

Updated 07/10

EVEREADY BATTERY BENNINGTON, VERMONT

FACILITY SPECIFIC HOUSE RULES FOR OUTSIDE CONTRACTORS

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GENERAL RULES AND REQUIREMENTS
BENNINGTON FACILITY

A. EMERGENCY PROCEDURES

Medical: Report all medical or first aid emergencies to the security office. Dial "0" on the nearest phone. Advise the security office of your location in the plant and the nature of your emergency. The security office will summon the Bennington Rescue Squad to your location.

DIAL "911" TO DISPATCH EMS

Fire: In the event of a fire, do not attempt to extinguish. Immediately leave the area and evacuate the facility via the nearest designated emergency exit or secondary emergency exit (review maps in your work area). Report the fire by activating the manual fire alarm pull station located at each emergency exit. Upon evacuation, report to the nearest EBC Exit Tender and advise them of the nature and location of the fire.

Environmental: In the event of a spill of a hazardous material, do not attempt to clean up. Notify the security office by dialing "0" on the nearest phone. Advise security of the location and nature of the spill.

Do not place hazardous materials in a trash can or sink, regardless of circumstances.

B. CONTRACTOR TRAINING

To gain unescorted access to the plant, all contractor employees must attend EBC Bennington's Contractor Safety Training. This training is required to be updated annually. No contractor employee will be allowed on-site without an EBC escort.

C. CONTRACTOR BADGES

All contractor employees shall wear and display, when asked, their contractor safety badge.

D. ENTRY TO AND EXIT FROM THE FACILITY

All contractor employees shall enter and exit the facility through the Scott Street Security Office. Contractor employees shall sign the Contractor Sign-In form located at the Scott Street security office when they;

1. Enter the facility
2. Leave the facility for any reason.

Exception: Contractors may utilize other entry and exit doors as their work requires. However, upon leaving the plant site (that is the area bordered by Scott, Gage, Division and Pratt Streets) they must report to the Security office and sign the Contractor Sign-In Form.

E. REPORTING PROCEDURES

Upon reporting to Energizer, the lead contractor employee shall contact their EBC Contact and advise them of their presence and planned location in the facility.

Upon leaving the facility, the lead contractor employee shall contact their EBC Contact and advised them of their departure.

F. HAZARDOUS WORK PERMITS

The Contractor must obtain Hazardous Work Permits signed by an authorized EBC representative to perform any of the following operations:

1. Use of ignition sources in restricted spaces (including all welding and cutting in the facility).
2. Entering vessels or confined spaces.
3. Opening process equipment.
4. Electrical hot work. (See Section D)
5. Making excavations and trenches.
6. Moving radioactive sources.
7. "Hot pipe" tapping.
8. Operating heavy equipment around electrical power lines.
9. Working in electrical manholes or other confined spaces.
10. Working in oxygen-enriched, oxygen-deficient, or other potentially hazardous environments.
11. Breaking or cutting lines or opening equipment which did or could contain toxic, corrosive, flammable, hot, or pressurized materials.
12. Working at elevations greater than 6 feet.

G. PROCESS SAFETY

Contractors working in production areas must advise the EBC Contact person of any work on or near any production machinery or material storage containers.

H. SMOKING AND OPEN FLAMES

SMOKING IS ABSOLUTELY PROHIBITED IN THE PLANT OR ON THE PLANT ROOF. Designated smoking areas are provided outside the facility at the Plant I cafeteria exit and at the rear of Plant II.

Cigarettes, cigars, and matches shall be disposed of in designated receptacles and shall not be thrown in trash containers.

SPECIFIC SAFETY RULES

A. ASBESTOS

Although most asbestos pipe insulation has been removed, there are a few areas remaining. If the project involves pipe insulation, the contractor shall confirm the status of the insulation as to its asbestos content prior to commencement of work.

There are also areas of the facility that include asbestos floor tile. Confirm the status of floor tile prior to commencement of work.

B. COMPRESSED AIR USAGE

Compressed air shall only be used to power pneumatic tools.

C. CONFINED SPACE ENTRY

The Bennington Fire Department does not have the capability to conduct confined space industrial rescue. The contractor shall arrange for confined space rescue. The EBC EH&S Coordinator shall approve the contractor's confined space rescue plans.

Confined spaces are identified by signs and include, but are not limited to, tanks, pits, elevator pits, and areas under equipment and above ceilings. Contact the EBC EH&S Coordinator to confirm the status of the area to be entered.

D. ELECTRICAL SAFETY

I. Electrical Hazards

1. GENERAL PERSONAL REQUIREMENTS:

Alertness:

Employees shall be instructed to be alert at all times when they are working near live parts within the Limited Approach Boundary of energized electrical conductors or circuit parts or where other electrical hazards exist. Employees are not permitted to work within the Limited Approach Boundary on energized electrical conductors or circuit parts or where other electrical hazards exist while their alertness is recognizably impaired due to illness, fatigue, or other reasons.

Conductive Articles Being Worn:

Conductive articles of jewelry and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or unrestrained metal frame glasses) shall not be worn where they present an electrical contact hazard with energized electrical conductors and circuit parts, unless such articles are rendered nonconductive by covering, wrapping, or other insulating means.

Clothing Not Permitted:

Clothing made from flammable synthetic materials that melt at temperatures below 315°C (690°F) such as acetate, acrylic, nylon, polyester, polyethylene, polypropylene, and spandex, either alone or in blends shall not be used.

Eye Protection:

Employees shall wear protective equipment for the eyes to prevent injury from electric arcs, flashes, or from flying objects resulting from an electrical explosion.

Face Protection:

Employees shall always wear eye protection under face shields or hoods.

Foot Protection:

Employees shall wear electrical hazard or EH rated shoes. They shall maintain this footwear clean and free of any known defects.

Housekeeping:

Employees shall maintain all tools and clothing in a clean and dirt free manner.

2. GENERAL WORK REQUIREMENTS:

Attendants:

If signs and barricades do not provide sufficient warning and protection from electrical hazards, an attendant shall be stationed to warn and protect employees. An attendant shall remain in the area as long as there is a potential for employees to be exposed to the electrical hazards.

Barricades:

Barricades shall be used in conjunction with safety signs where it is necessary to prevent or limit employee access to work areas containing energized conductors or circuit parts or potential energized conductors or circuit parts. Conductive barricades shall not be used where it might cause an electrical hazard. The barricades shall be placed no closer than the Limited Approach Boundary.

Blind Reaching:

Employees shall be instructed not to reach blindly into areas that might contain exposed electrical conductors and circuit parts or potential energized electrical conductors or circuit parts where an electrical hazard exists.

Conductive Cleaning Materials:

Employees shall not use steel wool, metalized cloth, silicon carbide, water, aerosol cleaning fluids, or other electrically conductive cleaning materials inside the Limited Approach Boundary.

Conductive Materials:

Conductive materials, tools, and equipment that are in contact with any part of an employee's body shall be handled in a manner that prevents accidental contact with energized electrical conductors or circuit parts. Such materials and equipment include, but are not limited to; long conductive objects such as ducts, pipes, tubes, conductive hose and rope, metal-lined rules and scales, steel tapes, pulling lines, metal scaffold parts, structural members and chains.

Electrical Clearances:

Always assure that proper depth of working space is maintained and present when conducting voltage or amperage measurements on energized conductors or circuit parts.

Hazardous Classified Locations:

Electrical maintenance conducted in Hazardous or Classified Locations must always ensure that the form of construction, installation, and other maintenance activities being conducted on the equipment uses materials that are suitable for the Hazardous or Classified Location and that the classification is not compromised. All electrical troubleshooting conducted in Hazardous or Classified locations must always adhere to the pertinent JSHA and the procedures required for the area to ensure that the electrical activity does not introduce any additional hazards in itself.

3. GENERAL WORK REQUIREMENTS:

Illumination:

Employees shall not enter spaces containing electrical hazards unless illumination is provided that enables the employees to perform the work safely. Where there is a lack of illumination or an obstruction precludes observation of the work to be performed, employees shall not perform any tasks within the Limited Approach Boundary of energized conductors or circuit parts where an electrical hazard exists.

Qualified Person:

One who has skills and knowledge related to the construction and operation of the electrical equipment and installations and has received safety training to recognize and avoid the hazards involved.

Portable Ladders:

Portable ladders shall have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized electrical conductors or circuit parts where an electrical hazard exists. Metal or aluminum ladders are not permitted in EBM facilities.

Reclosing Circuits After Protective Device Operation:

After a circuit is de-energized by a circuit protective device, the circuit shall not be manually energized until it has been determined that the equipment and circuit can be safely energized. The repetitive manual reclosing of circuit breakers or re-energizing circuits through replaced fuses is prohibited.

Routine Opening and Closing of Circuits:

Load rated switches, circuit breakers, or other devices specifically designed as disconnecting means shall be used for the opening, reversing, or closing of circuits under load conditions.

The routine operation for opening and closing circuits shall adhere to the following:

1. Always properly interrupt the load.
2. Always assume a safe position when energizing or de-energizing an electrical enclosure.
3. Always, keep head and torso turned away from the disconnect when energizing or de-energizing.
4. Maintain solid balance and footing.
5. Position your body such that you are not in front of any part of the enclosure or disconnect.
6. Energize or de-energize by moving away from the enclosure and the disconnect.

7. Stay clear of the electric Arc Blast Zone.

Safety Signs or Tags:

Safety signs, safety symbols or accident prevention tags shall be used where necessary to warn employees about electrical hazards that might endanger them.

4. ENERGIZED ELECTRICAL WORK REQUIREMENTS:

There are three types of electrical work that are permitted to be performed on energized electrical conductors and circuit parts by qualified personnel.

This work includes:

1. **Troubleshooting:** Work performed on energized electrical conductors and circuit parts to determine the cause and location of a problem. Work done under this heading must be performed only with suitable test instruments.
2. **Calibration:** Adjustments performed on electronic components with energized electrical conductors and circuit parts to cause a particular parameter to have a specified value or state.
3. **Repair Work:** Removing, installing modifying or repairing electrical components or wiring on energized electrical conductors or circuit parts. Conducting repair work of any type in an electrical enclosure with energized electrical conductors and circuit parts requires a Hazardous Work Permit.

The following electrical work procedures are to be followed when electrical work is performed on energized electrical conductors and circuit parts or in the immediate vicinity of energized electrical conductors and circuit parts:

1. Electrical troubleshooting work may be performed on energized electrical conductors and circuit parts provided that only approved test instruments are used to perform the task and the proper procedures and personal PPE are applied in the troubleshooting process.
2. Calibration work may be performed on energized electrical conductors and circuit parts provided that only approved test instruments are used to perform the task, there are documented procedures for the calibration, and personal PPE are applied in the calibration process.
3. **Repair work on energized electrical conductors or circuit parts of any kind is prohibited.**
 - a. Conducting repair work of any type in an electrical enclosure with energized electrical conductors and circuit parts requires a Hazardous Work Permit.

Energized Electrical Conductors and Circuit Parts Work = Electrical Hot (Energized) Work:

By definition, electrical “hot” or energized work is repair work on or in the immediate vicinity of energized electrical conductors or circuit parts. The immediate vicinity is defined as any energized electrical conductor or circuit part that is within the reach of the electrical worker when the work task is being performed. An electrical enclosure is considered “energized” if there are any energized electrical conductors or circuit parts inside the immediate enclosure. This includes the line-side of conductors if the enclosure has a main disconnect integral to the enclosure.

5. GENERAL TEST INSTRUMENTS AND EQUIPMENT:

Test Instruments:

1. Test instruments, equipment, and their accessories shall be rated for circuits and equipment to which they will be connected.
2. All voltage and current instruments shall have a minimum rating of CAT III.
3. Test instruments, equipment, and their accessories shall be designed for the environment to which they will be exposed and the manner in which they will be used.
4. Only qualified persons shall perform testing work on or near live parts operating at 50 volts up to 600 volts AC.
5. Test instruments and equipment and all associated test leads, cables, power cords, probes, and connectors shall be visually inspected for external defects and damage before each use. If there is a defect or evidence of damaged that might expose an employee to injury, the defective or damaged item shall be removed from service, and no employee shall use it until repairs and tests necessary to render the equipment safe have been made.

Solenoid Type Voltage Testers:

Use of solenoid type voltage testers that activate a spring-loaded solenoid plunger is prohibited. These testers will draw a small arc when contact is made with the measured surface.

Probe Exposure:

Only the minimum amount of test lead should be exposed on contact type instruments. This minimizes the chance of accidentally causing a short circuit if the test lead contacts more than one conductor at a time.

Proximity Voltage Testers:

The use of proximity type voltage testers are permitted for general diagnostics. Proximity type voltage testers are **not** permitted for establishing an electrically safe condition.

6. GENERAL ELECTRICAL PPE:

Employees working in areas where there are electrical hazards shall use protective equipment that is designed and constructed for the specific part of the body to be protected and for the work to be performed. When an employee is working within the flash protection boundary he/she shall wear protective clothing and other personal protective equipment in accordance with the Flash Hazard Analysis or the listed Hazard Risk Category Classifications.

Body Protection:

Employees shall wear clothing resistant to flash flame wherever there is a possible exposure to an electric arc flash.

Coverage:

All parts of the body inside the Arc-Flash Protection Boundary shall be protected. Shirt sleeves shall be fastened at the wrists and shirts shall be closed at the neck.

Fit:

Tight-fitting clothing shall be avoided. Loose fitting clothing provides additional thermal insulation due to air spaces. FR apparel shall fit properly such that it does not interfere with the work task.

Hand Protection:

Employees shall wear rubber insulating gloves with leather protectors where there is a danger of hand and arm injury from electric shock and burns due to contact with live parts. Gloves made from layers of flame resistant material provide the highest level of hand protection.

Heavy-duty leather gloves also provide good protection. Where voltage-rated gloves are used, leather protectors shall be worn over the rubber gloves. The leather protectors also provide good arc-flash protection for the hands.

Rubber gloves with leather protectors are required to be worn for all voltage measurements and current measurements where the voltage is greater than 50 volts

Leather protectors shall be worn where required for arc flash protection and anytime the hands are inside the Arc Flash Protection Boundary.

7. MINIMUM REQUIRED ELECTRICAL PPE:

The minimum electrical PPE that is required for voltage testing, troubleshooting and calibration on energized electrical systems shall be identified as the EBM Minimum Risk Classification:

Footwear:	Electrical Hazard rated work shoes meeting ANSI Z41 PT91 EH
Insulated Gloves:	Class 00 Rubber Gloves rated at 500 VAC. (Canada: Class 0 Rubber Gloves rated at 600 VAC)
Leather Protectors:	Leather gloves for wearing over the rubber insulated gloves
Eye Protection:	Safety Glasses with side shields meeting ANSI Z87.1
Shirt:	Arc-rated long sleeve with a minimum arc rating of 4
Pants:	Arc-rated long pants with a minimum arc rating of 4
Underwear:	100% cotton
Glove Bag:	Storage bag for protection of rubber gloves and leather protectors
Volt Meter:	Electrically rated for CAT III
Hearing Protection:	Ear canal inserts

NOTES:

1. Clothing made from flammable synthetic materials that melt at temperatures below 315°C (690°F) such as acetate, acrylic, nylon, polyester, polyethylene, polypropylene, and spandex, either alone or in blends shall not be used or worn.
2. Conductive articles of jewelry and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or unrestrained metal frame glasses) shall not be worn where they present an electrical contact hazard with

energized electrical conductors and circuit parts, unless such articles are rendered nonconductive by covering, wrapping, or other insulating means.

3. Coveralls with a minimum arc-rating of 4 can be worn in lieu of arc-rated pants and shirt provided all other clothing is 100% cotton.

E. HAZARD COMMUNICATION

The Contractor shall supply EBC Bennington with Material Safety Data Sheets for all materials introduced into the facility.

All containers brought into the facility by contractors shall bear a label compliant with NFPA of HMIS protocols.

F. HEARING PROTECTION

Areas where hearing protection is required are denoted by signs on the entrance doors and throughout the production area.

G. HOISTING EQUIPMENT

The contractor shall provide EBC Bennington with copies of their hoisting equipment safety check procedures and completed inspection forms.

H. LOCKOUT/TAGOUT

Specific lock out-tag out procedures exist for every machine in the plant. They are posted near or on the machine in clear plastic pouches. The contractor shall follow these LOTO procedures.

If the contractor discovers a procedure missing or otherwise unavailable, they must contact their EBC Contact to obtain the procedures.

I. RESPIRATORY PROTECTION

Any access to the Silver Oxide Pellet Production area requires the use of an air purifying respirator. The contractor shall provide EBC with current medical approvals and fit tests to confirm the ability of their employee to wear respirators.

J. ROOF WORK

Prior to accessing any roof area, the contractor must obtain an emergency evacuation beeper from the security office. In the event of a plant evacuation, this will be the primary means of notification.

No contractor employee shall work within 6 feet of a roof edge without the use of a fall protection system. A bright orange line is painted on the roof six feet from the roof edge. No

contractor employee shall work in the area between this line and the roof edge without the use of a fall protection system

K. ELEVATED WORK

All contractors working at a height of 6 feet or more above a floor surface or above another work level shall use a fall protection system.

Scaffolding: Scaffolding shall be designed and erected by certified scaffolding erectors. Users shall be trained according to OSHA regulations. Use of electrical man-lifts requires training, inspection and hardhats.

L. SAFETY INSPECTIONS / SAFETY STAND-DOWN

Safety Inspections. Members of Energizer's safety team will conduct periodic safety inspections. These inspections are intended to identify and address safety issues. In the event an inspection reveals a violation of any OSHA, Energizer or Contractor's safety rule, or, if in the opinion of the Energizer colleague, a serious safety risk exists, the Energizer colleague will meet with the contractor's OSHA Competent Person to resolve the issue. These audits will be used as part of a performance evaluation after project completion.

Safety Stand-Down. If safety inspections by Energizer colleagues reveal repeated safety violations, Energizer may ask the contractor to suspend site activities under a "Safety Stand-Down".

Under a Safety Stand-Down contractor employees must:

- Cease all site activities
- Secure all hazardous equipment or materials
- Secure any tools or other hardware
- Vacate the facility
- Turn in any access card keys

A Safety Stand-Down will remain in effect until the safety manager or other management representative for the contractor can meet with Energizer to resolve the issue.