



# Contractor Briefing - Environment, Health & Safety (EHS)

Some data in this presentation may be considered Proprietary & Confidential



# Definitions

**Authorized Emergency Vehicles** – Vehicles of the Fire Department, Security, and Medical when responding with emergency equipment activated.

**Competent Person** – Individual(s) capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

**Contractor** – Any agent/agency engaged by K&L Microwave through written or electronic contract (or other agreement) to perform work on K&L properties and those properties for which K&L has operating responsibilities.  
*Not included are contractor employees who work under the direct supervision of K&L personnel. These employees would fall under K&L Microwave Environmental, Safety and Health (EHS) programs.*

**EHS** – Environmental, Health and Safety

**Hot Work** – Any operation that involves open flames or produces heat or sparks. Some examples include welding, cutting, brazing, grinding, soldering, torch applied roofing, etc.

# Definitions

**MSDS (Material Safety Data Sheet)** – Details the hazardous properties of the products along with the precautionary measures required for safe use.

**Other - Than Serious Violation** – A condition that does not have the same potential for causing bodily harm, yet may contribute to a decrement in bodily functions or increase bodily stress.

**POC (Point of Contact)** – A K&L representative responsible for providing oversight of Contractors to ensure compliance with the terms and conditions of the contract, purchase order, or other authorizing documents.

**Serious Violation** – A condition that could result in an injury or illness, which causes prolonged or temporary impairment of the body or substantially reduces efficiency on or off the job.

**Vehicle** – Any means of transportation used to transport personnel and/or property/equipment (e.g., automobiles, trucks, lift trucks, scooters, golf carts, and bicycles).

# Acronyms

- ANSI American National Standards Institute
- AS Aero Space
- CFR Code of Federal Regulations
- CP Company Policy
- ENV Environmental Resources
- EPA Environmental Protection Agency or Act
- EHS Environmental, Health & Safety
- FOD Foreign Object Damage
- FPS Fire Protection Services
- GFCI Ground Fault Circuit Interrupter
- ISO International Standards Organization
- LOTO Lockout/Tag out
- MSDS Material Safety Data Sheet
- NFPA National Fire Protection Association
- NIOSH National Institute for Occupational Safety and Health
- OEM Original Equipment Manufacturer
- OSHA Occupational Safety and Health Administration
- POC Point of Contact
- PPE Personal Protective Equipment
- S&H Safety and Health

# Purpose

- The purpose of this presentation is to inform contracting companies of K&L Microwave specific EHS requirements.
- The project manager and/or supervisor from the contracting company is required to review this presentation prior to commencement of work at K&L Microwave. The contracting company is responsible for EHS compliance by its own employees and subcontractors and for dissemination of EHS requirements to its employees and subcontractors before any contractual work begins.
- This presentation is an overview of basic applicable company and regulatory standards and should not be considered as a substitute for provisions of the Occupational Safety and Health Act of 1970 or other local, state and federal occupational environmental, safety, and health programs. Any discrepancy between this presentation and regulatory and contractual requirements shall be resolved by using the most stringent requirement.

# Contractor/Supplier Safety & Health

It is the policy of K&L Microwave to provide a safe and healthy working environment. This applies to Contractor personnel as well as K&L employees.

## **“EHS is Everyone’s Responsibility”**

### Contractor Safety and Health Program

- All Contractors, shall be familiar with and comply, at all times, with all applicable regulations while performing work on K&L premises.
- The Contractor shall carefully read and evaluate the safety provisions of each contract to determine the safety requirements of the contract. This includes but is not limited to the assignment of personnel, training requirements and required safety equipment.
- The Contractor is responsible for insuring flow down of safety, health and environmental information, provided by K&L Microwave, to all their employees and Subcontractors.

## **“EHS IS EVERYONE’S RESPONSIBILITY”**

# Contractor Responsibilities

- Contractor

- The contractor will not under any circumstances use the company's equipment or property unless stated in the contract and approved by the Facilities Manager
- If large rental equipment (cranes, lifts, etc.) is used by the contractor, contact information (including the name of the company it is rented from and a phone number) shall be available upon request of the company.
- ***ALL CONTRACTORS MUST CALL THE FACILITIES MANAGER PRIOR TO PERFORMING WORK AT ANY KLM SITE***

- Contractors employed in connection with the construction, painting, repairing, maintenance, renovation, demolition of any fixed structure or its parts shall comply with OSHA Standard 29 CFR Part 1926 for the Construction Industry.

- Contractors may also have compliance requirements to OSHA Standard 29 CFR Part 1910 for General Industry and to other Federal, State, and local regulations.

- Contractors should obtain copies of the OSHA Standards for the Construction Industry (29 CFR Part 1926) and OSHA or General Industry (29 CFR Part 1910) prior to starting work at K&L Microwave.

# Competent and Qualified Persons

- ▶ "Competent person" means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.
  - OSHA 1926.32(f)
- ▶ "Qualified" means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work or the project.
  - OSHA 1926.32(m)
- ▶ K&L Microwave and OSHA construction standards require a Competent Person for activities such as:
  - Scaffolding,
  - Fall Protection,
  - Cranes,
  - Excavations/Trenching/Shoring,
  - Steel Erection,
  - Ladders.

# Hazard Communication

K&L Microwave maintains a database of hazardous chemicals used at our facilities. Safety data sheets (SDS) for those hazardous chemicals are available from your POC.

Contractors with employees working on K&L premises shall review their contract(s) for information concerning hazardous chemicals and provide training and personal protective equipment as required to employees to safely perform their work.

The Contractor shall provide to the POC, in advance of any work, associated SDS's for each hazardous material intended to be used.

Hazardous materials on company premises shall be labeled in compliance with OSHA 29 CFR Part 1910.1200, "Hazard Communication." Labels must be legible and replaced when torn or defaced.

**Personal Protection Equipment is required at all times when handling chemicals**

# Vehicle and Traffic Safety

## Traffic Safety

- Contractors shall not close or impede the use of any aisle, road, or exit (even temporarily) without approval from the POC.
- Vehicles shall yield to pedestrians. Pedestrians have the right-of-way at all times.
- During lunch and break periods and at shift changes, vehicle operators shall use extreme caution to avoid vehicle-pedestrian accidents.
- All vehicles shall stop and give the right-of-way to emergency vehicles.
- K&L has the prerogative of suspending driving privileges of contractors, vendors, and suppliers who have demonstrated unsafe driving practices.

# Foreign Object Damage (FOD) Prevention Compliance

In order that K&L may provide its customer's the highest level of Quality and Safety in all products manufactured, the company has stringent FOD Prevention Procedures in place throughout the facility.

All vendors, subcontractors and suppliers shall review the company FOD Prevention Program and may be required to complete FOD PREVENTION TRAINING. Your contract POC will provide the information required to complete training.

As an approved vendor, supplier or subcontractor, you're required to abide by these procedures and remain in compliance while working in ALL FOD Controlled areas. Failure to do so may constitute an immediate contract termination and/or your removal from the facility.

# Prohibited Items

No alcoholic beverages, drugs, explosives, firearms, ammunition, gambling material or persons under the influence of alcohol/drugs will be permitted on the company property.

# Tobacco Use

- ▶ K&L has instituted a “no tobacco use” policy for all buildings and surrounding parking areas.
- ▶ Smoking or the use of tobacco is NOT permitted on any K&L owned property to include:
  - 2250 Northwood Drive
  - 2300 Northwood Drive
  - 822 Brown Street



# Personal Protective Equipment (PPE)

*Personal protective equipment shall meet the requirements of 29 CFR 1910 and 1926.*

- Head protection shall be selected and used in accordance with CFR 1926.100. ANSI Z89.1 approved hardhats shall be worn on all construction sites.
- Suitable eye/face protection shall be selected and used in accordance with the requirements of 29 CFR 1926.102 and shall be worn when exposed to operations generating a hazard to the face.
- Foot protection shall be selected and used in accordance with 29 CFR 1910.136 and 29 CFR 1926.96.
- Construction sites should be considered a “hard hat – safety glasses – work shoe” areas unless the potential for a hazard is non-existent and prior approval has been obtained from the POC and EHS.
- Work areas identified, "EYE PROTECTION REQUIRED", are 100% eye protection areas. These areas require the use of eye protection at all times.

***K&L will not furnish Contractor personnel with any PPE.***

# Hazardous Waste

The contractor will supply all necessary Department of Transportation approved drums. The contractor shall ensure the drums are stored and labeled properly.

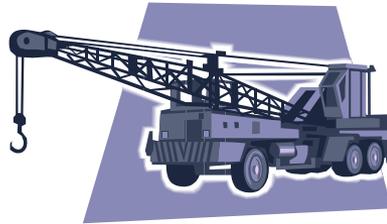
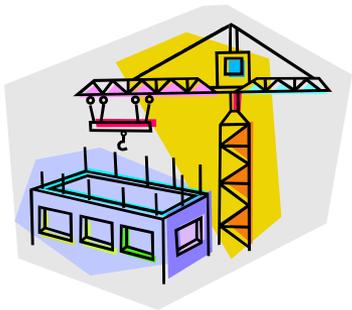
Disposal of hazardous waste, including contaminated soils or refuse, shall be done by an approved K&L disposal contractor in accordance with regulatory requirements. Contractor will be responsible for all disposal cost.

Disposal of waste generated from operations (i.e., paint, solvents, floor coatings, etc.) must be coordinated with the POC and EHS prior to generation. Facility generated waste (i.e., process tank cleaning solutions, lead abatement, etc.) will be the sole responsibility of the company in coordination with the POC.

Under no circumstances may any material of any kind be discharged to any sewer or storm drain without approval from EMS representative or POC.

# Hoisting Equipment

- ▶ In buildings where cranes are in operation, the crane operator will blow a whistle or sound a buzzer to warn personnel of approaching crane(s) and load(s). At no time will personnel stand or walk under a crane load.
- ▶ The use of hoisting equipment such as powered cranes or hand-powered hoisting devices is prohibited unless approval has been obtained by the POC and EMS representative.



# Housekeeping

- ▶ All places of employment shall be kept clean and orderly. Materials and equipment shall be stored in designated places.
- ▶ Sharp projections, where injury may occur, shall be eliminated.
- ▶ Outside dumpsters shall be kept effectively covered and closed unless in use.
- ▶ Aisles and exits must be kept clear at all times and materials and equipment stored in designated places.
- ▶ Electrical cord sets and air hoses used in work areas shall not create a tripping hazard.
- ▶ Objects shall not be “stored” on the top of any cabinets, electrical panels, etc.
- ▶ Chemical containers shall be stored properly at the end of the work shift.

# Pollution Prevention/Solid Waste Management

- ▶ The contractor should determine the location of the recycling and/or disposal facilities to be used for all materials recycled and/or disposed of which will be generated from the work performed under the contract as well as their method of transport, prior to the commencement of work. The contractor should transport non-recyclable solid wastes to a state permitted disposal facility that accepts these materials for disposal or reclamation. Please use appropriate recycling containers (i.e. cardboard)
- ▶ The contractor shall be responsible for collecting and removing solid wastes, including all construction debris (including concrete), and segregating recyclable wastes from non-recyclable wastes.
- ▶ Recyclable materials including construction debris that cannot be reused onsite by the contractor should be transported by the contractor to a valid recycling facility that reclaims and recycles these materials.
- ▶ Recycling contractors should maintain records (i.e., scale or recycling receipts that reflect quantity disposed) for all solid waste material re-used, recycled or, if necessary, land filled throughout the contract period, and provide to POC.

# Accidents / Injuries / Illnesses

*Accident prevention will be the responsibility of the contractor to initiate and maintain programs to:*

- Provide for daily safety inspections of the job site(s), materials, tools, and equipment.
- Permit only those employees qualified by training, licensed or experienced, as appropriate, to operate machinery, tools, or equipment.
- Conduct weekly 10-15 minute safety talks to reinforce safety awareness. Topics should be related to work under the contract.
- Ensure warnings are posted to inform employee of hazards or potential hazards. It is the responsibility of the contractor to so advise it's employees, subcontractors, and suppliers.
- Ensure that affected employee(s) receive(s) necessary first aid or medical treatment.

*Promptly report all accidents/injuries/illnesses to the POC. Immediately notify Human Resources of any serious accidents or injuries. Secure the area and equipment if blood or other bodily fluids are present.*

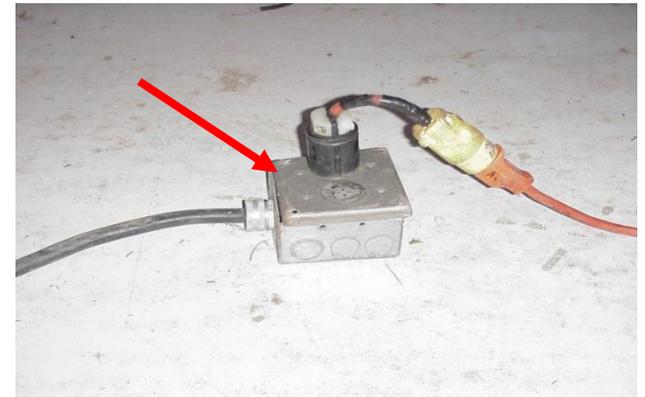
# Specific Requirements

## Electrical Safety

- ▶ *Extension cords, constructed of metal junction boxes and flexible cords shall not be used.*
- ▶ *Stay clear of “High Voltage” locations - unless approved by the POC.*
- ▶ *Piggy backing of electrical cords is prohibited.*



Ground Prong Missing



Improper Installation and Use

# Specific Requirements

## ▶ Fall Protection

- Contractors shall provide their own fall protection equipment (i.e., harness, lanyard, vertical / horizontal life lines, etc.). Company owned fall protection equipment or components are not to be used by contractors.



Non-Compliant Guardrail



No Fall Protection Equipment

# Specific Requirements

## “Hot Work” - Welding/Cutting

- ▶ Welding on an automatic sprinkler system is prohibited (still charged)
- ▶ Only approved containers and portable tanks shall be used for storage and handling of flammable & combustible liquids.
- ▶ A new permit is required at the beginning of each work shift or as the result of changed work location(s) or conditions.
- ▶ Once the Hot Work is complete or the permit has expired, call POC for recheck of the area. After clearance by POC, original permit will be picked up.
- ▶ All hot work shall be properly shielded when performed within or outside any building.
- ▶ Hot work in a paint booth, whether in service or deactivated, shall require the approval of K&L POC.
- ▶ The contractor shall provide fire extinguishers of the type & size required at all work sites.

# Specific Requirements

- ▶ Lockout / Tag out (LOTO)
- ▶ Provide the POC with documentation [LOTO Training](#) for those employees engaged in, supervising or serving as stand-bys for LOTO activities.
- ▶ Affected company and contractor employees shall be informed of LOTO activities in their work area.
- ▶ Contractor shall notify POC (at least 24 hours in advance) of need for system outage of Fire Protection Systems.



K& L Microwave Lock & Tag Out

# Specific Requirements

## Painting, Sandblasting and Pressure Washing

- ▶ Indoor spray painting is permitted only in authorized paint spray booths/buildings with prior approval from the POC and EHS.
- ▶ Outdoor spray or electrostatic painting, sand or other abrasive blasting, and pressure washing is strictly prohibited unless approval is obtained from the POC and EHS prior to the commencement of work.
- ▶ Brush and/or roller painting may be accomplished in other buildings or areas where authorized by the POC.
- ▶ Contractor must ensure that all applicable OSHA requirements are met regarding potential exposure of their personnel to hazardous materials.
- ▶ Painting of building structures (interior or exterior) will be addressed on a case-by-case basis with EHS and POC.
- ▶ Contractors involved in on-site painting operations must report paint and associated solvent usage monthly.

# K&L Microwave Company Pre-Work EHS Document Requirements

*The following pre-work Environmental, Health and Safety (EHS) documents (forms) must be signed and submitted to the Company Point of Contact prior to the commencement of work:*

- ❑ Competent Person Designation - Prime construction contractors working at K&L owned or operated facilities are required to have a competent person on-site at all times. The contractor shall submit to the POC a list of “Competent Persons” as defined and required by specific OSHA standards.

# General Requirements

## Important Telephone Numbers

### Emergency Only Numbers

To Report a Fire, Chemical Spill or Medical Emergency

In-plant extension.....5911

When calling from a cellular telephone.....410-749-2424

### Non-Emergency Numbers

Environmental, Safety & Health.....410-219-3978

Facilities Manager.....443-497-6604

Director of Quality.....410-219-4487

