Attachment K

- Sop 36 Contingency Plan G. BRUSS Rev 5
- Operational Risk Assessment 2008
- EHS 16 Plant Close Down

BRUSS	Standard Operating Procedure	REFERENCE: SOP 36
		PAGE: 1 of 6
		QA RELEASED:
Contingency Plan		REV: 5
WRITTEN BY: J James		DATE: 25.04.13

1.0 Purpose

The purpose of this plan is to identify unforeseen emergency situations, which may result in the inability to meet customer requirements.
Needs and requirements will be assessed so that Bruss will be prepared to respond to an emergency and regain operation of the systems that are made inoperable.

Unforeseen emergencies are:
A. Power Outage
B. Strike
C. Fire
D. Transport Failure
E. Key Equipment Failure
F. Field Failures
G. Influenza Pandemic
H. Total loss of access to site

See PFMEA 'Contingency Plan Risks' in conjuction with this SOP for more detailed risk assessment.

2.0 Scope

This procedure applies to all affected employees of G. Bruss Dichtungstechnik GmbH.

3.0 Responsibility

It is the responsibility of the General Manager and Management team to ensure compliance with this procedure.

4.0 General Actions

The following actions should be implemented in stages if there are disruptions or problems, as defined in this procedure, either in the entire company or in individual areas, during or outside working hours:
Contact Numbers:

Plant management

S. Vogt	352	087 2983900

Production management/maintenance

P. Devins	333	087 6623453
J. James	372	087 6105300
M. McGowan	320	087 6796025

Emergency Services: 999 or 112

ESB: 071 9145261

Customer Service must agree the delivery situation with the customer as soon as possible and should keep in constant contact with them. In the event of bottleneck situations, production management will come to a decision about special freights, the use of couriers and priority new production.

5. Unforeseen Emergencies

A. Power outage

The generator is designed to start up immediately to provide emergency power (lights, telephones, refrigeration) in the event of a power outage. What has priority to run:

-Cooling
-Lights

Plant/production management is to be informed immediately

Call Electricity Supply Board:

All other actions are co-ordinated by the plant management or their representatives. Management will make a decision as to whether the staff can be sent home.

1. Production

All WIP that are in the machines/CC/tools and ovens should be blocked and, in the event of a lengthy power outage, destroyed or tested for usability.

2. Information Technology

IT is supported by :

UPS units
Daily Back-ups
Bruss Hoisdorf IT (Baan)

After a power outage, damage needs to be assessed, as well as a determination of the amount of data/programs that may have been lost. The data must be re-entered and backed up.

B. Labour Shortage

If a strike is called, processes should be organised and any problems identified immediately and according to the time limit set out in the plan agreed between the management and the works council.

The following points should be followed and worked through in order to guarantee customer supply:

- Establish anticipated duration of strike
- Staff requirements
- Requirements until the anticipated end of the strike
- Necessary relocation to other Bruss sites
- Organisation of transport

C. Fire

The PEO (Planned Emergency Operation – EHS 42) Procedure to be followed

Emergency telephone number: 999 or 112.

The following principles must be observed:

- Keep emergency exits clear
- Ensure that accesses are kept free for the fire brigade
- Switch off electricity in affected area

An assessment of all damages and its impact on customer delivery situation will be carried out.

- Identify damaged tools.
- Identify damaged machines.
- Determine required capacities
- Identify relocation requirements for materials and tools

D. Transport failure

The entire requirement of compounds is covered from Hoisdorf. Current KanBan system allows for a lead time of 10 days. Deliveries are made by truck twice a week. If the trucks should break down or be involved in an accident, the following should be checked as soon as the situation is known:

- Where the breakdown occurred
- Organise replacement transport

If the load cannot be used, new production should be started immediately.

E. Failure of key equipment

Production management must be informed immediately if any key equipment fail, thus causing potential capacity problems and jeopardising production. All measures will be co-ordinated by plant/production management. Maintenance to determine severity of disruption and inform Production Management to link with affected customers. Set up actions necessary to recoup any loss of capacity, i.e. overtime or use of different equipment.

List of key equipment:

a. Molding Machines (Vertical/Horizontal) – see Asset List
b. Tools – lead time for refurbishment of tools in an emergency is 1 week
c. Ovens – see Asset List
d. Deflashing machines – See Asset List
e. Inspection machines – See Asset List
f. Packing – 5 packing stations

List of key supplies:

a. Raw Material -
b. Nitrogen – 2 tanks with remote telemetry for fill level.
c. Water – water shortages are advised in advance
d. Packaging –Emergency packaging to be used with agreement from customer
e.

F. Field failures

These are dealt with under our Customer Complaint procedure (SOP 32)

G. Influenza Pandemic

In the event of the upgrading of World Health Organization levels on the above, the company will follow as deemed necessary by Senior Management, the guidelines from the Department of Enterprise, Trade and Employment; Business Continuity Planning: Responding to and Influenza Pandemic, (Advice to Businesses on Preparing for a Pandemic). We will also take account of the Process Instruction (Pandemiplan) PA-Nr. 5.01.03.13 03.08.09 from Bruss Hoisdorf and follow SOP 54, Pandemic Planning.
During the duration of any pandemic we will keep up to date with daily information bulletins from the Health Service Executive and keep our employees informed of best practice. We will work in conjunciton with our external medical advisors and in co-operation with the Safety Committee.

H. Total loss of access to site

If manufacturing operation on existing site is completely lost then the following alternative options are to be actioned:

- Set-up external office in local hotel or office block to co-ordinate communication and rescue plan. E-mail is hosted externally therefore will function as normal.
- Co-ordinate via Bruss headquarters in Germany re-commencement of production at other Bruss or partner sites.
- Re-manufacture tooling as necessary using sub-contract Toolmakers. CAD tooling drawings stored on server at Bruss Headquarters Germany.
- Raw material supply (rubber) mixed externally at Bruss headquarters Germany.

6.0 Reference documents

PEO HSE Procedures
Non Conforming Product
Emergency Team, First Aiders
Customer Complaint Procedure
Business Continuity Planning (Department of Enterprise, Trade and Employement
Pandemiplan (Bruss Hoisdorf)
Asset List – Key production Equipment

Revision History

Date	SOP Revision	Addition or amendment	Amendment by
08.06.04	0	First Draft	
22.07.04	1	Amendment	S. Murtagh
25.05.07	2	Update	S. Murtagh
05.08.09	3	Update for pandemics	S. Murtagh
25/03/13	4	Update for PFMEA addition	J James
25/04/13	5	Update for total site loss	J James

Operational Risk Assessment
G.Bruss GmbH, Finisklin Road, Sligo. E168460, N336322

Complexity		Score
Licensed Activity Class		
IPPC Class 5.7 Manufacture of elastomers where the production capacity Exceeds 1,000 liters per week, Not included in paragraphs 5.12 – 5.17	**G3**	**3**
Environmental Sensitivity	**Sub Matrix Score**	**Score**

Human Occupation. Located>250m from site.	**1**	
Ground Water protection. Poor Aquifer Vulnerability rating Low	 **0** **0**	
Sensitivity of receiving Waters Class B Designated Coastal & Estuarine Waters.	 **2** **2**	
Protected Ecological Site > 150 m from site boundary	**0**	
Air Quality & Topography, Simple Terrain	**0**	
Sensitive Agricultural Receptors Fruit, Vegtable or Dairy Farming > 150 m from site boundary.	 **0**	
Total Environmental Sensitivity Low = < 7 = 1 Moderate =7-12 = 2 High = > 12 = 3	**3**	**1** **Low**
Pollution Record	**1**	**1**
Overall Risk Score (Hazard Potential x Environmental Sensitivity) x Pollution Record.	**3x1x1=**	**3**
Risk Category		**Low**

BRUSS In cars around the world	EHS Procedure	REFERENCE: EHS - 16
		PAGE: 1 of 2
		RELEASED:
Plant Close Down Procedure		REV: 7
WRITTEN BY: N. Groom		DATE: 21.05.13

1.0 Purpose, scope and responsibilities

The purpose of this procedure is to highlight all the relevant action to be taken when closing down the factory. It is the responsibility of the Production Supervisor to ensure that this procedure is being followed, when closing down the factory.

2.0 Procedure

1. Compression Area: Cell 1,2 3

a) All compression machines heating switched to auto and motors switched off.
b) All ovens must be switched off.
c) All canopy fans and roof fans must be switched off.
d) All lights on tables must be switched off.
e) All shot blast machines must be switched off.
f) All conveyors must be switched off.
g) All washing machines must be switched off.

2. Injection Area – MIR Cell 1,2 BOY, V. Inj Cell 1,2,3

a) All injection machines heating switched to auto and motors switched off. **Note:** Do not switch off cold channel units.
b) All ovens must be switched off.
c) All canopies, roof, wall and table fans (including table extractor fans) must be switched off.
d) All lights on tables must be switched off.
e) Middle plate heaters must be switched off.
f) Pre-heat injection tool must be switched off.
g) Shot Blast Machines must be switched off.

3. Barwell

a) All barwells, extruders and mills must be switched off.
b) Heating must be switched off.
c) Strip puller must be switched off.
d) Roof fans must be switched off.
e) Water for strips must be switched off.

4. Tool room

a) All workshop machinery must be switched off.
b) All gas bottles must be turned off and left in a safe manner.
c) Oil heater must be switched off.
d) Fork trucks must be left inside of factory in a safe manner.

5. Packing , Dispatch / Quality Inspection and Auditing Areas

a) All weighing equipment must be switched off.
b) The strapping machine must be switched off.
c) The electric forklift must be connected to recharge unit.
d) All table lights must be switched off.

e) All oil heaters must be switched off.

6 Nitrogen Line/Tanks

a) Main valves No7 on nitrogen tanks must be switched off on **both** tanks. The valve No.5 must be left open on **one** of the tanks to allow nitrogen gas to be delivered to the ovens in case of fire.

7. General

a) Compressors must be switched off.
b) All exit doors must be secured.
c) Oil burners switched off.
d) Overhead heaters switched off.
e) All windows must be closed (Canteen and Toilets)
f) All office staff must ensure their relevant departments are secured and lights switched off.
g) Main gates must be closed and locked.

Revision History

Date	WI Revision	Addition or amendment	Amendment by
21.05.08	New Format	6	QA
21.05.13	review	7	EHS