SAFETY & ENVIRONMENTAL PROCEDURES
for
CONTRACTORS

APS Technology
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INTRODUCTION

The following guidelines have been established to assist contractors (“you’) in providing safe working conditions and conducting environmentally sound practices while working or otherwise being present at an APS Technology facility. Each contractor is required to perform work in accordance with all applicable Federal, State, and local safety regulations, but also with those established by APS Technology.

Background
APS Technology is a manufacturer of electromechanical instrumentation and sensor systems. Our environment is bright, clean, and pleasant to work in. As a contractor engaged by APS, we are concerned about your safety and your impact on the environment while at our facility. We have developed many internal safety and environmental compliance programs, that when followed properly, will protect both you, all employees, and company property.

About these Procedures
The procedures in this document have been developed to help comply with Federal regulations instituted by the Occupational Safety and Health Administration (“OSHA”), the Connecticut Department of Energy and Environmental Protection (“DEEP”), the Texas Commission on Environmental Quality (“TCEQ”) and by the Environmental Protection Agency (“EPA”).

Please read the contents of this document and please sign the certification on page 8 of this document. In Connecticut please return the signed certification it to our Safety & Facilities Engineer and in Texas return it to the Supervisor Developmental & Special Products. The Certification will expire in one year. If you have any questions concerning the information contained in this document, please contact either:

In CT        Eric Turner
            Safety & Facilities Engineer
            Phone: 860-613-4450 x 210

In TX        Tom Hinrichs        Linda Ford
            Supervisor Developmental & Special Products  Electronics Supervisor
            Phone: 281-847-3700 x 310      Phone: 281-847-3700 x 307

Maria Pangakis
APS Human Resources Director
Phone: 860-613-4450 x107
Prior to the commencement of work, contractors must provide the Purchasing Manager with:

- A copy of your Worker’s Compensation Insurance.
- A copy of your liability insurance.
- A copy of any requested certifications that you have pertaining to the work you were hired to do (i.e., current electricians license, current powered industrial truck training certificate, etc.)

**GENERAL INFORMATION**

Sign in and out at the front receptionist's desk each day you are at the facility.

Visitors must be escorted on APS premises.

Smoking is not permitted anywhere on the APS premises. This includes all buildings, parking lots and grounds.

Safety glasses are required at all times in the machine shop, assembly areas, labs, mechanical engineering and vertical test facility. Open toed shoes/sandals are not allowed to be worn in the shop, labs, inspection, assembly, and shipping/receiving areas.

APS Technology is an alcohol and drug free workplace.

Exit doors must be kept clear and unobstructed at all times. If the exit must be interrupted for any length of time, in CT notify the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products, so an alternate exit route may be determined and communicated to employees.

If our emergency evacuation signal is activated you are required to exit the building immediately using the nearest exit and report to the muster area. In CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products will inform you of the muster location prior to work assignment. Remain at the muster location until the all clear signal is indicated.

In the event of a need to report an emergency, fire, medical or chemical spill, in CT dial extension 100 during normal business hours, 8:00 AM-5:00 PM and in TX dial extension 333.

APS Technology has trained First Aid Responder teams.

Fire extinguishers are located throughout the facilities.

Emergency showers and eyewash stations are located and identified throughout the facilities.
Should you be involved in a work related injury at our facilities you should follow all procedures established by your company and also notify our Safety & Facilities Eng. You will be required to complete an APS Technology accident/injury report that must be signed by the injured worker as well as the supervisor in charge.

**SAFETY PROGRAMS/PROCEDURES**

**Bloodborne Pathogens**
Blood and other bodily fluids may contain diseases such as Hepatitis B and Human Immunodeficiency Syndrome. To protect yourself and the victim, follow the simple rule: If you see someone bleeding or hurt do not touch them or tend to them- dial extension 100 in CT and extension 333 in TX, so that a member of our trained First Aid team can be notified and come to the scene immediately. If you become accidentally exposed to blood or bodily fluids wash your hands immediately with soap and running water.

**Compressed Gas Cylinders**
Compressed gas cylinders must be secured. The protective cap must be in place during transit and storage. A suitable cylinder truck with chain must be used. Cylinders must be legibly marked to identify content. Empty cylinders must be labeled "Empty".

**Confined Spaces**
APS Technology has identified and labeled confined spaces at our locations. Employees are not permitted to enter these spaces. If you are required to work in a non-permit confined space, in CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products, will review the hazards and procedures with you before you begin work in these areas.

**Electrical Safety**
All contractors working on or near electrical equipment and/or circuits that may become energized must be qualified, specifically trained and licensed to work on such equipment. If you are required to work on live equipment and/or circuits, you must comply with safe electrical work practices as specified in OSHA 29 CFR 1910 331-399 and the National Electric Code.

**Flammable Liquids / Chemicals Storage**
Flammable and combustible materials must be stored in proper UL approved safety containers and clearly labeled. Temporary chemical storage vessels must have secondary containment and be approved, in CT by the Safety & Facilities Eng. and in TX by the Supervisor Developmental & Special Products, prior to the chemical being brought on site. Incompatible material must be adequately segregated. All chemical containers must be labeled and properly stored.

**Hazard Communication**
Prior to bringing any hazardous materials/chemicals on site, the contractor must provide, in CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products, with a
list of the materials/chemicals to be used. The current Safety Data Sheets (SDS) for each hazardous material/chemical and information on the quantity and description of how they will be used and stored on our site is also required. Once this information is reviewed by the Safety & Facilities Eng. or Supervisor Developmental & Special Products, you may be required to plan your work around production activities to prevent APS Technology employees from being exposed to these chemicals. All chemical containers must be labeled and properly stored. If your work at our facility requires you to work with or around any hazardous chemicals that we use, you will be provided with the Safety Data Sheets, health hazard information and protective measures to be used. You are then responsible for assuring that all of your employees understand this information and how to protect themselves from the hazardous materials/chemicals.

**Hearing Protection**
During certain operations in our facility we recommend the use of hearing protection. You will be informed if you are working in an area when those operations are taking place.

**Hot Work**
All welding, cutting or spark producing operations must first be approved in CT by the Safety & Facilities Eng. and in TX by the Supervisor Developmental & Special Products. Any such activity requires a fire watch. A fire watch consists of a trained person standing by with an approved fire extinguisher that will extinguish a fire that may ignite on materials being welded, cut or grinded. The contractor must provide adequate guarding such as welding curtains or tarps.

**Housekeeping**
It is essential that safe access to work areas be maintained at all times. Work areas must be continually cleaned as the work progresses. Store materials, equipment and tools in an orderly manner. Precautions must be taken to prevent tripping hazards that could occur from extraneous material, depressions, obstructions tools, or equipment. Dust and debris must be prevented from entering production areas. All chemicals must be put in an approved storage location when they are finished being used for the day.

**Ladders**
Ladders must be tied off or held. The extension ropes must be secured. The top of the ladder must extend at least 3 feet beyond the supporting object when used as access to an elevated work area. If it is necessary to place a ladder in or over a doorway, the door must be barricaded and signs posted. If working overhead in traffic areas, post warning signs or equivalent indicators. Do not work overhead if employees are present below.

**Lockout/Tagout**
In CT you will be informed by the Safety & Facilities Eng. and in TX by the Supervisor Developmental & Special Products, of the Lockout/Tagout procedures for the control of hazardous energy if you will be affected by the lockout or release of a system. If you will work
on a job that requires you to lockout a system, you must provide, in CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products, with a copy of your written procedure. Your procedure will be evaluated on whether it meets the requirement of the standard. If you do not have a written procedure, you will be trained per our procedure. Do not work on equipment until it is de-energized and tested. In CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products, will be responsible for ensuring that all affected APS Technology employees are instructed in and understand the contractors Lockout/Tagout program. When both the contractor and APS Technology employees are required to lock out a system at the same time, the APS Technology program shall be used.

**Powered Industrial Equipment**

All contractors and their personnel are prohibited from using any industrial powered equipment at APS unless properly trained and certified in industrial powered equipment safety. This equipment includes, but is not limited to, forklifts, electric pallet trucks, and scissor lifts. You must get permission in CT from the Safety & Facilities Eng. and in TX from the Supervisor Developmental & Special Products, before using any APS Technology equipment. Verification of training may be required. The use of signs, barriers and/or cones to prevent APS Technology employees from entering areas where overhead work is performed is required. Do not work overhead if employees are present below.

**Personal Protective Equipment**

Contractors must provide their own personal protective equipment such as safety glasses, respiratory protection, gloves, hearing protection, safety shoes, etc. The selection and use of all PPE must be in accordance with all OSHA regulations.

**Radiation Protection**

APS uses certain radioactive material in connection with its products. As described in the APS Radiation Safety Program, the use of these materials is controlled and monitored as mandated by the Nuclear Regulatory Commission. **ONLY PROPERLY TRAINED PERSONNEL ARE PERMITTED TO HANDLE OR MOVE ANY RADIOACTIVE MATERIALS OR RADIOACTIVE MATERIALS DEVICES UNDER THE SUPERVISION OF THE APS RADIATION SAFETY OFFICER (“RSO”).* Contractors and visitors are not permitted to enter the source area without the approval of the RSO. Any violation of this rule or the APS Radiation Safety Program will result in the contractor’s immediate withdrawal from APS property. Contractors most likely will never be required to work near the sources; however, in the event that a contractor is required to perform work in or around the source area, the contractor and its personnel are required to strictly follow the APS Radiation Safety Program. To ensure contractors’ safety, APS will test the source area prior to permitting contractors to enter the area. APS is strongly committed to promoting employee safety and the safety of visitors and the general public. To assure this commitment is being met, the RSO may request that a member of the contractor’s team wear a radiation monitor so that
APS can verify that no radiation exposure was received by the contractor’s personnel while performing work at APS.

In the event an APS employee determines a device containing radioactive materials is to be installed, relocated or removed by a contractor, that contractor must refrain from performing such actions until specifically instructed to do so by the RSO.

APS recommends that you review a copy of the APS Radiation Protection Program and welcomes any comments or questions, which should be addressed to the RSO, Randy Stevens at extension 263 or rstevens@aps-tech.com.

**Roof Work**

Prior approval must be obtained in CT from the Safety & Facilities Eng. and in TX by the Supervisor Developmental & Special Products, before accessing the roof. Never access the roof without prior notification to an APS representative. If working within 6 feet of the building edge, a personal fall arrest system must be used. Be aware of overhead electrical wires and tie down or support wires. Be aware of piping systems that may be on the roof including natural gas lines. Avoid working on a wet roof. Avoid working in extreme hot or cold weather. Do not purposely drop anything from the roof.

**ENVIRONMENTAL PROGRAMS/PROCEDURES**

**Waste Management Procedures**

APS Technology has waste management procedures in place, DOC-EHS-10021, for the proper collection, storage and disposal of all regulated wastes generated on site, in compliance with all applicable laws and regulations. Contractors are responsible for the proper disposal of all regulated wastes they generate on site in compliance with all applicable laws and regulations and any other APS procedures. Contractors are responsible for knowing what constitutes a regulated waste. Contractors must assure that all wastes, empty containers, or other debris are disposed of as regulated. Regulated wastes must not be disposed of down any sink, drain, or catch basin or mixed in with the regular trash. Under no circumstances shall any material be drained onto roads, parking lots, ditches, or marsh areas. Do not dispose of any wastes on site without first notifying, in CT the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products.

**Stormwater Pollution Prevention Plan**

APS Technology facilities have been issued a General Permit for the Discharge of Stormwater Associated with Industrial Activity from the State of Connecticut DEEP and the State of Texas TCEQ. The permit requires APS Technology to implement a Stormwater Pollution Prevention Plan, (SWPPP). The SWPPP is a written plan that outlines the potential sources of stormwater pollution and methods of reducing or eliminating that pollution into our stormwater. It is a state law that compliance of our Stormwater Pollution Prevention Plan is followed. Any acts that disregard our efforts to keep the stormwater clean will not be tolerated.
In order to comply with our pollution prevention efforts, the following are **PROHIBITED**:

- Washing of equipment or vehicles on the property.
- Discharging of treated water systems such as cooling tower water.

### Spill Prevention, Control and Countermeasures Plan (SPCC)

In CT, APS Technology is required to prepare and implement a Spill Prevention, Control and Countermeasures plan, SPCC. The SPCC Plan outlines APS Technology's oil containment systems and procedures to prevent an oil or petroleum spill. It also outlines spill response and clean up protocols. To minimize the risk of spills or releases to the environment, contractors must employ appropriate protective procedures such as double containment, overflow protection, employee training and other measures as part of activities involving the use, storage and handling of petroleum products or hazardous materials while on APS property. State law and APS Technology require that all spills on our property or inside of our facility must be reported immediately. If you cause or see a spill, use the SPILL procedure to report it.

1. Dial ext. 100
2. Describe your location/situation.

We have a trained spill response team that will be at the scene to ensure the spill is cleaned up properly and that all employees are safe. A spill is defined as a release of any material (chemical, petroleum, oil, contaminated water) to a location where it can be no longer used for its intended purpose. This does not include the actual application of the material. Spills also include leaks from trucks and/or construction equipment occurring either inside or outside of the buildings. Contractors are responsible to have spill clean-up materials at their job site. If a contractor fails to provide these materials they will be provided by APS Technology, however the cost of all used materials will be charged to the contractor. If the APS Technology Spill Team determines the spill requires a specialist to clean up the spill, or the spill was not cleaned up adequately by the contractor, APS Technology will take measures to contact our spill response contractor. In all cases the contractor is responsible for any costs incurred as a result of the spill cleanup. These costs may include removal of contaminated materials as well as restoration of the area.

### Recycling

APS Technology has an active recycling program in place. Recycling is mandatory in CT. We recycle office paper, cardboard, scrap metals, soda cans, and other items. In CT see the Safety & Facilities Eng. and in TX the Supervisor Developmental & Special Products if there are any questions on how to recycle wastes.
Revision History.

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<td>Update to include Houston</td>
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<td>M. Pangakis</td>
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<td>7/24/15</td>
<td>Eric Turner</td>
<td>Update smoking policy, add Radiation Program</td>
<td>15-177</td>
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<td>11/20/15</td>
<td>Eric Turner</td>
<td>Add reference to open toed shoes, update language used for Radiation Program</td>
<td>15-277</td>
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SAFETY & ENVIRONMENTAL CERTIFICATION FOR CONTRACTORS

I am an employee of a contractor hired to do work at APS Technology. I have read, understand, and agree to follow all safety and environmental policies described in the document entitled; “Safety and Environmental Procedures for Contractors”, a copy of which has been provided to me.

Print Name: _________________________________________
Company: _________________________________________
Signature: _________________________________________
Date:           ____/____/____

DO NOT WRITE BELOW THIS LINE

Received:    ____/____/____
Signature:   _________________________________________
Safety & Facilities Engineer, APS Technology

Signature: ___________________________________________________________________
Supervisor Developmental & Special Products