

AK Steel Corporation
BUTLER WORKS
P.O. BOX 832
BUTLER, PENNSYLVANIA 16003-0832

TELEPHONE 724.284.2000

Gerald W. Hesidenz
Director - Safety and Risk Management

RECEIVED

Exhibit 38

02 NOV 15 AM 9:54

OSHA - PGO

November 12, 2002

Robert Szymanski
Area Director
Occupational Safety and Health Administration
Federal Building, Room 1428
1000 Liberty Avenue
Pittsburgh, PA 15222

RE: Letter received by fax on 11-6-02 alleging coils are transported in overloaded trailers and are unsecured as well as alleging that this is being done against company procedures.

Dear Mr. Szymanski:

As you are aware, we produce both stainless and electrical grades of steel here at the facility. The movement of our coil product from one area of the plant to another involves transit by tractor trailer on coil hauling flatbeds.

I will respond to each item of the complaint separately.

Overloading of coil hauling trucks:

Our trucks are not overloaded. For hauling loads of coils outside the plant, we follow state and federal requirements for public roadways. Inside the plant, our practice is to use the load capacity ratings of the vehicles as the maximum weight limit. For example: the hauling of our electrical grade coil products can be a combination of sizes and weights on the same trailer. (See Enclosures 1a-1d). The load capacity for our CRNO trailer is 130,000 pounds with instructions to the operators to load no more than 2 quad coils (weighing 48,000 pounds each). If a mixed size load of coils is being transported by this trailer, the operator must calculate the total coil weight to assure they do not exceed 120,000 pounds per the Job Safety and Health Analysis for hauling electrical grade coils (See Enclosure 2: JSHA 057-0579-600B). Our Hilltop trailer has a 90,000 pound capacity and likewise has requirements not to exceed that weight limit.



Robert Szymanski

Page 2

November 12, 2002

Our stainless product is transported from our Main Plant on Armco Drive to our Stainless Processing Plant on Bantam Avenue by rail. If we must use tractor trailers and flatbeds, stainless coils are transported in full compliance with state and federal motor vehicle code regulations.

Coils are transported "unsecured":

Our electrical steel grade coils are susceptible to product damage from load binding. For this reason, we have the two trailers mentioned in the first section designed with a "V" trough in the bed (See Enclosures 3a, 3b, & 3c). This allows the coils to ride in the depression of the trailer securely without binding. In other cases, we have laid quad coils down "eye to the sky" for transit. These are the only exceptions to traditional securing a load by binding, and we have taken precautions by the specially designed trailer trough to assure the load is secure. In-plant roadways are posted with 15 mph in populated areas and 25 mph in several normally unpopulated stretches. All other material in transit, whether it be product or parts for delivery, are done with chain binders or strap binders.

Exception Approval:

The aforementioned are done by exception and approved by the safety group.

Our handbook (See Enclosure 4) has instructions for the operation of trucks and other pieces of mobile equipment. Page 100 - #5 instructs, among other things, "not to ride in a truck with unsecured loads". As described in Section #2, these coils are not unsecured; they are in a trough or "eye to the sky" position which keeps them from moving. Page 100 - #7 instructs employees "not to transport loads that are unstable or above the rated capacity of their vehicles". As described in Section #1, these vehicles are not overloaded.

SHSP-0035-28, "Qualifications for Mobile Equipment Operators", is enclosed (See Enclosure 5) for your review. Section 2.9 directs the employee to "follow the state motor vehicle code, both inside and outside the plant, paying particular attention to the regulations covering seat belt usage, stop signs, speeding, reckless driving, overloading, and condition of the vehicle." Any transit of material outside the plant is done per state code with CDL qualified drivers. On nonpublic highways, (i.e., in-plant roads), we expect our drivers to follow the same requirements of the state code that apply.

AK Steel Corporation

Robert Szymanski
Page 3
November 12, 2002

If you have any questions, please give me a call at 724-284-2240.

Sincerely,



Gerald W. Hesidenz
Director – Safety and Risk Management

GWH/ln

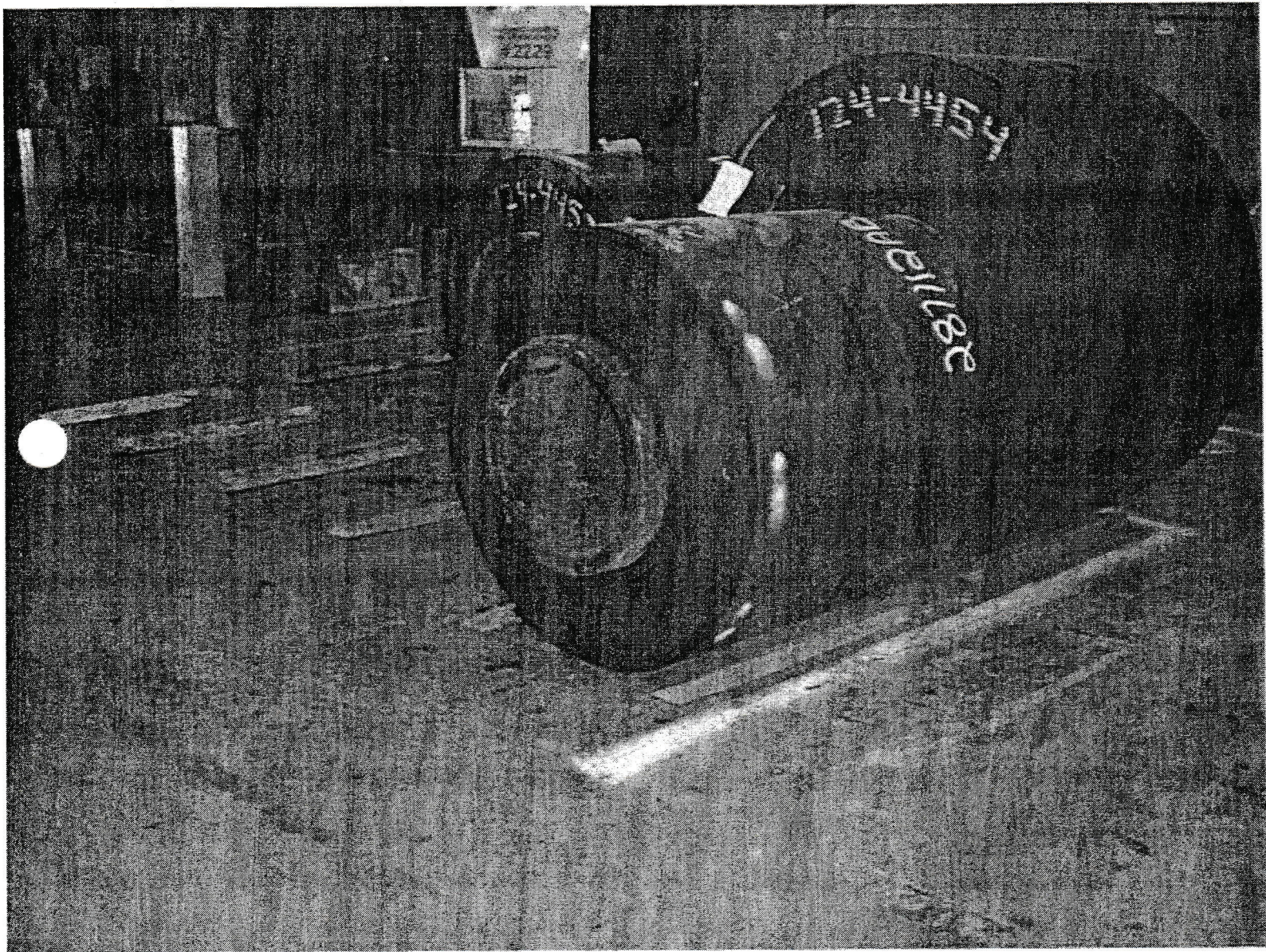
Enclosures

cc (w/out enclosures): Mark Tabler
Tom Ayres
John Vensel
Bill Smith
BAIU Office
Labor/Trucks Bulletin Board
Jim Stanley - Middletown

ENCLOSURES

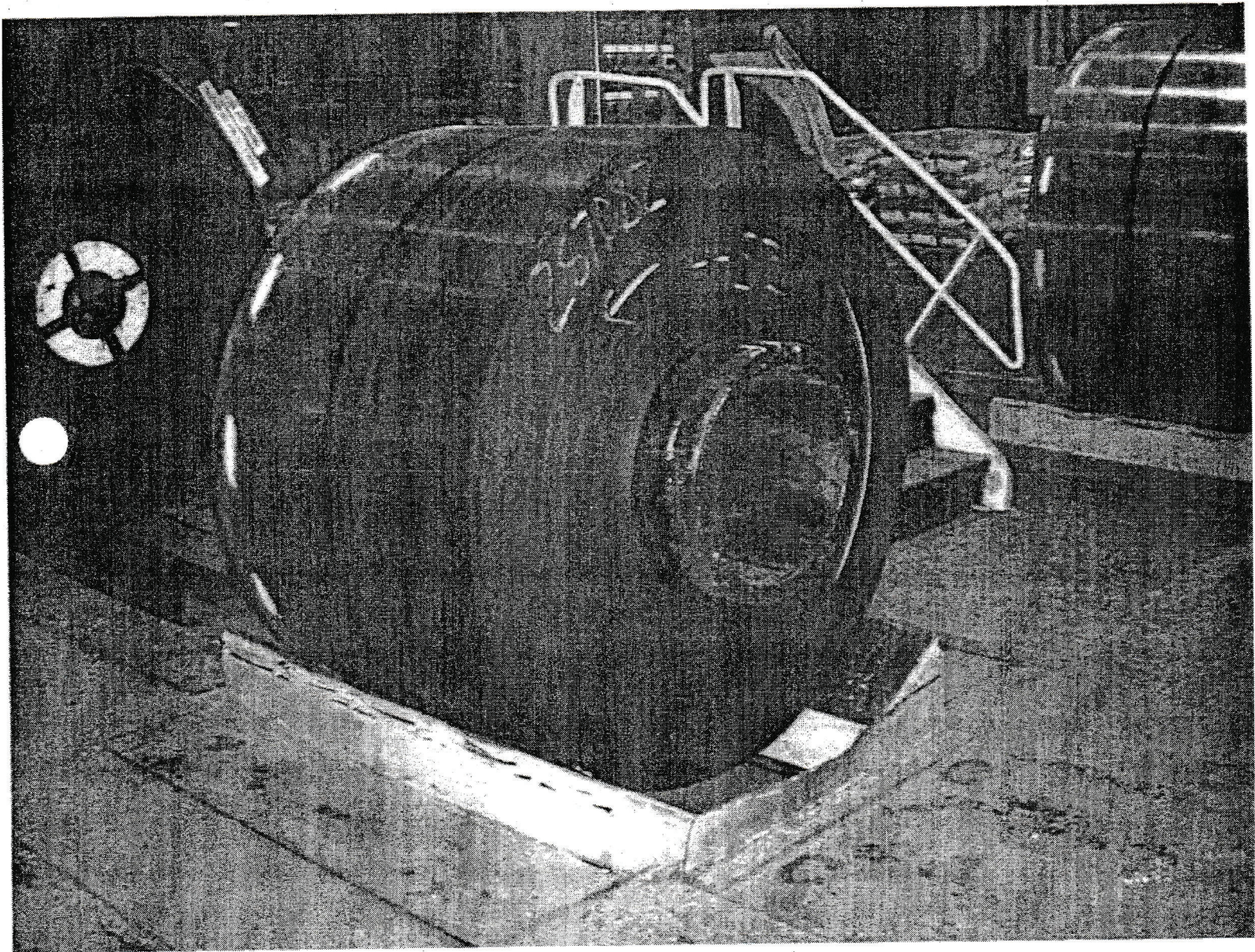
<u>Enclosure Number</u>	<u>Title</u>
1a	Photo - Single coil
1b	Photo - Double coil
1c	Photo - Triple Coil
1d	Photo - Quad Coil
1e	Photo - Loaded Coil Hauling Trailer
2	JSHA 057-0579-600b "Hauling Coils Intra Plant"
3a	Photo - Loaded coil hauling trailer
3b	Engineering Blueprint - 65 ton capacity CRNO trailer
3c	Engineering Blueprint - 45 ton capacity Hilltop trailer
4	AK Steel Butler Works Safety, Health and Security Handbook
5	AK Steel Butler Works Standard Safety and Health Policy 0035-0028 "Qualifications for Mobile Equipment Operators"

Attachment 1a



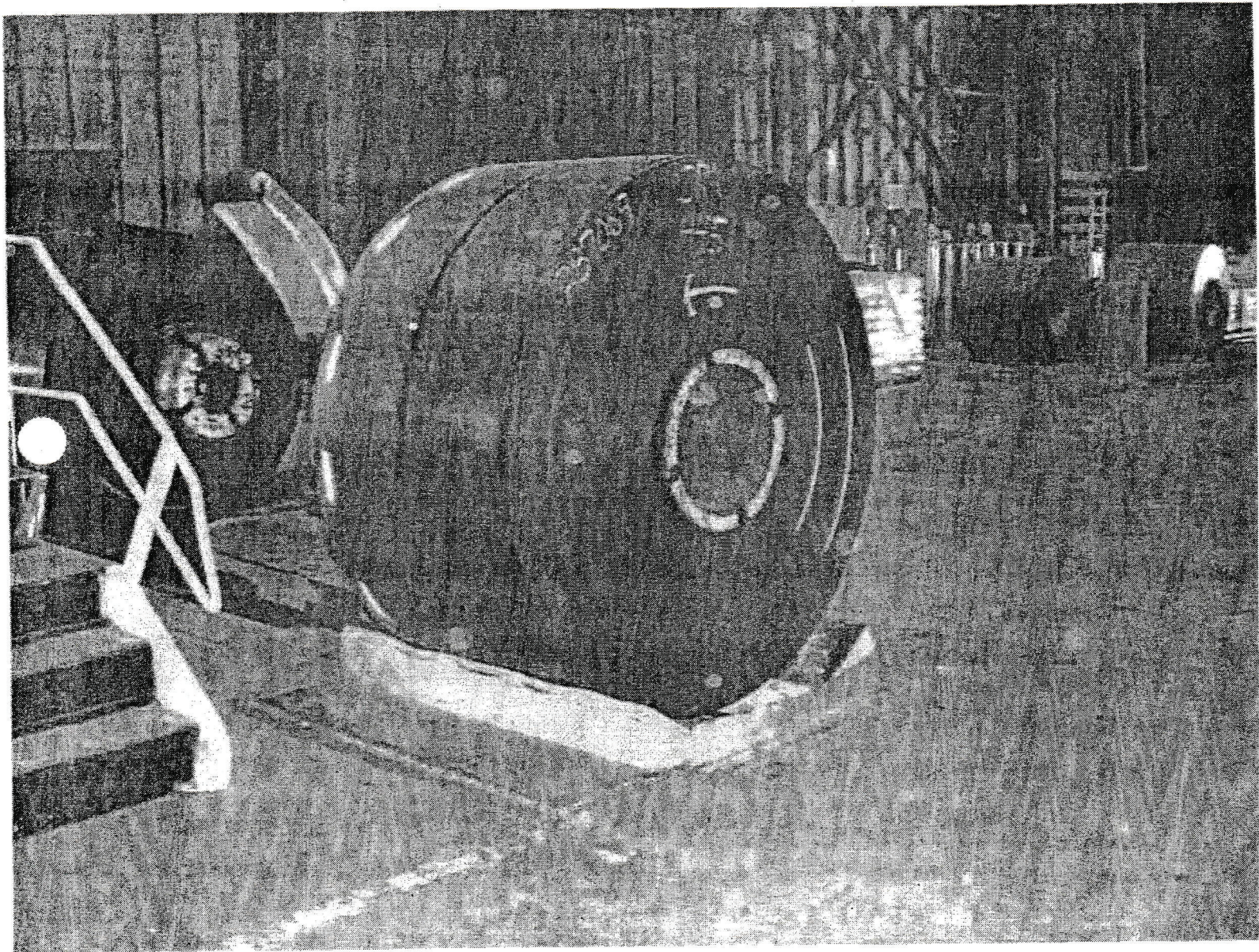
Single coil $\approx 12,000$ lbs

Attachment 1b



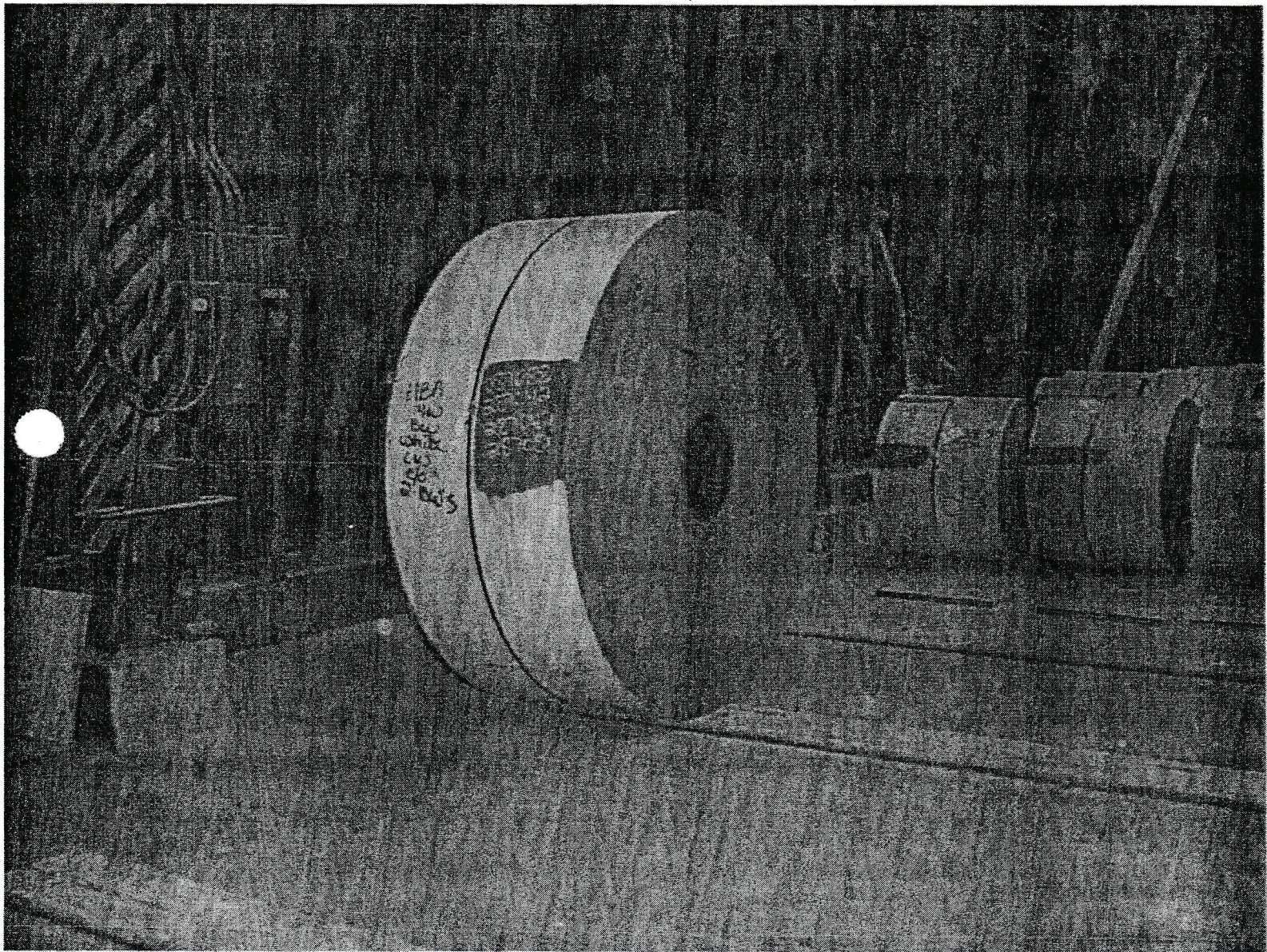
Double coil \approx 24,000 lbs

Attachment 1c



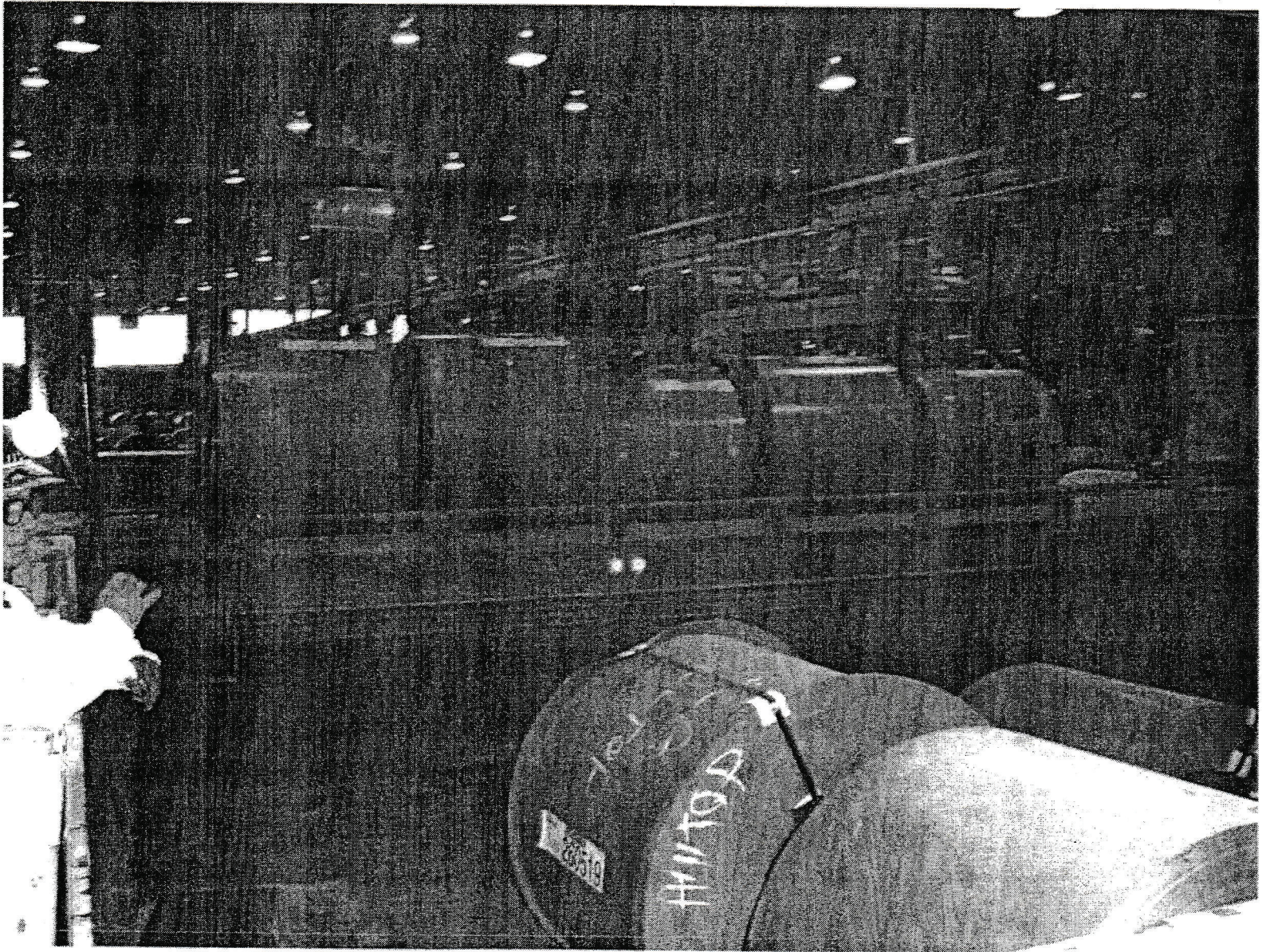
Triple coil \approx 36,000 lbs

Attachment 1d



Quad coil \approx 48,000 lbs

Attachment 1e



Attachment 2

Electrician
GRADE 1 LS



Butler Works

JOB SAFETY AND HEALTH ANALYSIS

Department: Trucks
 Document Owner: Section Manager
 Signature: Ed Tassey
 Doc. Owner Name: Ed Tassey

JSHA: 57-0579-600B
 Date: 2/1/01
 Job: Hauling Coils-Intra Plant
 Occupations: Truck Driver

Required Personal Protective Equipment:	Hard hat, side shield glasses, metatarsal safety shoes, long sleeved shirt, gloves, valid Pennsylvania CDL license, wear seat belts at all times when in company vehicle, cut protection Kevlar arm guards, and flame resistant clothing.	MSDS(S) Associated with the Job:	
BASIC JOB STEPS Break the job down into basic steps that tell what is done first, what is done next, and so on.	POTENTIAL ACCIDENTS/ILLNESSES OR KNOWN HAZARDS SB - Struck by (CB) - Contacted by (SA) - Struck against (CW) - Contact with (CI) - Caught in illness CO - Caught on (CB) - Caught between (F) - Fall (SC) - Strain-overexertion (E) - Exposure (occ)	SAFE JOB PROCEDURES For each potential accident/illness, ask yourself what exactly should the employee do or not do to avoid the accident/illness.	ACCIDENTS Date of last accident:

UNCONTROLLED DOCUMENT



Butler Works

Department: Trucks
 Document Owner: Section Manager
 JSHA: 57-0579-600B
 Date: 2/1/01

BASIC JOB STEPS	POTENTIAL ACCIDENTS/ILLNESSES OR KNOWN HAZARDS	SAFE JOB PROCEDURES	ACCIDENTS
1. Check and service equipment.	1. A. CB - Other equipment. B. SB - Hood of truck falling on hand. C. (CB) - Hot motor when checking oil and water. D. F - Different level and same level. Slipping and tripping on blocking, etc. E. SO - Lifting tarpaulins and blocking. F. (CB) - Fire and explosion when filling fuel tank.	A. Keep in clear of other moving equipment (trucks, etc.). B. Clean snow off hood in winter, and open hood by the front hand hold. Do not lower hood with sides of fenders. C. Wear gloves when checking oil and water. Use shop rags and gloves to release radiator cap. Release slowly and carefully. D. Use handles when getting on truck. Oil and grease on bed of truck. Blocking, chains, binders, tarps. Blocking holders should be placed in order. De-icer, salt, and sand are to be used if bed of truck has ice on it. Sweep bed clear of snow. Use truck stairs (where available) for mounting and dismounting the bed of the truck. Keep truck stairs on a level surface and setting right up next to the truck. Make sure wheel locks are operating properly. Check out stairs before use for any wear or damage. E. Lift properly using your legs. Keep your back straight. Don't jerk lift. F. Turn engine off. No smoking or open flames when filling fuel tank. Ground fueling nozzle on frame of truck. Avoid spilling the fuel.	

UNCONTROLLED DOCUMENT



Department: Trucks
 Document Owner: Section Manager

JSHA: 57-0579-600B
 Date: 2/1/01

BASIC JOB STEPS	POTENTIAL ACCIDENTS/ILLNESSES OR KNOWN HAZARDS	SAFE JOB PROCEDURES	ACCIDENTS
<p>2. Driving to and from departments to load and unload coils.</p>	<p>2. A. SB - Railroad and other equipment.</p> <p>B. SA - Building and surrounding vehicles.</p> <p>C. SB - Struck against the cab.</p> <p>D. SA - Cab hitting building door.</p> <p>E. SB - Backing into buildings.</p> <p>F. F - Different levels.</p>	<p>2. A. Drive within the legal speed limits. Do not take chances to save time. Obey all traffic laws. Do not drive too fast for conditions. (Weather) Stop at blinking red lights. Stop as needed at all railroad crossings. Do not depend on Transportation people to guard crossings.</p> <p>B. When entering any job site, it is the drivers responsibility to observe the surroundings around the job site. If not sure of truck clearance, STOP, get out of truck and observe area for truck clearance. Get help if needed. Make sure both mirrors are clean and adjusted properly. When help is needed, make sure window is rolled down, so you can hear helper when giving directions.</p> <p>C. Road condition, construction areas. Wear seat belts. Watch for unexpected traffic movements. Avoid jamming of brakes.</p> <p>D. Have all doors completely open when entering or exiting buildings. Make sure that tractor and trailer are completely clear of building and door before using automatic door opener/closer.</p> <p>E. When backing into buildings, keep your visibility good. Observe overhead cranes, tractor, and pedestrian movement. Turn on flashing amber lights, fourway flashers, back-up alarm must be working. If entering a building with railroad access, call the Yard Master for clearance. Follow General Safety Order #3 and SPI B-1.02-7. The light above the railroad doorways must be red to enter. The light must be changed by the department supervisor only. When leaving the building, remove derails, orange cones and notify the Yard Master to cancel the clearance.</p> <p>F. When dismounting tractor, observe area for uneven surface or foreign material before stepping down.</p>	



- Butler Works

Department: Trucks
 Document Owner: Section Manager
 JSHA: 57-0579-600B
 Date: 2/1/01

BASIC JOB STEPS	POTENTIAL ACCIDENTS/ILLNESSES OR KNOWN HAZARDS	SAFE JOB PROCEDURES	ACCIDENTS
3. Loading and unloading coils.	3. A. SB - Coil and hook. B. SB - Telescoping coil. C. SB - Bands.	3. A. Do not get on bed of truck when crane is loading and unloading coils. B. Keep in clear when crane is lowering coil on truck. C. Check bands to make sure that they are on tight. On large coils, do not load unless they are banded with two bands and one cross band.	
4. Operating coil cover for CRNO trailer.	4. A. CB - Rollers and coil cover. B. SB - Crane hook striking coil cover.	4. A. Keep fingers clear of line of travel of coil cover while opening or closing. B. Slide coil cover to opposite side away from crane hook while loading or unloading coils.	
5. Using metal cover on Hilltop coils.	5. A. SB - Cover. B. CB - Cover and trailer. C. F - Falls.	5. A. Stay clear when crane is setting cover on truck. Make sure cover is properly loaded on truck. B. Keep off truck when loading coils and cover. C. Do not guide cover by hand, STAY CLEAR!!! Use positioning device as required.	
6. Hooking or unhooking trailer from tractor.	6. A. SO - Cranking dolly wheels. B. F - Slips and falls. C. SB - Crank. D. CB - Tractor and trailer. E. SO - Wet line. F. SB - Wet line.	6. A. Use good body position and do not exert pressure on crank when dollies are completely down. B. Watch for uneven ground surfaces. Try to place trailer on level ground. C. Keep legs clear of crank while turning. D. Stay clear of area between tractor and trailer. E. When connecting the wet line, do not over tighten. F. When disconnecting the wet line from the trailer, store it in a secure position.	
7. Parking equipment.	7. A. SB - Drifting truck. B. SB - Locomotive.	7. A. Shut down motor. Place in lowest gear. Set the EMERGENCY BRAKE . B. When parking around railroad tracks, keep at least six (6) foot clearance.	

NOTE: 1. Do not exceed the weight capacity of the trailers. CRNO trailer is 60 ton and Hilltop trailer is 45 ton.
 2. Do not chain or bind electrical coils. Set electrical coils in "V" trough in trailer or haul eye to the sky.
 3. Driver will haul one full box of coils at a time unless exceeds weight capacity of number one.



Butler Works

Department: Trucks
 Document Owner: Section Manager

JSHA: 57-0579-600B
 Date: 2/1/01

BASIC JOB STEPS	SAFE JOB PROCEDURES	ACCIDENTS
-----------------	---------------------	-----------

REVISION REGISTER

DATE	REVIEW / REVISION DESCRIPTION	PAGE NO.	INITIALS
2/1/01	New JSHA	All	DH
2/14/01	Revised item 1-C	1	DH
3/21/01	Revised NOTES	3	DH

Attachment 3a



Attachment 3B

ROGERS BROTHERS CORPORATION
ALBION, PA. 15401

MODEL FG65L84/51/20/102/3XSP

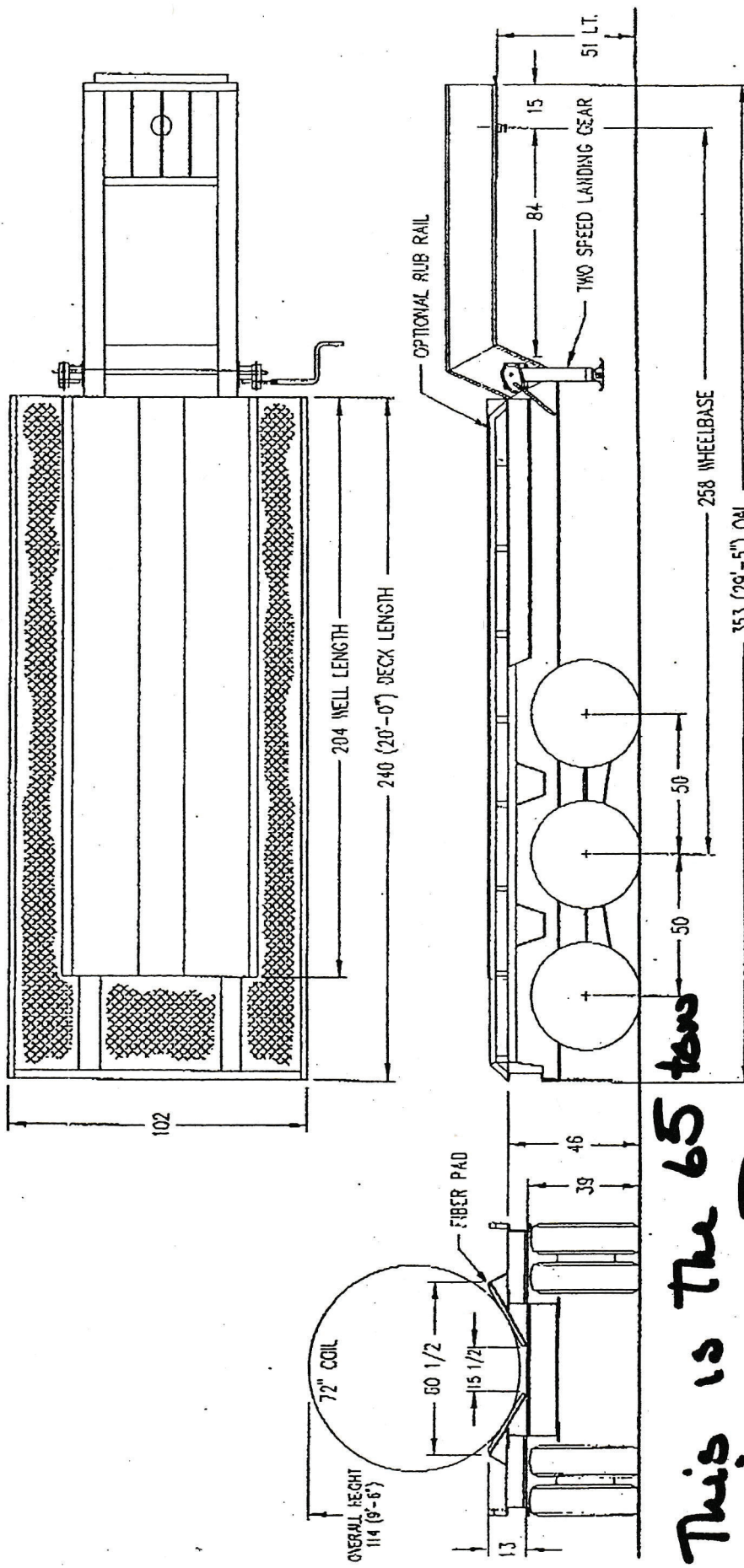
CUSTOMER ARMCO STEEL

DATE 9-28-99

PROJ. NO.



PROPOSAL DRAWING



NOTE:

ALL ILLUSTRATIONS, WEIGHTS, AND SPECIFICATIONS ARE APPROXIMATE. THESE MAY VARY WITH MODEL. CHANGES, DIMENSIONS ARE IN NOTES. SUBJECT TO ENGINEERING REVISION AS REQUIRED.

This is the 65 ton Trailer. Blue Print is wrong. See Attachment 3A

12 - 275/70R, 22.5 TUBELESS TIRES
NEWAY TR-8900 SPRING WALKING BEAM SUSPENSION
90,000# CAPACITY, 5 3/4" AXLES

W. R. ROGERS

0313-15

Attachment



HIGHWAY EQUIPMENT COMPANY

Main Office:
Pittsburgh area
22035 Perry Highway
Zelienople, PA 16063
Tel: 724-452-7800
Fax: 724-452-7030

Branch:
Clarion / Clearfield
Route 219 North
DuBois, PA 15801
Tel: 814-371-3600
Fax: 814-371-6770

Branch:
Erie / Sharon
5846 West Road & I-79
McKean, PA 16426
Tel: 814-476-7755
Fax: 814-476-1759

Account#	Order #	Brc	Sl#
001124A	136974	01	10

Date	Invoice #	Page
09-20-00	10031618	1

I N V O I C E

Sold To:

ARMCO ADVANCED MATERIALS CO.
BUTLER ACCOUNTS PAYABLE INVS.
P. O. BOX 1211
BUTLER PA 16003-1211

Ship To:

ARMCO ADVANCED MATERIALS CO.
BUTLER ACCOUNTS PAYABLE INVS.
P. O. BOX 1211
BUTLER PA 16003-1211
Ship Via

Entered By marcie	Customer Purchase Order 0283028 0283028	Customer Contact	Ord Date 09-20-00
Model	Serial Number	Equip ID	Customer Job number Customer Phone # 724-284-2986

Ord	Ship	B/O Part Number	Description	Unit Price	UM	Extended
-----	------	-----------------	-------------	------------	----	----------

TO INVOICE YOU FOR SALES TAX ON YOUR PURCHASE OF:

1 - 65 TON NEW ROGERS GOOSENECK TRAILER
SERIAL #23926

1 PENNSYLVANIA SALES TAX

PA PENNSYLVANIA SALES TAX 0.00

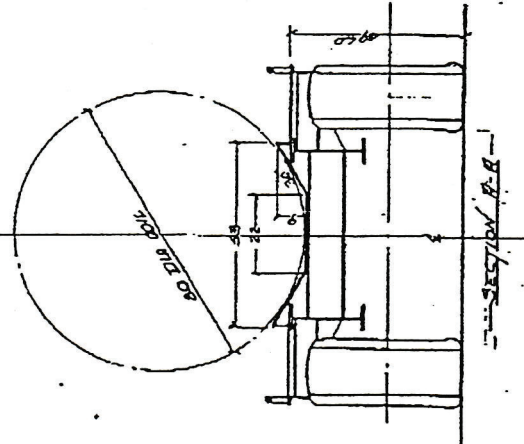
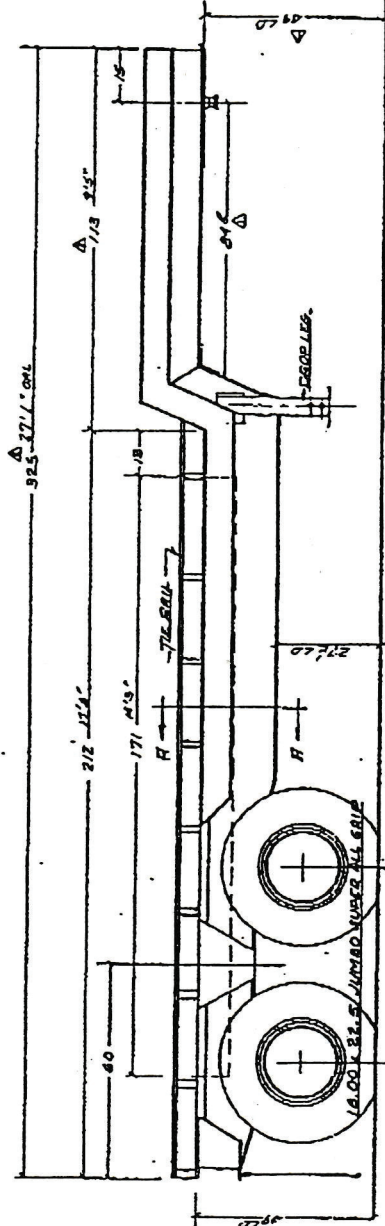
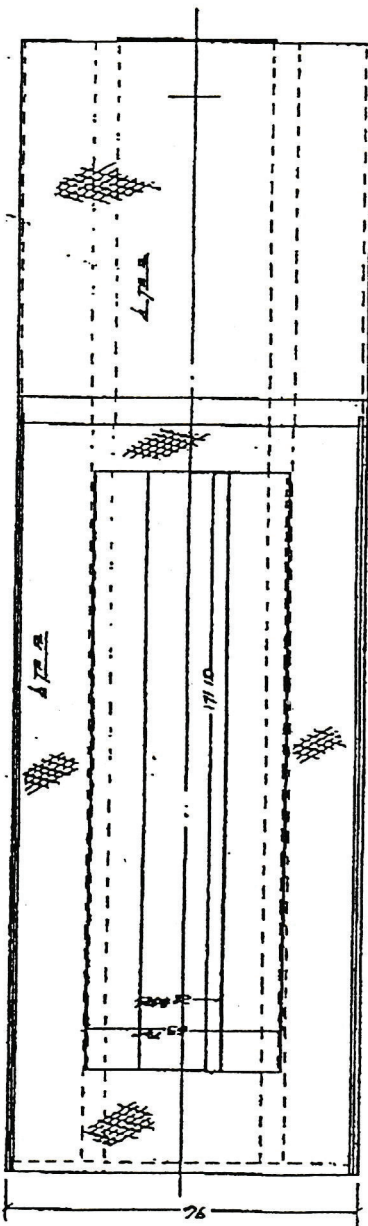
* REMIT TO: *
* DEPT. L305P *
* PITTSBURGH, PA 15264-0305 *

Total Invoice
Due By:
09/30/00



Attachment 3C

PROPOSAL DRAWING



4-1/2" HITCHES H900 TRO SPRING
 STD-ERGE-424 AXLES
 161 x 7 AIR BRAKES

45 Ton Hi Top TRAILER



ROGERS BROTHERS CORPORATION
 ALBION, PENNSA
 BARMCO-STEEL-CORE
 COLL. TRAILER
 ED. 100-27-57-20

DATE: 2-19-82
 DRAWN BY: [Name]
 CHECKED BY: [Name]
 SCALE: 1/2" = 1'-0"

PROJ. NO. 1102 32
 REV. NO. 1102 32
 ADD. # 24 04

or other vehicles that do not have specifically approved seats and seat belts.

5. If you are authorized to ride in a truck or other plant vehicle, do not allow any part of your body to hang over the edge. Do not jump off a moving vehicle. Do not ride in a truck with unsecured loads.

6. Pedestrians must be aware of plant vehicle movement when walking through buildings or yards. Do not walk beside equipment while it is in motion. Do not assume the vehicle operator can see you. Be prepared for sudden turns or the vehicle backing up.

7. Operators of plant vehicles are not to transport loads which are unstable or above the rated capacity of their vehicles.

8. Mobile cranes are not to be used to transport materials on the hook to and from the job site.

9. Never use a forklift or similar vehicle as a working platform or allow yourself to be hoisted from one level to another unless a specifically designed platform is provided and you have been authorized to use the vehicle in this way. The platform must be secured to the forklift, and the forklift operator must remain at the controls at all times while the platform is in use.

10. When a powered industrial truck is left unattended, the load lifting device shall be fully lowered, controls neutralized, power shut off, and brakes set. Wheels shall be blocked if the truck is parked on an incline.

11. When a vehicle is being refueled or serviced, the motor must be shut off. Gasoline refueling is also to take place out of doors at a location, which is well in the clear of ignition sources. The vehicle being refueled must be attended the entire time during the fueling process. The following sign must be attached to or next to the fuel pump.

WARNING: This is a designated "No Smoking" area.

12. Operators shall use access ladders and provided steps and/or ladders to get on or off the equipment. Do not jump from the vehicle to the ground. Alertness, firm footing, and firm grip on handholds must be maintained when boarding and dismounting equipment. Hand holds and steps shall be part of the daily inspection to assure their integrity.

13. Be alert for other moving equipment, debris, obstructions, product, or uneven ground surfaces which may be in the area when boarding or dismounting the vehicle.



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

Signature:

Doc. Owner - Name: **Mark G. Tabler**

1.0 SCOPE

The purpose of this SHSP is to detail the procedures required for qualification as a mobile equipment operator.

2.0 PROCEDURE

2.1 Basic Types of Mobile Equipment

- 2.1.1 Ambulance
- 2.1.2 Bulldozers/Payloaders/Bobcats
- 2.1.3 Bus Type Vehicles
- 2.1.4 Fire Truck
- 2.1.5 Locomotives
- 2.1.6 Mobile Cranes
- 2.1.7 Motor Trucks (Pickup, Vans)
- 2.1.8 Passenger Cars
- 2.1.9 Aerial Lifts/Bucket Trucks



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

2.1.10 Track Maintenance Equipment

2.1.11 Tractors (All Types)

2.1.12 Tractor Trailers

2.1.13 Yard Cranes

2.1.14 Powered Industrial Trucks (Mobile, power propelled trucks used to carry, push, pull, lift, stack, or tier material)

2.2 Qualifications

2.2.1 Has been selected by the proper authority.

2.2.2 Has passed a physical examination.

2.2.3 Has completed the Mobile Equipment rules and regulations orientation.

2.2.4 Was assigned to certain equipment and the operating instructions were covered.

2.2.5 Satisfactorily completed practical training.

2.2.6 Powered Industrial Truck operators are required to participate in a program which consists of a combination of classroom instruction (lecture, discussion, video tapes, and/or conference) and practical training (demonstrations and practical exercises by the trainee. Maximum allowable training period not to exceed four [4] weeks.).

2.2.7 Required Powered Industrial Truck training components and work related topics are listed in Sections 3.0 and 4.0 of this SHSP.



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

- 2.3** The department training the employee is responsible for seeing that current mobile equipment rules and regulations are covered with the trainee.
- 2.3.1** All training and evaluation shall be conducted by a designated person who has the requisite knowledge, training, and experience to train powered industrial truck operators and judge their competency.
- 2.4** After a trainee has successfully completed all the steps in the training program, they will be issued an operator's card signed by the following individuals:
- 2.4.1** Plant Physician
- 2.4.2** Supervisor providing the training
- 2.4.3** Supervisor of Department/Maintenance Supervisor
- 2.4.4** Operator
- 2.5** After a trainee has successfully completed all the steps in the training program, the following must occur annually:
- 2.5.1** The Mobile Equipment Operator is to make an appointment at the Medical Department for his/her physical during their birth month.
- 2.5.2** Should an employee be disqualified from operating a particular piece of mobile equipment for medical reasons, the Plant Physician will line through the approval section of the mobile equipment operator's card dealing with that type of equipment and initial the line. Any questions concerning the disqualification should be directed to the Plant Physician.



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

- 2.5.3** A mobile Equipment Operator's card remains valid until the 15th of the month following his/her birthday. Any employee not meeting this requirement will not be permitted to operate the equipment beyond that date.
- 2.5.4** Each operator must participate annually in the Mobile Equipment Operator's Safety Review Program.
- 2.6** Only those employees who have a current operator's card and licensed in the state of Pennsylvania shall be assigned to operate Mobile Equipment. A driver's license is not necessary to operate mobile equipment if the equipment is not driven on plant or municipal roadways and the operator is appropriately trained.
- 2.7** All employees who drive motor vehicles (owned, leased, rented, or personal) in the course of their employment, must have the appropriate, valid Pennsylvania Motor Vehicle Operator's license. This shall be verified annually and noted on the individual's S.C.R. card or an approved record keeping form by the employee's supervisor.
- 2.8** An operator will not be permitted to operate AK Steel equipment on plant or municipal roadways during a period while their Pennsylvania "Operator's License" is suspended or revoked. Convictions for driving under the influence of alcohol or other controlled chemical substances must be reported to the supervisor.
- 2.9.** Operators shall operate their vehicles in strict conformance with all the provisions of the State Motor Code, both inside and outside the plant, paying particular attention to the regulations covering:
- 2.9.1** Seat belt use (required)
 - 2.9.2** Stop signs
 - 2.9.3** Speeding



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

- 2.9.4 Reckless driving
- 2.9.5 Overloading
- 2.9.6 Condition of Vehicle

- 2.10 Operator must use all safety equipment as prescribed by Management.
- 2.11 Annually, all employees who operate mobile equipment/vehicles must review this SHSP as well as SSP-0060-8, SSP-0060-27, SHSP-0035-19, and the section covering vehicles and mobile equipment in the Safety and Security Handbook.
- 2.12 It shall be the responsibility of the supervisors employing operators to see that these employees have a current operator's card. No operator may operate equipment in any department without the approval of department supervision. If any operator has not received adequate training on a piece of equipment to which they are assigned, it is the responsibility of the immediate supervisor to provide the necessary training. Motor trucks and bus type vehicles may be assigned to qualified people for limited use at supervisor's discretion.
- 2.13 The supervisor shall not authorize, or order, the operation of a vehicle outside the plant in any manner or condition that constitutes a violation of the Pennsylvania Motor Vehicle Code, thus jeopardizing the operator's State License.
 - 2.13.1 In case of an accident on Company property involving damage to property or equipment not owned by AK Steel, the operator and their supervisor are responsible for reporting the incident immediately to the Security Department.
 - 2.13.2 In case of an accident on the street or highway, the operator and their supervisor are responsible for reporting the incident to the Safety Department.



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

- 2.13.3** The operator of any motor vehicle involved in an accident resulting in death or personal injuries in any degree shall, within twenty-four hours, forward a report to the appropriate State Agencies. Failure to report accidents may result in suspension of operator's license.
- 2.13.4** Refresher or remedial training shall be provided when there is reason to believe that there has been unsafe operation, when an accident or near miss occurs, or when an evaluation indicates that the operator is not capable of performing the assigned duties.
- 2.14** Due to the nature of their training and experience, Maintenance and Service personnel are authorized to operate equipment covered by this SHSP for repair and maintenance work. They, however, must satisfy the initial Powered Industrial Truck training annual review described in 2.11 and annual physical requirements.
- 2.15** All other AK Steel Mobile Equipment Operators not listed in Section 2.1 must conform to Sections 2.6 through 2.11 of this SHSP.
- 2.16** Only those employees with a current Operator's card are permitted to operate the equipment listed in this SHSP.
- 2.17 Certification**
- 2.17.1** The employer shall certify that each operator has received the proper training, has been evaluated as required by this paragraph, and has demonstrated competency in the performance of the operator's duties. The certification will include the name of the trainee, the date of the training, and the signature of the person performing the training and evaluation.
- 2.17.2** Each department shall be responsible for retaining the training records of each employee.



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

3.0 POWERED INDUSTRIAL TRUCK TRAINING COMPONENTS

- 3.1 Training shall include all operating instructions, warnings, and precautions for the types of Powered Industrial Trucks the operator will be authorized to operate.
- 3.2 Similarities to, and differences from, the automobile
- 3.3 Controls and instrumentation: what they do and how they work
- 3.4 Power plant operation and maintenance
- 3.5 Steering and maneuvering
- 3.6 Visibility (including restrictions due to loading)
- 3.7 Vehicle capacity
- 3.8 Vehicle stability
- 3.9 Vehicle inspection and maintenance
- 3.10 Refueling or charging, recharging batteries
- 3.11 Operation limits
- 3.12 Any other operating instructions, warning, or precaution listed in the operator's manual for the type of vehicle which the employee is being trained to operate.

4.0 WORKPLACE RELATED TOPICS

- 4.1 Surface conditions where the vehicle will be operated.



Safety and Health

SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment** Procedure Number: **SHSP-0035-28**
Doc. Owner: **General Manager, Butler Works** Effective: **4-10-01**

- 4.2 Composition of probable loads and load stability.
- 4.3 Load manipulation, stacking, unstacking.
- 4.4 Pedestrian traffic.
- 4.5 Narrow aisles and other restricted places of operation.
- 4.6 Operating in hazardous classified locations.
- 4.7 Operating on ramps and other sloped surfaces that could affect the stability of the vehicle.
- 4.8 Other unique or potentially hazardous environmental conditions that exist or may exist in the workplace.
- 4.9 Operating the vehicle in closed environments and other areas where insufficient ventilation could cause a build-up of carbon monoxide or diesel exhaust.

5.0 REFERENCES

- 5.1 SHSP-0035-19
- 5.2 SSP-0060-8
- 5.3 SSP-0060-27
- 5.4 Safety and Security Handbook

lln/kms



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

REVISION REGISTER:

Date	Revision Description	Page No.	Initials
7-19-71	Initial Issue	n/a	gwh
10-22-93	On file in Safety Department	n/a	gwh
12-5-98	Added Scope	1	lln
12-5-98	2.4.1 Works Physician changed to Plant Physician	2	lln
12-5-98	2.5.1 Plant Hospital changed to Medical Department, text modification pertaining to physical	3	lln
12-5-98	2.6 Reference to Ohio, Zanesville deleted	3	was
12-5-98	2.7 Reference to Ohio, Zanesville deleted	3	was
12-5-98	2.8 Ohio deleted	3	was
12-5-98	2.11 Standard Security Procedure #8 and 27 changed to SSP-0060-8 and SSP-0060-27; S.P.I. No. B-1.02-19 and B-1.02-28 changed to SHSP-0035-19 and SHSP-0035-28 removed "page 58", changed to "the section covering vehicles and mobile equipment..."	4	was
12-5-98	2.13 Ohio deleted	5	was
12-5-98	2.13.1 Plant Protection changed to Security	5	was
12-5-98	2.14 S.P.I. changed to SHSP	5	lln
12-5-98	2.15 Text modification regarding references	5	lln
12-5-98	2.16 S.P.I. changed to SHSP	5	lln
12-5-98	Added References	6	lln
12-5-98	Put into new format	All	lln
6-28-99	2.1.2 Deleted "Skyworker"	1	gww
6-28-99	2.1.14 New section added	2	gww
6-28-99	2.2.6 and 2.2.7 New sections added	2	gww
6-28-99	2.3.1 New section added	3	gww
6-28-99	2.7 "S.C.R.C." changed to S.C.R. card or an approved record keeping form"	4	gwh
6-28-99	2.13.4 New section added	6	gww
6-28-99	2.14 Text modification in last sentence	6	gww
6-28-99	2.17 New section added	6	gww



SAFETY AND HEALTH STANDARD PROCEDURE

Title: **Qualifications for Operators of Mobile Equipment**

Procedure Number: **SHSP-0035-28**

Doc. Owner: **General Manager, Butler Works**

Effective: **4-10-01**

Date	Revision Description	Page No.	Initials
6-28-99	3.0 References changed to 5.0; new section added as 3.0	7,	gww
6-28-99	4.0 New section added	7,8	gww
6-28-99	3.0 References changed to 5.0	8	gww
7-13-99	2.1.2 Added Bobcats	1	lrd
7-13-99	2.1.9 Skyworker changed to Aerial Lifts/Bucket Trucks	1	lrd
7-13-99	2.1.10 Track mobile changed to Track Mtce Equipment	1	lrd
7-13-99	2.11 Deleted reference to SHSP-0035-28	5	gwh
7-13-99	1.19 Deleted reference; 5.3 changed to 5.1; 5.1 changed to 5.2; 5.2 changed to 5.3; 5.5 changed to 5.4	8	gwh
1-19-01	Modified headers and footers with new logos	All	lln
3-24-01	Changed Armco to AK Steel	4,6	kms
4-10-01	Changed Doc Owner Name from Dennis R. Wist to Mark G. Tabler	1	kms