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| **TECHNICAL INSTRUCTION SYSTEM** | Doc. No. T.I. OP-Safety-022  | Rev. 013 |
| **Document Description:** |
| **Contractor EHS Program** |
| **\* Denotes change from previous revision** | **Supersedes Revision:** | 012 |
|  **Approvals: On File**  **Process Outlines: Per Info Card** |

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|  | **Related Documents:** |  |  |
|  | **EHS-F-022-Contractor Pre-work Review Check Sheet** |  |  |
|  | **EHS-F-022-Contractors Certification Sheet** |  |  |
|  | **EHS-F-022-Contractor Safety Fact Sheet** |  |  |

**1. Purpose:** This operating procedure establishes the requirements for contractors working onsite at an ATI SM facility.

**2. Scope:** This written Contractor Environmental Health and Safety Program has been developed by ATI SM to ensure that all employees and contractors receive consistent and accurate information about the requirements for contractors while working onsite at an ATI SM facility.

**3. Applicability:** This operating procedure applies to all contractors working onsite at an ATI SM facility.

To that end, contractors are required to:

**3.1** Comply with all federal, state and local regulations;

**3.2** Comply with the ATI Specialty Materials EHS Requirements for Contractors,

**3.3** Take all reasonable precautions with respect to their work and the materials brought onto ATI Specialty Materials properties.

Deviating from these requirements may result in forbidding contractor employees from entering ATI Specialty Materials property. Repeated violations will result in voiding the contract.

**4. Annual Certification/Documentation:** Within 30 days from the expiration of the contractor’s insurance certificates, ATI Specialty Materials will contact the contractor requesting the following documentation. The following documents must be kept up to date to maintain access to ATI Specialty Materials facilities and/or Next Gen Alloys:

**4.1. For insurance requirements please refer to the Contractor Fact Sheet.**

**4.4.1.** **Workers Compensation Experience Modification Rate (EMR)**. Contractors can obtain the EMR from their workers’ compensation insurance carrier or broker.

Companies that are required to maintain an OSHA 300 log (>10 employees), must submit their OSHA Form 300A, Summary of Work-Related Injuries and Illness for the last 3 years initially, and annually thereafter.

**4.4.2.** If the contractor is not required to maintain an OSHA 300 log (<11 employees during the most recent full calendar year), and are unable to submit incidence rates, then the contractor must submit two references from previous customers, acknowledging appropriate safety performance on the job.

**4.4.3. Certification Sheet**: Annually, an owner or officer from each company must sign and return the ATI Specialty Materials EHS Requirements for Contractors Certification Sheet.

**4**.**4.3.1** – Contractors will be required to provide proof of applicable OSHA and Environmental required training. This proof must be attached to the Certification Sheet.

**5. EHS Practices:** The following environmental, health and safety practices will be enforced when work is performed on ATI Specialty Materials property. As indicated, some items are only applicable to production areas. The following are minimum requirements. If there are any questions about the required safety requirements, those questions should be discussed with the ATI Specialty Materials Project Manager and/or the Area Safety Coordinator.

**5.1. Pre-work EHS Review Policy**: **Prior to commencing work**, the contract personnel, who are actually completing the work, must meet with the ATI Specialty Materials Project Manager to review the EHS policy, scope of work, and complete the Contractor EHS Pre-work Check Sheet. Those contractors performing service work are only required to complete Contractor EHS Pre-work Check Sheet annually. Service work includes, but is not limited to, security, housekeeping, HVAC, landscaping, mobile equipment contract repairmen, etc. During this process is when ATI will consult with contractors for changes and improvements in our EHS Management System.

**5.1.1.** At a minimum, the Contractor EHS Pre-work Check Sheet shall include all affected equipment, utility routing and required safety programs.

**5.1.2.** The ATI Specialty Materials Project Manager must keep the completed Contractor EHS Pre-work Check Sheet on file throughout the duration of the subject project.

**5.1.3.** If the work is to be completed within a production area, the appropriate maintenance department must also be represented at the Pre-work EHS Review, and they must also sign the Pre-work EHS Review Check sheet.

**5.1.4.** If the scope of work changes during the course of the job, the ATI Specialty Materials Project Manager must conduct another Contractor EHS Pre-work Check Sheet with the contractor and the appropriate maintenance department. Before the contractors can proceed, another Contractor EHS Pre-work Check Sheet must be completed, signed and kept on record for the duration of the project.

**5.1.5.** If contractors are working under the direct supervision of ATI Specialty Materials personnel in a Contract Maintenance capacity, the Contractor EHS Pre-work Check Sheet is not required to be completed.

**5.2. Construction Sites**: If the contractor and the ATI Specialty Materials Project Manager and Area Safety Representative agree that all of the following requirements are met, then an area can be designated as a “construction site.” Within the “construction site,” the contractor must comply with all applicable OSHA regulations, but they are not subject to ATI Specialty Materials-specific safety rules (e.g. metatarsals, 3-foot rule, no-touch policy). The following requirements apply to construction sites:

**5.2.1.** Areas determined to be “construction sites” must be barricaded to separate them from ATI Specialty Materials production areas.Separation of construction sites from production areas must be complete, and the use of production area facilities (e.g. bathrooms, break areas) is not permitted. If the separation from production areas is not possible, the area will be considered an ATI Specialty Materials production area.

**5.3. Environmental Management:** When contract work can impact the environment, the contractor and ATI Specialty Materials Project Manager must discuss those potential impacts. Additionally, the ATI SM Project Manager will communicate any significant environmental aspects and the required controls to the contractor so that impacts will be minimized or eliminated.

**5.3.1.** Contractors shall not discharge anything to drains and/or sewers without prior approval from the EHS Department.

**5.3.2.** Contractors shall provide adequate spill prevention. Spills and other releases to the environment must be immediately reported to the Project Manager and EHS Department.

**5.3.3.** Contractors shall handle used oil, PCB’s, and oily absorbent materials per instructions given by their project manager.

**5.3.4.** Contractors shall immediately notify the Project Manager and EHS Department of any abnormal conditions found during excavation activities at the facility.

**5.3.5.** Contractors shall properly label, store, and dispose of all their waste materials used on-site in accordance with facility procedures and applicable legal requirements.

**5.3.6.** Contractors shall minimize the effects of noise, odor, light, fugitive dust emissions, and traffic movement on and/or adjacent to facility property

**5.4. Hazardous Communications**: When bringing chemicals on site, Contractors must:

**5.4.1.** Provide the applicable Safety Data Sheets (SDSs) to the Area Safety Coordinator and get their approval prior to bringing chemicals on site.

**5.4.2.** Maintain written Hazard Communication Program and all applicable SDSs. These may be requested at any time during the project.

**5.4.3.** Chemicals must be stored in visibly labeled, original or approved containers, per OSHA regulations.

**5.4.3.1.** At the end of the project, the contractor must remove all used and unused chemicals from ATI Specialty Materials property.

**5.5. Lockout/Tagout**: Contractors performing work that requires Lockout/Tagout must:

**5.5.1.** Sign the attached Certification Sheet to certify that all of their personnel who perform work requiring Lockout/Tagout have completed up-to-date Lockout/Tagout training.

**5.5.2.** Have a written Lockout/Tagout program, which meets all OSHA regulations, including the use of single-keyed locks by all employees who are working on the “locked out” job.

**5.5.3.** If the job involves work on equipment that has machine-specific Lockout/Tagout and/or line breaking procedures, then those procedures shall be shared with the contractor.

**5.6. Confined Space Entry**: Contractors working within a Confined Space must:

**5.6.1.** Sign the attached Certification Sheet to certify that all of their personnel who perform Confined Space Entries have completed up-to-date Confined Space Entry training.

**5.6.2.** Have a written Confined Space Entry program, which meets all OSHA requirements.

Provide all required Confined Space Entry equipment including, but not limited to, calibrated atmospheric monitoring equipment.

**5.6.3.** ATI Specialty Materials entry procedures that have been developed for the confined space being entered by the contractor shall be shared with the contractor.

**5.7. Fall Protection**: Contractors working from heights greater than six feet (>6’), including the use of man-lifts, must:

**5.7.1.** Sign the attached Certification Sheet to certify that all of their personnel who perform work at heights >6 feet have completed up-to-date Fall Protection training.

**5.7.2.** Provide and utilize the appropriate fall protection equipment.

**5.7.3.** Have a written fall protection program that complies with all applicable OSHA standards.

**5.7.3.1.** Platforms and scaffolds must be erected using accepted engineering practices in compliance with OSHA standards. Equipment must be inspected daily, and during use.

**5.7.3.2.** Ladders: Portable or job made ladders must be used in accordance with OSHA regulations and be in good condition. All ladders must be non-conductive, unless approved in writing by the Project Manager and Area Supervision.

**5.8. Personal Protection Equipment (PPE)**: The PPE requirements for each department must be followed when in that department. When in doubt, the contractor shall confer with their ATI Specialty Materials Project Manager to determine the required PPE. The following guidelines are not all inclusive:

**5.8.1.** The contractor is responsible for supplying all of their own PPE.

**5.8.1.1.** When safety glasses are required, they must be fitted with side shields. Prescription glasses must meet ANSI standards for safety, or over glasses/goggles must be worn.

**5.8.1.2.** Steel-toed shoes with metatarsal protection must be worn in ATI Specialty Materials production areas.

**5.8.1.3.** Grinding requires the use of a face shield.

**5.8.1.4.** Hearing- Hearing protection must be worn in areas where required.

**5.8.1.5.** Gloves must be worn when handling metal, except around rotating equipment.

**5.9. Respiratory Protection**: If respirators are required to be worn, the Contractor must:

**5.9.1.** Sign the attached Certification Sheet certifying that all of their personnel who are required to wear respirators have completed up-to-date Respirator Protection training and passed OSHA-required respirator physicals.

**5.9.2.** Provide appropriate respiratory protection equipment.

**5.10. Hot work**: Contractors performing Hot Work (cutting, welding, grinding, etc.) in or around ATI Specialty Materials production areas must either:

**5.10.1** Perform Hot Work in Hot Work areas, as approved by area supervision, or;

**5.10.2.** Be issued an approved Hot Work permit by the area supervision.

**5.11. Industrial Mobile Equipment (IME)**: Contractors who operate IME on ATI Specialty Materials property must:

**5.11.1.** Sign the attached Certification Sheet to certify that all of their personnel who operate IME have completed up-to-date IME training.

**5.11.2.** Obey all traffic signs and sound horn at every intersection.

**5.11.2.1.** Obey maximum speed limit of 10mph unless otherwise posted.

**5.11.2.2.** Yield right-of-way to pedestrians.

**5.12. Painted Aisles** are designated for pedestrian traffic. Do not leave equipment or materials in aisles.

**5.13. 3-Foot Rule**: No pedestrian is permitted to come within 3 feet of IME without:

The load engaging apparatus lowered to the ground (e.g. forks lowered flush to the ground), and; All equipment controls in a neutral position, and; the parking brake set.

Exceptions must be approved by Area Supervision in writing before such work commences.

**5.14. Excavations**: Contractors performing excavations, including concrete sawing, must:

**5.14.1.** Design trenches, pits, holes and other excavations, and any required shoring using accepted engineering practices.

**5.14.2.** Identify all underground utilities prior to commencing any excavation.

**5.14.3.** Adequately fence or barricade open excavations to protect against intrusion.

**5.15. Crane Safety**: Production cranes are only to be used by ATI Specialty Materials personnel, unless written permission is given by Area Supervision. If that permission is granted, then contractors performing crane lifts must comply with the following:

Sign this document certifying that all of their personnel who operate cranes have completed an up-to-date crane training/certification course.

**5.15.1 No Touch Policy**: To reduce the chance of serious injury the load should be guided using a “no-touch” tool, such as a tag line or control pole.

**5.15.2.** Departmental horn and alarm signals must be understood for the area where the job is located.

**5.15.3.** Adequate communications must be established to ensure safe lifts.

**5.15.4.** Spotters or other means must be used to ensure that people are not underneath elevated loads.

**5.15.5.** Cranes must not be side loaded.

**5.16. No Touch Policy**: In addition to the “no touch” tool requirement above, all personnel must wear gloves when handling metal, unless working around rotating machinery.

**5.17. Electrical Safety**: All electrical work will be done in accordance with the latest edition of the National Electrical Code and NFPA 70, including all arc flash requirements contained in NFPA 70E.

**5.18. Housekeeping**: Work areas must be kept clean and free of trip hazards and objects leaning on end, which could fall. Trash and debris generated by the contractor must be collected and properly disposed of off-site by the contractor, unless prior arrangements have been made with the ATI Specialty Materials Project Manager. The job site is to be left clean and free of any extraneous matter upon completion of the project work.

**5.19. Contractor Sign In**: Contractors must sign in and out of the plant, unless an ATI Contractor Badge is used for entry. Contractor badges must be visibly worn while on site.

**5.20. Removal of Equipment/Material**: Any removal of equipment (new or used) or scrap material owned by ATI Specialty Materials is prohibited unless authorized in writing by ATI Specialty Materials’ Capital Buyer, General Manager of US Operations, or Director of Purchasing.

**5.21. Deliveries**: The staging, pick up, or delivery of equipment or material must be pre-arranged with your ATI Specialty Materials Project Manager.

**5.22. Accidents and injuries** that occur on ATI Specialty Materials’ property must be reported, in writing, to the ATI Specialty Materials Project Manager and/or Area Safety Coordinator as soon as possible and no later than 24 hours after the incident.

**5.23. Regulatory Inspection**: Contractors must immediately report any OSHA or regulatory agency inspections occurring on ATI Specialty Materials property. The Area Safety Representative must receive copies of any citations resulting from regulatory inspections within 24 hours.

**5.24. Indoor Air Quality**: Measures must be taken to control indoor air quality at acceptable levels when the Contractor’s job includes the creation of dusts, fumes, gasses, mists, irritants, or intense smells within ATI Specialty Materials buildings. Proper capture or ventilation measures must be provided by the contractor.

**5.25. Equipment Condition**: Power tools, machinery and equipment must be in good operating order. Safety devices originally installed by the manufacturer shall not be removed or defeated. Electrical equipment must be protected by Ground Fault Circuit Interrupters (GFCIs).

**5.26. Equipment Supply**: Contractors are to supply all of their own equipment, incidentals and supplies required to complete the job quoted, unless otherwise specified in the job description.

**5.27. Warning Tape Policy:** Yellow “Caution” tape and Red “Danger – Do Not Enter” tape are the only warning tapes authorized for use at ATI Specialty Materials facilities. The following policies govern the use of those warning tapes:

**5.27.1. Yellow “CAUTION” tape** shall be used as a border to caution every one of potential hazards resulting from non-standard conditions.

**5.27.1.1.** Access: Avoid area if possible. If access is necessary, enter with caution only after:

Making contact with personnel working in the taped-off area, and getting permission to pass through, or; reading and understanding posted signs that identify the potential hazards.

**5.27.1.2.** Examples of when to use Yellow Caution Tape:

Designate a work area for equipment repairs or installation

Designate an area for an incident investigation

**5.27.1.3. When standard conditions are restored, tape must be removed.**

**5.27.2. Red “DANGER – DO NOT ENTER” tape** shall be used as a border to restrict access to areas that contain hazards resulting from non-standard conditions, which might cause bodily harm. **When standard conditions are restored, tape must be removed.**

**5.27.2.1.** Access: No admittance except for authorized personnel.

**5.27.2.1.1.** Authorized personnel are those persons designated by area supervision to repair and/or remove the non-standard condition.

**5.27.2.1.2.** If other personnel must enter the area (e.g. assess progress), they must be escorted at all times by authorized personnel.

**5.27.2.2.** Examples of when to use Red Danger Tape:

around trenches, pits, open man holes

around open or damaged electrical panels

underneath overhead hazards (e.g. hanging loads and work on overhead cranes)

**5.27.3 General Notes about warning tape**:

**5.27.3.1.** Warning tapes are not to be used to identify areas such as wet floors or wet paint. Signs should be used to identify these conditions.

**5.27.3.2.** Avoid blocking common throughways when possible.

**5.27.3.3** Use stands or other devices to limit the taped off area, so that the safe flow of traffic can continue.

**5.28 Warning Lights:** The standard for warning lights throughout our facilities are:

 5.28.1. Green (constant burn) – Normal, Equipment Good

 5.28.2. Blue (constant burn) – Equipment Needs Attention

 5.28.3. Yellow (flashing) – Caution, Moving Equipment

 5.28.4. Red (flashing) – Keep Clear of Equipment of Area

 **5.29.   Radiation** - Where the contractor requires a radiation producing device to

 perform the required work, then the following shall be required:

                **5.29.1.** – All radiation-producing devices must be properly registered or

 licensed with the appropriate government body.

                **5.29.2.** – All contractors’ using radiation-producing must be properly trained in

 radiation safety by the contractor.

**6. ATI Specialty Materials Project Manager:** The Project Manager is usually, but not always, the ATI SM employee who initiates the requisition for the contractor services. Project management responsibilities can be delegated to Area Supervision, as long as both parties agree to that arrangement. The ATI SM employee who initiates the requisition for contractor services is responsible for making arrangements for project management.

**6.1** Each facility shall maintain a list of approved project managers. This list shall be maintained by the onsite Safety Pro. Please refer to the EHS-F-07-Document Record Retention list for the location of this list.

**7. Technical License/Certificate**: Contractor shall be capable of producing applicable license within 24 hours of the request (e.g. Fuel Distribution License, Section 9 ASME Code Welding Certifications).

**8. Security**: All contractors performing work on ATI SM premises are required to contact their ATI Specialty Materials Project Manager at least two days prior to a job to obtain Contractor Badges. Badges must be visibly worn while working on ATI Specialty Materials premises.

**9. Drug & Alcohol Policy**: If a contractor’s employee is suspected of being under the influence of drugs or alcohol while on ATI Specialty Materials property, the contractor must:

Immediately take that employee for drug and/or alcohol testing at an approved testing facility.

If the employee in question fails the alcohol and/or drug testing, or if the employee refuses to submit to testing, then the employee will not be allowed to reenter ATI Specialty Materials property.

**10. Facility Access**: Contractors are not allowed to visit departments or areas other than those wherein work has been assigned.

**11. Smoking** is allowed in designated areas only.

**12. Food and drinks** are allowed in designated areas only.

**13. Parking** is allowed in designated areas only.

**14**. **EHS Process Audits**: The EHS Department will conduct process audits on this program at each facility

 to determine the effectiveness of implementation. The audit results will be given to the plant management

 who will develop a corrective action plan. The facility EHS personnel will track the corrective action plan

 to completion.

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| Revision | Date: | Remarks | Revised by |
| 001 | 5/6/15 | Updated Program into TI format. | Alison Gallagher |
| 002 | 6/12/15 | Updated 5.4 to change reference of MSDS to SDS. | Preston Baucom |
| 003 | 7/17/15 | Added related documents | Alison Gallagher |
| 004 | 7/29/15 | Added section 6.1 | Alison Gallagher |
| 005 | 9/22/15 | Included EHS Policy in 1. Modified 5.1. Added reference to significant aspects in 5.3. | Preston Baucom |
| 006 | 10/29/2015 | Added Related Documents | Jay Hayes |
| 007 | 1/22/16 | Added section 5.3.3. | Preston Baucom |
| 008 | 6/21/16 | Added Section 5.28 | Preston Baucom |
| 009 | 7/28/16 | Added Section 5.29. | Pete Lewis |
| 010 | 10/27/16 | Modified Section 5.1 to exempt service work | Alison Gallagher |
| 011 | 12/5/16 | Modified Section 5.1 to added IME repairmen to exempt. | Larry Allen |
| 012 | 2/22/17 | Removed compliance evaluation and replaced with EHS Process Audit (added section 14, EHS Process Audits). | George Taylor |
| 013 | 09/21/2018 | Updated section 1 (Purpose) by removing the old EHS policy. | Joe Hinkle |
| 014 | 08/06/2019 | Updated section 5.1 to show that service contractors are required to sign Pre-Work Check Sheet annually.  | Alison Gallagher |