Attachment A
Lead Oxide Unloading Procedures

1.0 Purpose

This procedure outlines the steps to be taken during the transfer of lead oxide to the storage silos at JCBGI manufacturing facilities. Includes actions to be taken prior to, during, and after the unloading process to ensure the safety of all employees and the protection of the environment. Immediate spill response procedures are included but the Spill Response Plan provides more comprehensive spill response procedures.

2.0 Scope

This procedure applies to the Tampa Plant of Johnson Controls Battery Group.

3.0 Responsibility

This procedure covers the responsibilities of the Ball Mill Operator and the Delivery Truck Driver.

4.0 Process

4.1 Training

Tampa JCBGI has designated the Ball Mill Operator as the lead oxide transfer contact person trained in the hazards of the job and proper handling techniques, including:

- Health effects
- Safety measures and Spill response
- Unloading procedures of the delivery company
- Necessary personal protective equipment (PPE)
- MSDS

Other employees may assist during unloading, but the Ball Mill Operator will have primary responsibility for the lead oxide transfer operations.

4.2 Truck Arrival

4.2.1 The Oxide Truck Driver makes contact with the Ball Mill Operator.

4.2.2 The Ball Mill Operator inspects the truck for visible leaks or cracks. If leaks or cracks are found, halts the process and contacts the EHS Supervisor or his or her designee. Immediate corrective action shall be taken to ensure that no additional lead oxide is emitted into the environment.

4.2.3 The Ball Mill Operator analyzes a sample of oxide provided by the driver. If the sample is in specification, the truck can be unloaded. The unloading procedure should take place inside the building.

4.2.4 Prior to transferring lead oxide the Ball Mill Operator will make sure there is adequate space in the storage tanks. If the available space is sufficient, the Ball Mill Operator will authorize the driver to connect the hose and begin the transfer.

4.2.5 The Ball Mill Operator is responsible for ensuring that:

- Material is transferred into the correct tank
- Correct connect lines are used
- No leaks of lead oxide are occurring during unloading operations

4.3 Safety Equipment

4.3.1 Personal protective equipment will be worn during all phases of material transfer. At a minimum, safety boots, gloves, and protection for street clothing should be worn. Respirators and hearing protection should be worn when needed.

4.3.2 The spill response kit will be available and in close proximity to the lead oxide delivery area.

4.4 Responsibilities of the Ball Mill Operator

4.4.1 Makes sure that the truck driver is aware of this unloading procedure.

4.4.2 Makes sure the truck driver knows where the Emergency Stop Button is located.

4.4.3 Inspects the truck for visible leaks or cracks. If leaks or cracks are found, halts the process and contacts the EHS Supervisor or his designee. Immediate corrective action should be taken to ensure that no additional lead oxide is emitted into the outdoor or plant environment.

4.4.4 Checks hoses used for unloading to make sure the hoses are not damaged.

4.4.5 Makes sure that the hoses are properly connected to the plant blower and the oxide transfer pipe. If the plant blower is not working properly, contact the EHS Supervisor who will contact the Environmental Protection Commission to evaluate alternatives.

4.4.6 Places a collection device under connection to catch any lead oxide that may fall from the hose.

4.4.7 After the hoses are connected and the driver is ready to start, the Ball Mill Operator is to start the transfer blower.

4.4.8 Double checks the hose connections and the oxide truck for leaks. If any leaks are observed the system must be stopped immediately.

4.4.9 Checks for leaks along with the truck driver during the unloading process.

4.4.10 Turns off the transfer system when the truck driver informs that the truck is empty.

4.4.11 Makes sure all of the hoses are put away or re-connected back to their original positions.

4.4.12 Removes collection device. Disposes any lead oxide collected as a Hazardous Waste using approved collection and disposal methods.

4.5 Responsibilities of the Truck Driver

4.5.1 Ensures that the delivery truck has no cracks or leaks prior to departure from the origin facility.

4.5.2 Checks in with Ball Mill Operator when he arrives at the plant.

4.5.3 Provides a sample to the Ball Mill Operator for quality control.

4.5.4 Makes sure the transfer system is turned OFF before starting to connect hoses to the truck. The truck driver should drive into the building to conduct the transfer operation.

4.5.5 After hoses are connected, contacts Ball Mill Operator to start transfer system.

4.5.6 Makes sure there are no leaks.

4.5.7 Monitors the entire unloading process.

4.5.8 When the truck is empty, contact the Ball Mill Operator to stop the transfer system.

4.5.9 After the transfer system is OFF, disconnects the hoses.

4.5.10 Returns hoses to original locations.

4.6 Emergency Response

4.6.1 In the event of a leak or complication, the Ball Mill Operator will immediately instruct the Truck Driver to cease unloading the material and close the valve on the fill pipe.

4.6.2 In the event of a spill, the Ball Mill Operator will do the above, plus will contact the plant Emergency Coordinator to manage the JCBGI Spill Response Procedure and contact appropriate agencies.

4.7 Disconnection

4.7.1 The Ball Mill Operator will confirm with the Truck Driver that material transfer has ceased.

4.7.2 The hoses will be cleared before disconnecting.

4.7.3 The Ball Mill Operator will supervise the truck shut down and hose cleaning process.

4.7.4 There must be a collection device under the truck-hose connection to ensure that no material is released to the environment during shutdown or cleaning.

4.7.5 Verify there are no leaks prior to releasing the truck back onto the roadways.

5.0 References

49 CFR 172.700 series

6.0 Definitions

MSDS – Material Safety Data Sheet

7.0 Forms

Bill of Lading

8.0 General

N/A