



SECTION 5

CHAPTER 2

GOVERNMENT AUDITS AND INSPECTIONS

Purpose

This chapter outlines the procedures concerning the conducting of assessments, audits and inspections by governmental groups such as Occupational Health and Safety Administration (OSHA), Department of Transportation (D.O.T.), Environmental Protection Agency (EPA) or any other agency that may have jurisdiction over the laws and regulations in how we run our business.

Scope

This Section applies to all areas of the Company.

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Handling Governmental or State Agency Representatives

What to Do When they call

When an area office is contacted by a Federal, State, County or local agency to inquire concerning doing an audit or inspection, the following steps should be completed.

1. Name of the individual calling and what agency they represent.
2. What is the purpose of the agency calling?
3. What are they wanting to audit or inspect.
4. When do they want to do the audit or inspection.

You should cooperate fully with their request for the correct information and then alert the Line of Business VP, VP of Operations and the VP of HSE.

What to do when you receive a notice in the mail

When you receive notification from a governmental agency in the mail, concerning an audit or inspection, alert the Yard Manager over the area concerning the notice and forward a copy to the Line of Business VP, VP of Operations and the VP of HSE.

What to do when agency representatives arrive at an area

When an agency arrives at an area office to complete an audit or inspection, you should first notify the locations Yard Manager and HSE Coordinator before allowing the agency access to your facility or files. Cooperation should be given to their request and make them comfortable until the Yard Manager or next line Supervisor arrives at the site. Follow the above mentioned request for

office

information concerning why they are there, identification of the individuals to complete the audit or inspection and notify the Line of Business VP, VP of Operations and the VP of HSE as to the nature of their needs and requests.

What to do when agency representatives arrive on location

The following steps shall be taken when an agency representative arrives on location **without a valid search warrant**:

1. Cease all operations.
2. Verify the identification of the visitor.
3. Be respectful, courteous, and communicate to the visitor of the company's policy for the agency to obtain a valid search warrant prior to the inspection or audit process.
4. Call your immediate supervisor.
5. All employees will report to the designated muster area and wait for instructions from supervision, management or company HSE personnel.

The following steps shall be taken when an agency representative arrives on location **with a valid search warrant**.

1. Cease all operations.
2. Call your immediate supervisor (The supervisor shall notify management and company HSE personnel.)
3. Verify the identification of the visitor.
4. Verify the visitor is compliant with the PPE requirements.



5. Be respectful, courteous, and communicate to the visitor of the company's policy to wait until members of management and/or company HSE personnel arrive to accompany him or her with the inspection process.

6. All employees will report to the designated muster area and wait for instructions from supervision, management or company HSE personnel.