesses involving contractor employees or incidents which cause damage to Koppers or third party property are immediately reported to Koppers Facility Management Team.
- f. Complies with all applicable federal, state and local regulations and Koppers policies and procedures
- g. Ensures all employees participate in Koppers orientation training

- h. Meets daily with Koppers Facility Management Team representative to review safety concerns or issues, the work progress and to discuss how the work plan may impact on Koppers operations and other work in the area.

5.0 CONTRACTOR PERSONNEL RESPONSIBILITIES

All employees of the contractor will:

- a. Maintain a safe worksite
- b. Work every day without injuring themselves or others
- c. Only perform work that they are trained for and qualified to do
- d. Recognize and report all incidents and near misses to contractor supervisors
- e. Stop, correct and report any unsafe work condition
- f. Comply with all applicable federal, state and local regulations and Koppers policies and procedures
- g. Participate in Koppers orientation training

6.0 CONTRACTOR EXPECTATIONS

Koppers selects contractors who deliver the best value for the time and money invested. Safety performance is a factor to be considered when determining best value. Koppers is committed to safety and health as the primary consideration in all our activities. We operate, and expect our contractors to operate, on a principle belief that all accidents are preventable. No work shall begin without first addressing and resolving all safety hazards. We expect contractors to conduct their business in a manner that complies with both the letter and spirit of all laws, rules, and regulations, and applicable company policies and procedures. We expect:

- a. All contractor personnel to work every day without injuring themselves or others
- b. Contractors to have a comprehensive written safety program
- c. Contractors to provide new employee safety orientation
- d. Contractors and individual employees to possess necessary licenses, permits and / or training records as required by local, state and federal statutes.
- e. Contractors to provide ongoing safety training necessary for their employees to safely perform their tasks as well as meeting all applicable regulatory training requirements
- f. Contractors, contractor employees and sub-contractors to fully accept the responsibility for a safe workplace

General contractors are accountable and responsible for ensuring that their subcontractors are in compliance with the applicable provisions of this Program. Subcontractors are considered employees of the general contractor. Should Koppers determine, in its sole discretion, that a contractor or its subcontractor has failed to comply with any required provision of this Program, Koppers shall have the right to hold said contractor accountable for that breach of duty. Koppers may then exercise any and all rights available to it for breach of the terms and conditions of its contract with said contractor, specifically including treating the breach of duty as a failure to proceed with the work in a timely manner, incorporating all remedies available therefore.

7.0 COAL TAR PRODUCTS

Many Koppers facilities use and / or work with coal tar products. Koppers facility management team shall provide you with and review the safety data sheets for all products you may encounter while on-site. If you have any questions it is your responsibility to contact Koppers Facility Management Team so they can assist you.

In general, all coal tar products are harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated materials. Do not get coal tar products in eyes, on skin, or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). Use protective cream on exposed skin before and during the work shift. To reduce sun sensitivity a sun-blocking lotion (SPF 15+) can also be applied prior to application of a protective cream.

Wash exposed areas thoroughly with soap and water after skin contact and before eating, drinking, using tobacco products, or restrooms. After the exposed areas have been cleaned, keep out of direct sunlight for the next two to three days to avoid sunburn to the photosensitized skin areas. Remove contaminated clothing and wash before reuse.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth, and in some cases, result in skin cancer. Do not handle until all safety precautions have been read and understood.

8.0 WRITTEN SAFETY AND HEALTH PLAN / PROGRAMS

Contractors shall have a written safety and health plan or program which meets or exceeds the minimum requirements set forth in this Program. Contractors shall adhere to their own written safety and health plan requirements. The contractor shall furnish their written safety and health plan or program to the Koppers Facility Management Team for review upon request.

9.0 BILINGUAL COMMUNICATIONS

The primary language spoken at all Koppers US facilities is English. Therefore, contractors must provide a bilingual individual for each work crew containing non-English speaking employees. This individual must be capable of reading and writing in English and must translate rules and instructions for the non-English speaking employees. This individual shall be present on-site at all times whenever the contractor has employees who do not speak English working at the facility.

10.0 FIREARMS, OTHER DEADLY WEAPONS & EXPLOSIVE DEVICES

Contractor employees are strictly prohibited from possessing, transporting, storing or using firearms, other deadly weapons, or explosive devices while on Koppers property.

Examples of these items consist of but are not limited to: handguns, rifles, shotguns, pistols, machetes, knives exceeding a 4 inch blade, bombs, grenades, cross bows, bow and arrow, etc.

Note: Contractors that need to use knives that exceed a 4 inch blade length to complete their work (i.e. Insulators), shall receive authorization from the Koppers Facility Management Team prior to starting work.

11.0 INCIDENT REPORTING

All contractors shall **immediately** report to a member of the Koppers Facility Management Team all employee injuries/illnesses, vehicle incidents, property damage, near misses and spills.

The contractor shall conduct an incident investigation to determine the root cause(s) of all incidents. A Koppers Facility Management Team representative may ask to participate in the investigation depending on the type and severity of the incident. The investigation reports shall be submitted to Koppers upon request.

12.0 SMOKING

Smoking is only permitted in designated areas which have been determined by each facility. The designated areas can vary from facility to facility, so these locations will be communicated during safety orientation training. Any Contractor vehicles, office trailers, etc. will also be deemed non-smoking areas when located in a non-smoking area. **Note:** Some Koppers facilities do not permit smoking in any area.

13.0 SUBSTANCE ABUSE

Koppers prohibits the use, sale, purchase, manufacture, transportation, possession, solicitation, distribution, or transfer of illegal drugs and the consumption or possession of alcoholic beverages on Koppers premises. Further, contractor employees shall not report to work or conduct business while impaired or under the influence of alcohol or any drug.

If an employee's ability to perform his/her duties safely may be impaired because of taking medication according to a doctor's prescription, the employee is expected to discuss this with his or her supervisor before commencing work that day.

Contractor personnel will be removed from Koppers property any time the contractor or Koppers suspects that the individual is under the influence, or is observed possessing or abusing drugs or alcohol while on Koppers property.

14.0 USE OF PLANT UTILITIES

Prior to starting work on Koppers property the contractor and the Koppers Facility Management Team shall discuss what plant utilities will be needed and authorized for the contractor to use while on-site. Plant utilities shall not be used until permission has been granted from the Koppers Facility Management Team. Plant utilities include electricity, natural gas, water, compressed air, compressed gases, steam, sewage, condensate and fire hydrants.

15.0 ASBESTOS

The majority of Koppers facilities contain some form of Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) on-site. During the safety orientation each contractor will be informed of the location(s) of known ACM and/or PACM prior to starting work. Unless the contractor is a qualified asbestos abatement contractor and hired by Koppers for that purpose, the contractor will not disturb material (pipe insulation, tile flooring, etc.) unless informed by the Koppers Facility Management Team that the material is free from asbestos.

Asbestos abatement contractors shall ensure compliance with all federal, state and local regulations while conducting work on Koppers property.

All applicable permits and/or licenses shall be acquired by the contractor prior to commencing work on Koppers property.

Note: More information regarding asbestos can be found in the Permit to Work section.

16.0 LEAD-BASED PAINT

Prior to any contractor disturbing and/or demolishing any painted surfaces, paint samples from the surfaces shall be collected and analyzed by a third party to verify whether or not the paint contains lead, unless the Koppers Facility Management Team can verify that the surface(s) in question are free of lead-based paint.

Abatement contractors hired by Koppers to remove, abate and / or demolish any lead-base painted material shall ensure they are in compliance with all applicable federal, state and local regulations.

All applicable permits and/or licenses shall be acquired by the contractor prior to commencing work on Koppers property.

17.0 COMPRESSED GAS CYLINDERS

Contractors who will be using compressed gas cylinders on Koppers property shall comply with all federal, state and local regulations for the duration of the project.

Compressed gas cylinders shall be legibly marked, for the purpose of identifying the gas content, with either the chemical or the trade name of the gas. Such marking shall be by means of stenciling, stamping, or labeling, and shall not be readily removable. Whenever practical, the marking shall be located on the shoulder of the cylinder.

Cylinders shall be kept away from radiators and other sources of heat that can generate temperatures greater than 125 degrees F.

Valve protection caps, where the cylinder is designed to accept a cap, shall always be in place and hand-tight, except when cylinders are in use or connected for use.

Acetylene cylinders shall be stored, handled and used valve end up.

Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour.

Back flow and flashback protection shall be used on each of the burning outfits.

Compressed gas cylinder storage areas shall be prominently posted with the names of the gases being stored.

18.0 CONFINED SPACE ENTRY REQUIREMENTS

Contractors that will be conducting work within a permit-required confined space at a Koppers facility shall have a written Permit Required Confined Space Entry program that is in compliance with OSHA's 1910.146 standard.

All contractor employees who will conduct work involving confined space entry shall be properly trained to do so. Training records shall be available per request.

Koppers will provide the contractor with all the applicable information pertaining to the confined space to be entered (i.e. hazards associated with the space, emergency rescue guidance, etc.).

Koppers will complete a confined space entry permit prior to the contractor entering the space, unless other arrangements have been made with the Koppers Facility Management Team. The contractor shall review and can use the Koppers permit if they prefer or complete a permit of their own prior to entry. Regardless of whose permit is used, all applicable elements of the permit shall be completed and complied with through the entire entry process.

Contractors performing confined space entry work shall have all the applicable equipment to complete the work. This equipment shall include but is not limited to air monitors, tri-pods rescue retrieval devices, full body harnesses and ventilation equipment. Contractors are responsible for managing all aspects of the confined space entry.

When contractors and Koppers personnel are working in a confined space together, the Koppers Facility Management Team will lead the work. This means Koppers will complete the confined space entry permit, coordinate rescue efforts, inform Koppers and contractor personnel of the potential hazards they may encounter while in the confined space, review applicable safety data sheets with Koppers and contractor personnel, ensure the proper personal protective equipment is being worn, and confirm what type of communication will be used between the attendant and entrants. **Note:** In this case, Koppers Facility Management Team is coordinating the permit required confined space effort due to their knowledge of the permit space to be entered. However input shall be solicited from the contractor regarding any additional safety and / or health concerns prior to entry. Koppers and the contractor shall review the confined space entry permit, rescue procedure, personal protective equipment requirements, etc., so both are in agreement prior to entry.

19.0 CONTROL OF HAZARDOUS ENERGY REQUIREMENTS

All contractors are responsible for complying with OSHA's 1910.147 Control of Hazardous Energy (Lockout/Tagout) standard. The contractor shall have a written Control of Hazardous Energy program and employee training records which shall be available upon request.

If contractors will be exposed to hazardous energy while on Koppers property, they will be provided a copy of Koppers equipment specific "Energy Control Procedure" for review. Koppers personnel will properly isolate the hazardous energy that the contractor will be exposed to with locks, blinds or other suitable method. The contractor will be required to verify the isolation of the hazardous energy per the equipment specific "Energy Control Procedure" and each employee required to work within the hazardous area shall place his/her "personal" lock on a "group" lock box for their own personal protection. The Koppers supervisor responsible for the area and/or Koppers project manager will place his/her personal lock on the "group" box as well.

Once the task has been completed, each contractor employee will exit the hazardous area and remove his / her personal lock from the "group" box. The contractor shall inform the Koppers supervisor and/or project manager that the task is complete and it is safe to re-energize the equipment. Finally, the Koppers supervisor and/or project manager will verify the task is complete, remove his/her personal lock from the "group" box and initiate the proper start-up procedure for that equipment.

20.0 EMERGENCY PREPAREDNESS AND EMERGENCY EVACUATION REQUIREMENTS

During the safety orientation, contractors will be informed on responses in the event of an emergency situation. All contractor employees will be trained on the facility's employee alarm system, the evacuation plan, reporting an emergency, and meeting location after the evacuation has occurred.

21.0 FALL PROTECTION

Contractors are required to adhere to OSHA's Fall Protection regulations. Unless, the contractor's fall protection program is more stringent than OSHA. The contractor will be required to obtain a Koppers "Working at Heights" permit for the following activities:

- a) Use of scaffolding
- b) Work requiring personnel fall arrest equipment (excluding engineered systems)
- c) Working from crane supported work platform (man basket)
- d) Working from a manlift and anticipating leaving the lift while elevated

Note: The contractor shall adhere to their fall protection program if it is more stringent than the requirements set forth in this program.

22.0 FIRE PROTECTION REQUIREMENTS

Any use of Koppers equipment for incipient stage firefighting in association with hot work activities or emergency response shall be coordinated in advance with Koppers Facility Management Team.

Without permission contractors are NOT permitted to tamper with, use or remove any fire protection equipment that is located on Koppers property. This includes but is not limited to fire extinguishers, fire pumps, sprinklers, piping, hydrants and monitors.

Contractors shall not park in front of or block any fire protection equipment (e.g., hydrants, monitors, etc.) while on-site. Enough room shall be available for emergency crews to access the fire protection equipment with their vehicles.

Aisles and passageways shall be kept open with free access to all Koppers fire extinguishers.

Contractors are required to provide their own fire protection equipment for all hot work activities while on Koppers property.

23.0 HAND AND PORTABLE POWERED TOOLS

All hand and portable powered tools that will be used on Koppers property shall be in compliance with all federal, state and local regulations. Additionally, hand and portable powered tools that are used on-site shall be used for their intended purpose.

24.0 HAZARD COMMUNICATION

The OSHA Hazard Communication Standard (29 CFR 1910.1200) requires that employers inform their workers of the presence, identity, and hazards of workplace materials through a written hazard communication program, labels, substance lists, safety data sheets, and training.

Contractors shall provide Koppers, before commencing work, a list of hazardous chemicals and their safety data sheets for all contractor owned hazardous chemicals on site.

The Koppers Facility Management Team will inform contractors regarding Koppers owned hazardous chemicals to which contractor employees may be exposed; and will provide contractor employees access to the safety data sheets for these chemicals. The contractor shall disseminate such information to its employees and subcontractors and assure that appropriate precautions are taken.

25.0 HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE

Contractors that will perform excavation work on Koppers property and may be exposed to contaminated soil shall have HAZWOPER trained employees conducting the work. This work must be supervised by a HAZWOPER competent person with 40 hours initial training and 3 days of supervised field experience.

26.0 HOUSEKEEPING REQUIREMENTS

Contractors are responsible for ensuring their work area(s) are maintained in a clean and orderly manner at all times. This means all work areas shall be free from trash, debris, scrap material, food waste, spilled material, trip/slip hazards, etc.

Dumpsters, roll-offs and/or trash cans shall be provided by the contractor for housekeeping activities. All trash material shall be disposed of properly depending on the type of material being disposed (i.e. landfill, treatment storage and disposal, etc.). Materials contaminated with certain chemicals require specific handling and disposal. Contractors are to consult with the Koppers Facility Management Team regarding the proper disposal of contaminated materials.

Contractor employees shall not track tar, creosote, mud or any other similar substance into Koppers office buildings. Boot covers are required at some facilities.

27.0 MOBILE EQUIPMENT OPERATION (FORKLIFTS, AERIAL LIFTS, CRANES, ETC.)

Contractor employees shall be properly trained and/or certified, depending on the type of equipment he/she will be operating, ensuring compliance with all applicable federal, state and local regulations.

The load rating for the mobile equipment to be used shall be adequate for its intended use.

Contractor employees shall comply with all federal, state and local inspection and preventative maintenance requirements while operating equipment on Koppers property.

Contractors are NOT permitted to operate Koppers owned or leased mobile equipment, unless authorization has been granted by the Koppers Facility Management Team.

Vehicles in which the driver has an obstructed view to the rear must have an audible backup alarm or must have an observer stationed outside the vehicle when it is backing up.

28.0 PERSONAL PROTECTIVE EQUIPMENT

Contractors are required to provide their employees with all necessary personal protective equipment (PPE).

28.1 Eye Protection

Appropriate eye protection must be worn at all times on Koppers worksites.

- a. Eye protection must meet ANSI Z87.1 standard for safety eyewear
- b. Safety glasses with side shields are the minimum protection required at all times while on the job site except in designated areas, (i.e. office building, parking lot, etc.).
- c. Additional or more protective eye / face protection may be required depending on the task being performed. For example, heavy grinding shall require safety glasses with side shields and a face shield.

28.2 Foot protection requirements

While in the field, all contractors are required to wear footwear which meets ASTM F2413-05 safety requirements.

- a. Minimum 6-inch laced boots
- b. "Metatarsal" protection is required. "Steel Toe" shoes without metatarsal protection may be worn if the Koppers Facility Management Team specifically authorizes their use.
- c. Work boots must meet compression and impact guidelines set by the American National Standards Institute (ANSI Z41-1991).
- d. Chemical resistant sole protection is required.
- e. Slip resistant/positive traction sole construction is required.

28.3 Hand protection

The appropriate hand protection must be selected for the work being performed.

- a. A short, tight fitting canvas or leather glove should be worn during most construction and heavy maintenance work.
- b. Certain electrical work requires approved insulating rubber gloves.
- c. Chemical resistant rubber or plastic gloves shall be worn as specified by the chemical's safety data sheet.
- d. Long, cuffed welding gloves shall be worn during welding or grinding.

28.4 Head protection

All contractors are required to wear head protection that meets ANSI Z89.1 requirements while on the job site except in designated areas (i.e. office building, parking lot, etc.).

28.5 Hearing protection

Proper hearing protection shall be worn at all times while working in high noise areas of the facility. Koppers will notify the contractor of all high noise areas throughout the facility and all high noise areas are identified by the following signage: "Danger – High Noise Area, Hearing protection required".

28.6 Protective clothing

Minimum acceptable outer wear shall be:

- a. Long sleeve shirts
 - Short sleeve shirts may be worn only while working in office buildings or the non-preservative areas at wood treating facilities.
- b. Full length pants or overalls/coveralls

Sleeveless shirts and blouses, tank tops, muscle shirts, mesh material shirts or blouses do not offer proper protection and are not acceptable. Dangling sleeves, neckties, or other loose clothing or jewelry shall not be worn when working on or around machinery.

28.7 Respiratory Protection

Appropriate respiratory protection shall be worn:

- a. In designated areas throughout the facility that are marked “DANGER – Respiratory Protection Required”. The Koppers Facility Management Team will provide the contractor guidance regarding what type of respiratory protection shall be worn per the safety data sheet.
- b. During all welding activities unless the contractor has objective air monitoring data that proves employee exposure is below OSHA’s PEL for the material being welded.

Contractors are required to ensure that all employees that will be wearing a respirator have been medically cleared by a licensed health care professional and fit tested for the type and model respirator that will be used.

28.8 Supplemental Requirements

THE FOLLOWING SECTION APPLIES TO CONTRACTOR EMPLOYEES WORKING AT KOPPERS WOOD TREATING PLANTS WHERE THE SCOPE OF WORK INVOLVES CONTACT WITH WOOD TREATING PRESERVATIVES INCLUDING CREOSOTES, PENTACHLOROPHENOL & CHROMATED COPPER ARSENATE (CCA) (“REGULATED AREAS”)

Check with facility management before beginning work in “Regulated Areas”.

Work conducted in “Regulated Areas” will require additional personal protective equipment use and handling restrictions including but not limited to the following:

- a. Metatarsal rated protective footwear with chemical resistant soles or chemical resistant boot covers.
- b. Depending on the scope of work, disposable protective coveralls or cloth coveralls will be required.
- c. Chemical resistant gloves.

Protective coveralls, chemical resistant gloves, footwear, and any other items contaminated with preservative must remain on site during the course of the work and after completion of the job.

Tools and other articles contaminated with preservative must be cleaned prior to leaving facility property. Articles that become contaminated and cannot be adequately de-contaminated cannot be removed from the facility (i.e. synthetic slings, tool bags, etc). Confer with the Koppers Facility Management Team regarding how to properly dispose of the contaminated materials.

Eating, drinking, or smoking is prohibited in "Regulated Areas".

Clothing and other absorbent material that has been contaminated with preservative must be properly disposed. Confer with the Koppers Facility Management Team regarding how to properly dispose of contaminated materials.

After leaving a regulated area, wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

29.0 SIGNAGE AND BARRICADES

Contractors shall use signs and barricades whenever work being performed on Koppers property poses a risk to other employees (e.g., elevated work where employees below are exposed to falling objects or materials, excavations, crane lifts, arc flash boundaries, floor openings, and pits).

The use of caution tape, danger tape, orange fence, or other barricade material is required in the area where the work described above is taking place.

30.0 SAFETY ORIENTATION

A member of the Koppers Facility Management Team conducts and documents facility specific orientation for contractors. At a minimum, orientation must be designed and carried out so that the contractor understands their responsibility to:

- a. Make his/her employees aware of the Koppers SH&E Policy, facility rules, security and emergency procedures, which may be outlined in one or a combination of the following: a letter, onsite orientation, and other facility documents.
- b. Understand and comply with all federal, state and local laws and regulations, codes and ordinances, facility permits and procedures applicable to the project.
- c. Immediately reports any spills, releases, suspicious activities or abnormalities to the facility project manager.
- d. Assure that all activities done on Koppers facility are conducted properly and with regard for all safety, health and environmental aspects and hazards of the job.

Contractors will ensure understanding of the above prior to leaving the safety orientation.

31.0 TRAINING REQUIREMENTS

Contractors are responsible for maintaining compliance with all federal, state and local employee training requirements. Training records must be made available for inspection, if requested by the Koppers Facility Management Team.

32.0 CELL PHONE POLICY

Contractors present at Koppers facilities shall not use hand-held or other communication devices while observing, operating or directing any of the following, unless the communication provides an additional level of safety, such as those necessary for railcar movements, crane operations, confined space entry, or as necessary for efficient plant communications:

- a. Plant vehicles
- b. Personal vehicles
- c. Tank, Flatbed or Dump Trucks
- d. Powered Industrial Trucks
- e. Fixed Industrial Equipment
- f. Potentially Dangerous Activities

This list is not meant to be exhaustive, and there may be other situations where use of communication devices is prohibited.

NOTE: Cell phones shall only be used in designated areas, as designated on the Koppers facility. The Koppers Facility Management Team will inform the contractor where cell phones are allowed during the on-site safety orientation.

33.0 IN-FACILITY RAILROAD REQUIREMENTS

When stepping out from between cars or locomotive/track mobile, contractors must watch for moving equipment on adjacent tracks or vehicles and machinery.

Contractors shall not cross within 20 feet of the end of standing equipment, unless:

- a. Speed limits for all equipment on the track is 5 MPH or less; and
- b. The employee checks for movement prior to crossing track; and
- c. Distance is sufficient to allow safe passage should there be unexpected movement; and
- d. Designated walkways are used, when available.

No one shall go between uncoupled locomotive/track mobile and cars when clearance between them is less than 50 feet, unless proper safeguards (i.e. chocked wheels) are provided.

Contractors shall not step on rails, frogs, switches or connections.

Contractors shall not be permitted to ride on railcars.

Contractors' construction materials, equipment, machinery, tool boxes, etc. shall not be stored within 6 feet of any railroad track.

Where any contractor employee is working on a railcar over 6 feet in height and within the vicinity of an engineered fall arrest system, the employee is required to utilize the fall arrest equipment to prevent a fall.

A "blue flag" and "de-railer" shall be present on the track whenever a contractor is performing work on the tracks, on a railcar, or within close proximity to the tracks. The "blue flag" and "de-railer" are used to notify other trains that work is being performed on the track and access is not permitted.

The Koppers Facility Management Team will ensure the placement of the "blue flag" and "de-railer" prior to the start of work. The contractor must ensure the "blue flag" and "de-railer" remains on the track until the work has been completed and all personnel are clear from the tracks.

34.0 LADDER USAGE

Contractors are required to provide portable ladders for their employees to use while on Koppers property. Contractor employees are never permitted to use a Koppers portable ladder while on-site unless permission has been granted by a member of the Koppers Facility Management Team.

All portable ladders used on Koppers property shall be in good working condition and in compliance with all federal, state, local and manufacture requirements.

35.0 LOW SPEED / PASSENGER VEHICLE OPERATION

Contractors that will be operating low speed and/or passenger vehicles onsite shall comply with the following requirements.

- a. Operation of all-terrain vehicles (ATVs) is prohibited at all Koppers facilities.
- b. Operation of vehicles not meeting the standards contained within this policy is prohibited at all Koppers facilities.
- c. The speed limit at all Koppers facilities for all vehicles is 15 mph (24 kph). More restrictive speed limits may be established as necessary by individual facility management.
- d. No person shall be permitted to ride in or on any vehicle without a passenger restraint system (seat belt). Riding in pickup truck beds is prohibited.
- e. Acceptable Low Speed Vehicles (LSV) shall have the following features:
 - Passenger restraint system (seat belt) consisting of at minimum a lap belt
 - Side by Side seating with all seats facing forward
 - Minimum of four (4) wheels
 - The maximum speed capacity shall be controlled via mechanical engine speed limiter (governor) or engine capacity.
 - Head lights and tail lights are required if to be used during low ambient light conditions.
- f. Vehicles with the ability to exceed 20 mph (32 kph) which are used for plant access, but are not road worthy state registered vehicles, such as passenger light trucks, utility trucks, passenger cars and other vehicles, shall have the following functional features:
 - Brakes, running and parking
 - Restraint System (seat belts) for all passengers
 - Tires, standard size with a minimum of 2/32 inch (16 mm) tread depth
 - Windshield with no cracks impairing driver's line of sight
 - Windshield wipers
 - Rear view and side mirrors
 - Head and Tail Lights
 - Horn
 - Doors that open, close and latch
 - No other conditions that compromise safe vehicle operation
- g. Facility Management shall provide employee training on the safe use of equipment prior to assignment and ensure it is safely operated and maintained.
- h. This policy is not intended to apply to vehicles currently regulated by more stringent jurisdictional standards such as the US OSHA Powered Industrial Truck rules.
- i. All traffic signs (railroad crossing, stop signs, etc.) shall be obeyed while on Koppers property.

Definitions:

- a. Low Speed Vehicles shall mean a powered vehicle with a maximum speed less than 20 mph (32 kph) and total payload capacity (including occupants) of less than 1200 pounds (550 kg). The most common form of LSVs are commercially available golf carts.
- b. All-Terrain Vehicles (ATV), also known as a quad, quad bike, three wheeler, or four wheeler, shall mean a vehicle that travels on low pressure tires, with a seat that is straddled by the operator, along with handlebars for steering control.

36.0 PERMIT TO WORK REQUIREMENTS

The Koppers Safe Permit to Work System is used to control risk during potentially hazardous tasks. The purpose is to improve communications on all projects so that all impacted parties are aware of impending work and can make accommodations on a timely basis.

Contractors will be required to participate and assist in the completion of applicable permits while on Koppers property. The following is the list of permits that may be required depending on your scope of work.

Permit to Work System Hazard Scope

Hazardous Atmospheres – Airborne Employee Exposure: PERMIT
Confined or enclosed space entry
Pipeline/Flange/Vessel breaking causing exposure to contaminants that is likely to result in immediate, acute or chronic health effects to the worker or any adverse release to the environment. Examples include smoke, fume, irritant, toxic or other corrosive gases at sufficient concentration as to impede the ability to escape.
Hot Work: PERMIT
Defined by: work of any kind where heat is used or generated e.g. welding, cutting, grinding, brazing, soldering, sawing or use of non-intrinsically safe or flameproof equipment in regulated areas.
Working at Heights (Falls): PERMIT
Use of scaffolding
Work requiring personnel fall arrest equipment (excluding engineering systems)
Working from crane supported work platform (man basket)
Working from manlift and anticipate leaving lift while elevated
Working on or near Energized (Live) Electrical Circuits: PERMIT
Working on or near live electrical circuits (>50 Volts AC). Excluding testing, troubleshooting or voltage measuring by qualified and authorized persons.
Working on Critical Control Systems: PERMIT
Boiler/Furnace Firing and Control Systems
Fire Protection Detection and Suppression Systems
Pressure/Vacuum Protection Systems or Devices
Production Process Controls
Environmental Pollution Control Equipment
Special Hazards: PERMIT
Radiological - Work near nuclear gauges or other ionizing radiation equipment
Asbestos – Work that may disturb asbestos containing or presumed asbestos containing materials
Lock out/Tagout - Work involving exposure to hazardous/trapped energy without an implemented energy control procedure. <u>Hazardous Energy Thresholds:</u> Electrical: ≥ 50 V AC and ≥ 5 mA; < 50 V AC and > 1000 W; > 10 J stored energy

Thermal (hot) - Liquids or gases > 120°F (49°C); Surfaces ≥ 140° F (60°C) Thermal (cold) - Liquids and surfaces < 27°F (-3°C) Kinetic (moving)/Potential - No threshold; each situation must be evaluated Pneumatic/Hydraulic – >150 psi (rigid pipe); > 50 psi (flexible, unsecured lines) Chemical - No threshold; each situation must be evaluated
Excavations – trenches, pits, boreholes, pile driving or movement of unusually heavy vehicles Assessment of buried services to be completed prior to breaking ground at any depth.
Specialized Services High Pressure water cleaning Hot Tapping of vessels or pipelines

37.0 PROCESS SAFETY MANAGEMENT

RESERVED

38.0 ENTERING AND EXITING THE FACILITY

All contractor personnel shall sign-in when entering the site and sign-out when exiting the site on a daily basis. The locations where personnel will be required to sign-in and out can vary from site to site and will be communicated to you by facility management.

39.0 THEFT

Any contractor employee observed stealing Koppers property, another individual's personal property, or the contractor's property shall be immediately removed from the facility and banned from working at any Koppers facility.

Koppers will report theft to the local police department.

40.0 VEHICLE PARKING AND MOBILIZING ON-SITE

During safety orientation training all contractor employees will be informed where company passenger vehicles, heavy equipment, machinery and personal vehicles shall be parked while on-site.

Also, prior to the start of the project, the Koppers Facility Management Team and the contractor management team shall discuss where mobile offices (*trailers*), roll-offs (*dumpsters*), fabrication areas and other equipment shall be stationed if these facilities are needed.

All plant roadways must be kept passable at a moment's notice for firefighting equipment. If it is necessary to block a roadway for a long period of time, the contractor shall receive permission from the Koppers Facility Management Team.

41.0 RESTROOMS / SHOWERS / SANITATION

It is the contractor's responsibility to provide adequate toilet and/or shower facilities for all employees working on Koppers property. Unless, prior to starting work permission has been granted by Koppers Facility Management Team to use their facilities. The number of toilets and / or shower facilities shall depend on the number of employees on-site. The facilities shall remain in a sanitary condition at all times.

42.0 EMERGENCY EYEWASH AND SHOWER STATIONS

It is the responsibility of the contractor to provide adequate eyewash and/or shower facilities for employees working with or around corrosive material. However, arrangements may be made with the Koppers Facility Management Team to use their plumbed and/or portable eyewash and shower stations if they are within the required distance.

43.0 FUEL STORAGE

All fuels (gasoline, diesel, kerosene, etc.) shall be stored in the contractor's designated work area in approved tanks and/or containers.

The designated fuel storage area shall be equipped with a 20lb ABC fire extinguisher, with adequate containment to minimize any spills and drips, and locks on fueling nozzles to prevent theft or tampering with fuel dispensing equipment.

Contractors are strictly prohibited from fueling their personal vehicles, company owned vehicles or equipment/machinery with Koppers fuels.

44.0 WORKING OVER OR NEAR WATER

Contractors shall provide and require their employees to use U.S. Coast Guard approved life jackets or buoyant work vests when working over or near water, where the danger of drowning exists.

Prior to and after each use, the buoyant work vests or life preservers shall be inspected for defects which would alter their strength or buoyancy. Defective units shall not be used.

45.0 EATING AND DRINKING

Eating and drinking shall only take place during scheduled break times and within designated areas of the facility. The designated area(s) will be determined by the Koppers Facility Management Team prior to the start of work. Contractor employees are not permitted, unless authorized by the Koppers Facility Management Team, to take breaks in Koppers buildings. Lastly, no employees are permitted to eat or drink in process areas of the plant.

Appendix A History of Changes

Revision Number	Date	Summary of Changes
0	3/7/2014	Original Policy Issuance