

CONTRACTOR RESPONSIBILITIES

Contractor projects will be guided by the procedures detailed in this manual and also by any specific regulations unique to the area or department where the contractors' work is being performed. It is understood and agreed that compliance with this program does not relieve the contractor from its sole responsibility to provide a safe work place and to fully comply with the Virginia Occupational Safety and Health (VOSH) Standard for the Construction Industry.

1.0 General Responsibilities

The contractor shall:

- 1.1. Organize and maintain an ongoing accident and fire prevention program, including general safety and health for the duration of the project.
- 1.2. Ensure that all subcontractors working for the contractor on this project maintain a similar program. International Paper considers subcontractor personnel as employees of the general contractor.
- 1.3. Familiarize himself with all information contained herein, as well as local, state and federal laws and regulations applicable to the project.
- 1.4. Review all of the applicable policies and procedures contained in this manual, in addition to those other applicable procedures noted by the IP Contractor Manager, with their employees prior to the start of actual work. Exemptions to procedures contained in this manual shall have prior written approval of International Paper.
- 1.5. Ensure the cooperation and compliance of all contractor personnel with International Paper Safety policies. The contractor shall correct all safety violations immediately. If violations continue, the contractor shall remove the offending personnel from the project.
- 1.6. Cooperate fully with International Paper personnel as required to maintain an accident free project.
- 1.7. Conduct safety briefings for all employees before allowing them to work on the job. These briefings must be documented in writing, with a copy to the IP Contractor Manager.
- 1.8. Identify location of telephone nearest to job site in case International Paper assistance for contractor injury or emergency is required.
- 1.9. Be able to locate a current copy of the IP "Contractor on Premises" procedures. These are available on the "EHS Files" icon on any IP –Franklin networked computer.
- 1.10. Know where to obtain copies of MSDS sheets for IP process chemicals in proximity to contractor's jobsite.
- 1.11. Contractor office/tool trailer at mill site shall have contractor company name and 24 hour telephone clearly posted on exterior of trailer.
- 1.12. Provide contractor employees with all safety supplies & equipment necessary to accomplish work. Additionally, as a contingency measure, the contractor shall provide, at the jobsite, back-up safety equipment ready for immediate use in case of primary equipment malfunction.

1.13. Establish and maintain a 24-hour per day phone number which International Paper may utilize to contact contractor personnel.

1.14 Contractors are expected to provide their own sources of compressed air. Contractor personnel shall not make any connection to the mill air system without prior written approval of the IP Contractor Manager and the operating department where the job is taking place.

2.0 Housekeeping

2.1 All contractor areas (trailers and jobsites) must be cleaned on a regular basis. All construction debris must be placed in containers and hauled to the IP landfill, to be coordinated through the IP Contractor Manager.

2.2 Clear access must be maintained to all emergency equipment and work areas. Areas around and walkways to equipment such as safety showers, eye/face wash units, first aid/medical supplies, stretchers, fire extinguishers, and fire hoses must be kept clear at all times.

2.3 The area used by contractor personnel for lunch and breaks shall be cleaned of all bottles, cans, bags, and other trash daily. This trash shall be placed in appropriate containers and hauled away from the mill as necessary by the contractor. This includes contractor parking areas.

2.4 If a designated smoking area has been established, the contractor is responsible for proper disposal of butt can contents.

2.5 Waste generated from materials brought on-site by the contractor (chemicals, food wastes, etc.) must be disposed of in accordance with all IP-Environmental Engineering policies and all applicable State and Federal regulations.

2.6 Keep cords and hoses 7 feet overhead or lay them flat outside of walkways. Cords and hoses that lay across roads or walkways must be protected.

2.7 All materials, tools and equipment must be kept in a stable position (tied, stacked or chocked) to prevent rolling or falling.

2.8 When cleaning oil spills in the paper machine area anhydrous soda ash (sodium carbonate) shall be used as an absorbent in lieu of "Oil Dry."

3.0 Photography Requirements

3.1 Before any video recording devices (cameras, cellphone cameras, videotape) are used at the mill site by contractors, visitors, consultants, or vendors, the Franklin "Photography Contract" must be completed by the contractor or visitor and approved by the Loss Prevention Department

3.2 While taking photographs within the mill, a copy of the photography contract must be maintained with the camera and produced if questioned by IP mill employees.

4.0 General Conduct

4.1 Unsafe workmanship or behavior, hazardous chance-taking or "horseplay" will not be tolerated at any time. Unsafe conditions including defective tools, equipment or guards must have corrective action enacted promptly.

4.2 All plant areas except immediate project work areas shall be considered "Off-Limits" to all contractor personnel except those necessary areas required to be passed through coming and going

to work. Contractor employees observed in mill areas away from their jobsite will be escorted from the mill site, and not allowed to re-enter the mill until the contractor supervisor discusses necessary training and/or disciplinary action for the contractor employee with the IP Contractor Manager.

4.3 Contractors **WILL NOT** use man lifts located throughout the mill and will not use elevators unless they have been instructed in the proper operation of the elevators.

4.4 All vending machines, lunch-lounge-restrooms, and maintenance shops, are "Off-Limits" to all contractor personnel. The contractor shall provide any facilities required to meet personnel needs.

4.5 Contractors shall provide adequate secure storage (locked gang and tool boxes) for all tools and equipment used on the project, both contractor-owned and employee-owned. **INTERNATIONAL PAPER IS NOT RESPONSIBLE FOR LOST OR STOLEN EQUIPMENT.**

4.6 Fighting, gambling, possession of firearms, possession or use of alcohol or unauthorized drugs will be reasons for contractor personnel to be barred from this site.

4.7 Smoking shall be allowed in designated areas only, in accordance with the mill's smoking policy.

4.8 Contractors will not bypass safety switches and interlocks on equipment.

4.9 All contractor employment activities will be conducted off the mill site.

5.0 Chemical Screening Program

Qualified contractors shall have a documented substance abuse program that requires testing unless prohibited by law. A testing protocol should include pre-employments, random and reasonable cause testing.

6.0 Machinery/Equipment Hazards

6.1 Material Handling

6.1.1 Contractor employees using industrial trucks or mobile equipment shall be trained by the contractor in the proper use and care of such equipment.

6.1.2 Routine inspection of material handling equipment will be conducted in accordance with appropriate VOSH standards.

6.1.3 Visible working load limit signs must be installed on all material handling equipment.

6.1.4 High visibility lighting shall be available in all areas of material handling.

6.1.5 Safety latches or suitable substitutes must be installed on all hoist hooks.

6.1.6 Frayed, kinked or rusted wire rope, chain, cable or worn rope or slings must not be used for material handling operations.

6.1.7 Materials will not be lifted overhead of International Paper employees or other contractor personnel. If necessary, areas will be barricaded to prevent people from walking underneath material handling operations.

6.1.8 Contractors shall not erect job structures (e.g. scaffolding, staging, platforms), nor use equipment (e.g. boom lifts, mobile cranes), which create an obstacle for the movement of mill

equipment, such as overhead/gantry cranes or vehicles servicing continuous processes, without the prior express approval of the IP Contractor Manager.

6.2 Hole Covers

6.2.1 Use - All holes or openings through floors or decking at all elevations must be provided with hole covers or barricades immediately. Do not store material or equipment on a hole cover. Hole covers must be legibly labeled, secured, and structurally adequate.

6.2.2 Placement - Must be cleated, wired, or otherwise secured so it cannot slip sideways or horizontally beyond the hole.

6.3 Ladders

6.3.1 Contractor employees shall not use metal ladders during performance of work at the mill. Fiberglass or wooden ladders are acceptable.

6.3.2 Portable ladders shall be lashed, blocked or otherwise secured to prevent their being displaced. The side rails of ladders used for access to any level shall extend not less than 36 inches above that level. When this is not practical, grab rails which will provide a secure grip for an employee moving to or from the point of access shall be installed.

7.0 First Aid/Medical Care

7.1 International Paper cannot assume responsibility for the treatment of injuries or illnesses suffered by employees of contractors engaged in construction or other work on the mill premises.

7.2 In case of severe injuries the Main Gate (4777) should be called and instructed to call the Rescue Squad in accordance with the established procedure for such injuries.

7.3 As a matter of courtesy, the International Paper Medical Department will upon request provide First Aid for minor injuries. The Medical Department is staffed at all times when the mill is operating.

7.4 Treatment of contractor first aid cases by the International Paper Medical Department is a privilege. All contractor employees must first notify the contractor supervisor, who in turn must notify the International Paper Contractor Manager before first aid will be administered.

7.5 Injuries and illnesses requiring the services of a physician will be directed to the Emergency Room of the Southampton Memorial Hospital or to a doctor's office. Authorization for such referral must be obtained from the supervisor of the injured or ill person except when an emergency would preclude this action.

7.6 Except in an emergency situation, International Paper will not provide transportation of non-International Paper employees to the hospital or doctor's offices. Should an emergency dictate the immediate transportation of these employees by International Paper personnel, specific information will be given to the hospital or doctor in regard to the Contractor who is responsible for the injured or ill patient.

7.7 The contractor must notify the IP Contractor Manager of all injuries occurring on the job. First Aid cases typically do not require a formal investigation, however, the contractor is responsible for providing a written report of the incident to the IP Contractor Manager, and contractor personnel, before the end of the shift. The IP Contractor Manager may decide to initiate a formal investigation, including completion of the IP Incident Investigation form.

8.0 Serious Injury Procedure

8.1 Contractors shall immediately notify the Gate House (4777) (Main Gate of Paper Mill) and request that the Rescue Squad be called. State exact location of injured person including nearest "Star of Life" location number, kind of injury (such as a fall from a scaffold or electrical shock), condition of victim (such as unconscious or trapped beneath machinery); and give your name and telephone number.

8.2 The Rescue Squad must be met by an employee who will then guide them to the exact location of the injured person. This meeting shall be at the Main Gate to the Paper Mill or at the No. 6 Recovery Boiler gate to the Pulp Mill.

8.3 Contractor site supervision must promptly notify the IP Contractor Manager that a serious injury has occurred. IP Franklin's Incident Investigation form will be completed for all OSHA recordable injuries, in addition to any investigations performed by the contractor.

8.4 If unsafe conditions exist which pose a hazard to International Paper, contractor, or visitor personnel, the contractor supervisor shall promptly inform a production department supervisor so that immediate corrective action can be initiated to eliminate or reduce further injuries or illnesses.

8.5 In the event that a response is required by International Paper, any individual may request such assistance by calling 4777 and notifying the Main Gate Guard. A detailed description of the situation must be given to the Guard who will then appropriate personnel.

9.0 Electrical Safety

9.1 Electrical Control Rooms

9.1.1 Electrical control rooms are designed and constructed for the protection of electrical equipment only. They may have power levels up to 13,800 volts and include both 480 volt and 2400 volt motor starters. The rooms are, therefore, for Authorized Personnel only, and are not to be used for storage, breaks/lunch or other purposes without the specific written approval of the IP Maintenance Manager.

9.1.2 Electrical control room doors are to be kept shut at all times unless opened for entry of personnel or equipment. DO NOT PROP DOORS OPEN. If the door closer will not close the door properly, report it to the International Paper Contractor Manager immediately. Electrical control room doors shall not be blocked without written approval from the IP Maintenance Manager.

9.2 Electrical Safety

9.2.1 Electrical power cords ARE NOT to be run through door openings - thus holding doors partly open. Keep door shut tightly.

9.2.2 Ground Fault Interruption (GFCI) equipment shall be used at the electrical outlet supplying power to 110/120 volt electrical tools and equipment. For contractor supplied equipment (e.g. generators, welding machines) which have built-in GFCI protection, portable GFCIs are not required if the contractor has conducted and documented a pre-use inspection of the equipment.

9.2.3 Do not remove electrical fixtures or conduit to facilitate installation or removal of equipment. Check with the IP Contractor Manager for assistance when electrical components or equipment require displacement.

9.2.4 Contractor shall ensure that their employees are instructed in appropriate Electrical Safety Related Work Practices.

9.2.5 All 110/120 volt extension cords shall be in good repair and be of three (3) conductor NEMA design with ground terminal in operating condition.

9.2.6 Exposed lighting panels, drive cabinets, etc. shall be barricaded at least 4 ft. to keep working clearances correct and to protect "unqualified, non-exposed" employees from the hazard.

9.2.7 Contractor shall implement a grounding assurance program to inspect for frayed insulation, appropriate connections, ground fault circuit interrupters, double insulated power tools, etc., and correct all deficiencies identified.

9.3 Contractor Electrical Tie-In

9.3.1 All contractor electrical work within the boundaries of existing mill electrical equipment and systems shall be coordinated through the International Paper Maintenance Department.

9.3.2 All work within existing electrical equipment is required to be witnessed by International Paper Maintenance Department personnel. All work practices shall be in compliance with Electrical Related Safe Work Practices (1910.331-335), Power Generating Equipment (1910.269), and with the Personal Protective Equipment Standards (1910.137) or similar Construction Industry Standards.

9.3.3 All work will be accomplished by the contractor and will be the sole responsibility of the contractor.

9.3.4 All temporary wiring installations shall comply with Article 305 of NFPA 70, National Electrical Code.

9.3.5 Electrical systems in contractor trailers shall comply with NFPA 70.

9.3.6 International Paper will provide trailer service at 220v, single phase, 4 wire, 50 amperes. This service is provided via a 50A, NEMA 14-50 receptacle. The contractor is responsible for the plug at the trailer.

10.0 Security & Traffic Procedures

10.1 Security of Equipment

10.1.1 In addition to maintaining up-to-date listings of serial numbers, all contractor owned and privately owned tools and equipment should be marked in some manner. The more visible are the markings, the greater the deterrent against theft. If the items are stolen and later recovered by police, the items will be returned. On high value personal items, using the state abbreviation and driver's license number will enable police to locate the owner.

10.1.2 Equipment storage area, gang boxes, trailers, pre-fabricated buildings, and other tool storage areas should remain locked when no one from the contractor crew is in the immediate area. Avoid locating gang boxes in remote, poorly lighted areas. Whenever possible, group them together and if feasible enclose with a temporary fence and security lighting. Even with a fence the individual boxes should be secured with a good quality padlock.

LOCKS DESIGNATED AS THE LOCKOUT LOCK (#7 Master Lock) SHALL NOT BE USED FOR THIS PURPOSE. Small tool boxes should be chained to heavy equipment when unattended.

10.1.3 Make reports as soon after discovery of the theft as possible, to the Main Gate Guard, extension 4434. Leave the crime scene intact until arrival of the responding deputy. Provide descriptions of the stolen property including value and serial numbers if available.

10.2 Parking Control

10.2.1 Parking for contractor personnel is limited to designated areas east of state route #691 and other designated areas as determined by International Paper. No personal vehicles are allowed in mill parking lots or within the mill.

10.2.2 Only necessary contractor owned vehicles are allowed within the mill areas, and they must have plainly visible identifying markings. The contractor supervisor shall consult with the IP Contractor Manager to insure his company name is on the contractor list on the IP-Franklin computer network "homepage". This list is used by IP security personnel when opening mill gates to allow contractor access to the mill site. Over-the-highway contractor vehicles must have a gate pass issued by IP to enter manufacturing areas of the mill. Contractor vehicles shall utilize either the Main Gate or #6 Recovery Boiler gate for entering and exiting the mill's manufacturing areas (the "Scales" gate is reserved for pick-up and delivery operations, typically involving tractor-trailers).

10.2.3 Parking along streets or at the end of parking aisles is prohibited.

10.2.4 Parking is not authorized on the grass, sidewalks, etc., or in such a manner that blocks or creates a hazard for other vehicles.

10.2.5 Parking in areas that have been designated as "no parking" zones is prohibited at all times.

10.2.6 Head-in parking is required in lots with one-way aisles and recommended in other lots.

10.2.7 Any contractor vehicle parked inside the mill must be left unlocked, with the keys visible, in the event the vehicle must be moved during an emergency.

10.3 Traffic Safety Rules

10.3.1 Obey posted speed limits (15 mph max.) and safety signs.

10.3.2 Vehicles used to transport employees shall have seats firmly secured and adequate for the number of employees to be carried per VOSH standard 29 CFR Part 1926.601(b) 8. This requirement may be satisfied by having contractor personnel sitting in the closed bed of pickup trucks. Contractor employees sitting on the sidewalls or tailgate of a truck is prohibited.

10.3.3 Yield to pedestrians.

10.3.4 Always stop your vehicle when entering a street from a parking lot.

10.3.5 Do not pass tractor trailer trucks stopped adjacent to the loading dock east of roll finishing (area between sheet plant and roll finishing) unless the driver signals you or you are sure the driver is out of the cab.

10.3.6 Seatbelts, if installed on the vehicle (or equipment), must be worn at all times while being operated on mill premises.

10.4 Pedestrian Entrance & Exit

10.4.1 Pedestrian entry/exit to the mill is through gates at #6 Recovery Boiler or “Brass Alley” (directly across the public highway from the contractor parking lot). Any alternate routing must be approved by the IP Contractor Manager and Loss Prevention.

10.4.2 Contractor personnel must “sign in” and “sign out” on gate logs.

10.4.3 Safety glasses, hard hats and safety shoes must be worn when entering the premises. Contract employees entering through the #6 Recovery Boiler gate must have appropriate escape respirators on their person.

10.4.4 All contractor employees shall have a single color hardhat with a company name or logo and the employee’s name or number clearly visible at all times. Contractor supervisors shall have a color-contrasting stripe around or at least on each side of their hardhat as a means of identification.

10.5 Visitor & Delivery Control Procedure

10.5.1 The purpose of this section is to control visitor and delivery traffic to the mill in such a way that personnel will remain safe and International Paper confidentiality and security is maintained.

10.5.2 Before contractors can receive visitors and/or vendors, the contractor superintendent must notify the IP Contractor Manager. The IP Contractor Manager will then implement the International Paper Visitor & Delivery Personnel Procedure. In addition, this requirement applies to personnel associated with regulatory agencies.

10.5.3 Deliveries either by common carrier or by contractor personnel shall be covered by all IP safety procedures. All drivers are required to wear personal protective equipment and it is the responsibility of the contractor to make the drivers aware of International Paper's safety procedures. Delivery personnel who are not wearing the required personal protective equipment shall stay within their trucks.

10.6 Hiring Of Personnel

Prospective employees should be instructed to meet the appropriate contractor representative in the construction parking lot or some other site off the mill premises. Do not have them gather in the vicinity of any mill gate. Contractors are prohibited from hiring personnel on International Paper premises.

11.0 Hazard Communication

11.1 The contractor is responsible to assure compliance with 29 CFR 1926.59 Hazard Communication Standard regarding hazardous materials (i.e. labeling, MSDS, hazard determination, and training).

11.2 The contractor will ensure that all hazardous materials and chemicals it brings onto International Paper's property will be labeled in accordance with the requirements of the OSHA Hazard Communication Standard (29 CFR 1926.59). The NFPA or HMIS Hazard Ratings are preferable methods of labeling.

11.3 The contractor will obtain, or have access to, the appropriate process chemical hazard information through the IP Contractor Manager. The contractor is required to maintain MSDS forms for chemicals being used during the construction/maintenance activity.

11.4 Using the chemical hazard information, the contractor supervisor shall train personnel on chemical hazards, detection methods, symptoms of exposure, first aid measures, spill procedures

and methods used to prevent exposure including good work practices, housekeeping, engineering controls, and required personal protective equipment.

11.5 Contractor supervisor must ensure employee understanding of hazard communication training by appropriate verification/test methods. Documentation may be requested by the IP Contractor Manager.

11.6 The contractor must conduct training for all employees at the start of the job, and subsequently for any new employees hired. When a new chemical hazard is introduced to the workplace, training on the hazards associated with that material must be performed prior to its use.

12.0 Hazardous Materials

12.1 Compressed Gas Cylinders

12.1.1 Cylinders must be tied off vertically to an adequate support while in storage, transit, or use.

12.1.2 Lift cylinders to upper levels with appropriate cages only. Do not lift with slings or by the protective cap.

12.1.3 When cylinders are stored, they must be capped, separated by gas type, and secured in designated storage areas. Cylinders must be within their specified inspection date.

12.1.4 Oxygen and fuel gas cylinders must be secured using a substantial, non-combustible restraint.

12.2 Contractors shall not store, handle, apply or use acids or caustics until detailed instructions, safety precautions, and proper protective equipment are obtained.

13.0 Radiographic Work

13.1 General Requirements

13.1.1 All radiographic work must be in compliance with 29 CFR 1926.53.

13.1.2 No radiographic work will be conducted without the approval of the International Paper Radiation Safety Officer and the operating department superintendent responsible for the area.

13.1.3 When radiographic work is necessary, the contractor will notify the International Paper Contractor Manager. The IP Contractor Manager will notify the department superintendent responsible for the area to schedule the work and to ensure that International Paper employees will be out of the area during the work.

13.1.4 The area around radiographic work will be blocked off and signs will be posted at all entrances to the areas. The signs must have standard radiation warnings similar to:

**DANGER
RESTRICTED AREA
RADIOACTIVE MATERIALS
X-RAY HAZARD**

13.1.5 The size of the area to be blocked off will depend upon the type of radiographic work being done, the size of the source being used and shielding provided by surrounding equipment and buildings. The size of the area should be determined by standard radiation protection practices and the need to prevent exposure of International Paper employees.

13.2 Specific Requirements

13.2.1 At least one operable, calibrated survey meter must be on site and preferably one per camera, prior to the beginning of any radiographic work.

13.2.2 There must be documentation showing that the survey meter has been calibrated within the past three (3) months.

13.2.3 When not in use, radiographic devices must be locked and must be under constant surveillance or locked in storage. Under no circumstances will a restricted area or nuclear device be left unattended.

13.2.4 Prior to radiographic exposures, an initial boundary for the "restricted area" must be established based on calculations of 2 milliroentgen/hour (mr/hr) exposure rate, identified with rope or barrier tape and posted with the words "CAUTION (OR DANGER) RADIOACTIVE MATERIALS."

13.2.5 At the first exposure, the 2mr/hr boundary is to be verified by survey meter, the boundary adjusted if necessary, and the survey results documented.

13.2.6 The radiographer or his assistant must maintain direct surveillance of the restricted area and keep all personnel out of the area during exposure. Cease exposure if personnel cannot be kept out of area.

13.2.7 Following exposure, perform survey to ensure that the source has returned to the shielded position.

13.2.8 A radiographer will perform radiography or personally supervise the activities of a radiographer assistant in performance of radiographic operations.

13.2.9 Perimeter surveys as identified above must be repeated each time exposure technique or geometry changes.

13.2.10 Only radiographers or radiographer assistants will be allowed in restricted areas during radiographic operations.

14.0 Oil Spill Notifications

In the event of an oil spill

14.1 Stop the leak, if possible, and notify the IP Contractor Manager, or, if unavailable, a production department supervisor. If outside the mill, call the Main Gate (569-4434).

14.2 ALL OIL SPILLS MUST BE REPORTED, REGARDLESS OF SIZE BY THE IP CONTRACTOR MANAGER, PRODUCTION SUPERVISOR, OR CONTRACTOR SUPERVISOR TO THE TECHNICAL DEPARTMENT.