

**UCHIYAMA MFG AMERICA LLC**

494 Arrington Bridge Road

Goldsboro, NC 27530

# Contractor Safety Orientation

# **CONTRACTOR SAFETY ORIENTATION**

## **CONTRACTOR SAFETY POLICY**

- 1) This document informs interested parties, including employees, that our facility has developed a procedure to transmit safety information both from UMA to contractors and their workers and from contractors and their workers to UMA.
- 2) Common sense and safety concerns encourage standardization of these communications.
- 3) These procedures standardize information transfer to make sure that all concerned have the information they need to work safely.

## **PURPOSE**

- 1) A written contractor safety policy establishes guidelines to be followed for contractors working at our company.
- 2) The rules established:
  - a) Provide a safe working environment.
  - b) Govern facility relationships with outside contractors.
  - c) Ensure that contractor employees and our employees are trained to protect themselves from all potential and existing hazards.
- 3) The effectiveness of the contractor safety program depends upon the active support and involvement of all employees.
- 4) This plan is intended to implement a program to ensure that all contractor work practices are carried out safely to minimize the possibility of injury or harm to the contractors' employees or our own employees.
- 5) It is intended to serve as an additional tool in safeguarding the health and safety of employees.
- 6) The contractor safety policy establishes uniform requirements designed to ensure that contractor safety orientation, coordination, and safety administration practices are communicated to and understood by employees.
- 7) The most significant area with a hazard is in the area of NL 24 where Methyl Ethyl Ketone (MEK) is used in the process of making a glue mixture for parts.
  - a) MEK is highly flammable and in this area the following is strictly prohibited:
    - The wearing of hats or hair nets
    - Use of electronic devices
    - Key fobs, radios, cellphones etc.
    - Use of lighters, spark or any flame producing devices
    - Static electricity
    - Smoking
- 8) This document is provided to ensure all UMA safety plans, policies and procedures are communicated to all participating contractors as well as an avenue for contractors to communicate their safety plans, policies & procedures to UMA.
- 9) This program aims to prevent personal injuries and illnesses.

## **ADMINISTRATIVE DUTIES**

- 1) Environmental, Health & Safety Manager is responsible for developing and maintaining the program.
- 2) A copy of the plan may be reviewed by employees and is available on the department floor computers.
- 3) Additionally, the Environmental, Health & Safety Manager is also responsible for maintaining any records related to the contractor safety program.
- 4) If after reading this program, you find that improvements can be made, please contact EHS Manager.
  - a) We encourage all suggestions because we are committed to the success of our contractor safety program.
  - b) We strive for clear understanding, safe behavior, and involvement from every level of our company.

# **CONTRACTOR SAFETY ORIENTATION**

## **EXPLANATION OF RESPONSIBILITIES**

### **1) *Company Responsibilities***

- a) UMA has specific safety responsibilities when hiring contractors to come onto the worksite, onto the grounds, or into the buildings or facilities to perform work.
- b) Company responsibilities when hiring contractors include the following listed steps. UMA will:
  - Take steps to protect contract workers who perform work on or near a potentially hazardous process/es.
  - Obtain and evaluate information regarding the contract employer's safety performance and programs.
  - Inform the contractor of known potential fire, explosion, or toxic release hazards related to the contractor's work and the process
  - Explain the applicable provisions of the emergency action plan to the contractor, and require that the contractor disperse that information to all workers who will work at this site.
  - Develop and implement safe work practice procedures to control contract employee entry into hazardous work areas.
  - Maintain a contract employee injury and illness log.
  - Periodically evaluate the contract employer's fulfillment of his or her responsibilities under this policy.
  - Hire and use only contractors who meet Contractor Selection Criteria as listed in the next section of this policy
  - Hire contractors who fulfill the minimum liability and Workers Compensation (if required) Insurance requirements.

### **2) *Contractor Responsibilities***

- a) Contract employees must perform their work safely. Considering that contractors often perform very specialized and potentially hazardous tasks, such as confined space entry activities and non-routine repair activities, their work must be controlled.
- b) Contractor responsibilities when accepting contracts with UMA include the following listed steps  
The contract employer will:
  - Assure that the contract employee is trained in the work practices necessary to safely perform their job.
  - Instruct the contract employee in the potential fire, explosion, or toxic release hazards related to their job and the process.
  - Assure that the contract employee knows the applicable provisions of the emergency action plan.
  - Document contract employee training.
  - Inform contract employees of and then enforce safety rules of the facility, particularly those implemented to control the hazards of the contracted process during operations.
  - Require that all subcontractors abide by the same rules to which the contractor is bound by this section.
  - Abide by the facility smoking rules. Smoking is prohibited except in the designated smoking area.
  - Abide by the facility smoking, tobacco and vaping rules. Tobacco use of any kind and vaping is prohibited inside the facility. Therefore, these activities are only permitted in the designated smoking area.

## **GUIDELINES FOR CONTRACTOR SAFETY**

- 1) The following listed steps are the standard procedures for evaluating and choosing contractors who will work on-site at UMA.
- 2) Obtain and evaluate information regarding a contractor employer's safety performance and programs when selecting a contractor to perform any type of contract work that might bring them into contact with any hazardous chemical or process on the premises of UMA.

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- 3) To determine that past safety performance, the group or individual selecting the contractor should consider the contractor's:
  - a) Employee injury records such as Experience Modification Rate (EMR or MOD) for workers' compensation for the past three years and the contractor's past safety record in performing jobs of a similar nature.
  - b) OSHA log, which includes the injury and illness rates (number of lost-time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) and incidence rates for lost-time accidents and recordables for the past three years.
  - c) Written safety program and training system.
- 4) For contractors whose safety performance on the job is not known, obtain information on injury and illness rates and experience and obtain contractor references.
- 5) Contractor work methods and experience should be evaluated. Ensure that for the job in question the contractor and its employees have the appropriate:
  - a) Job skills.
  - b) Equipment.
  - c) Knowledge, experience, and expertise.
  - d) Any permits, licenses, certifications, or skilled tradespeople necessary to be capable of performing the work in question.
- 6) The contractor must be willing and able to provide a current certificate of insurance for workers' compensation and general liability coverage with UMA.
- 7) Each contractor must be responsible for ensuring that its employees comply with all applicable local, state, and federal safety requirements, as well as with any safety rules and regulations set forth by UMA.
- 8) Possible ways to determine past compliance with such safety regulations include:
  - a) Requesting copies of any citations for violations occurring within the last three years, to determine the frequency and type of safety laws violated.
  - b) Having all bidders on jobs describe in detail in writing any safety programs in place at the contractor, infractions, accidents, and workers' compensation claims within the last three years.
  - c) This information will provide UMA with a solid background on that contractor's safety performance and adherence to safety rules and regulations.

### **GUIDELINES FOR INFORMATION EXCHANGE**

- 1) ***UMA Guidelines for Information Exchange***
  - a) Before contract work begins, UMA must:
    - Designate a representative to coordinate and communicate all safety and health issues and communicate with the contractor.
    - The designated representative will have a copy of the work document, be thoroughly familiar with its contents, and with the safety and health aspects of the work, or know who to call to obtain this information
    - The designated representative is responsible for ensuring that all company responsibilities listed below are carried out.
  - b) Provide a copy of UMA's written safety policies and procedures to the contractor if requested.

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- c) Inform the contractor of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be given the telephone numbers of the nearest hospital, ambulance service, and fire department.
  - Wayne UNC Health
    - Main.....(919)-736-1110
  - Fire Department
    - Emergency.....911
    - Non-Emergency.....(919)-580-4256
  - Ambulance.....911
  - Police.....(919)-705-6572
- d) Conduct an inspection of the proposed worksite area before the prestart-up meeting so any known information about on-site hazards, particularly nonobvious hazards, are documented and thoroughly communicated to the contractor.
- e) Work directly with the contractor's designated representative, with whom all contacts should be made.
- f) Conduct a pre-start up meeting (walk through) with the contractor's designated representative and a supervisor from each of the areas of the plant involved in the contractor's work.
- g) Review all contract requirements related to safety and health with the contractor's designated representative, including, but not limited to, roles and procedures, personal protective equipment (PPE), and special work permits or specialized work procedures.
  - Advise the contractor that the facility safety and health policies must be followed.
  - A copy of the facility's safety plans may be furnished to the contractor.
  - In an effort to ensure contractors adhere to PPE requirements we may inspect all contractor's PPE to validate serviceability.
  - UMA shall inspect all hard hats used and apply an approved sticker to all hard hats that shall be used in the area for fall protection.
- h) Inform contractor's designated representative of the required response to employee alarms and furnish the contractor with a demonstration or explanation of the alarms.
- i) Communicate thoroughly with the contractor's designated representative any safety and health hazards (particularly non-obvious hazards and hazard communication issues) known to be associated with the work, including those in areas adjacent to the worksite.  
(particularly nonobvious hazards and hazard communication issues) known to be associated with the work,
  - Tell them it is the contractor's responsibility to convey this information to its employees.
- j) Review preparation of worksite before contractor begins initial work.
- k) Identify connect-points for all services, such as steam, gas, water, electricity, etc. Define any limitations of use of such services.
- l) Ensure that all affected employees at UMA receive training on all hazards to which they will be introduced by a contractor.
- m) During the Contractors Orientation, we will provide appropriate information concerning hazards of the areas that they will be subject to.
  - UMA will provide this in one of two ways:
    - By briefing all employees of the contractor or by providing the information to the contractors' foreman, president, owner, etc and they will convey the information to their employees and documents this in the same manner in which it is documented for the foreman, etc.b

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## **DURING THE CONTRACT WORK, UMA MUST:**

- 1) Limit, as necessary, the entry of UMA employees into contractor work areas.
- 2) Monitor the contractor's compliance with the contract throughout the duration of the work.
  - a) When checking contractor work during the project, note any negligent or unlawful act or condition in violation of safety standard or requirements.
  - b) Any items noted should be brought immediately to the attention of the contractor's designated representative in writing, with a copy of the notice being sent to the contractor's home office concurrently.
  - c) However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the contractor's designated representative, or in his/her absence, the contractor's employees to stop the unsafe act or condition.
  - d) Do NOT allow work that is in violation of a regulation to continue.
- 3) Document all discussions, including place, time, and names of contractor employees in attendance.
- 4) Approve the contractor beginning work each day, unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
- 5) For work for which UMA has developed specific and generally applicable procedures, make sure contractors and their subcontractors follow the same procedures.
- 6) Do not allow loaning of tools and equipment to outside contractors and their subcontractors.
  - a) The contractor is required to provide the necessary tools and equipment.
  - b) Some exceptions may apply and must be approved through the EHS Manager.
- 7) Contact the nearest medical facilities, when available, in emergency situations where severity of the injury dictates immediate attention.
- 8) Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor to investigate and report to the facility manager all personal injuries to the contractor / subcontractor employees.
- 9) Investigate and report any property losses.
  - a) Maintain a contractor accident report file.

## **CONTRACTOR GUIDELINES FOR INFORMATION EXCHANGE**

- 1) Before the contract work begins, the contractor must:
  - a) Designate a representative to coordinate all safety and health issues and communicate with UMA's designated representative.
  - b) Provide documentation of any necessary safety training, as described in the Training Requirements section of this policy, to UMA's designated representative.
  - c) Sign a confidentiality statement to protect UMA's proprietary data.
  - d) Foreman or responsible person sign the environmental briefing checklist acknowledging agreement for environmental protection.
  - e) Provide information to the designated representative on the safety and health hazards that may arise during the course of the contractor's work at UMA and the means necessary to avoid danger from those hazards, including Hazard Communication and all other potential hazards.
  - f) Obtain from UMA any safety rules and regulations in effect at the site or potential hazards present that may affect the contractor's work.
  - g) Be certain to be informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working.
    - The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service, and fire department.

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- h) Advise and train its employees on hazards associated with the work to be performed, including any Hazard Communication or other hazard information provided the contractor by UMA's designated representative.
  - i) Keep the designated representative of UMA fully informed of any work which may affect the safety of UMA's employees or property.
    - This includes complying with the state and federal right-to-know legislation and providing the designated representative appropriate safety data sheets (SDSs) or other required information about chemicals the contractor will bring onto the site.
  - j) Know who to call and what to do in emergencies, including where first-aid and medical services are located and train employees on this.
- 2) All contractors, sub-contractors and their employees will complete the safety training.
- a) Every time a contractor or designated representative will sign in the visitors log at the reception desk; receive a contractor's or visitor's badge prior to the start of work.
- 3) During the contract work, the contractor will:
- a) Have a designated site safety coordinator present and attentive to the work being carried out at all times that the contractors and/or subcontractors are working at the facility site.
  - b) Ensure that all subcontractors are abiding by the terms of this plan.
  - c) Perform its work while the plant is operating, if necessary, and establish necessary safe practices to permit work under operating conditions without endangering UMA's associates and property.
    - This includes but is not limited to: barricading, sign-posting, and fire watches.
  - d) Make sure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meet all OSHA requirements.
  - e) Be held responsible and accountable for any losses or damages suffered by UMA and/or its employees as a result of contractor negligence.
  - f) Provide its employees with medical care and first-aid treatment. Plant first-aid facilities may be used only in case of emergencies.
  - g) Use only the plant or building entrance designated, and follow the facility access control practice.
    - The contractor will also ensure that each contractor employee is issued and wears some form of easily seen identification.
  - h) Provide supervisors and employees who are competent and adequately trained, including training in all health and safety aspects of the work involved in the contract.
  - i) Provide all tools and equipment for the work, including PPE, and ensure the equipment is in proper working order and employees are instructed in its proper use.
  - j) Maintain good housekeeping in the workplace.
  - k) Follow specific instructions supplied by UMA should emergency alarms be activated.
  - l) Notify the designated representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on the site of UMA. Provide a copy of each accident report to the designated representative.
  - m) Receive and use a copy of the facility's written safety policies and procedures.
  - n) After conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials in a proper and legal manner.

# **CONTRACTOR SAFETY ORIENTATION**

## **TRAINING REQUIREMENTS**

### **1) *UMA Requirements***

- a) Uchiyama MFG America LLC makes sure that affected company employees receive training on all hazards to which they will be introduced by a contractor.
- b) In addition, we emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by UMA to the contractor.

### **2) *Contractor Requirements***

- a) Train all workers on all safety and health hazards and provisions applicable to the type of work being done, and provide documentation of such training to UMA's designated representative.
- b) Train employees on where to obtain first-aid and medical services.
- c) Ensure Lockout/Tag out procedures for both Authorized and Affected personnel

## **RECORDKEEPING REQUIREMENTS**

### ***UMA Requirements***

- 1) The designated representative will:
  - a) Fill out the New Projects Checklist CL03-007 prior to start of any project.
  - b) Have a copy of the contract on file and be thoroughly familiar with its contents, and with the safety and health aspects of the work.
  - c) Keep records of all training done with company workers regarding hazards to be caused by the contracting company.
  - d) Keep copies on file of all forms or statements related to the contract that are required by UMA to be filled out before or during contract work.
  - e) Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.
  - f) Keep records of all documentation of any sort given to you by the contractor, including records of training done, SDSs, accident reports, etc.
  - g) Keep records of all documentation of any sort you give to the contractor, including list of hazards to train their employees on, SDSs, etc.
  - h) Document all discussions, letters, memos, or other communications made to the contractor regarding safety issues, including place, time, and names of people involved.

### ***Contractor Requirements***

- 2) The contractor will:
  - a) Keep records of all training done with contract workers and all documentation provided to the contracting company regarding such training.
  - b) Keep copies on file of all forms or statements related to the contract that are required by UMA to be filled out before or during contract work.
  - c) Have on file the telephone numbers of the nearest hospital, ambulance service, and fire department.
  - d) Have copies on-site of all safety data sheets (SDSs) or other required information about chemicals relevant to the work on-site.
  - e) Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.

## **ADDITIONAL INFORMATION**

- 1) After reading this, and if, anyone has questions or suggestions, please contact the Environmental, Health & Safety Manager or the Human Resource Manager.