

**Olin Winchester
Environmental, Health & Safety
Policy Procedure**

WIN-EHS-14

**CONTRACTOR ENVIRONMENTAL,
HEALTH & SAFETY REQUIREMENTS FOR
WORK ON OLIN PROPERTY**

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SECTION 1. PURPOSE

1.1 It is the mission of Olin Winchester to conduct operations in such a manner as to protect the health, safety & welfare of its employees, the community in which we do business and our shared environment. This includes the selection and use of responsible Contractors who understand and abide by Olin environmental, health & safety (EHS) requirements at all times while performing Work on Olin premises.

1.2 The requirements herein are mandatory and failure to comply will subject Contractors and Subcontractors to responsive action by Olin up to and including withholding of the opportunity to perform future services for Olin.

1.3 Contractors performing Incidental Services or non-EHS Sensitive Work on Olin premises are not subject to the mandatory requirements presented in this policy/procedure, however they are expected to comply with applicable federal, state and local environmental, health and safety laws and regulations as well as Olin Work Rules and Safety requirements (see Appendix G of this policy/procedure).

SECTION 2. APPLICABILITY

2.1 This policy/procedure applies to Contractors and their Subcontractors who perform EHS Sensitive Work and/or Incidental Services on Olin premises.

SECTION 3. REFERENCES

3.1 The following materials are associated with the information provided in this document and should be consulted for further information.

Olin Winchester Contractor EHS Sensitive Work Orientation Course

SECTION 4. DEFINITIONS

4.1 Contractor - non-Olin personnel who perform Work on Olin property.

4.2 Controlled Substance - for purposes of this policy, a Controlled Substance includes any drug or chemical substance, including alcohol, the purchase of which is controlled under federal or state laws. Included are drugs which are legally obtainable but have been obtained illegally as well as drugs which are not legally obtainable.

4.3 EHS Sensitive Work - job activities of a size, duration or type which have a reasonable potential to adversely impact Olin or Contractor personnel health or safety or to impact the environment in a significant manner. Determination as to whether a particular job is to be considered EHS Sensitive Work is made by the Olin Project Manager using guidelines provided in Appendix A of this policy/procedure. Incidental Services are not considered EHS Sensitive Work for purposes of this policy/procedure.

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4.4 Emergency Work - Work of an unplanned nature for which delay in performance due to the unavailability of a Pre-approved Contractor would create undue hardship upon Olin in the form of significant production loss or immediate endangerment to human health or the environment.

4.5 Experience Modification Rate (EMR) - is a procedure developed by the National Council on Compensation Insurance (NCCI), a national rating organization, utilizing past insurance experience of the individual policyholder to forecast or predict future losses. Experience rating compares the experience of individual employers with the average employer in the same classification (i.e. type of business). The differences between these employers are reflected in an experience modification factor. Each year, NCCI evaluates payroll and accident experience for three previous completed years and calculates a modification factor for each qualified firm. The average factor is expressed as 1.00. A firm with a factor of less than 1.00 will pay less premium while a firm with a factor greater than 1.00 will pay more premiums.

4.6 Engineering Services – activity of a purely professional consultation or advisory nature. Contractors whose employees perform only Engineering Services on Olin premises are not required to be on the Olin Approved EHS Sensitive Work Contractor (Pre-approved Contractor) list but are otherwise subject to all other requirements of this policy/procedure when performing EHS Sensitive Work.

4.7 Hot Work - Work involving flame, spark producing or other heat sources such as welding, cutting, brazing, etc. Grinding, drilling, scrapping, etc. may be considered Hot Work if:

4.7.1 conditions exist that could reasonably be expected to start a fire;

4.7.2 in the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dusts with air); or,

4.7.3 in the vicinity of explosives, powder or initiating compounds.

4.8 Incidental Services - activities that do not present material hazards to Olin such as janitorial Work (other than involving asbestos containing materials), food and drink services, laundry, delivery, other supply services, or Environmental Services.

4.9 Olin Approved EHS Sensitive Work Contractor (Pre-approved Contractor) - a Contractor who has been evaluated and deemed capable of performing EHS Sensitive Work on Olin property.

4.10 Olin Contractor EHS Sensitive Work Orientation - materials consisting of a site specific DVD, on-line internet course, or on-site training at an Olin designation learning center. Materials are intended to facilitate the contractor/subcontractor with appropriate Olin workplace rules and policies/procedures to be followed when working on Olin premises.

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4.11 Olin Project Manager - an Olin employee designated as the primary contact for the Contractor. Usually this is the original requester of the Contractor's services.

4.12 Olin Work Permits - permits issued by appropriate Olin personnel which authorize the performance of Work such as confined space entry or Hot Work activities.

4.13 Pre-Work EHS Review - A review of the environmental, health & safety aspects of the job prior to the start of Work. Conducted by the Olin Project Manager, and, if deemed necessary by the Olin Project Manager, attended by the Contractor, Subcontractor(s), Olin environmental, safety and/or plant protection representatives.

4.14 Routine and Repetitive Work - Work performed by the same Contractor or Subcontractor over a period of time, in the same area and manner, and for which the potential hazards are readily apparent and easily conveyed.

4.15 Subcontractor - non-Olin personnel under the direct control of Contractors who perform Work on Olin owned property.

4.16 Work - performance of maintenance, repair, turnaround, major renovation, replacement, new construction, demolition or specialty work on Olin equipment, machinery or structures.

SECTION 5. RESPONSIBILITIES

5.1 Contractors will:

5.1.1 Comply with all applicable Olin environmental, health, safety and plant protection policies & procedures at all times.

5.1.2 Immediately advise the Olin Project Manager of any incident that causes or has the potential to cause injury or damage to Olin employees, property, or the environment.

5.1.3 Immediately report to the Olin Project Manager any accident or Work related illness occurring to Contractor or Subcontractor employees regardless of severity.

5.1.4 Cooperate fully with the Olin Project Manager and others in the investigation and correction of any incident or accident to Olin, Contractor or Subcontractor employees or property.

5.1.5 Furnish own safety and personnel protective equipment, as prescribed by local, state and federal regulations.

5.1.6 If contracted to perform EHS Sensitive Work, have all employees who will enter Olin property successfully complete the Olin Contractor EHS Sensitive Work Orientation course and receive a badge

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to gain entry to Olin premises. This orientation shall be renewed every 36 months by all contractor/subcontractor employees enter Olin premises.

5.1.7 Ensure that all subcontractors and subcontractor employees are aware of the requirements of this policy/procedure including the need for subcontractors to have their employees complete the Olin Contractor EHS Sensitive Work Orientation course.

5.1.8 Monitor the Work of Subcontractors to ensure that Olin policies and procedures are being followed. Document all violations and correct immediately.

5.1.9 Conduct training, medical testing and record keeping for Contractor’s employees as prescribed by OSHA or EPA regulations as applicable to the Work being performed. Ensure that Subcontractors are in compliance with OSHA required training, medical testing and record keeping requirements.

5.2 Olin Project Manager will:

5.2.1 Act as a liaison between Olin and the Contractor and/or Subcontractor(s).

5.2.2 Determine whether a job constitutes EHS Sensitive Work using guidelines provided in Appendix A of this policy/procedure.

5.2.3 Initiate a Pre-Work EHS Review with appropriate Contractor, Subcontractor(s), production, and Olin environmental, health, safety and plant protection representatives as necessary. During this review, inform the Contract of the known potential fire, explosion, or toxic release hazards related to the Contractor's Work and the process. Explain applicable provisions of Olin’s emergency action plans. Discuss control of the entrance, presence and exit of Contractor and Subcontractor employers to the plant and Work areas. Request that the Contractor advise Olin of any unique hazards presented by the Contractor or Subcontractor’s Work, or of any hazards found by the Contractor or Subcontractor during Work.

5.2.4 Assist Contractor in obtaining the necessary Olin Work Permits applicable to the tasks being performed.

5.2.5 Conduct periodic safety checks and reviews of Contractors performing EHS Sensitive Work to ensure that proper Work practices are being followed and deficiencies corrected immediately.

5.2.6 Only use Contractors on the Olin Approved Contractor list to perform EHS Sensitive Work. For Emergency Work, Contractors not on the Olin Approved Contractor list may be used as long as all of the conditions described in Section 8. of this policy/procedure are met.

5.3 Olin Environmental, Health and Safety (EHS) will:

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5.3.1 Provide potential Contractors with notification of requirements necessary to be approved to perform Work on Olin premises.

5.3.2 Notify all approved Contractors of the need for all employees who will be entering Olin premises of the need to complete the Olin Contractor EHS Sensitive Work Orientation course prior to entry and on a 36 month renewal.

5.3.3 Collect and maintain a file of completed Olin Contractor EHS Sensitive Work Pre-qualification Questionnaires.

5.3.4 Evaluate and approve Contractors for performance of EHS Sensitive Work. Post to the Olin Vision Zero website the names of approved EHS Sensitive Work Contractors.

5.3.5 Administer renewal and updating of Olin Contractor EHS Sensitive Work Pre-qualification questionnaires on a 5-year cycle.

5.3.6 Develop, distribute, revise, update and otherwise administer this policy/procedure.

5.3.7 Develop, produce and keep current Olin EHS Contractor Orientation materials.

5.3.8 Provide assistance and guidance as needed and requested by the Olin Project Manager in interpretation and application of rules, regulations and Olin policy and procedures.

5.3.9 Investigate reported safety related incidents and maintain a record of Contractor and Subcontractor incidents including injury details and corrective measures taken to prevent recurrence.

SECTION 6. PRE-WORK JOB EVALUATION & PLANNING

6.1 Contractors may only perform EHS Sensitive Work for which they are pre-approved and have signed documentation on file. See Section 8. for Emergency Work exception.

6.2 All questions not answered in the affirmative must be accompanied by an explanation. Olin will evaluate the completed questionnaires to determine if the Contractor is approved to perform EHS Sensitive Work on Olin premises. Additional information may be requested from the Contractor to substantiate, clarify or expand on any information provided.

6.3 Upon completing successful evaluation, Contractors will be placed on the list of Olin Approved EHS Sensitive Work Contractors. Pre-approved Contractors will receive re-evaluation at least every 5 years and more frequently if deemed necessary by Olin based on Contractor performance.

6.4 Prior to allowing EHS Sensitive Work to be performed, the Olin Project Manager will conduct a Pre-Work EHS Review of the Work to be performed. If deemed necessary by the Olin Project Manager,

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meetings with the Contractor, Subcontractor(s) and Olin environmental, health, safety and/or plant protection representatives may be held to complete the Pre-Work EHS Review.

6.5 Written documentation of Pre-Work EHS Reviews using a Pre-Work EHS Review Checklist (Appendix C) is optional for Emergency Work and mandatory for all other EHS Sensitive Work.

6.6 The Olin Project Manager will retain original of the completed checklist on file until completion of Contractor Work on the project. For Routine and Repetitive Work, a copy of the completed checklist shall be retained for one year.

SECTION 7. ROUTINE & REPETITIVE WORK

7.1 For Routine and Repetitive Work, the Olin Project Manager may choose to perform an annual Pre-Work EHS Review. Should a hazard be introduced for which the Contractor has not been informed or a new Contractor be used to perform the Work, a new Pre-Work EHS Review must be completed.

7.2 At the discretion of department supervision, generic Pre-Work EHS Review Checklists may be used to convey hazards in a particular Work area for Routine and Repetitive Work. Generic Pre-Work EHS Review Checklists must be periodically reviewed to ensure changes in potential hazards are adequately conveyed.

SECTION 8. EMERGENCY WORK

8.1 For Emergency Work, the Olin Project Manager may use a Contractor not on the list of Olin Approved EHS Sensitive Work Contractors provided the following conditions are met.

8.1.1 The Olin Project Manager obtains a completed and signed Olin Contractor EHS Sensitive Work Pre-qualification Questionnaire (Appendix B) from the Contractor. A copy of the completed questionnaire must be sent to EHS for filing and update of the list of Olin Approved EHS Sensitive Work Contractors.

8.1.2 The Olin Project Manager orally conveys the known hazards of the Work or conducts a Pre-Work EHS Review using the Pre-Work Review Checklist (Appendix C).

8.1.3 Contractor employees who will be performing EHS Sensitive Work on Olin premises must either complete the Olin Contractor EHS Sensitive Work Orientation course online, at a designated off-site center or in person by the Olin Project Manager before they can gain entry into the plant.

SECTION 9. ORIENTATION

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9.1 Each Pre-approved Contractor and subcontractor employee attempting entrance to Olin premises is required to have completed the Olin Contractor EHS Sensitive Work Orientation course within the prior 36 months to gain entry into the plant.

9.2 Instructions on how to obtain the orientation are provided in Appendix F of this policy/procedure.

9.3 Proof of successful completion of the Olin Contractor EHS Sensitive Work Orientation course will be registration in the Olin designated orientation provider database and issuance of a badge that signifies that the bearer has successfully completed the course. The badge will be date sensitive and a new badge will be required upon expiration.

9.4 All Contractor/Subcontractor costs associated with compliance with the Olin Contractor EHS Sensitive Work Orientation course is the responsibility of the Contractor/Subcontractor.

SECTION 10. SUBSTANCE ABUSE PROGRAM

10.1 Olin believes any involvement with the unlawful use of Controlled Substances by Contractor or Subcontractor employees to be a serious safety concern for Olin and its employees. For this reason, it is the policy of Olin to expect Contractors and Subcontractors who perform EHS Sensitive Work on Olin premises to have developed and provided to Olin written certification of a company Controlled Substance abuse program.

10.2 Elements of the Contractor's Controlled Substance Abuse program should be essentially equivalent to the programs used by Contractors of the same type and size performing Work in the local area.

10.3 The following components, at a minimum, are expected to be included in a Contractor/Subcontractor Controlled Substance Abuse program.

10.2.1 Pre-employment drug testing designed and implemented to prevent the hiring of anyone with prohibitive levels of a Controlled Substance in their system.

10.2.2 Random drug testing of employees.

10.2.3 For-cause drug testing when a reasonable belief exists that an individual is using or has recently abused any Controlled Substances based on observed physical, behavioral or performance indicators.

10.2.4 Immediate removal from the Work site of any individual who exhibits unsatisfactory job behavior or performance which is believed to be caused from abuse of a Controlled Substance including prescription medication.

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10.2.5 Employee assistance program to provide educational information concerning the effects and consequences of drug use on personal health, safety and Work environment.

10.2.6 Rehabilitation testing of any employee after return to Work with a positive test during a rehabilitation testing period permanently disqualifying the employee from performing Work.

10.3 Olin reserves the right to, without prior announcement and at any time, carry out searches and inspections of Contractor and Subcontractor employee's personal effects when entering Olin premises, at the Work site and upon leaving Olin premises for purposes of ensuring compliance with this policy/procedure.

SECTION 11. ACCIDENT/INCIDENT INVESTIGATION

11.1 The Contractor must immediately advise the Olin Project Manager of:

11.1.1 Any incident that causes or has the potential to cause injury or damage to Olin employees or property.

11.1.2 Any accident or Work related illness to Contractor or Subcontractor employees Working on Olin premises regardless of severity.

11.2 The Contractor must cooperate fully with the Olin Project Manager and others in the investigation and correction of any incident or accident to Olin, Contractor or Subcontractor employees or property.

11.3 The Olin Project Manager will notify EHS who will maintain a record of Contractor and Subcontractor incidents including injury details and corrective measures taken to prevent recurrence.

SECTION 12. OLIN WORK PERMITS

12.1 It is the policy of Olin to require Olin Work Permits for Contractor and Subcontractor Work which involves activities such as confined space entry and Hot Work.

12.2 When the need for an Olin Work Permit has been identified, the Contractor or Subcontractor will notify the Olin Project Manager who will assist the Contractor in preparing the necessary request for a permit in conformance with the appropriate Olin policy/procedure.

SECTION 13. WORK IN PROCESS SAFETY CHECKS

13.1 The Olin Project Manager will conduct random, periodic walk around safety checks of the Work site to ensure that this policy & procedure is being complied with as well as obvious regulatory requirements and standards applicable to Work performance.

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13.2 Safety checks of EHS Sensitive Work shall be conducted at a frequency commensurate with the complexity of the Work being performed.

13.3 Findings and corrective action may be documented using the Olin Project Manager’s Contractor Safety Check Card as shown in Appendix D of this policy/procedure.

SECTION 14. SUBCONTRACTORS

14.1 The Contractor will ensure that its Subcontractors comply with all of the requirements imposed on the Contractor pursuant to this policy/procedure.

SECTION 15. AUDIT OF CONTRACTORS

15.1 Olin reserves the right to conduct random periodic audits of Olin Approved EHS Sensitive Work Contractors.

15.2 The purpose of these audits is to affirm Contractors have met all conditions for approval as stipulated in this policy/procedure and certified to in the Olin Contractor EHS Sensitive Work Pre-qualification Questionnaire.

15.3 At a minimum the audit will cover the following items listed below. If the Contractor is found deficient in any area Olin will decide whether the Contractor may remain on the approved list until deficiencies are corrected to Olin’s satisfaction or whether the Contractor will immediately be suspended from doing additional Work on Olin premises until deficiencies are corrected to Olin’s satisfaction.

15.3.1 General discussion with Contractor management as to why Olin is conducting the audit. A deficiency is when any of the following exist:

15.3.1.1 Refusal by the Contractor to cooperate or allow Olin to conduct an audit.

15.3.1.2 Absence of a completed and signed Olin Contractor EHS Sensitive Work Pre-Qualification Questionnaire on file.

15.3.2 Review of the Contractor’s EMR and injury history for an indication of the severity and frequency of injuries.

15.3.2.1 A deficiency is considered to be an abnormal number of injuries for the type of Work performed (e.g. EMR > 2.0) or if the severity of injuries is not consistent with industry standards based on the size of Contractor and type of Work performed.

15.3.3 Review of the Contractor’s written safety program. A deficiency is when any of the following exist:

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15.3.3.1 Absence of a written safety program or if the written safety program is considered inadequate for the size of Contractor and type of Work performed.

15.3.3.2 Failure to conduct periodic safety checks while Work is being performed.

15.3.3.3 Absence of a new hire orientation program or failure to provide adequate procedures and/or instructions in the subject area for which the Contractor has requested Olin approval.

15.3.4 Review of the Contractor's training records of employees assigned to Work at Olin with particular emphasis on compliance with training associated with the type of Work conducted on Olin premises.

15.3.4.1 A deficiency is considered to be when the Contractor has no or cannot produce written documentation of training, or if training documentation shows training is not conducted within OSHA required frequency

15.3.5 Review of Contractor's Controlled Substance Abuse program.

15.3.5.1 A deficiency is when the Contractor does not have documentation that it has implemented a Controlled Substance Abuse program which meets the minimum requirements as specified in this policy/procedure nor can a reasonable explanation be provided as to why a program is not needed

15.4 Review Contractor EHS performance with Olin Project Managers who have used the services of the Contractor during the audit period under review. A deficiency is feedback from the Olin Project Manager that Contractor does not consistently follow Olin, OSHA or EPA rules; is unresponsive or untimely in correcting deficiencies when brought to the Contractor's attention; or does not enforce Olin EHS Sensitive Work requirements upon Subcontractors.

15.5 Following a Contractor audit, a written summary of audit findings will be placed on file which includes recommended action by the Contractor to resolve deficiencies and whether Contractor may remain on the Olin approved list pending resolution of deficiencies.

SECTION 16. LEAD CONTAINING MATERIALS

16.1 Contractors performing actions involving the building, renovating, or tearing down of structures, substrates, or portions thereof including, but not limited to salvage, removal, encapsulation, installation, repair, scraping, sanding, heating, cleaning, abrasive blasting, welding, cutting, and burning operations where lead or materials containing lead in any amount are present must follow the requirements of 29 CFR 1926.62.

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16.2 The Olin Project Manager will complete the Olin Project Manager Pre-Startup Checklist for Construction or Demolition Activities Involving Lead-containing Material (Appendix H) and send a copy to EHS prior to any such activity involving lead-containing material by a Contractor.

SECTION 17. ASBESTOS CONTAINING MATERIALS

17.1 All Work involving any material containing more than 1 percent asbestos by weight must be coordinated through an Olin ACM Certified Supervisor who will ensure the Contractor is qualified to perform asbestos abatement.

17.2 Contractors are required to follow all regulations and OSHA & EPA approved work practices when performing any activities involving asbestos or asbestos containing materials (ACM). Work practices include, but are not limited to the following.

17.2.1 Make appropriate notifications to government agencies regarding ACM work to be performed on Olin property. Provide annual notifications for unscheduled work performed at Olin by the Contractor.

17.3.2 Prepare a compliance plan, perform a hazard assessment, and conduct training, employee exposure monitoring, medical surveillance, proper work practices, and recordkeeping as required by OSHA and EPA regulations.

17.3.3 Ensure all Contractor and Subcontractor employees performing asbestos abatement work under contract to Olin have received appropriate training as required by OSHA and EPA regulations.

17.3.4 Conduct employee monitoring for asbestos work performed by the Contractor. Olin reserves the right to monitor employee exposure during any job performed on Olin property.

17.4 Contractors performing renovation and demolition involving Regulated Asbestos Containing Material (RACM) including friable asbestos material, Category I ACM that has become friable, Category I ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or Category II ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by forces expected to act on the material in the course of demolition or renovation activities must comply with the requirements of 40 CFR Part 61, Subpart M – National Emission Standard for Asbestos.

17.5 Within 10 days of completion of Class I or II Asbestos Work by an Olin Contractor, the Contractor shall inform the Olin ACM Certified Supervisor assigned to the project of the location and quantity of ACM and/or PACM remaining in the area as well as the final monitoring results taken in that operation.

SECTION 18. EXCAVATION AND TRENCHING

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18.1 Contractors performing excavation or trenching on Olin property are expected to fully comply with OSHA standard 29 CFR 1926.650 including use of a Contractor supplied competent person.

18.2 Prior to opening an excavation, the Olin Project Manager will estimate and advise the Contractor of the location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installations that could reasonably be expected to be encountered during excavation work.

18.3 Where oxygen deficiency (atmospheres containing less than 19.5% oxygen) or a hazardous atmosphere exists or could reasonably be expected to exist, the atmosphere in the excavation shall be tested before personnel enter an excavation greater than 4 feet deep. Test results shall be confirmed with the Olin Project Manager prior to anyone entering the excavation.

18.4 When employee exposure to the excavation can reasonably be expected, daily inspections of excavations and surroundings shall be made by a competent person as defined by regulation. An inspection shall be made prior to the start of work and as needed throughout the shift.

18.5 Where the competent person finds evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, exposed employees shall be removed from the hazardous area until the necessary precautions have been taken to ensure their safety. The Olin Project Manager must be notified when such situations have been encountered.

SECTION 19. HOT WORK

19.1 Hot Work shall be permitted only in areas that are or have been made fire safe. If the object on which Hot Work is to be performed cannot readily be moved, all movable fire hazards in the vicinity shall be taken to a safe place. If the object upon which Hot Work is to be performed cannot be moved and if all fire hazards cannot be removed then fire-resistant shields or guards shall be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards. If these requirements cannot be followed then Hot Work shall not be performed.

19.2 Whenever there are floor openings or cracks in the flooring that cannot be closed, precautions shall be taken so that no readily combustible materials on the floor below will be exposed to sparks which might drop through the floor. The same precautions shall be observed with regard to cracks or holes in walls, open doorways and open or broken windows.

19.3 Ducts and conveyor systems that might carry sparks or fire from the Hot Work area to distant combustibles shall be suitably protected or shut down.

19.4 When combustible materials such as paper clippings, wood shavings, or textile fibers are on the floor, the floor shall be swept clean for a radius of 35 feet. Combustible floors shall be kept wet, covered

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with damp sand, or protected by fire-resistant shields. Where floors have been wet down, personnel performing Hot Work shall be protected from possible shock hazards.

19.5 If Hot Work is to be done on a metal wall, partition, ceiling or roof, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation, preferably by relocating combustibles. Where combustibles are not relocated, a fire watch on the opposite side from the Work shall be provided.

19.6 Material, equipment, machinery and structures upon which Hot Work will be performed shall be cleaned or otherwise decontaminated to remove residual traces of explosives, powder, oil or flammable liquids. Lines, trenches and tanks shall be evacuated and purged as necessary to remove the risk of explosion or fire from residual or confined gases.

19.7 Hot Work in the vicinity of explosives, powder or initiating compounds must be reviewed and approved by the Olin Project Manager and the Olin Safety Department prior to the initiation of any Hot Work by Contractors and/or Subcontractors.

19.8 A sufficient number of fire extinguishers of the proper type shall be readily available at the Hot Work location.

19.9 For Hot Work that may involve the risk of major fire such as building roofs and structures, the Olin Plant Protection Department shall be contacted for advice as to how to obtain appropriate fire equipment and trained personnel on standby at the Hot Work site as appropriate.

19.10 Hot Work shall be prohibited in the following situations.

19.10.1 In areas not authorized by Olin.

19.10.2 In sprinkled buildings while such protection is impaired unless continuous standby fire response personnel and equipment are present and approved by the Olin Plant Protection and Safety Departments.

19.10.3 In the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dusts with air) or explosive atmospheres that may develop inside unclean or improperly prepared tanks or equipment which have previously contained such materials, or that may develop in areas with an accumulation of combustible dusts.

19.10.4 In areas near the storage of large quantities of exposed, readily ignitable materials such as bulk cardboard, baled paper, or wood pallets.

19.10.5 On a metal partition, wall ceiling, or roof having a combustible covering or on walls or partitions of combustible sandwich-type panel construction.

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19.10.6 On pipes or other metal in contact with combustible walls, partitions, ceilings or roofs if the Work is close enough to cause ignition by conduction.

19.11 Before Hot Work is permitted to proceed, the area shall be inspected by the Olin Project Manager or his designee and if the area is found to be safe for Hot Work to proceed and an appropriate Fire Hazard Authorization Permit as shown in Appendix I shall be completed and signed.

19.12 A Fire Hazard Authorization Permit is issued for the Hot Work to be performed in a designated area and does not specify or limit the number or type of employees performing the Work.

19.13 Fire Hazard Authorization Permits are valid for a work period no greater than a scheduled work shift such as 8, 10, or 12 hours. Only the Plant Protection or Safety Department may authorize multi-shift Fire Hazard Authorization Permits for special situations.

19.15 The Fire Hazard Authorization Permit should be given to the Olin Project Manager following completion of the Hot Work for which it was issued.

19.16 Fire Watches shall be required whenever Hot Work is performed on Olin property in locations where other than minor fire might develop, or when any of the following conditions exist:

19.16.1 Appreciable combustibles (e.g. large quantities of cardboard, wooden pallets, paper, etc.) are more than 35 feet away but are easily ignited by sparks.

19.16.2 Wall or floor openings are within a 35-foot radius expose combustible material in adjacent areas including concealed spaces in walls or floors.

19.16.3 Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs could possibly be ignited by conduction or radiation.

19.17 Fire watches shall have fire extinguishing equipment readily available and be trained in its use. They shall be familiar with procedures for sounding an alarm in the event of a fire. They shall watch for fires in all exposed areas, try to extinguish them only when obviously within the capacity of the equipment available, or otherwise sound the alarm.

19.18 While assigned as fire watch, personnel shall not be required to perform additional tasks which might interfere or otherwise restrict their ability to closely observe the area.

19.19 A fire watch shall be maintained for at least 30 minutes after completion of Hot Work unless authorized otherwise by the Olin Project Manager, Olin Plant Protection or Safety Department.

SECTION 20. CONFINED SPACE ENTRY

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20.2 Whenever Contractors or Subcontractors are required to enter an Olin Permitted Confined Space all are required to comply with Olin's Confined Space Entry procedures.

20.3 Olin personnel will act as Confined Space Entry Supervisors for Entry of Olin Permitted Confined Spaces by Contractors and Subcontractors.

20.4 Contractor supervision will be required to review and sign the Confined Space Entry Permit prior to Entry by any Contractor or Subcontractor personnel.

SECTION 21. CONTROL OF HAZARDOUS ENERGY STARTUP (LOCKOUT/TAGOUT)

21.1 Whenever Contractors and Subcontractors perform Servicing and/or Maintenance on Olin machinery or equipment subject to lockout/tagout, the Contractor's and Subcontractor employees are required to comply with OSHA standards and Olin's written machine specific procedures prepared for each machine, or similar types of machines, that is subject to lockout/tagout.

21.2 Olin machine specific lockout/tagout procedures, available from the Olin Project Manager include the following.

21.2.1 Identification of the machine/equipment.

21.2.2 A description of the hazardous energy sources, their location and the specific steps for shutting down, isolating, blocking and securing the machines or equipment to control hazardous energy sources.

21.2.3 Specific requirements for testing the machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices and other hazardous energy control measures.

21.2.4 A single set of machine specific procedures can cover any number of machines or equipment if they have the same hazardous energy control measures.

21.3 Contractors performing lockout and tagout are to use a lock and tag that is in compliance with OSHA requirements and compatible with Olin lockout devices and equipment.

SECTION 22 DECONTAMINATION OF ENERGETIC MATERIALS

22.1 Before service, repair, storage or disposal of equipment located or used in the manufacture of energetic materials including explosives, primer mix or propellant powder is permitted, all residue must be thoroughly removed from the equipment by decontamination.

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22.2 Contractors will not be permitted to work on any equipment exposed to energetic materials unless authorized by supervisor of the area and proper decontamination is followed.

22.3 Contractors will not enter any explosives operations for repair work without having authority from the production supervision prior to performing repairs, adjustments or to make modifications on any type of equipment.

22.4 A decontamination tag as shown in Appendix J is used to signify that decontamination of a piece of equipment or item with potential energetic material contamination has been successfully completed. Decontamination tags can be issued for the duration of the project provided energetic materials are not reintroduced prior to completion of the project.

22.5 Potential energetic material contaminated equipment requiring disassembly shall have connecting parts, plates, nuts, and bolts at point of contact, soaked in penetrating oil in addition to receiving decontamination.

22.6 Parts of potential energetic material contaminated equipment or items that are repaired on location must receive decontamination for the safety of the repairman and/or adjustor. The method and level of decontamination will be dependent on the extent of the repairs. The Olin supervisor of the area shall make the determination of the method and level of decontamination.

22.7 Instrument and electrical repair work on equipment in explosives departments may be performed on parts of the operating line not directly exposed to energetic materials without a decontamination tag, but prior to the start of repairs authorization must be obtained from the area general foreman at the location of repair.

22.8 Major installations or modification projects in departments where explosives operating lines are active will require the decontamination of designated work area. For example, half or part of department may be designated, or isolated for the installation or modification. In this instance, all equipment in the designated area will receive decontamination and the area will be marked or roped off and a decontamination tag will be attached to the equipment. The area will also be posted with decontamination tag(s) in the most conspicuous locations.

22.9 Welding, cutting or soldering will not be permitted in any explosives operation building unless authorized by the area foreman or his designee. Decontamination and a Hot Work permit must have been executed and approved by the area foreman or his designee prior to the work being conducted.

22.10 Spark producing grinders, drills and impact tools will not be permitted for use in repair work in explosive or propellant powder operations unless decontamination of potential energetic material contaminated equipment or items has been completed and a Hot Work permit has been executed and authorized by the area foreman.

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22.11 Upon completion of the servicing, repair, storage or disposal, the decontamination tag should be returned to the Olin Project Manager or area supervision.

SECTION 23 HAZARD COMMUNICATION (HAZCOM)

23.1 Contractors must be informed about the hazardous chemicals at Olin's workplace to which their employees may be exposed during their Work on Olin premises. Olin will provide this information in the form of a Pre-Work EHS Review by the Olin Project Manager and/or designee. Material Safety Data Sheets (SDS) and will be provided as necessary as will information of the Olin HAZCOM labeling system. The format of the exchange will be directed by the scope of Work, type of Work performed, and departmental guidelines and practices.

23.2 Contractors must have HAZCOM information available and provided to the Olin Project Manager upon request regarding the potential hazards associated with chemicals that Contractors and Subcontractors bring into the workplace. Olin will inform its employees about contractor hazardous chemicals to which they may be exposed in the workplace.

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**WIN-EHS-14 APPENDIX A
EHS SENSITIVE WORK DETERMINATION GUIDELINES**

- Contractor Work involving one or more of the following activities should be considered EHS Sensitive Work.
 - Lockout/Tagout
 - Confined Space Entry
 - Removal or disturbance of any asbestos containing materials
 - Trenching or excavations over four (4) feet deep
 - Any chemical discharges to an Olin sewer
 - Demolition of any Olin building or structure
 - Servicing or installation of any overhead crane or hoist
 - Hot work
 - Electrical work >50 volts to ground
 - Work requiring fall protection (any work >six (6) feet off the ground without adequate restraining handrails)
 - Activities involving lead-containing materials
 - Work on any Olin process or equipment involving chlorine or a chlorination process
 - Work involved in any Olin Winchester manufacturing operation, process, or equipment which manufacture, handle, transport, or package explosives or explosive materials

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WIN-EHS-14 APPENDIX B



Contractor EHS Sensitive Work Questionnaire & Certification

This questionnaire and certification must be completed and signed (by an owner, director, officer, or other person with such delegated authority) and returned to Olin for evaluation and approval prior to the Contractor or Subcontractor being approved to perform any Environmental Health & Safety (EHS) Sensitive Work on Olin plant premises.

Please check the EHS Sensitive Work in which you may be involved by either your company or any sub-contractor company you hire while working on Olin's plant premises.

- Lockout/Tagout
- Confined Space Entry
- Removal or disturbance of any asbestos containing materials
- Trenching or excavations over four (4) feet deep
- Any chemical discharges to an Olin sewer
- Demolition of any Olin building or structure
- Servicing or installation of any overhead crane or hoist
- Hot work
- Electrical work >50 volts to ground
- Work requiring fall protection (any work >six (6) feet off the ground without adequate restraining handrails)
- Work on any equipment at Olin involving chlorine or a chlorination process
- Activities involving lead-containing material
- Work involved in any Olin Winchester manufacturing operation, process, or equipment which manufacture, handle, transport, or package explosives or explosive materials

All Contractors wishing to become approved to perform Olin EHS Sensitive Work must check and certify ALL of the following items below:

I certify that my company and any sub-contractor that I hire to work on Olin plant premises will:

- Have and will enforce a written safety program.
- Conduct periodic on-site job safety inspections at Olin as necessary.
- Train all employees working at Olin in all appropriate OSHA and EPA rules.

- Train all employees in regulations and standards applicable to the type of work to be performed on Olin plant premises.
- Have and will enforce a substance abuse policy which attempts to identify a characteristic, behavior, appearance or other condition that indicates a person is impaired and at risk to the safety or health of them self or a coworker due to the consumption of any compound, liquid or chemical or any other substance.
- Have a worker's compensation experience modifier rate (EMR) less than 1.0.
- Report all accidents, injuries, incidents, and near misses involving their employees while working at Olin regardless of severity.
- Furnish their own personal protective equipment (PPE) unless otherwise approved by the Olin project manager.
- Keep written records to substantiate compliance with any of the items listed above
- Complete an Olin EHS Sensitive Work Orientation (including testing) prior to performing EHS Sensitive Work for the first time and within a 36 month period thereafter.
- Agree to random audits by Olin to verify compliance with any of these certifications and agreements upon thirty (30) days written notice.

CERTIFIED: _____

TITLE: _____ DATE: _____

COMPANY NAME: _____

ADDRESS: _____

BUSINESS CONTACT _____ TELEPHONE _____

WIN-EHS-14 APPENDIX C

OLIN CONTRACTOR EHS SENSITIVE WORK PRE-WORK REVIEW CHECKLIST

INSTRUCTIONS: Completion of this check list is mandatory for EHS Sensitive Work. Review each item of the Checklist prior to the start of Work and note each item applicable to the task to be performed. The resulting evaluation is the basis for developing the environmental, safety & health requirements for the task. The Olin Project Manager may need to request assistance from Safety, Industrial Hygiene, Environmental, & Plant Protection to develop appropriate controls.

Project Title:	Work Area:
Olin Project Manager:	Phone:
Contractor (if known):	Requisition/Service Order #:

Potential Chemical Exposures (check all that apply): <input type="checkbox"/> Asbestos <input type="checkbox"/> PCB <input type="checkbox"/> Lead <input type="checkbox"/> Radiation <input type="checkbox"/> Acid/Caustic <input type="checkbox"/> CO2 Kidde Discharge <input type="checkbox"/> Flammable/Combustibles <input type="checkbox"/> Other (specify):

Employee personnel monitoring or waste sampling? <input type="checkbox"/> Yes <input type="checkbox"/> No

Potential Physical Exposures (check all that apply): <input type="checkbox"/> Heat Stress <input type="checkbox"/> Noise <input type="checkbox"/> Welding Fumes <input type="checkbox"/> Sand Blasting <input type="checkbox"/> Heavy Lifts <input type="checkbox"/> Above Ground Work <input type="checkbox"/> Confined Space <input type="checkbox"/> High Voltage <input type="checkbox"/> Water Hazard <input type="checkbox"/> Trenching/Excavation <input type="checkbox"/> Compressed Gas <input type="checkbox"/> Underground Utilities <input type="checkbox"/> Initiating Compounds/Explosives/Powder <input type="checkbox"/> Working in area serviced by cranes <input type="checkbox"/> Other (specify):
--

Potential Asphyxiate Exposures (check all that apply): <input type="checkbox"/> Natural Gas <input type="checkbox"/> Hydrogen <input type="checkbox"/> Nitrogen <input type="checkbox"/> Chlorine <input type="checkbox"/> Other (specify):
--

Olin Work Permits Required: <input type="checkbox"/> Confined Space <input type="checkbox"/> Hot Work <input type="checkbox"/> Decontamination
--

Environmental Considerations: Hazardous chemicals/materials brought on site: Wastes removed: Wastes left on site (Environmental Services approval req'd): Discharges to Olin sewers? <input type="checkbox"/> No <input type="checkbox"/> Yes-approval req'd from Environmental Services
--

Written plan req'd? <input type="checkbox"/> No <input type="checkbox"/> Yes-(specify):

List of Subcontractors (if known): Is Contractor EHS approved? <input type="checkbox"/> YES <input type="checkbox"/> NO
--

EHS Sensitive Work Involving (check all that apply):	
<input type="checkbox"/> Lockout/Tagout	<input type="checkbox"/> Confined space entry
<input type="checkbox"/> Removal/disturbance of asbestos	<input type="checkbox"/> Trenching/excavation
<input type="checkbox"/> Generation of hazardous waste	<input type="checkbox"/> Chemical discharges to sewers
<input type="checkbox"/> Handling/transportation of powder/explosives	<input type="checkbox"/> Chlorine system
<input type="checkbox"/> Propane system	<input type="checkbox"/> Activities involving lead-containing material
<input type="checkbox"/> Primer Operations	<input type="checkbox"/> Servicing of cranes/hoists
<input type="checkbox"/> High Explosives/Primer Island Operations	<input type="checkbox"/> Hot Work
<input type="checkbox"/> High voltage	<input type="checkbox"/> Work requiring fall protection
<input type="checkbox"/> PSM covered process	

Olin reviewed by:	Date:	Contractor reviewed by:	Date:
-------------------	-------	-------------------------	-------

By signing this checklist Contractor is committing to review all information with Contractor and Subcontractor employees.

Original- Olin Project Manager; Copy attached to request for quote, service order or directly to Contractor

**WIN-EHS-14 APPENDIX D
OLIN PROJECT MANAGER'S
CONTRACTOR SAFETY CHECK CARD**

**OLIN PROJECT MANAGER'S
CONTRACTOR SAFETY CHECK CARD**

Project: _____

Contractor: _____

Olin Project Mngr: _____

Date: _____ Time: _____

Check if acceptable, note any deficiencies and
corrective action.

Use of PPE _____

Work permits _____

Air emissions _____

Water releases _____

Waste handling _____

Housekeeping _____

Tools _____

Equipment _____

Material handling _____

Signs & barricades _____

Use of LO/TO _____

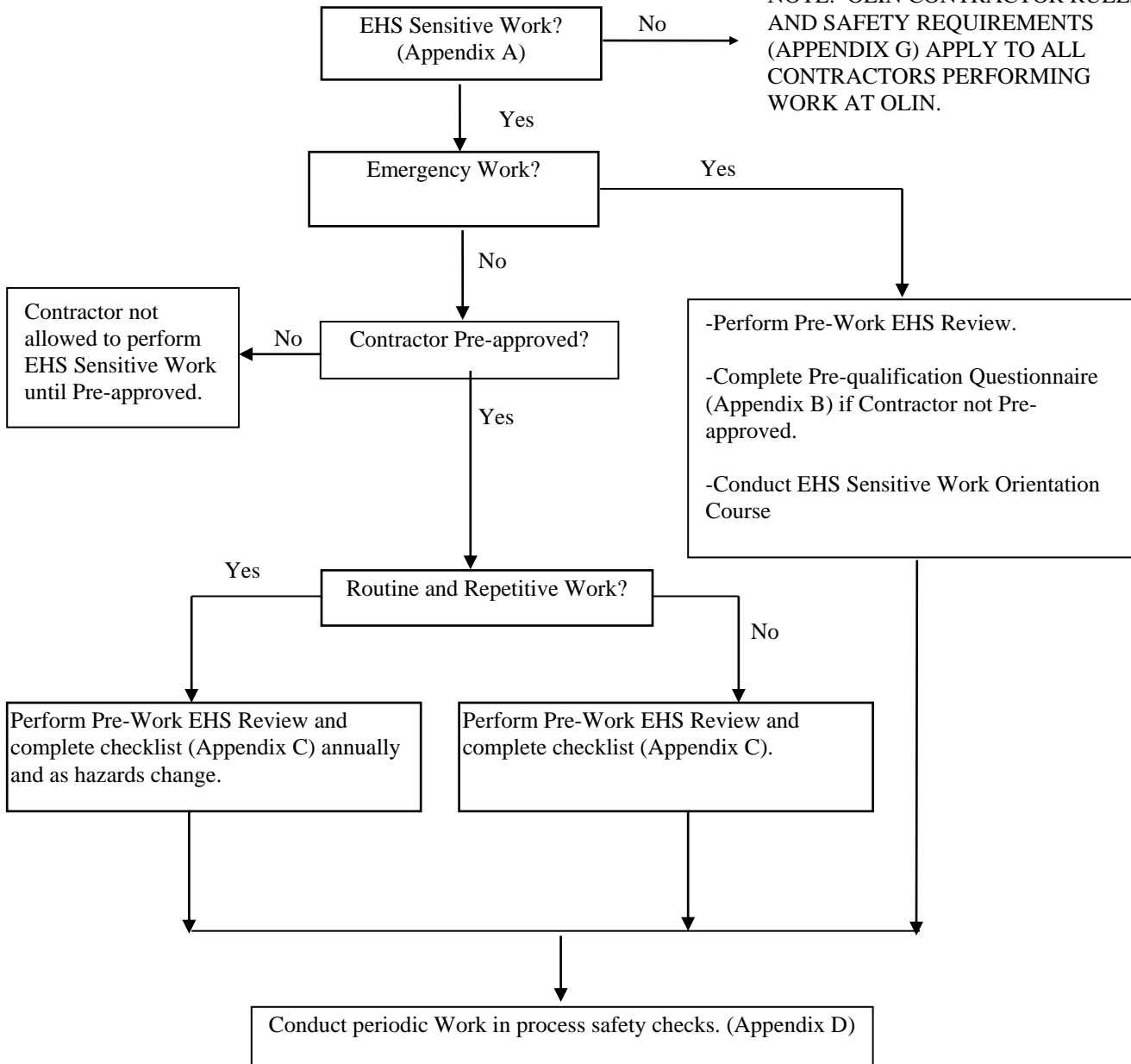
Fall protection _____

COMMENTS: _____

Use back for additional comments.
Send completed card to Safety Dept. - M1320

**WIN-EHS-14 APPENDIX E
OLIN CONTRACTOR EHS SENSITIVE WORK FLOWCHART**

NOTE: OLIN CONTRACTOR RULES AND SAFETY REQUIREMENTS (APPENDIX G) APPLY TO ALL CONTRACTORS PERFORMING WORK AT OLIN.



WIN-EHS-14 APPENDIX F
OLIN CONTRACTOR EHS SENSITIVE WORK ORIENTATION COURSE INSTRUCTIONS

Internet Training Call:

<p>Brian O'Reilly Gatefeed Consulting Group 9 West Hubbard Street Suite 301 Chicago, IL. 60610 (312) 467-9884 ext 301 Email: boreilly@gatefeed.com</p>	<p>Or register directly by accessing: www.gatefeed.com</p>
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East Alton Classroom Training Call:

<p>Amy Kozlowski Center for Workforce Training LCCC Bethalto Airport 1136 E Airline Dr. East Alton, IL 62024 (618) 468-5715 Email: akozlowski@lc.edu</p>	<p>Greg Bock Center for Workforce Training LCCC Bethalto Airport 1136 E Airline Dr. East Alton, IL 62024 (618) 468-5780 Email: gbock@lc.edu</p>
<p>Kathy Willis, Director Lewis & Clark Community College Alden Hall Center for Workforce Training; Occupational Training 5800 Godfrey Godfrey, IL 62035 (618) 468-5710 Email: kawillis@lc.edu</p>	

Oxford Classroom Training Call:

<p>Eddy Wood WIN Job Center 204-1 Colonnade Cove Oxford, MS 38655. (662) 234-3231, ext. 104 Email: ewood@northwestms.edu</p>	
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WIN-EHS-14 APPENDIX G

OLIN CONTRACTOR WORK RULES AND SAFETY REQUIREMENTS

This document contains the basic Work rules and environmental, safety, health and plant protection requirements for Contractors who Work within Olin plant areas. Questions should be directed to the Olin Project Manager or other Olin coordinator assigned to your contract.

1.0 Contractor Responsibility

1.1 In addition to these Work Rules and Safety Requirements, Contractors who will be performing certain environmental, health or safety sensitive activities (EHS Sensitive Work) on Olin premises as defined by Olin policy/procedure WIN-EHS-14 are required to successfully complete the Olin Contractor EHS Sensitive Work Orientation course and test and have submitted to Olin a duly signed EHS Sensitive Work Pre-qualification Questionnaire. The following activities are considered EHS Sensitive Work:

- Lockout/Tagout
- Confined Space Entry
- Removal or disturbance of any asbestos containing materials
- Trenching or excavations over four (4) feet deep
- Any chemical discharges to an Olin sewer
- Demolition of any Olin building or structure
- Servicing or installation of any overhead crane or hoist
- Hot work
- Electrical work >50 volts to ground
- Work requiring fall protection (any work >six (6) feet off the ground without adequate restraining handrails)
- Activities involving lead-containing materials
- Work on any Olin process or equipment involving chlorine or a chlorination process
- Work involved in any Olin Winchester manufacturing operation, process, or equipment which manufacture, handle, transport, or package explosives or explosive materials

1.2 All Contractors performing activity on Olin premises, whether considered EHS Sensitive Work or not, are subject to these Work Rules and Safety and Requirements in addition to the specific language of the purchase order, service order or other contract under which Olin retains the Contractor.

1.3 Contractor is responsible for conducting training, medical testing and record keeping for Contractor's employees as required by Olin, OSHA or EPA regulations as applicable to the Work being performed.

1.4 Contractor is solely responsible for his employees and their conduct. Prior to starting Work in any plant area, the Contractor shall be responsible for contacting the Olin Project Manager and/or the supervisor of the area in which the Work is to be performed, for details specific to that area (safety rules, use of shielding, personal protective equipment, Work restrictions, inherent hazards of the area, chemicals used, etc.)

1.5 Upon the request of Contractor, Material Safety Data Sheets for chemicals in the Work area will be made available. Contractor is responsible for advising his employees accordingly, prior to entering any plant area.

1.6 Upon request of Olin Project Manager, the Contractor must submit a list of chemical materials to be brought into the plant. Material Safety Data Sheets (MSDS) must be provided to Olin upon request.

1.7 Contractor must protect Olin equipment, property, work in process, and finished goods from damage.

1.8 Contractor must immediately report to Olin all incidents that causes or has the potential to cause injury or damage to Olin employees, property or the environment.

1.9 Contractor must immediately report any accident or work-related illness occurring to Contractor or sub-Contractor employees regardless of severity. Contractors must fully cooperate with Olin personnel in the investigation and correction of any incident or accident to Olin, Contractor or Subcontractor employee or property.

1.10 Contractors must monitor the Work of Subcontractors to ensure that all environmental, health and safety regulations, applicable policy/procedures along with these Work Rules and Safety Requirements are being followed.

2.0 Working Rules and Conditions

2.1 When entering Olin property, employees of Contractors and Subcontractors will be issued Olin Contractor badges. At the gate of entry, the Security Guard will log all Contractor personnel in and out. While on Olin property, badges must be prominently displayed on the person.

2.2 To perform work on Olin property all employees of Contractors and Subcontractors approved to perform EHS Sensitive Work must have a valid and current badge signifying they have successfully completed the Olin EHS Sensitive Work Orientation course.

2.2 Contractors and Subcontractors must use assigned Contractor's gates when entering or leaving Olin property as designated by the Olin Project Manager or Olin Security Guard.

2.3 Contractor vehicles or mobile equipment will not be allowed access to Olin property without a pass received from the Security Guard at the entry gate. Unnecessary driving around the plant is prohibited.

2.4 Matches, lighters, cameras, weapons, alcohol, etc. must not be brought into the plant in vehicles or on a person.

2.5 Contractor employees may use the unreserved portion of the Olin parking lot for parking personal vehicles. Only authorized personal vehicles are permitted in the plant.

2.6 Contractor employees are required to obey plant and department safety rules.

2.7 Use of tobacco products in any form is not allowed on Olin property.

2.8 Work areas shall be maintained in a neat and orderly manner. Materials shall be properly stored. Aisles, roads, passageways, etc. must be kept clear.

2.9 Contractor shall remove all unused material unless prior arrangements have been made.

2.10 Details regarding removal of construction debris must be Worked out with the Olin Project Manager. In some cases, Contractor is responsible for removal. In other cases, Contractor is prohibited from doing so.

2.11 Contractors will not be permitted to use or borrow Olin Personal Protective Equipment (PPE). For purposes of these rules PPE includes: eyewear, hard hats, shoes, respirators, ear muffs, face shields, and safety harness.

2.12 Contractors will not be permitted to borrow or operate an Olin critical safety device including a gas analyzer or emergency retrieval device except under the direction of an Olin employee.

2.13 If Contractor borrows any tools or equipment from Olin and Olin agrees to loan such tools or equipment, Contractor hereby agrees that each employee that Contractor permits to use the borrowed tools or equipment has the requisite training, certificates, skills and experience to use such tools or equipment in a safe manner. Contractor represents, warrants and certifies that all necessary training and recordkeeping related to the use of the borrowed tools or equipment is done in strict accordance with applicable federal and state statutes, regulations and rules. Furthermore, Contractor agrees to release, indemnify and hold harmless Olin Corporation, its parents, subsidiaries, officers, directors, shareholders and employees, from and against any and all claims, suits, fines, judgments, penalties, costs, losses or expenses (including without limitation reasonable attorneys fees and costs of litigation), which arise out of, are based on or result from the use of such borrowed tools or equipment.

2.14 Any tools or equipment borrowed by Contractor from Olin are on an as-is, where-is basis, and Contractor is solely responsible for inspecting the tools and/or equipment prior to use to ensure that they may be used safely without endangering the user or others.

2.15 Contractor tools, equipment, ladders, vehicles, scaffolding shall have identifying name of the Contractor or Subcontractor when in use on Olin property.

2.16 Contractors will be allowed to plug into existing electrical outlets. Other electrical connections are not ordinarily permitted, and only by qualified Contractors according to Olin Electrical Specifications.

2.17 Permanent connections to any Olin electrical, overhead wiring, natural gas, compressed air, nitrogen, water, steam, process piping, or sewers must be approved by either the Olin Utilities Department or the appropriate Winchester Engineering Department.

2.18 The Olin Plant Protection Department or Olin Project Manager must approve temporary connections to Olin fire hydrants, compressed gas lines and electrical load centers.

2.19 Contractors are not permitted to ever shutoff, close, or otherwise disable any Olin fire suppressant system including sprinkler, fire hydrant, fire loop blocking valves, CO2 or halon systems.

3.0 Safety Requirements

3.1 Contractors performing Work subject to lockout/tagout must comply with Olin policy EALT-EHS-12 (“Control of Hazardous Energy Sources (Lockout Tagout”).

3.2 Contractors performing Work in permit-required confined spaces must comply with Olin policy EALT-EHS-17 (“Confined Space Entry”).

3.3 Contractors welding, cutting, or using open flames, torches and other types of spark producing equipment, comply with Olin policy EALT-EHS-26 (“Hot Work”).

3.4 Contractor employees must obey all in-plant stop signs, posted speed limits, and other posted instructions.

3.5 Vehicles and equipment should park in locations based on instruction from the Olin Project Manager, and should avoid blocking roads, fire lanes, fire hydrants, etc.

3.6 When Contractor employees are working overhead, the area below must be roped off and signs placed indicating danger. Contractor shall provide a ground person for overhead Work if deemed necessary by the Olin Project Manager.

3.7 When it is necessary for Contractors to Work in areas where overhead cranes are operating, the following precautions must be observed. The Olin Project Manager or responsible parties will:

- Contact and obtain clearance from the area supervisor or foreman of department where Work is to be done. Explain to him and affected crane operators the Work to be done and the precautions to be taken.
- Outline to Contractor the physical limitations within which employees are to Work and not to exceed these limitations.

3.8 Contractors performing Work on cranes and electrical feeders must comply with Olin policy EALT-EHS-25 (“Cranes and Hoists”).

3.9 Appropriate personal protective equipment as required by OSHA standard and/or Olin shall be provided by the Contractor and must be worn at all times. Sleeved shirts and sturdy shoes are required.

3.10 The Olin Project Manager on any specific job may impose additional personal protective equipment requirements.

3.11 Holes in floors, excavations, and other openings must be properly barricaded at all times.

3.12 Storage, handling, and usage of oxygen and acetylene tanks must be in accordance with recognized safety practices. Compressed gas cylinders, empty or full, must be in an upright position and secured to prevent them from being knocked over.

3.13 Shielding must be provided for grinding, chipping or other similar operations to protect Olin employees, production materials and equipment. Mechanical ventilation shall be provided and used within enclosed areas.

3.14 Flammable liquids shall be grounded and stored in an approved safety container with spark arrests. Oily rags, waste, waste paper, and other flammable and combustible materials shall be stored in tightly closed metal containers. The Contractor shall provide safety containers as required.

3.15 Flammable material must be removed at the end of each workday to a designated safe location.

4.0 General

4.1 If the Contractor fails to comply with these requirements, the Olin Project Manager or member of the Olin Safety & Loss Prevention Department may, without prejudice to any other legal or contractual rights of Olin, issue an order verbally, or in writing, stopping all or any part of the Work. The Contractor shall be notified immediately. Thereafter, a start order for resumption of Work may be issued at the discretion of the Olin Project Manager or Safety & Loss Prevention representative who originated the stop order. The Contractor shall make no claim for an extension of time or compensation for damages in connection with such Work stoppage. Failure to comply can result in disbarment from the Olin property.

4.2 The Olin Project Manager has the right to require the Contractor to correct any unsafe practice.

4.3 In case of conflict between these requirements and any specific provisions of the purchase order, the purchase order provisions take priority.

4.4 Safety and co-ordination meetings may be conducted by Olin Project Manager, e.g., weekly, daily, at start-up, as needed, etc. Contractor supervision must be present at these meetings.

WIN-EHS-14 APPENDIX H
Olin Project Manager Pre-Startup Checklist for Construction or Demolition Activities
Involving Lead-containing Material

This checklist is for the use of the Olin Project Manager in inquiring whether the Contractor is qualified to perform Construction or Demolition Activities involving Lead-containing material. Any items marked “NO” must be completed or approved by the Olin EHS Department prior to conducting work.

Project: _____

Project Manager: _____ Date: _____

YES	NO	
		Has Contractor completed a hazard/exposure assessment for each activity which may lead to Lead exposure?
		Has a compliance plan/program been completed including the following elements?
		-A description of each activity in which Lead is emitted.
		-A description of the means in which to limit exposure and ensure regulatory compliance.
		-A report of the technology considered in meeting the PEL.
		-Air monitoring data.
		-A detailed schedule for program implementation.
		-A description of work practices and administrative controls.
		Is personnel monitoring to be conducted? If not, are past results for similar jobs available?
		Does the Contractor have a medical surveillance program?
		Is blood sampling conducted? Are past results available?
		Does the Contractor keep monitoring and medical records?
		Do all Contractor employees receive periodic training on means to reduce Lead exposure?
		Is personal protective clothing and equipment provided?
		Does the contractor have a respiratory protection program?
		Does the contractor have a respiratory protection program?
		Are appropriate respirators provided?
		Are change rooms with showers and hand washing facilities provided?
		Are separate eating facilities provided?
		Are work areas where the PEL exceeded posted as follows: <p style="text-align: center;">"Warning Lead Work Area, Poison, No Eating or Smoking"</p>
		Have provisions been made for the proper disposal of Lead contaminated wastes?
		Are containers provided for contaminated protective clothing? If clothing is to be washed, are the containers labeled as follows: <p style="text-align: center;">Caution: Clothing Contaminated With Lead. Do Not Remove Dust By Blowing Or Shaking. Dispose Of Lead Contaminated Wash Water In Accordance With Applicable Local, State, Or Federal Regulations.</p>

WIN-EHS-14 APPENDIX I OLIN EMPLOYEE FIRE HAZARD AUTHORIZATION PERMIT

Olin Winchester- Operations
 Phone: 662-513-2002 – Oxford, MS
 618-258-2000 – East Alton, IL

FIRE HAZARD AUTHORIZATION PERMIT

PERMIT NOT VALID UNLESS ALL SECTIONS ARE COMPLETE

COMPANY		LOCATION	
IDENTIFY EQUIPMENT BEING WORKED ON (i.e. Machine Name and Number)			
DESCRIPTION OF WORK TO BE PERFORMED		PRECAUTIONARY MEASURES TO BE TAKEN BY PERFORMING DEPT	
<input type="checkbox"/> CUTTING <input type="checkbox"/> GRIND <input type="checkbox"/> WELD <input type="checkbox"/> SOLDER <input type="checkbox"/> ELECTRIC TOOLS <input type="checkbox"/> HOT ROOFING TAR/HOT TAR KETTLE OTHER _____		YES NO <input type="checkbox"/> <input type="checkbox"/> DOES JOB REQUIRE FIRE BLANKETS OVER HAZARD POINTS? <input type="checkbox"/> <input type="checkbox"/> SHOULD WORK AREA BE WETTED DOWN? <input type="checkbox"/> <input type="checkbox"/> HAS APPROPRIATE SUPERVISION BEEN NOTIFIED? <input type="checkbox"/> <input type="checkbox"/> ARE DECONTAMINATION GUIDELINES APPLICABLE? IF "YES", HAVE WORKING MATERIALS BEEN DECONTAMINATED? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> <input type="checkbox"/> ARE ADDITIONAL PERMITS REQUIRED (CONFINED SPACE, EXCAVATION, ETC)? <input type="checkbox"/> <input type="checkbox"/> ANY SPECIAL CIRCUMSTANCES REQUIRING A LONGER THAN 30 MINUTES FIRE WATCH? IF YES ABOVE, HAS THE ADDITIONAL FIRE WATCH BEEN ASSIGNED? <input type="checkbox"/> YES <input type="checkbox"/> NO	
FIRE EQUIPMENT PROVIDED AT WORKSITE		PERMIT IS NOT VALID UNLESS THE FOLLOWING QUESTIONS ARE ANSWERED	
<input type="checkbox"/> FIRE EXTINGUISHER <input type="checkbox"/> CHARGED LINE <input type="checkbox"/> FIRE BLANKETS <input type="checkbox"/> FIRE WATCH ON STANDBY OTHER _____ <p style="text-align: center;">FIRE WATCH</p> Authorizing supervisor requires that a fire watch be performed for at least 30 minutes after completion of the hot work based on an inspection of the combustibles present in the work area of the hot work. SIGNATURE OF PERSON(S) PERFORMING FIRE WATCH _____ Individuals in the vicinity of the hot work should be informed of the hot work and instructed to monitor the area after the fire watch is completed. YES NO <input type="checkbox"/> <input type="checkbox"/> NOTIFICATION PERFORMED?		YES NO <input type="checkbox"/> <input type="checkbox"/> DOES MAINTENANCE / CONTRACTOR HAVE A CHARGED FIRE EXTINGUISHER ON THE JOBSITE? <input type="checkbox"/> <input type="checkbox"/> ARE ENOUGH EXTINGUISHERS AVAILABLE CONSISTENT WITH HAZARDS INVOLVED? <input type="checkbox"/> <input type="checkbox"/> FIRE EXTINGUISHERS – CHECK TYPES USED: A _____ TRASH/WOOD/PAPER B _____ FLAMMABLE/COMBUSTIBLE LIQUIDS C _____ ELECTRICAL/EQUIPMENT ABC _____ MULTIPURPOSE – (RECOMMENDED) OTHER (DESCRIBE) _____ <input type="checkbox"/> <input type="checkbox"/> ARE ALL COMBUSTIBLES MOVED AWAY FROM THE WORKING AREA? <input type="checkbox"/> <input type="checkbox"/> HAS LATENT DUST AND DIRT BEEN REMOVED FROM THE AREA? <input type="checkbox"/> <input type="checkbox"/> CONFLICTING JOBS HAVE BEEN EVALUATED? <input type="checkbox"/> <input type="checkbox"/> COMBUSTIBLE MATERIALS WITHIN 35 FEET OF SPARK PRODUCING/OPEN FLAME HOT WORK REMOVED FROM AREAS, AND FIRE BLANKET PROVIDED AS NEEDED? <input type="checkbox"/> <input type="checkbox"/> FLOOR/WALL OPENINGS COVERED TO PROTECT AGAINST SPARKS FALLING TO LOWER FLOORS OR PENETRATING ADJACENT AREAS, AND FIRE BLANKETS PROVIDED AS NEEDED? <input type="checkbox"/> <input type="checkbox"/> PROCESS/ELECTICAL EQUIPMENT LOCKED/TAGGED OUT? <input type="checkbox"/> <input type="checkbox"/> FLAMEPROOF CURTAINS/SHIELDS ERECTED AROUND WELDERS TO PROTECT INDIVIDUALS IN THE VICINITY FROM FLASH? <input type="checkbox"/> <input type="checkbox"/> FLAMEPROOF CURTAINS/SHIELDS ERECTED WITH NO SERIOUS RESTRICTION OF VENTILATION? <input type="checkbox"/> <input type="checkbox"/> SEWERS AND DRAINS COVERED? <input type="checkbox"/> <input type="checkbox"/> CONVEYORS THAT COULD CONVEY SPARKS SHUTDOWN AND DUCTS BLANKED / PROTECTED? <input type="checkbox"/> <input type="checkbox"/> ACTIONS TAKEN TO PREVENT HEAT TRANSMISSION BY RADIATION/CONDUCTION TO UNOBSERVED COMBUSTIBLES. <input type="checkbox"/> <input type="checkbox"/> CONTAINERS OR OTHER SOURCES OF FLAMMABLE LIQUIDS REMOVED FROM HOT WORK AREA? <input type="checkbox"/> <input type="checkbox"/> PASSAGeways, LADDERS, STAIRWAYS CLEAR OF WELDING CABLES AND OTHER EQUIPMENT? <input type="checkbox"/> <input type="checkbox"/> PIPELINES OR DRUM/VESSEL CONNECTION DISCONNECTED OR BLANKED? <input type="checkbox"/> <input type="checkbox"/> HOLLOW SPACES, CAVITIES, OR CONTAINERS VENTED? GAS CHECK _____	
ATMOSPHERIC TESTING: % LEL _____ % OXYGEN _____		SIGNATURE(S) OF PERSON(S) PERFORMING TEST TIME OF TEST	
DATE ISSUED	TIME ISSUED	THIS PERMIT IS VALID ONLY IN THE SPECIFIC AREA IN WHICH IT WAS ISSUED AND FOR A PERIOD NO GREATER THAN ONE OPERATING SHIFT _____ SIGNATURE(S) OF PERSON(S) PERFORMING WORK	
THE WORKSITE WAS INSPECTED AT (TIME)		DATE	
A.M. P.M.		ISSUING DEPARTMENT	AUTHORIZING SUPERVISOR

Date Revised: 3/24/2014

**WIN-EHS-14 APPENDIX J
SAMPLE DECONTAMINATION TAG**

FORM AO-OSHA 7 ZRF-038 (199)

CAUTION

EXPLOSIVE

**AND RELATED DANGEROUS SUBSTANCES
DECONTAMINATION TAG**

DEPT. 4439 DT 7/11/01
EQUIP. OR PART
Lubricator Key Plates

ALL EXPLOSIVE HAS BEEN REMOVED FROM
THIS PART OR EQUIPMENT UNLESS OTHER-
WISE SPECIFIED BELOW
Cleaned with Electro

Slash 7/11/01
AUTHORIZATION
REPAIRS **WITHIN** AMMUNITION OPERATIONS

Boyle 7/11/01
GEN. FOREMAN AUTH. REPAIRS DATE

REPAIRS **OUTSIDE** AMMUNITION OPERATIONS
ALL SHIFTS, (INCLUDING WEEKENDS)

GEN. FOREMAN AUTH. REPAIRS DATE
Robert Bachman 7/11/01
AMMO. LOSS PREVENTION REQUIRED FOR OPEN FLAME WORK DATE

FOR ADDITIONAL INFORMATION TELEPHONE

Change record:

6/7/07

- 4.10 added internal link to Olin EHS Sensitive Work Orientation Video.

12/20/07

- Removed reference to Brass throughout document.
- Revised 2.7 of plant rules to indicate use of tobacco products is not allowed on Olin property.

3/4/08

- Changed Appendix B, C & G to hyperlinked document.

3/24/08

- Removed reference to hydrogen in Appendix A
- Added activities involving lead-containing materials to Appendix A

2/18/09 revised 9.1 from annual to 36 months.

5/27/11

- routine review and update, no significant changes

7/28/14 – rewrite for posting to internet