



Intercontinental Terminals Company LLC
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Management Commitment to the Voluntary Protection Programs (VPP)

Intercontinental Terminals Company LLC management is committed to continually improving our safety and health performance and providing a safe and healthful workplace for our associates. This commitment is reflected in our daily activities by utilizing our core values of Safety, Honesty, Integrity, Dedication, and Respect. With this commitment from all our associates, along with our Journey to VPP Star Recognition, this will help us attain our Vision:

ITC is a safe and dedicated partner whose associates are recognized as proud leaders in customer care and operational excellence

To show our commitment to VPP:

- We are committed to doing our best to provide outstanding safety and health protection to our employees through management systems and employee involvement.
- We are committed to achievement and maintenance of the Star program requirements and to the goals and objectives of the Voluntary Protection Programs.
- We agree to correct, in a timely manner, all hazards identified through self-inspections, employee reports, accident investigations, or any other means with interim protection as necessary.
- We agree to protect any employee with safety related duties from discriminatory actions (including unofficial harassment) resulting from these duties.
- We will provide the results of self-inspections and accident investigations to our employees upon request.
- We agree to provide the information below for OSHA review onsite. We agree to retain these records until OSHA communicates its decision regarding initial VPP participation. We will likewise retain comparable records for the period of VPP participations to be covered by each subsequent evaluation until OSHA communicates its decision regarding continued approval by performing the following:
 - Written safety and health programs.
 - All documentation relating to the programs, if available, including the following:
 - Management statement of commitment to safety and health.
 - The OSHA 300 logs for the site and for all applicable contractor employees on the site with appropriate back-up documentation.
 - Safety and health manuals.
 - Safety rules, emergency procedures, and examples of safe work procedures.
 - The system for enforcing safety rules.
 - Reports from employees of safety and health problems and documentation of the response.
 - Self-inspection procedures, reports, and corrective tracking.



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- Accident investigations.
 - Safety and health committee minutes (where applicable).
 - Employee orientation and safety training programs and attendance records.
 - Industrial hygiene monitoring records.
 - Annual safety and health program evaluations and site and or corporate audits, including the documented follow-up activities, for at least three years.
 - Preventative maintenance program.
 - Accountability documentation
 - Contractor safety and health program(s).
- In agreeing to make this information available to OSHA, we understand that any materials we feel are confidential or revealing of trade secrets, OSHA will view on site to avoid placement in government files subject to Freedom of Information Act (FOIA) requests.
 - Each year by February 15, we will provide OSHA our annual injury incidence and lost work day case numbers and rates, hours worked, and estimated average employment for the past calendar year separately for our regular employees and for applicable onsite contract employees as well as a copy of our annual safety and health program self-evaluation;
 - We will notify employees, including new hires as they arrive, about participating in the VPP, their right to register a complaint with OSHA, and their right to obtain self-inspection and accident investigation results upon request;
 - We understand that we may withdraw our participation at any time for any reason should we deem that desirable.

We, the undersigned, respectfully submit this Statement of Management Commitment and request consideration for participation in the Voluntary Protection Programs.



Brent J. Weber
President and CEO



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