

SAFE PRACTICES FOR OUTSIDE CONTRACTORS

Contractor, including all of Contractor's sub-/contractors, shall conduct all the Work in accordance with the contents of this document entitled SAFE PRACTICES FOR OUTSIDE CONTRACTORS which is appended to and made part of the contract for this Work:

1.0 PROTECTION OF WORK AND PROPERTY

- 1.1 Contractor shall protect all work and property from damage or loss. Should work be temporarily suspended, Contractor shall take necessary steps to protect property and equipment from the elements, fire and vandalism. Contractor shall take precautions to protect the public and workers from injury.
- 1.2 It is the intent of the drawings and specifications that all work be done in a safe manner. Any omission in plans and specifications to ensure a safe, workmanlike job shall not excuse Contractor from doing the necessary work to produce such a job and shall not to be used to justify a demand for additional compensation.

2.0 SAFETY REQUIREMENTS

- 2.1 All local and state safety laws and regulations shall be closely followed including inspection and certification of equipment, where required.
- 2.2 Before starting work, Contractor must obtain from Owner any specific instructions concerning operating hazards and applicable safety regulations. Meetings may be held with all concerned (owner, contractor, subcontractor) to outline the necessary job procedures and Owner's policy. Additional briefings shall be held following the completion of one project and prior to the start of the next.
- 2.3 Parking, signing in and out to account for employees, sanitation facilities and wandering through the plant should also be reviewed.
- 2.4 Owner's supervision in the area where work is being performed shall be notified of Contractor's activity schedule for each day through the Project Coordinator. Project Coordinator is Owner or Owner's designee who shall be responsible for administration of the Contract.

2.5 Travel in the Plant

- a. Use only prescribed walkways, crossovers, or roadways.
- b. Contractor employees are restricted to those plan areas specifically discussed in the pre-work meeting (paragraph 2.2).
- c. Contractor's employees using work vehicles shall maintain safe speed at all times and stay alert for pedestrians.
- d. Obey all warning signs.
- e. Observe plant rules with respect to smoking and the use of personal protective equipment.
- f. All contractor and subcontractor employees shall be trained in the emergency procedures and evacuation plans of the site.

2.6 Moving Machinery, Railroad & Mobile Equipment

- a. Stop, look, and listen before crossing tracks or roads where there may be moving equipment.
- b. Standard railroad rules regarding the use of blue flags and blue lights shall be observed. Rail cars and trailers must be chocked while loading and unloading.
- c. When equipment is not in use, it must be positioned where it will not block railroad tracks, roads, walkways, or temporary passageways. All equipment not in use must be secured so as to prevent movement or operation.

- d. If mobile equipment is being used in an area where company workers or the public would be endangered, the area shall be barricaded during operation to protect pedestrians.
- e. Contractor vehicles shall be equipped with back up alarms meeting the requirements of the Federal Safety and Health Act.
- f. Contractor's/subcontractor's employees shall not use equipment, tools, material or personal protective devices belonging to Owner.

3.0 LOCKOUTS

- 3.1 Contractor's employees shall be trained on the purpose and use the lockout/tagout procedure and comply with OSHA regulation 29CFR1910.147. Contractor will inform Owner of Contractor's lockout procedures and show documentation of training.
- 3.2 Contractor shall know the sources of energy in area where work will be performed. This must be documented by the Project Coordinator.
- 3.3 When work is to be performed on machinery or equipment that can be placed in operation, OSHA standard lockout procedures shall be followed.
- 3.4 When there is necessity, for trouble shooting purposes, to work on "live" electrical equipment, the work must be performed by a qualified and adequately trained person.
- 3.5 All employees (Owner's and Contractor's) shall be notified when the condition in 3.4 will exist.

4.0 PERSONAL PROTECTIVE EQUIPMENT

- 4.1 Personal protective equipment shall be worn by Contractor's employees as required by Owner or Contractor and shall be furnished by Contractor.
- 4.2 For construction work on company premises, safety shoes are required. Eye protection is required for most maintenance type work. Where protection is required, side shields are also required.
- 4.3 Hearing protection shall be worn in high noise areas where noise exceeds 85 dBA. Such high noise areas are posted or otherwise stated by owner.
- 4.4 Where chemical exposure exceeds OSHA permissible exposure level, Contractor shall have a documented respirator program including training.

5.0 HOUSEKEEPING

- 5.1 Good housekeeping must be maintained at all times. Materials must be piled in a stable and orderly manner. Debris, rubble and garbage must be regularly removed. Contractor's job is not complete until all debris and unused materials have been removed from job site.
- 5.2 Contractor shall provide adequate toilet facilities conforming to state and federal regulations. Plant toilet facilities shall not be used by Contractor's employees unless approved by local management.
- 5.3 Since most of Owner's raw materials, work-in-process, and finished goods are combustible, Contractor must take extra precautions to avoid fire. Removal of scrap and careful storage of materials is important to protect facilities and employees.

6.0 TREATMENT OF INJURED

- 6.1 Contractor shall provide treatment of its sick or injured employees. Cases involving injury such as serious bleeding, fractures, etc. may be given emergency treatment at plant dispensaries or first aid facilities to the extent possible.

7.0 SAFETY MEETINGS

- 7.1 Regular safety meetings, safety supervision and observations are expected to be held by and for Contractor's employees.
- 7.2 Safety meetings should be held to call attention to specific safety requirements necessary for the completion of Contractor's work.
- 7.3 Copies of safety meeting documentation must be provided to Project Coordinator for review and placed in the Contractor file.
- 7.4 Contractor's employees shall have completed all applicable OSHA required training and documentation of same shall be available for Owner's review.

8.0 REPORTING ACCIDENTS

- 8.1 When accidents occur that require a formal report on personal injury, death or property damage, a copy of this report is to be submitted to Project Coordinator.
- 8.2 In event of a fatality, or an accident involving three or more employees who are hospitalized, Contractor is obligated to advise the OSHA area office within 8 hours.
- 8.3 Copies of each contractor's OSHA log will be furnished to the Project Coordinator for review and placed in the Contractors' respective files.

9.0 CRANE AND CRANE RUNWAYS

- 9.1 Before performing any work on or near cranes or crane runways, Contractor must first make arrangements with Project Coordinator. Contractor shall conform to crane safety rules. Contractor shall not use any cranes or hoists without the express written permission of the facility manager.

10.0 FIRE PREVENTION

- 10.1 Contractor shall observe Owner's fire prevention and control regulations in effect at the location where the work is to be performed taking specific cognizance of the following:
 - a. Temporary buildings or construction trailers erected or placed on Owner's property by Contractor shall be of fire retardant materials and shall be located and erected only after approval by Owner. Buildings shall not be located near chemical storage tanks or other hazards.
 - b. Heating facilities for construction trailers or buildings shall be operated by fuels approved by Owner and shall be acceptable to the insurance carrier and Owner. Gasoline, coal or wood-fired stoves or salamanders will not be permitted inside enclosed trailers or temporary facilities. Adequate ventilation shall be provided. Stoves or heaters shall be properly vented and vent pipes shall have tight joints and be well supported.
 - c. Facilities used for providing heat for outdoor areas shall be properly safeguarded and fuels (preferably propane or oil) used shall be acceptable to Owner. Salamanders shall have a steel guard rail completely around them with a clearance of at least 12 inches. Salamanders shall be kept at least 25 feet from combustible materials.
 - d. Closed metal containers shall be used for storing and handling flammable liquids. Containers shall be identified with markings indicating the contents. Containers larger than 5 gallons shall not be stored inside offices, stock room, or similar enclosures. Dispensing equipment shall be locked when not in use. If requested by Owner, dispensing equipment shall be removed. When liquids with flashpoints below 100 degrees F. are present, the following, in addition to the above, applies:

Container shall be equipped with relief venting, adequate grounding and approved flame arrestors at the vent and pouring spout. Any exception to the above must be approved by Owner.

- e. When work is to be done in critical fire hazard areas, a special fire prevention meeting shall be held with Owner to familiarize Contractor with the potential hazards and the precautions that must be taken.
- f. Where sprinkler installations are inoperative or not yet installed, it may be necessary to lay out connected hose lines to provide the fire watch with a quick means to control fire. Contractor shall provide and maintain a suitable amount and type of portable fire equipment for the control of early stage fires.
 - g. Contractors shall exercise care not to paint or otherwise make sprinkler heads inoperative or less effective.
 - h. Before sprinkler system or fire supply line is made inoperative, Owner shall be immediately notified so proper impairment procedures are followed. Only OWNER can permit an impairment
 - i. In event of an accidental breakage or impairment of the sprinkler system or water supply, Owner must be notified immediately.
 - j. Procedure for summoning outside help and the Plant Emergency Organization to control fires shall established by agreement between Contractor and Owner (Project Coordinator).

11.0 BURNING AND WELDING EQUIPMENT

- 11.1 Burning and welding shall not be done at any place in the plant by Contractor until the location where work is to be done is approved by Owner and a HOT WORK PERMIT is obtained by Project Coordinator.
- 11.2 Adequate measures shall be taken before burning or welding operations begin such as removal of combustibles, providing a fire watch, and making adequate fire-fighting equipment available.
- 11.3 Oxygen, propane and gas cylinders shall be returned to the storage area after use. They shall not be scattered about the premises. Protective caps shall be replaced over cylinder valves when being transported and when the cylinders are not in use.
- 11.4 Acetylene or liquid gas cylinders shall never be used in a horizontal position as the liquid may be forced out through the hose. Cylinders should be kept in upright position.
- 11.5 Oxygen and gas cylinders when not in carriers shall be chained in an upright position at least 20 feet apart unless separated by a steel partition.
- 11.6 Since paper dust accumulates on rafters, beams and other surfaces, such combustible material should be removed before an ignition source is introduced. The speed at which such dust burns can quickly cause fire to spread throughout the plant.

12.0 PLANT ROOFS - OVERHEAD WORK

- 12.1 Before work is performed on an occupied plant roof, cyclone system or gravity tank, Owner shall be notified.
- 12.2 No material shall be thrown or dropped from plant roofs unless permission has been granted by Owner and proper chutes are used.
- 12.3 When performing overhead work, Contractor shall rope off or take adequate measures to protect workers in the area. Warning signs shall be conspicuously posted. If conditions justify a watchman, he shall be stationed to warn persons in the vicinity.
- 12.4 All scaffolds shall meet the safety requirements of federal and state safety codes.
- 12.5 Safety harnesses or other fall protection shall be provided and their use enforced by Contractor as required by applicable standards.
- 12.6 When performing sandblasting or spray painting, Contractor's employees shall wear approved respiratory equipment. Warning signs shall be posted to alert other workers of the hazards. Contractor shall take all necessary steps to

prevent damage to Owner's facilities and vehicles from sandblasting or painting. Contractor must document compliance with respiratory protection training requirements for each employee engaged in these activities.

- 12.7 Contractor must remove debris from close proximity to buildings and material storage areas to minimize fire hazards. It is recommended that Contractor remove such debris from Owner's premises each day.

13.0 COMPRESSED AIR

- 13.1 Use of Contractor's own source of compressed air is required unless express approval has been granted prior to start of work by Owner.
- 13.2 Contractors should never use piped oxygen in place of compressed air.
- 13.3 All pressure vessels such as compressed air receivers, air compressors and boilers belonging to Contractor shall comply with the applicable Codes for Pressure Vessels - Fired and Unfired. They shall be inspected and approved by the authority having jurisdiction.
- 13.4 Workers should observe OSHA regulations and limit air pressure to 30 PSI dead end pressure in non-fixed installations.

14.0 ELECTRICAL SAFETY

- 14.1 When Contractor is required to work on or near power lines, he must first confer with Owner.
- 14.2 Proximity warning devices, in addition to required ground guides, should be used on cranes to warn of electric lines and avoid the possibility of electrocution.
- 14.3 Booting or other means shall be used where risk of contacting power lines warrant.
- 14.4 Contractor/Subcontractor employees who may work in, on or around exposed electrical parts or with power tools in damp areas, temporary lighting, etc., shall be trained in electrical safe work practice for qualified and unqualified workers. Documentation of successful completion must be provided by Owner.
- 14.5 All electrical contractors shall have a dedicated (no tools) safety representative on site when 20 or more contractor employees are on site.
- 14.6 In addition, the following practices shall be observed at PCA mills:**

14.6.1 No electrical panel, covers, doors, etc. can be opened without PCA personnel present.

14.6.2 Any boundary work (through floors, walls, roofs, etc.) will require PCA personnel to be present.

15.0 EXCAVATIONS

- 15.1 Before any excavating commences, Contractor shall check drawings with Owner and use any other source for information about underground utilities such as conduit, pipe lines, tanks, telephones, etc.
- 15.2 All excavation and necessary shoring shall be in accordance with OSHA regulations and other code requirements of the city or state in which work is performed.

16.0 SAFETY DATA SHEETS

- 16.1 In order to safeguard the health of workers, it is Owner's policy to obtain and review Safety Data Sheets on chemicals, paints, flammable substances, toxic or hazardous ingredients, etc., so they may be used safely in Owner's plants. If substitute non-hazardous materials are available, they should be used to avoid the possibility of worker exposure to harmful substances.
- 16.2 Contractor is required to submit Safety Data Sheets on products described above before introducing or using such products in Owner's facilities.

- 16.3 Safety Data Sheets are to be submitted to Owner who will determine if the product may be safely used or applied. If Owner's plant personnel are not familiar with materials being considered, phone contacts with the Corporate Director of Environmental Affairs and Safety and the Product Stewardship Representative may be necessary for prompt approval or review of materials being considered for use.

17.0 HAZARDOUS WASTE AND OTHER ENVIRONMENTAL ISSUES

- 17.1 All Federal, state and local applicable environmental rules and regulations must be followed including obtaining the necessary permits and notices.
- 17.2 All wastes generated as a result of Contractor's efforts must be properly disposed off site by Contractor.
- 17.3 Contractor employees must have at least awareness level HAZWOPER training.

18.0 CONTRACTORS HAZARDOUS WORK ACTIVITIES

- 18.1 Any Contractor work activity or product use that may be harmful to personnel in the vicinity must be evaluated and approved by Project Coordinator prior to such activity or use.
- 18.2 Contractor will control dust which might affect workers, the public, machinery, electrical equipment or the environment if Contractor performs grinding, air movement or sandblasting.
- 18.3 Carbon tetrochloride and benzene-based cleaning agents shall not be used in or stored on the plant premises.
- 18.4 Removing asbestos insulation from piping, boilers, or heating systems may create a serious health exposure. Permits, posting, exposure monitoring, work procedures and proper disposal of asbestos waste are required.
- 18.5 If lead melting is being used, protection from fumes or mist is required.
- 18.6 Asbestos free insulation shall be used to avoid asbestos exposure to Contractor's and Owner's employees.
- 18.7 When chlorinated hydrocarbons are used, personal protective equipment and ventilation requirements must be observed. The combination of welding and chlorinated hydrocarbon fumes will create phosgene gas under certain conditions. Exposure to phosgene gas results in serious health problems.
- 18.8 The use of powered industrial vehicles, internal combustion engines or liquid fuel salamanders may create dangerous levels of carbon monoxide. Proper ventilation must be provided in confined areas. Open flame heaters are particularly dangerous in tool sheds, construction offices and confined spaces because they consume large amounts of oxygen and give off carbon monoxide.
- 18.9 The proper storage, transportation and use of flammable materials such as acetone, alcohol, solvents, thinners, epoxy resins, methyl ethyl ketone, toluene or similar materials is important. Protect storage from vehicle movement, observe temperature storage requirements and assure that precautions shown on Safety Data Sheets and labels are followed.
- 18.10 When welding, cutting or brazing is being performed near combustibles, all precautions with respect to permits, fire watch, extinguishers, hose lines and personal protection to avoid burns, sparks and eye exposure are necessary. (Note: the combustible nature of Owner's products requires that contractor be especially careful performing work in Owner's plant. Substantial fire damage has resulted from improper contractor methods while performing cutting and welding.) A hot work permit must be obtained from Owner as in Paragraph 11.1.
- 18.11 Propane tanks must be installed in accordance with NFPA #58 standards. Portable tanks must be stored out of traffic areas and outside Owner's plants.
- 18.12 Compressed gas cylinders (acetylene and oxygen) must be stored 20 feet apart in an upright position and chained or cabled in place. See to SOPI 5002 - Compressed Gas Cylinders.
- 18.13 Strong acids or hydrochloric acid is an irritant to membranes of the eyes and respiratory tract. Severe exposure can result in death by pulmonary edema. Follow all instructions in Data Sheets and on container labels of these

dangerous corrosive liquids.

- 18.14 Contractor must establish spill plans for the storage of oil, chemicals, solvents, etc. introduced to the Owner's property by Contractor.
- 18.15 Potentially harmful work activity or product will require Owner approval. Product may require a Safety Data Sheet (SDS).

19.0 CONFINED SPACE ENTRY

- 19.1 Contractor shall comply with SOPI Number 2001 for work involving confined space.
- 19.2 Contractor must have a permit from Project Coordinator prior to entering any permit-required space as defined in CFR 1910.147
- 19.3 Contractor employees shall be fully trained on hazards and procedures of confined space work.
- 19.4 No work shall be performed in atmospheres with O₂ outside the range of 19.5 to 23.5, or flammable vapor above 10% of the lower explosives limit (LEL).

20.0 EMERGENCY AND OTHER PROCEDURES

- 20.1 All other applicable procedures shall be discussed prior to beginning of work including:
 - a. Emergency evacuation procedures
 - b. Emergency service and notification procedures
 - c. Spill and release procedures
 - d. Procedures requiring permitting.

21.0 PCA Mills – Random Drug & Alcohol Screening Program

21.1 All Contractor and sub-contractors present at any PCA mill during major mill outages or other outages and capital projects as designated by local PCA management shall be subject to PCA's Contractor Drug & Alcohol Random Screening Program (V.05.06.24), a copy of which can be found at <https://www.packagingcorp.com/doing-business-with-pca/>