

What is a Risk Management Program?

The United States Environmental Protection Agency (US EPA) published regulations and guidance for chemical accident prevention at facilities that use extremely hazardous substances. These regulations and guidance are enforced through the Risk Management Program. The Ohio Environmental Protection Agency's (Ohio EPA) Division of Air Pollution Control received delegation of the program in January 2000 and now audits all subject facilities for compliance with the regulations.

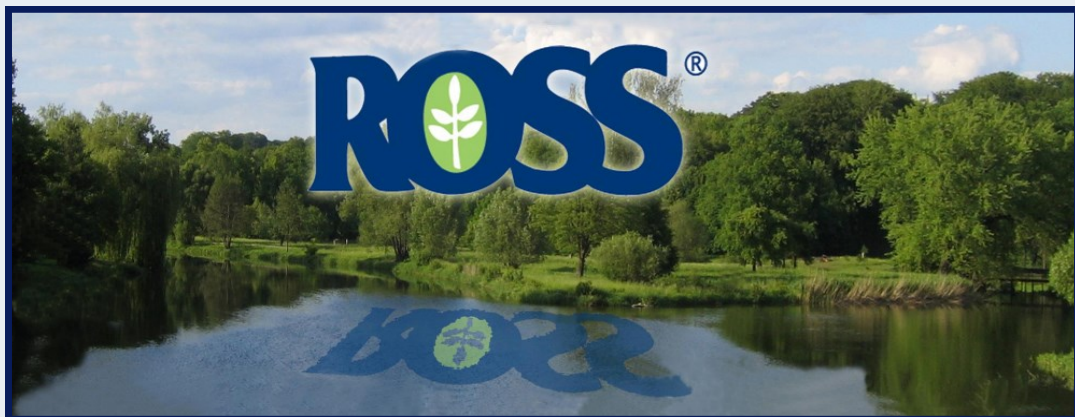
The Risk Management Program requires companies that use certain flammable and toxic substances to develop a Risk Management Plan (RMP) and share that information with the public. The information required for a Risk Management Plan helps local fire, police and emergency response personnel prepare for and respond to chemical emergencies. A facility's Risk Management Plan is available to the public, which fosters communication and awareness, thus improving accident prevention and emergency response practices.

Risk Management Plan Program *FACTSHEET*

About Ross Incineration Services, Inc.

Ross Incineration Services, Inc. (RIS) is a member of the RossWay Group[®] which also includes: Ross Environmental Services, Inc. and Ross Transportation Services, Inc. The companies have been located in Lorain County since 1949 and have facilities in Eaton Township and the City of Elyria. Combined, they have more than 275 associates.

RIS specializes in the destruction, by incineration, of industrial waste materials. Ross Transportation provides transportation services to the industry. Ross Environmental provides sales, marketing, community relations, customer service, human resources, purchasing, information services and regulatory assistance to the other Ross companies and customers.



Risk Management Plan at Ross Incineration Services

Facilities with a greater than threshold quantity of certain regulated substance are required to comply with the US EPA's Risk Management Program regulations. Based on an inventory at RIS of RMP-covered chemicals, Isopropyl Chloroformate, Toluene Diisocyanate (as 2,4-diisocyanate and unspecified isomer), and Formaldehyde have been received above the threshold quantity. These materials are not received as pure chemicals at RIS; rather they are typically received as constituents of waste mixtures received. RIS has evaluated how these chemicals are managed at its facility and based on that evaluation, safety procedures have been implemented for the safe handling of these chemicals. Additionally, RIS has an emergency response plan available should a release occur. This information is included in the facility's RMP.

RIS has safely managed waste materials covered by the RMP since the program's inception. RIS' plan was determined to be thorough and complete by Ohio EPA in 2003. RIS has updated its plan, as required, every 5 years and it was recently updated in 2021.

RIS Accident and Release Prevention

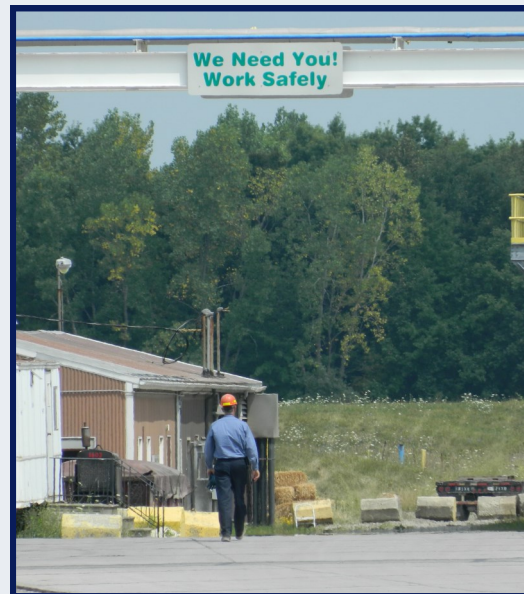
RIS firmly believes a release involving the hazardous chemicals listed in this factsheet is very unlikely. The company's number one priority is safety, and RIS is dedicated to keeping its associates, the environment and the community safe. Accident and release prevention are key components of RIS' RMP. The following descriptions have helped RIS to achieve remarkable accident and release prevention success.

Regulatory oversight

Many agencies and regulations including the Occupational Safety and Health Administration (OSHA), the Resource Conservation and Recovery Act, (RCRA) the Clean Air Act (CAA) and the US and Ohio EPA regulate activities at RIS. OSHA requires RIS to provide a safe and healthy work environment and provide its associates with proper safety training. RCRA requires RIS to operate in a manner that protects human health and the environment. Under the CAA and RCRA, RIS operates within the permits granted by the U.S. EPA and Ohio EPA. These permits outline, in detail, how the facility operates in order to prevent accidental releases and how the facility will respond in the event of an accidental release.

Facility Design

Waste management processes at RIS are engineered and constructed with controls to prevent or mitigate off-site releases of hazardous chemicals. For example, certain processes utilize emergency shutdown systems. Additionally, the facility is completely surrounded by an earthen dike to prevent off-site releases. The design of all systems and equipment used to manage hazardous chemicals have been reviewed and approved by independent engineering firms and the Ohio EPA. RIS must receive prior approval from the Ohio EPA for many changes to its systems or equipment.



Inspections

RIS conducts internal inspections of safety equipment such as firefighting equipment, first aid materials, signs, alarms and personal protection equipment. Internally, this includes inspecting all containers and tanks for leaks; ensuring lids are secure and containers are properly labeled.

Maintenance

Process instruments, such as sensors and indicators, are calibrated on a regular basis. All of RIS' equipment (fire extinguishers, safety controls, air monitoring equipment, storage tanks) are inspected on a regular schedule. All replacement parts (piping, valves, fittings) must be installed to meet the manufacturers' original specifications.

Training

Every RIS associate receives continual training to stay current with all regulations in addition to their initial new hire training, including extensive on-the-job training where they must complete a 40-hour classroom session and hands-on training within the first six months of

employment. In addition, associates must demonstrate proficiency in their duties before they can work independently. Eight hours of refresher training is required on an annual basis and associates also attend daily, monthly and quarterly safety training based on their length of service and duties.



Associates & equipment are regularly tested to meet strict standards at RIS.

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Standard Operating Procedures

In order to operate safely, RIS has Standard Operating Procedures. These procedure are clear instructions for associates to follow and ensure every associate performs each task in the approved, safe way. All procedures are in writing and are regularly reviewed and updated. Associates receive regular training to ensure they are familiar with the most current procedures.

In the Unlikely Event of an Emergency

If an accident or release should occur, RIS would implement their Emergency Action Plan. RIS has a dedicated Emergency Response Team (ERT) with at least two members on-site at all times. These individuals have extensive training by outside accredited organizations. RIS also has nine Emergency Coordinators who rotate “on-call” status and are available 24 hours a day, seven days a week. Finally, RIS has agreements with local response agencies including: the Eaton Township Fire Department, the Lorain County Sheriff and the Lorain County Emergency Management Agency to provide support if necessary.



Here, associates are familiarized with the layout, contents and usage of the onsite Emergency Response Trailer, used by the Emergency Response Team, in the unlikely event of an emergency.



Potential Local Off-Site Impacts

There are several steps that local residents should take in the event there would be an accident with off-site impacts.

- Tune your radio to a local emergency broadcast station to get information. (WEOL- AM 930).
- Follow the instructions of local fire department and sheriff's office officials.
- Prepare to “shelter in place” or evacuate. Steps for sheltering in place include:
 - Immediately go, and stay, inside the nearest building, home or vehicle;
 - Close all windows, doors and fireplaces;
 - Turn off any ventilation systems (furnace, air conditioner); and
 - Remain inside until the “all clear” signal is given.

If you are concerned or have questions about operations at the RIS facility, you can call the Corporate Communications Department during regular business hours at (440) 366-2063. After hours, the guard at the RIS facility can have the Corporate Communications on-call associate return your call. During an incident, trained staff are available to answer questions from the community. We recognize that keeping you informed is an important obligation and our Crisis Communications Team is trained to inform neighbors, associates and the media in the unlikely event of an incident.

RMP Covered Chemicals at RIS

Currently, RIS' RMP includes three chemicals – isopropyl chloroformate, toluene diisocyanate, and formaldehyde. These chemicals are included in the facility's RMP because a minimum threshold amount has been received. Again, these materials are not received as pure chemicals at RIS; rather they are typically received as constituents of waste mixtures received.

RMP Covered Chemicals at Ross Incineration Services, Inc.

Substance	Uses	Physical Description	Received at RIS
Isopropyl Chloroformate	Manufacture of plastics, pharmaceuticals, and agricultural pesticides.	Clear, colorless liquid with a pungent, irritating odor.	Bulk liquid.
Toluene Diisocyanate (as 2,4-diisocyanate and unspecified isomer)	Manufacture of flexible polyurethane foams, coatings, sealants, and adhesives.	Colorless to amber liquid with a strong odor.	Bulk and containerized liquid.
Formaldehyde	Manufacture of fertilizer, paper, plywood, and some resins.	Colorless liquid with a pungent odor.	Bulk and containerized liquid.

Stay Connected! Ross Community Newsletter

The Ross Group of companies has an Open Door Policy with our local community. As companies that enjoy the benefits of doing business in our local community, we recognize that we have a responsibility to be good corporate citizens and to maintain clear, open lines of

communications with our community. We believe that communication with the public is vital to the successful business practices of the Ross Group.

We are available to provide information, answer questions, give tours of our facilities and make presentations about our operations. As such, the Ross companies publish a Community Newsletter regularly and are available during normal business hours for any questions, comments or information.



For more information about this program or the Ross Group of companies, please contact:

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