



TYPE: EHS & Security	OWNER: Beth Zajkowski	RELEASE DATE: 05/25/2022
APPLICABLE: Howmet Structure Systems (US Locations)	TITLE: Environmental Health, Safety & Security	

ENVIRONMENTAL, HEALTH, SAFETY AND SECURITY:

Seller shall furnish a copy of Safety Data Sheet (SDS) for any product or material furnished on this purchase order which is or contains hazardous materials as defined in the code of Federal Regulations 29CFR 1910.1200 and/or CFR 49 and/or the Hazardous Products Act (R.S.C., 1985, c. H-3) and Hazardous Products Regulations (SOR/2015-17). Products and materials requiring SDS shall also be labeled according to the requirements in 1910.1200 and in the Hazardous Products Regulations (SOR/2015-17). The above-mentioned Safety Data Sheet shall be furnished to the Company's attention and be in their possession at least 48 hours prior to the arrival of the material at the Company's plant site. The Safety Data Sheet shall be marked with the Company's purchase order number/release and must contain the applicable case numbers as well as an assurance of the chemical's full compliance with the Toxic Substance Control Act (15 U.S.C. SEC. 2612 et. seq.) and the Hazardous Products Act (R.S.C., 1985, c. H-3). Any new information or changes to the original SDS shall be supplied to the Company promptly and in no case shall exceed three (3) months.

If any product covered by the purchase order is or contains a chemical substance as defined in the title 40, part 710 of the Toxic Substance Control Act (TSCA) (15 U.S.C. SEC 2612 et. seq.) and/or Canadian Environmental Protection Act, 1999 (S.C. 1999, c. 33) (CEPA), the Seller's acceptance of this order indicates its full compliance with all applicable rules, orders and regulations under TSCA and/or CEPA. The Seller certifies that they are not offering chemical substance(s) for import in violation of TSCA and/or CEPA or any applicable rule, regulation or order under TSCA and/or CEPA. Supplier represents that none of the goods purchased hereunder contain any polychlorinated biphenyls (PCBs). In addition to Howmet's Standard Terms and Conditions, Seller also agrees that all articles of material to be delivered in accordance with this purchase order is free of any asbestos containing material as defined by the United States Occupational Safety and Health Administration at 29 CFR 1910.1001(b). Seller warrants that any metal and semi-finished metal products delivered under this purchase order do not contain any regulated radioactive materials. Seller agrees to indemnify and hold Howmet harmless from any and all claims, demands, costs and expenses, including reasonable attorney's fees, resulting from or arising under, in whole or in part a breach of the forgoing warranty. Seller agrees to be responsible for proper removal and disposal of any such materials and to pay the costs of any necessary clean-up.

If Seller's materials or products do not exactly match the description on this purchase order, approval for substitution must be given by Company prior to shipment. A product specification sheet and safety data sheet must accompany the substituted material or product.

Flatbed Truck Delivery / Pick-up Policy

- Drivers' access to Flatbed trailers WITHOUT integrated fall protection (e.g., trailers with side kits, Conestoga, low boy trailers, etc.) is prohibited for activities such as securing the load, tarping, untarping and other related elevated activities WITHOUT the use of Company on-site fall protection platform.
- All Howmet site-specific procedures associated with delivery trucks must be followed completely. Failure to follow these important Safety rules could lead to the driver being removed from the location.

Tanker Truck Delivery / Pick-up Policy:

- Deliveries to Company location via tanker trucks are to be made with the delivery company/transporter taking adequate safety measures to minimize risk of fall incidents.
- Adequate safety measures such as, but not limited to, the following are to be provided by the tanker truck delivery company/transporter:
 - All activities are to be performed from the ground level with no climbing onto truck other than entering operator cab;
 - Working from within side rails of permanently mounted ladder on truck to access necessary controls and not overextending reach from the ladder;
 - Working from/within a platform/catwalk with proper guardrails installed; or
 - Working on the truck tanker while the operator is fully protected via full body harness and proper, engineered tie-off to an approved anchorage point on the tanker. (NOTE: Engineered anchor point to be properly labeled and inspected)
- All necessary equipment, training, certifications/approvals, INSPECTION RECORDS, and procedures shall be provided by the delivery company/transporter. Contact the ordering party or EHS if a delivery cannot be made utilizing the above specified safety measures.
- Company will establish a window of time when deliveries and pickups are to be made – will be within standard Company hours/schedules.
- All Howmet site-specific procedures associated with delivery trucks must be followed completely. Failure to follow these important Safety rules could lead to the driver being removed from the location.

ODS Management Plan - Appendix A (March 2018)

Refrigeration Repair Services -- Additional Contract Requirements at Howmet US Locations¹

All refrigeration system repair work performed at Howmet locations must comply with requirements of Clean Air Act regulations for Protection of Stratospheric Ozone (e.g., 40 CFR Part 82 Subpart F). Effective January 01, 2018 these requirements cover Class I and Class II refrigerants and non-exempt-substitute refrigerants. Contractor(s) conducting refrigeration repair services at this facility shall provide the following:

1. Technicians must be certified by an approved Certification Program for the type of refrigeration units they are servicing (§82.161). Prior to initiating work under this contract, the contractor shall provide the Howmet contact a copy of the Technician Certification for all personnel that will be conducting refrigeration repair at this facility. Updates for new personnel shall be provided on at least a quarterly basis.
 2. Only properly certified equipment can be used for recycling and recovery of refrigerants (§82.158). The contractor shall only use certified equipment to repair and service refrigeration equipment at Howmet locations
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3. The contractor shall provide the Howmet contact with documentation that the recycling and recovery equipment has been certified.
4. Any refrigerant that can be put back into the system it originated from without further processing should be re-used.
5. Contractors performing refrigeration repair services are to ensure transport and reclamation (or disposal) of recovered refrigerant in accordance with Howmet's [Refrigerant Reclamation-Disposal Policy](#). On a per shipment basis, contractors are to provide Howmet contact with documentation/ certification that refrigerant was managed by [EPA-Certified Refrigerant Reclaimers](#).
6. The contractor shall provide Howmet the following records, at a minimum, for worked performed on any appliance (air conditioner, refrigerator, chiller, or freezer, etc.):
 - Identification of the unit serviced
 - The date repair work was completed on the unit
 - A description of the work performed
 - The type and amount of refrigerant added to the unit (if any), and
 - The amount of refrigerant recovered from the unit (if any)
7. Large appliances, those with a full charge capacity greater than 50 pounds (>50 lbs.), must have significant leaks repaired within 30-days of the leak being found [§82.156 (i)]. Until January 01, 2019 significant leaks rates are defined as an annualized leak rate of $\geq 15\%$ for comfort cooling appliances and $\geq 35\%$ annualized leak rate for industrial process refrigeration and other equipment. Effective January 01, 2019 significant leaks are defined as an annualized leak rate of $\geq 20\%$ for commercial refrigeration equipment, $\geq 30\%$ for industrial process refrigeration equipment, and $\geq 10\%$ for comfort cooling and other appliances. For all large refrigeration units, a *follow-up verification test*² is required to document that repairs were successful and that the 30-day repair requirement was met. The contractor shall provide Howmet the following records, at a minimum, for worked performed on an appliance that has a full-charge capacity that is >50 lbs.:

Records for initial repair:

- Identification of the unit serviced
- The date initial repair work was completed on the unit
- A description of the initial work performed
- The type and amount of refrigerant added to the unit
- The amount of refrigerant recovered from the unit (if any)
- **Immediate notification to Howmet contact if repair cannot be made within 30 days**

Records for follow-up verification (must be within 30 days of initial repair):

- Identification of the unit serviced
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- The date the *follow-up verification test* was completed (if any refrigerant added during initial repair)
- A description of the follow-up work performed
- Results of the follow-up verification test
- The type and amount of additional refrigerant added to the unit (if any)
- **Immediate notification to Howmet contact if unit fails the *follow-up verification***

8. Contractors preparing small appliances, MVACs, and MVAC-like appliances for disposal must provide Howmet contact with copies of signed statements verifying that refrigerant has been evacuated from the appliance prior to disposal (§ 82.155). The statement must indicate that all refrigerant that had not leaked previously has been recovered from the appliance. This statement must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered. Contractor will forward a copy of the signed statements to Howmet contact.

¹ This scope of work language conforms to the requirements of Howmet's [Refrigerant Reclamation-Disposal Policy](#). When using the **Recommended Scope of Work Language for Contracted Refrigeration Repair Services at US Locations**, Transporters and Reclaimers of refrigerants are excluded from the Howmet's TSDF/Transporter auditing standard (60.13).

² *Follow-up verification test* means, for the purposes of §82.156(i), those tests that involve checking the repairs within 30 days of the appliance's returning to normal operating characteristics and conditions. Follow-up verification tests for appliances from which the refrigerant charge has been evacuated means a test conducted after the appliance or portion of the appliance has resumed operation at normal operating characteristics and conditions of temperature and pressure, except in cases where sound professional judgment dictates that these tests will be more meaningful if performed prior to the return to normal operating characteristics and conditions. A follow-up verification test with respect to repairs conducted without evacuation of the refrigerant charge means a reverification test conducted after the initial verification test and usually within 30 days of normal operating conditions. Where an appliance is not evacuated, it is only necessary to conclude any required changes in pressure, temperature or other conditions to return the appliance to normal operating characteristics and conditions.