

CONTRACTOR ORIENTATION PROGRAM

FOR

CIRCUIT CONTROLS CORPORATION



CONTRACTOR ORIENTATION PROGRAM

1. INTRODUCTION

It is the policy of Circuit Controls Corporation that all work activities must be conducted with full concern for the safety and health of our employees, contractors, visitors, and community. Every contractor is responsible for knowing safe work and environmental practices and ensuring they are followed.

Violation of safety practices, policies and procedures can result in termination of the contract.

2. PROGRAM ELEMENTS / PROCEDURES

A. Responsibilities

1. Corporate – Manager EHS

- Provide information on corporate program revisions and training recommendations.
- Maintain communication with all locations on changes in company and MIOSHA compliance requirements.
- Offer guidance on appropriate equipment for specific locations / applications.

2. Project Engineer(s)

- Become familiar with the orientation program, suggest revisions to the management.
- Make recommendations for correcting unsafe conditions and practices observed during plant inspections.
- Work with the applicable employees who engage in contract activities to provide training, as needed.
- Require ALL contract employees to complete orientation prior to the start of work.
- Cover job specific orientation for all contract employees
- Monitor program for effectiveness.

3. Contractor Management

- Assure contract employees are familiar with Circuit Controls Corporation safe work practices, policies and procedures applicable to the work being performed.
- Supply all personal protective equipment (PPE) and required training.
- Provide and document all applicable state and federal training required (examples: confined space, lock out / tag out, etc.). Documentation must be forwarded to Circuit Controls Corporation management, as requested.

B. Project Engineer will review qualifications of potential contractors and vendors and schedule orientation. All contractors must complete orientation prior to starting work and annually thereafter.

C. The safe work practices and procedures as outlined below will be conducted in accordance with applicable Local, State and Federal regulations including, but not limited to, MIOSHA:

1. **Above Ground Level Operations**

When necessary for a contractor to work above ground / floor level on structures or equipment, approved staging, scaffolds or flooring must be used. Ladders must be rigidly secured or must be equipped with approved non-slip ladder feet. If scaffolding or ladders are not used, the employee must wear a safety harness.

All scaffolding, runways or other temporary construction must be rigidly built to support four times (4x) the weight of all materials, apparatus, equipment and persons to be placed thereon.

2. **Alcohol, Illegal Drugs and Narcotics**

Consumption, sale, distribution or transfer of alcoholic beverages, illegal drugs or narcotics is prohibited on site.

3. **Barriers**

When required, the contractor must erect and maintain temporary barriers or rails and electric warning lights. No flame type lighting is to be used. Examples of situations require the use of a barrier include ditches, stairwells, elevator shafts and other opening in floors, roofs and walls and access levels to temporary stairs or ladders.

Contractors will provide and utilize cones or equivalent methods when roadways or walkways are obstructed.

4. **Behavior**

Gambling, horseplay (i.e., scuffling, pushing or throwing objects), fighting and other similar acts are prohibited.

5. **Cameras**

Proper clearance must be obtained before photographs can be taken on site. Approval must be obtained from the Plant Manager, who will outline the conditions and restrictions for use of the camera.

6. **Chains, Ropes and Hoisting Equipment**

The positioning and movement of cranes must be discussed with the Project Engineer prior to any such action. All persons must be kept from walking or passing under the boom and under loads being transported by crane or hoisting device. Cranes must be left in a safe condition when work stops.

7. Compressed Gas Cylinders

Compressed gas cylinders must be chained or bracketed securely in an upright position. Cylinders must not be hoisted by crane above ground level with the use of a cylinder carrier and approval of the designated Project Engineer. Cylinders must not be moved without the safety caps tightly secured. Material Safety Data Sheets (MSDSs) must be available for review on all cylinder gases. Oxygen and flammable gas cylinders must be separated by 20 feet or an approved barrier. Cylinders shall not be taken into confined spaces.

8. Confined Spaces

A Confined Space Permit is required any time a contractor enters a permit required confined space, which may accumulate hazardous vapors or toxic materials, where there may be an oxygen deficient atmosphere or other hazards requiring a permit. Entry will occur while the Project Engineer and contract personnel are both available. The Project Engineer will discuss hazards, precautions and protection needed for entry with the Contractor. After entry, the Project Engineer will meet with entry team to discuss hazards controlled or created during entry. All Work Permits require advance notice.

9. Deliveries

When possible, the contractor should schedule deliveries during normal working hours, between 7:00 AM to 4:00 PM. If a delivery is required outside of normal working hours, the Project Engineer must be notified.

10. Electrical Work / Equipment

Circuit Controls Corporation's own electrically driven machinery (i.e., cables, switchgear, electrical motors, mixers, pumps and other electrical machinery with moving parts, etc.) must be locked out and tagged out in accordance with MIOSHA's lockout / Tagout procedures. The contractor is responsible for safe isolation and work on energized equipment. Ground fault interrupters (GFI) must be used on electrically powered tools.

11. Emergency Information

The following procedures will be used for all injuries/illnesses, fires/explosions, spills/leaks/releases and other emergency situations:

- a.** Contact the nearest Circuit Controls Corporation employee and/or dial extension 0.
- b.** State type of incident, location, number of people involved.
- c.** Medical emergencies, dial 911. This will be conducted by a Circuit Controls Corporation Manager / Supervisor Staff.

Contractors must report all emergencies occurring at the plant to the Project Engineer immediately. In all first aid/medical emergencies, a written report must be prepared on the incident and provided to the Project Engineer within 24 hours of the incident.

12. Engine Fueling

Gasoline fueled engines must be operated in a well-ventilated area. The engine shall be turned off prior to refueling.

13. Entry Onto Roofs

Some buildings have exhaust systems on the roof. Contractors requiring roof access must notify the Project Engineer prior to entry.

14. Equipment

All contract equipment must be marked in such a manner as to identify ownership. Tool serial numbers should be recorded on a list and kept readily available for reference purposes. Any use of Circuit Controls Corporation equipment (forklift, power equipment, etc.) is not permitted. All training is the responsibility of the contractor.

15. Evacuation

Upon hearing an evacuation order or fire alarm, all occupants must secure work, if possible, and safely exit the building. Contract personnel are to stay in a predetermined location until the Project Engineer indicates it is clear to re-enter or cease work. Follow the emergency evacuation plan.

16. Excavation Work

Prior approval from the Project Engineer is required before any excavation begins. The Project Engineer will verify that the defined activity will not disturb any underground utilities.

Contractors must furnish all shoring, sheeting, bracing, etc, required to make trenches and excavations safe for employees.

Excavated materials will be placed where designated by the Project Engineer so as not to block access to buildings, fire protection or utility equipment, roads and walkways or create excess loading on the surrounding soil, possibly resulting in a cave-in.

17. Fall Protection

Contractors need to recognize fall hazards and establish procedures to prevent falls to lower levels or through holes and openings in walking/work surfaces. If safety harnesses and lines are required for work being performed in areas, follow MIOSHA rules and standards.

18. Fire Equipment Blockage

The Project Engineer must approve blockage of any fire protection equipment or system

19. Fire Extinguishers and Hoses

It is the responsibility of each contractor to provide and maintain suitable fire extinguishers for the project. They must be placed at each location where fire extinguishing equipment is required. All extinguishers will be of Underwriter's Laboratories approved type and have a current inspection tag. When a stand-by fire hose line is required, the hose and nozzle will be provided by the contractor. If an extinguisher is discharged, it must be removed from the location and promptly replaced with an operational unit. At no time will a discharged extinguisher remain at an active work site.

20. Fire Protection and Alarm Systems

Impairment or disabling of any hydrant, monitor, fire water main, hose station, manual fire alarm, sprinkler system or other automatic fire protection system is prohibited unless specifically authorized, in writing, by the Project Engineer.

If it is necessary to impair or disable a fire protection device or system, the Project Engineer must be informed at least 24 hours in advance of the proposed time of impairment. A suitable alternate means of protecting the area covered by the impaired system or device will be provided by the contractor for the duration of the impairment.

21. Fire Watch

Depending on the work in progress, a contractor may be required to assign an employee to act as a Fire Watch. A Fire Watch must not leave the job until relieved. They must be fully instructed in the use of fire extinguishers and our procedure in obtaining help, should a fire occur. Examples of work activities requiring a fire watch include welding, cutting operations, use of open flame tools, etc.

22. Firearms, Ammunition and Fireworks

Firearms, ammunition and fireworks are prohibited on Circuit Controls Corporation property.

23. Flammable Liquids

All flammable liquids used by contractors at the Plant must be stored in safety cans in pre-approved locations. Flammable liquids must be clearly labeled and stored in approved containers and areas. Dispensing must be by approved safety faucets, nozzles or flammable liquid pumps. Both vessels are to be grounded and bonded. Welding, open flame, etc, are prohibited in the event of any spillage of flammable material.

24. Gate Instructions / Hours

Contract personnel entering and exiting the site are required to sign-in at the front office and park in a designated area that is pre-determined.

Personnel, materials, tools and equipment are subject to inspection when entering or exiting.

a. Contractor Access – Normal Working Hours

Contractor vehicles, deliveries and construction equipment will be admitted between 7:00 AM and 5:00 PM.

b. Contractor Access – Off Hours

Contractors entering the site during off-hours, between 5:00 PM and 7:00 AM must sign in and out with the on duty supervisor and have prior clearance from the Project Engineer before they are allowed to enter the site. Pre-approval must be determined for any weekend work.

25. Governmental Regulations

Contractors will comply with all requirements of MIOSHA and other applicable State, Federal and Local Laws.

It is required that the contractor work in a practical and safe manner while adhering to the specific regulations outlined in this program.

26. Handrails

When stairways are installed, permanent handrails must be provided immediately. When permanent handrails cannot be provided upon stairway completion, suitable temporary handrails must be installed until permanent handrails are made available.

27. Hazardous Chemicals

To ensure the health and safety of Circuit Controls Corporation and contract employees, the following requirements must be met, whether or not mandated by applicable legal requirements:

a. Contractors will provide, to the Project Engineer, a list of all hazardous materials, substances, and chemicals that they introduce to the workplace. Contractors will also provide MSDS's to identify all known risks associated with the chemicals, substances or materials.

b. Contractors will ensure that all chemicals used at this location are labeled and handled in accordance with all applicable regulations.

- c. Contractors will provide to all their employees, training in the safe handling of hazardous materials, substances and chemicals and in the proper use of Personal Protective Equipment (PPE).
- d. The Project Engineer will review Circuit Controls Corporation's hazardous chemicals in the work area and provide MSDS's, as requested.
- e. All hazardous chemicals must be handled in accordance to Circuit Controls Corporation Environmental System.
- f. All Universal Waste and Recyclable Waste must be handled in accordance to Circuit Controls Corporation Environmental System. A list of various types of waste can be found in Appendix B at the end of this program.

28. Housekeeping of Job Site

The contractor must keep the job site reasonably clean and free from rubbish at all times during the progress of the work. At job completion, the contractor must remove all equipment, rubbish and debris, clean the work area and clean and repair any adjacent work area that has been marred by the contractor's operations.

29. Identification of Lines, Utilities, Alarm Systems, Etc.

Existing underground and overhead utilities, communication and fire alarm services will be located for the contractor by Circuit Controls Corporation personnel through the Project Engineer. The contractor will protect utilities and services from damage to prevent possible accidents or loss of fire protection and communication services.

30. Ladders, Tools, Equipment, Etc.

Ladders, tools, equipment, etc, used by the contractor must be inspected and maintained in a condition that will not constitute a hazard to contractor or Circuit Controls Corporation personnel. Ladders must be provided with approved type safety feet. Stepladders must never be used as straight ladders.

31. Orientation

The contractor will have a pre-construction Safety Orientation with the Project Engineer. The purpose of this meeting is to clarify Circuit Controls Corporation's requirements for the work to be performed and to review the contractor's proposed safety program for the project. Each contractor will receive a copy of safety rules and regulations for review with their employees.

At the completion of a formal Contractor Orientation, contractors will sign-off indicating that they understand the rules and policies as outlined in the program and indicated in Appendix A.

32. Permits – Confined Space, Fire Protection/Impairment and Hot Work

All permits should be requested in writing through the Project Engineer in advance of the time needed. All permits will be properly signed prior to initiation of work and must be posted at the job site for the following activities:

a. Confined Space

A confined space, as defined by MIOSHA is a space that:

- 1) is large enough and so configured that an employee can bodily enter and perform assigned work; and
- 2) has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults and pits are spaces that may have limited means of entry); and
- 3) is not designed for continuous human occupancy.

b. Fire Protection Impairments

A fire protection impairment form is required when a fire protection alarm system or device must be impaired or disabled to perform work required by the Contractor.

c. Hot Work

Hot Work Permits are required for some operations involving an open flame. See the Project Manager for Hot Work Permits details.

d. Safe Work

Roof activity, excavation, etc, must be reviewed prior to the start of work.

33. Personal Protective Equipment (PPE)

Safety glasses and safety shoes are required for any work activity in all areas. Certain jobs require PPE including, but not limited to, hearing protection, gloves, respirators, hard hats, etc. Contractors are responsible for supplying and maintaining all PPE used and training employees in its proper use.

34. Protection of Work

Contractors assume full responsibility for their work area during its progress until completion.

35. Roadways and Walkways

All roadways and walkways must be maintained by the contractor in a safe, clean and passable condition during the progress of the job. If a road must be blocked to the extent that safe passage of emergency vehicles is not possible, the contractor will advise the Project Engineer in advance.

36. Safety Evaluation

Unannounced safety evaluations may be conducted at each job site to ensure contractor compliance with Circuit Controls Corporation's Site Safety Requirements and to monitor the effectiveness of the contractor's safety program. Any violation of Circuit Controls Corporation's safety rules and regulations will be reported to the Project Engineer. Failure to comply with Circuit Controls Corporation procedures may result in the temporary shut down or termination of the job. Work requiring a permit will be reviewed to assure proper procedures are being followed.

37. Sanitary Facilities

Temporary toilet facilities will be provided, as needed, by the contractor in accordance with the requirements of the job specification and applicable legal requirements.

38. Thievery

Theft will not be tolerated. In all cases of theft, the contractor will fully investigate the incident and prepare a written report. A copy of the contractor's report will be transmitted to the Project Engineer and within 24 hours after discovery. Contractors will take precautionary measures to safeguard equipment, materials and personal property in their work area.

39. Utilities

The contractor will make no connection, either temporary or permanent, to any utility line nor operate valves, switches or any other device on such lines without specific written authorization from the Project Engineer. Utilities include electric, steam, water, fuel, air, gases, natural gas, sewer, telephone and similar services.

40. Vehicles/Traffic Regulations

Pedestrians will be given the right of way at all times. Vehicles driven on Circuit Controls Corporation property must comply with Motor Vehicle regulations.

Equipment being moved in a vehicle will be mechanically secured. Personnel will not be used to achieve the required stability.

Vehicles will not be parked or left unattended in fire zones. The flasher signal must be used when a vehicle is stopped on or near the side of the road.

41. Violation of Safety Rules and Regulations

The contractor's safety program will be in effect inside of the construction limits in addition to Circuit Controls Corporation's safety procedures. Violations of safety rules by the contractor will not be tolerated. Failure to

comply with Circuit Controls Corporation's safety policies and procedures may result in the temporary shut down or termination of the job.

42. Weather Emergencies

- a. The following radio stations will advise you of delayed openings or site closings due to inclement weather:

Radio: Lite 96 FM

Television: 7&4

- b. In the event a severe storm is predicted for the local area, the following precautions will be performed by contractors:

I. Secure all loose materials (i.e., scaffold boards, sheet metal, plywood, form lumber, etc.)

II. Remove all other loose material from the job site to a safe storage area. All portable building and other movable structures must be anchored.

III. Lower and secure rig booms.

IV. Empty tanks in low-lying, flood-prone areas will be removed or filled with liquid to a safe level to prevent floating.

V. Move motors and other equipment located in low-lying, flood-prone areas to a safe location.

VI. The Project Engineer will advise if other precautions are necessary.

VII. When advised to leave the Plant, all contractors will do so.

43. Work Specifications

a. Damage to Facilities

Any damage to existing facilities caused by the contractor or agents of the contractor will immediately be reported to the Project Engineer.

b. Joint Contractor Projects

Where joint contractor activity is involved, cooperation must be maintained between contractor firms to provide for minimum delay and interference with the project. Contractors must not obstruct, delay or endanger the work of others.

c. Limits on Contractor Access

Contractors and equipment will follow the route to and from the job site designated by the Project Engineer. Contractors are restricted to their designated work area except while in transit. Contractors will not enter existing buildings unless specific permission is obtained.

d. Storage and Unloading

Material and equipment is to be unloaded and stored in areas designated by the Project Engineer. Material storage areas and equipment therein will be marked with the contractor's decal or other suitable identification.

CIRCUIT CONTROLS CORPORATION
OUTSIDE CONTRACTOR REGULATIONS

RECYCLE OF VARIOUS WASTE STREAMS
Appendix B

1. Plastics
2. Metal
3. Glass
4. Beverage Containers
5. Cardboard
6. Clean Wood
7. All Batteries – Lead Acid and Dry Cell
8. Used Oil
9. Used Oil Filters
10. Fluorescent Lamps and Other Lights
11. Small Capacitors and Ballasts
12. Sorbents
13. Shop Towels and Other Textiles
14. Spent Parts Washer and Other Solvents
15. Aerosols
16. Painting Wastes
17. Wastes containing Silver and Other Precious Metals
18. Electronic Waste (computers etc.)
19. Waste Containing Radioactive Materials
20. Antifreeze
21. Scrap Metal