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January 2022

Re: Urgent Safety Matter – Closed Containers and Sealed Units

Dear Valued Supplier,

Our mission at Nucor is to become the safest steel company in the world. We believe there is nothing more important than ensuring that each of our teammates returns home safely every day. As a valued partner and scrap supplier, we are asking for your help to make sure this happens

Closed cylinders and sealed units represent a serious hazard in the steelmaking process that can result in injury or even death. Incidents caused by closed containers in the scrap supply are fully preventable. It is not enough to expect our inspectors and melt shop teammates to catch them at the mill; we need to stop them at the source. A supplier should never ship a closed container to a steel mill, and they must have processes in place to prevent this from happening.

We would like to set up a time to discuss our expectations with your team. This includes each supplier implementing a policy similar to the sample attached that is designed to prevent the shipment of closed containers or sealed units. We are confident that we can achieve our goal to become the safest steel company in the world by working together.

Your organization plays an important role in our success, and we appreciate your business. Your DJJ/Nucor representative will soon connect with your team on this important topic.

Thank you,

DJJ/Nucor

Attachments



# DJJ/Nucor Supplier Form

We require our scrap suppliers to take certain measures to eliminate closed cylinders and sealed units from being shipped to our steel mills. As a broker of the scrap metal that you produce, DJJ requires you to complete, sign, and return this form detailing the practices in place for the management of closed containers/sealed units in your process.

As a processor, we:

1. are aware of the requirement to implement appropriate steps to eliminate the presence of closed cylinders and sealed units in our prepared scrap;
  2. participate in a program to ensure this happens;
  3. communicate to our suppliers the need to participate in a program and can provide example letters to the consumer if required; and
  4. have a log to assure the proper handling, preparation and/or disposal of these items is being done.
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For additional information on the on this policy please contact your Nucor/DJJ representative.

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Company Location (City & State)

\_\_\_\_\_  
Authorized Individual (Name)

\_\_\_\_\_  
Contact Phone

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Return completed form to [DJJ.Brk.RCAdmin@djj.com](mailto:DJJ.Brk.RCAdmin@djj.com)

**For DJJ Use:**


## **Sample Closed Container/ Control Policy**

### **I. Purpose**

- A. The purpose of this policy is to prevent the shipment of Closed Containers (also known as Sealed Units) to steel mill customers and to prevent accidents resulting from the improper handling, storage, processing, and shipping of closed containers. Closed Containers include among other items /gas/liquid tanks/bottles, shock absorbers, hydraulic cylinders, whole engine blocks, transmissions, compressors, heat exchangers, torque converters, crimped tubing or pipe, ABU brake cylinders, conveyor rollers and gear boxes. When charged into a furnace, Closed Containers have the potential to cause rapid releases of energy that create serious hazards to people and equipment.

### **II. Elements of Policy**

Preventing Closed Cylinders from entering the scrap stream includes the following elements:

1. Inbound and outbound scrap inspection and source control
2. Employee and customer training and education
3. Outbound scrap inspection
4. Recordkeeping and auditing

### **III. Scrap Inspection**

- A. Inbound Scrap: All inbound scrap will be closely inspected for closed containers or items that could become Closed Containers. Inspectors must be highly visible and stationed at all unloading points to physically inspect the scrap while it is being unloaded. If Closed Containers are found, they will either be returned to the supplier or prepared in accordance with Section IV of this Policy so that they will not be shipped to a customer.
- B. Remote Scrap: For scrap picked up at commercial or industrial accounts, trained company drivers shall inspect loads before picking up boxes. Closed Containers should be removed by the customer before the container is picked up.
- C. Outbound Scrap Inspection: All outbound scrap will be inspected as it is being loaded into the truck, railcar, or barge for the presence of any Closed Container or scrap that does not meet the preparation requirements in Section IV of this Policy. If scrap inspectors cannot see 100% inside and out of a piece of scrap, it is considered sealed, even if not holding pressure or currently holding liquid.

- D. Inspector qualifications/documentation: All inspections will be performed by a trained inspector. All outbound inspections will be documented, and the records retained for at least one year.

#### **IV. Requirements for preparing scrap to prevent potential Closed Containers**

- A. All scrap preparation shall be performed in accordance with applicable safety and environmental requirements.
- B. All scrap must be processed to the point that they can no longer hold more than a de minimis amount of rainwater if stored outside. Torched holes are not sufficient.
- C. Tanks, cylinders, or sealed units must be cut open and prepared/cleaned so that no liquid, chemical or gas remains.
- D. Gas bottles must have both ends completely torched off, essentially making it resemble a pipe. Vehicle Gas/Fuel tanks and acetylene bottles are prohibited, even if cut up.
- E. Pipe/tube larger than 6" in diameter must be open on both ends and cut down the middle. Pipe/tube less than 6" in diameter must be open on both ends and not "crimp sealed" from a shear cut. (This creates "hollow bodies" which are not acceptable.)
- F. Bearing/bushing components must be fully open and not be pressurized or contain residual grease/oil.
- G. Heat exchangers must be processed in such a way that the inner tubes/fins are completely removed.
- H. Engine blocks must be completely drained and dismantled. Headers, pistons, valves, etc. must be completely removed. Wheel hub caps must be cut, and air brake chambers destroyed.
- I. Hydraulic cylinders must be drained and cut split across the barrel to relieve any pressure/fluid.
- J. If scrap inspectors cannot see 100% inside and out of a piece of scrap, it is considered sealed, even if not holding pressure or currently holding liquid.

#### **V. Employee Training**

- A. All new employees must be instructed at hire of the hazards associated with closed cylinders and the contents of this policy. This training will be documented.
- B. Temporary employees will receive instruction as necessary if their tasks will expose them to the hazards associated with scrap cylinders. This training will be documented.
- C. All inspectors for inbound and outbound scrap shipments will be trained on this policy. The training will be documented

#### **VII. Recordkeeping and Auditing**

- A. All training and outbound scrap shipment inspections will be documented, and the records retained for at least one year.
- B. An annual audit of this Policy will be conducted and documented. The audit will be retained for at least one year,