



Forged Products Operations  
Environmental Health & Safety Procedure

CREATION DATE: 24 November 2010  
REVISION DATE: 11 October 2023  
REVISION: 11

---

# Contractor EHS Policy

---

## EHS 017.1

ATI Forged Products - Cudahy Operations

ATI Forged Products – Appleton Operations

ATI Forged Products – Coon Valley Operations

ATI Forged Products – East Hartford Operations

ATI Forged Products – Irvine Operations

**UNCONTROLLED COPY IF PRINTED**

# Contractor EHS Policy

11

## 1.0 PURPOSE

- 1.1 The Contractor Safety Policy has been developed to outline the safety requirements for contractors working at ATI Forged Products. This policy is consistent with Occupational Safety & Health Administration (OSHA) requirements.

## 2.0 SCOPE

- 2.1 This process procedure applies to all contractors performing work for ATI Forged Products Business Units.

## 3.0 DEFINITIONS

- 3.1 **Green (Vendor Approved)** – A contractor receiving a Green rating is automatically approved to perform work at this Company.
- 3.2 **Yellow (Approval Contingent on EHS Department’s Decision)** – A contractor receiving a Yellow rating is subject to either approval or denial by the EHS department.
  - 3.2.1. If the contractor is denied they must be given feedback on the corrective action that needs to be assigned in order to reach Green status.
  - 3.2.2. Note: A Contractor may receive a yellow rating while still being able to perform work at this Company upon the approval of the EHS Department.
- 3.3 **Red** – Improvement Required/Corrective action must be taken in order to perform work at this Company. Contractors in this status may be removed from the approved contractor list after EHS, Facilities and Supply Chain review scope of work deficiencies.
  - 3.3.1. Contractors with this status may also be denied entry to the facility.
- 3.4 **Project Manager/Facilitator** – Person responsible for project or on-site activities provided by outside parties.

## 4.0 RESPONSIBILITIES

- 4.1 This policy will be administered by the EHS, Maintenance, Supply Chain Management/Purchasing and Facility Engineering Departments with specified duties as follows:
  - 4.1.1. **Supply Chain Management/Purchasing:**
    - A. Advise and provide the Contractor with all Company documentation required under this policy.
    - B. Will ensure that the Qualification EHS Questionnaire (EHS 017.1.1) has been completed, requested OSHA Logs have been provided, and the Contractor Safety Acknowledgement of Receipt (EHS 017.1.2) and Certificate of Liability Insurance has been completed and returned.
    - C. Document revision to be viewed and approved by Purchasing Manager or designee prior to issuance.
    - D. Adding new contractors to the Approval List.
  - 4.1.2. **Project Manager/Facilitator:**
    - A. Take steps to protect contract workers who perform work on or near potentially hazardous processes.

UNCONTROLLED COPY IF PRINTED

## Contractor EHS Policy

- B. Explain the applicable provisions of Company procedures pertinent to work being performed such as EHS 017.1.3 - Contractor Prewrite Checklist, Lockout/Tagout, Confined Space, Hot Work Permits, Emergency Action Plan and Personal Protective Equipment.
- C. In conjunction with the contractor, complete and retain permits required by Company Procedure to include Confined Space and Hot Work Permits.
- D. If you have a Security Department then notify Security of all subcontractors performing work at the facility.
  - i. Failure to notify Security of any subcontractors may result in them not being permitted entry to the facility.
- E. If you do not have a security department the approved contractor list must be verified.

### 4.1.3. EHS Department:

- A. Will provide training as requested by Project Manager or Supply Chain Management/Purchasing.
- B. Communicate Company Contractor Safety requirements.
- C. In conjunction with Supply Chain Management/Purchasing, will assist the Contractor in the Certification process and subsequent renewal.
- D. In conjunction with the Project Manager/Maintenance Supervisor, will retain on file, pertinent written instruction and/or permits generated through Hot Work and Confined Space activity.
- E. Will assist the Project Manager/Maintenance Supervisor in meeting the requirements of all Company Procedures.
- F. EHS Department will determine and manage contractors color code per Section 3.0.
- G. EHS will retain all documentation required by this policy and ensure that all conditions have been met prior to Contractor Certification approval and release passed onto the EHS department.

## 5.0 REFERENCES

- 5.1 [EHS 017.1.1 – Pre-Qualification EHS Questionnaire](#)
- 5.2 [EHS 017.1.2 – Contractor EHS Policy – Acknowledgement of Receipt](#)
- 5.3 [EHS 017.1.3 – Contractor Prewrite Check Sheet](#)
- 5.4 ATI Forged Products Approved Contractors List

## 6.0 PROCEDURE

### 6.1 Contractor Selection Criteria:

- 6.1.1. In order to perform services for this Company, all contractors must be certified by the EHS Department, through Supply Chain Management/Purchasing.
- 6.1.2. Certification will require the completion of the EHS Questionnaire and providing OSHA 300 Logs (3 years), and Certificate of Liability Insurance, as requested.

## Contractor EHS Policy

<b>11</b>
-----------

- 6.1.3. After initial certification, Contractor status will be reviewed on a periodic basis, **or a maximum of every three years** as determined by EHS Department and concurred by the Supply Chain Management/Purchasing.
- 6.1.4. Under emergency conditions, Supply Chain Management/Purchasing may retain contractors unable to submit the required pre-certification information prior to project start.
- A. Under these conditions the contractor will be given 30 days to meet certification requirements.
- 6.1.5. Proceeding the award of the contract, the contractor shall complete and provide Supply Chain Management/Purchasing Department with the following:
- A. Heavy Service Contractor (Building & Infrastructure installation and repair is regulated by OSHA 1926 Construction Standard or OSHA 1910 General Industry Standard).
- i. Current certificate of liability insurance containing commercial general liability, workers compensation liability and other special coverage if any, auto liability, excess liability.
  - ii. A completed EHS 017.1.1 Qualification EHS Questionnaire.
  - iii. Required OSHA 300 Logs.
  - iv. Signed copy EHS 017.1.2 Contractor EHS Policy – Acknowledgement of Receipt
- B. Light Service Contractor (Copy Machine Service, Stationary delivery, vending service, cleaning service, scale calibration, etc.).
- i. Current certificate of liability insurance containing commercial general liability, auto liability, excess liability, worker compensation liability and other special coverage.
  - ii. A completed EHS 017.1.1 Qualification EHS Questionnaire.
  - iii. Signed copy EHS 017.1.2 Contractor EHS Policy – Acknowledgement of Receipt
- C. Temporary Contractors
- i. On occasion it may be necessary to engage a service contractor on short notice to provide emergency repair and maintenance service.
  - ii. Temporary Contractors may be allowed to perform services without meeting Insurance and EHS documentation requirements.
  - iii. When applicable the temporary contractor will be escorted by a Company representative to minimize the risk of injury.
- 6.1.6. Once the Contractor has satisfied all requirements and is approved, they will be added to the Approved Contractors List in the EHS SharePoint site.
- A. If an approved contractor hires a subcontractor to come on-site, it is the responsibility of the Original contractor to train and ensure the subcontractor meets our EHS requirements.
- 6.1.7. Upon commencement of work at the facility:
- A. Facilitator will have contractor/subcontractor fill out the EHS 017.1.3 Contractor Prewrite Check Sheet.

**UNCONTROLLED COPY IF PRINTED**

**Contractor EHS Policy****6.2 Contractor Rating:**

- 6.2.1. After the EHS Department evaluates the answers to the Contractor Questionnaire each Contractor is put into one of three categories (Green, Yellow or Red).
- A. The color assigned to the contractor reflects the completeness of the Contractor's Safety Policy and determines if corrective action is needed prior to the Contractor to the start of work.
- 6.2.2. Deficiencies in a Contractor's Safety Program will negatively impact their rating and may warrant corrective action before the Contractor may start work at the facility.
- A. If the deficiencies outlined in the questionnaire directly relate to the type of work the Contractor performs the Contractor will receive a Yellow or Red rating.
  - B. A Yellow rating allows the EHS Department to determine whether the Contractor is approved or denied.
  - C. If given a Red rating, the Contractor will need to implement corrective action to achieve approved status.
- 6.2.3. If an existing contractor violates the Contractor's Safety Program and an incident is filed with EHS, then their status will be reviewed accordingly.

**6.3 Training:**

- 6.3.1. All Contractors will be expected to comply with all training required by OSHA 1910 and 1926 standards. In addition, the contractor will be required to be compliant with Company Procedures on any, or all the following:
- A. EHS 015.1 Hazard Communication Program
  - B. EHS 007.1 Lockout/Tagout
  - C. EHS 006.1 Confined Space (Cudahy)
  - D. EHS 009.2 Hot Work Permits
  - E. Asbestos Awareness
  - F. EHS 005.1 Personal Protective Equipment
  - G. Fall Protection General Industry (OSHA 1910.33; Appendix C)
  - H. EHS 011.3 Mobile Equipment Safety
  - I. EHS 012.1 Overhead Lifting Devices
  - J. EHS 003.1 Emergency Action Plan
  - K. Applicable Electrical OSHA & NFPA Standards
  - L. EHS 023.1 Bloodborne Pathogens Exposure Control Plan

**6.4 Personal Protective Equipment (PPE):**

- 6.4.1. The Contractor is responsible for providing all PPE required by OSHA and EHS 005.1 PPE Procedure

**Contractor EHS Policy**

<p><b>11</b></p>
------------------

**6.5 First Aid:**

6.5.1. **Medical Incidents** - any employee injury must be reported to the EHS Department and the Project Manager/Facilitator.

**6.6 Disciplinary Action:**

6.6.1. Company reserves the right to refuse or cancel access to Company property to any Contractor or their employees for disregarding ATI Company rules.

6.6.2. The contractor and contract employees will comply with all rules and regulations that apply.

6.6.3. Violations may result in the disqualification of a vendor, termination of a vendor’s contract or refusal to allow contractor employees onto Company property.

**7.0 ATTACHMENTS AND/OR FLOWCHARTS**

7.1 N/A

**8.0 APPROVALS**

8.1 Share Point approval to include:

8.1.1. Each ATI Forged Products EH&S Designated Representative

8.1.2. **Manager, EH&S**

**9.0 RECORDS**

9.1 Approved Contractors for each ATI Forged Product locations in the Approved Contractors List Library.

9.2 Contractor documentation is stored in the records library within EHS SharePoint site.

**10.0 REVISION HISTORY**

REVISION	DATE	SUMMARY
5	05/10/2016	Entire rewrite of document and given a new number from Doc # 3.6.
6	06/22/2016	4.1.1 (C) moved to 4.1.3 (E)
7	07/22/2016	2.1 – New paragraph. 3.3 – Updated paragraph. 4.1.1 (B) – Added Certificate of Liability Insurance. 4.1.1 (C) – New. 4.1.3 E – Renumbered to F and a new paragraph created for E. 5.3 – Added reference to Approved Contractors. 6.1.1 - Updated paragraph. 6.1.2 – Added “After” to the beginning of the paragraph. 6.1.4 (i) – Added auto liability, excess liability. 6.2.2 Updated paragraph. 6.2.3 – New paragraph. 6.3.1 – Added J-L. 6.5.1 – Changed n to “Any”. 8.1.2 – Added approver.
8	09/15/2017	4.1.2 (B) added Contractor Pework Checklist. 5.3 renumbered to 5.4 and updated hyperlink. 5.3 – New reference. 8.1.1 – Updated approvers. 9.1 – Updated where the spreadsheet is kept and changed from Cudahy only to ATI Forged Products as each location has one.
9	07/24/2018	Amended definition of Red Status. 4.1.2 (D) – Added to include Subcontractor requirements. 8.1.2 – Added Director, EH&S to approval chain.
	7/12/2019	Annual Review – No Changes per EHS Team. Removed Portland/Lebanon from

**UNCONTROLLED COPY IF PRINTED**

**Contractor EHS Policy**

---

**REVISION      DATE      SUMMARY**

		cover page and removed Director, EHS from approval section only. No content change.
10	09/06/2019	Updated document references throughout the procedure. Added definition for Project Manager/Facilitator. Clarified which forms are required to be completed based on the contractor type. Added 6.1.5 & 6.1.6. 8.1.2: Added Director, Quality & EHS as an approver.
11	10/11/2023	Updated 6.1.2, 8.1.2 and removed Billerica Ops from cover page.
		01/14/2025 – Renumbered document. No content change.