

CONTRACTOR EDUCATION PROGRAM

The Hazard Communication Standard requires a manufacturer to document how contractors will be informed of hazardous chemicals they may be exposed to while performing their work, and any suggestions for appropriate protective measures.

Monsanto has established corporate guidelines for contractor health and safety. Based on the corporate guidelines, Texas City has developed its own contractor safety program. Bulletins covering both the corporate guidelines and the Texas City program (Procedure Bulletin P-0106) are included in this section.

Orientation, covering general plant safety and work procedures, is held for contract employees on the first day of employment. An outline for contractor orientation is included elsewhere in this section. A training list, signed by each contractor in attendance, is retained by the Texas City (CED) contractor liaison. Personnel are given an orientation review annually. Contractors that have been trained are given badges and orientation decals for their hard hats. Badges are to be carried in their wallets.

Contractors who are hired for only one day (i.e., truck drivers) do not attend the formal orientation program. Instead, they are shown a short film, available at the Main Gate, which covers general plant procedures.

It is the responsibility of the Monsanto representative requesting the contractor's services to advise the contractor of known safety/health hazards and the use of protective equipment and procedures to minimize any exposures. In addition, the representative is responsible for seeing that the general safety orientation has been given, within the past year, to contractors he is bringing in. The contractor, in turn, is responsible for providing Monsanto with safety/health information, Material Safety Data Sheets, etc. for chemicals he brings into the Texas City plant.

Each area of the plant has documented contractor procedures particular to that area. A list of these procedures can be found elsewhere in this section.

CONTRACTOR ORIENTATION

1. Fire & Spill Codes

   A. Alarms are a series of blast on the air horn system.

   B. Know what the fire and spill alarm code is for your work area. Ask your Foreman if you do not know.

   C. When fire and spill alarm sounds, all work must stop. Personnel must report to their instruction point (I.P.) for a head count. They must go cross wind to get to I.P. When the all clear (15 second blast) has sounded, you can report to your work site. Permits are cancelled in the zone the fire and spill alarm sounded in. These have to be reissued or countersigned for the affected zone before work can begin after the all clear.

2. Emergency Procedure Alarm & Evacuation Alarm

   A. Emergency procedure alarm consist of short repeated blast on the air horn system that last 1 1/2 minutes. Evacuation alarm is a continuous blast that lasts 1 1/2 minutes. If either sounds, report to your instruction point immediately for further directions.

3. Cyanide Alarm

   A. When this sounds, leave your work area going cross wind and report to your instruction point for a head count. When the emergency is over, the area will be checked out and you will be allowed to return to work.

   B. Food and drink are not allowed in the cyanide unit.

4. Permits

   A. All craftsmen should look at the permits before they begin work. Check and make sure the permit is for your craft. Make sure the correct days date and work start and finish time is on the permit. Permits must be signed by Monsanto Personnel. Check number 11 on the permit for special requirements and follow all of these requirements.

   B. Entry permits are required for work in confined spaces such as vessels, towers, etc. and in excavations in excess of 5 feet deep. A holeman is required for entry. The holeman must stay at the manway while anyone is in vessel.

   C. Pull permits and return to chief operator at the end of the day or when finished working in that unit for that shift.

   D. If work is to be continued past the finish time stated on the permit, an extension of the permit must be obtained.

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5. Starting Your Job

   A. Locate Instruction Point for your work area.

   B. Locate safety shower and eye bath in work area.

   C. Locate wind socks and/or steam trails in work area.

   D. Know your fire and spill code for work area.

   E. Check into and out of control room through the chief operator.

6. Personal Protective Equipment

   A. Hard hat and safety glasses are required to be worn in construction areas at all times.

   B. Dark shaded lenses are not allowed to be worn at night.

   C. Areas that require cover goggles, ear plugs, etc. have signs posted around the area and/or supervision will instruct you as to what is required.

   D. Contact lenses are not allowed to be worn in the units.

7. Accidents

   A. Report all accidents to your foreman immediately no matter how minor, regardless of needing medical attention.

   B. Night Shift and week-end work: medical attention can be obtained from the Night Supt. at the Main Gate.

8. Ladders

   A. Inspect ladders daily before you use them. Do not use if damaged. Report damaged ladders to your foreman so they can be taken out of service.

   B. Extension ladders must be placed one foot out for every 4 foot in height. Secure the top of the ladder or make sure some one holds the ladder in place while it is being used.

   C. Do not stand on the top two steps of a step ladder.

9. Potable Water

   Do not drink out of utility hoses. Water will be furnished in water kegs.

10. Smoking **SC** **12154**

   A. Smoking is allowed in designated areas only.

   B. Do not bring matches or cigarette lighters into the plant.

   C. When a fire and spill alarm sounds, extinguish your smoke and report to your instruction point.

11. Ground Fault Interrupters

   All portable electric tools (drills, saws, pipe machines, etc.) connected to an electrical source by an extension cord must have ground fault protection.

12. Hose

A. Utility hoses must have the connections pinned with crows foot pins when the hose is in use.

13. First Break Into Piping

A. When breaking into piping, flanges, etc. for the first time after the pipe has been in service, the first break into piping rule is required.

B. The person breaking into piping that has contained (1) caustic, (2) acid, (3) piping containing hot fluids over 140°F, (4) super hazardous fluids such as AN, cyanide, chlorine, etc., (5) dangerous gases as carbon monoxide, etc. requires the following equipment to be worn: slicker suits, rubber gloves, rubber boots, fresh air mask, and an acid hood (plastic hood that covers the entire head). Persons breaking the bolts on the flange should break the bolts on the flange away from the craftsmen. Use duct tape to tape slicker sleeves and pant legs to gloves and boots respectively.

14. Cranes

Cranes must not operate within 10 feet of a high voltage power line that is in service. Electrical permits are required for equipment (cranes, JLG, etc.) that might work within 10 foot of high voltage electrical lines.

15. Vehicles

A. Speed limit is 15 miles per hour or less in the plant.

B. Persons riding in vehicle beds must ride in the beds or on benches if provided, but not on the bed railing.

C. Pedestrians, bicyclist and cranes have the right of way over other equipment.

D. When fire or spill alarm sounds, pull vehicle to side of road. Leave keys in the ignition, and leave vehicle, reporting at nearest instruciton point.

16. Scaffolds

A. Hand rails and mid rails are required on scaffolding that is greater than four feet high.

B. Toe board must be on scaffolding that is over 10 feet high.

C. Scaffolds must be complete for persons to work off of.

17. Safety Showers & Eye Baths

A. Know where they are located.

B. If you get some chemical in the eyes, hold eyes open with thumb and forefinger and flush eyes with water for 15 to 30 minutes. Seek medical attention after this. Do not rub eyes.

C. If you get chemicals on clothes, take a safety shower for 15 to 30 minutes. Remove clothes down to the underwear while showering. Seek medical attention.

18. Tools

A. Do not use damaged or defective tools.

B. Use the right tool for the job.

19. Compressed Gas Cylinders

A. Secure in an upright position at all times.

B. Remove regulator gauges when transporting cylinders.

C. Keep cylinder caps on cylinders when gauges are removed.

20. Beards

Facial hair is not allowed in the seal areas of respirators.

21. Lock Out

Make sure the equipment you are working on is locked out so you can not be injured if someone attempts to turn the equipment on.

22. Safety at Monsanto is an individual responsibility.

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March 9, 1984

MFI CONTRACTOR HEALTH & SAFETY

GUIDELINE

SCOPE

The following guideline sets forth safety and occupational health considerations for contractor personnel working on MFI property including those performing services administered by either the site or CED. The issues addressed are felt to be among those most critical to contractor relations at MFI sites today. These are not all inclusive and may be expanded in the future to better assist site management in consistently dealing with health and safety questions that arise. This guideline cannot be expected to cover every situation, but it provides a framework within which sound field decisions can be made. Their use will complement the existing EPS Guideline "Non-Company Personnel on Company Sites" (July, 1979) and the contract supplementary conditions available at individual locations.

OBJECTIVE

It is the continuing intent of MFI to exhibit proper concern for employee health and safety in the execution of contract work performed at MFI locations. MFI is continuing to strive for significant improvement in safety and health performance in all facets of manufacturing operations. Poor safety practice and/or disregard of worker safety and health by contractors working on company property will distract from that goal. MFI expects, in its relations with contractors, that work performed on our property will not only be of high quality, but will also be done in a safe and healthful manner.

PROCEDURES

In dealing with contractor's on a Monsanto site, the following elements apply:

1. Once the need for Contractor services is determined, the person requesting services should consult the site safety and health professionals and define those safety/health requirements called for to properly execute the work (i.e., what is expected of the Contractor and Monsanto).

   "General conditions", "specific conditions", and a description of specific hazards involved with the work should be reviewed with the prospective Contractor(s) prior to submission of bids and be incorporated into the written contract. Provision for the following items must be considered:

- RESPIRATORY PROTECTION
- BIOLOGICAL HEALTH MONITORING
- PERSONAL PROTECTIVE CLOTHING AND EQUIPMENT
- SUPERVISION OF CONTRACTOR EMPLOYEES
- CONTRACTOR SAFETY/HEALTH ORIENTATION
- HYGIENE FACILITIES AND PRACTICES
- EXPOSURE MONITORING
- EMERGENCY MEDICAL CARE
- INJURY REPORTING
- USE OF PLANT PERMIT SYSTEMS
- ENVIRONMENTAL CONTROL PROCEDURES
- HAZARD COMMUNICATION

2. All services performed on company property by outside contractors shall be covered by written contracts (normally provided by Monsanto) signed by both parties. As appropriate, Monsanto's purchase orders, signed by Contractor, may be used. Contracts drawn by Contractor must be reviewed and approved by Monsanto's Law Department.

3. In all Contractor work on company property, Contractor supervision is expected to maintain responsibility for the safety and health of his employees. Monsanto will advise Contractor of known safety, environmental, and health hazards associated with the workplace in order that the Contractor may carry out his obligations. Monsanto will also advise on the appropriateness of special protective clothing and equipment specific to operating areas in which Contractor personnel will work.

4. A Monsanto Contract Administrator shall be assigned at each site to:

   - COORDINATE ALL CONTRACTOR ACTIVITY ON SITE
   - BE FAMILIAR WITH ALL WRITTEN CONTRACTS
   - EXPLAIN SAFETY AND OCCUPATIONAL HEALTH HAZARDS ASSOCIATED WITH THE WORKPLACE (ORIENTATION)
   - APPRISE CONTRACTOR OF HIS RESPONSIBILITIES AND RESTRICTIONS WHILE ON SITE

   (Local purchasing agent should not be considered the Contract Administrator. Maintenance supervisor or project engineer would normally assume this role.)

5. A Monsanto Representative shall be assigned to closely monitor each Contractor's work on site and be primarily responsible for communication with Contractors. He will maintain close contact (frequency depends on the nature of the work) with Contractor or supervisory representative on job progress and scheduling.

6. Monsanto cannot be responsible for Contractor compliance to all state and federal regulations governing health and safety. Monsanto will attempt to utilize, when possible, Contractors who have demonstrated a high degree of compliance with workplace laws/standards, plant policies and practices, and have a history of good safety performance.

7. Each Monsanto location shall develop a general Contractor safety and health orientation training program to convey Monsanto's commitment to health and safety, Contractor general obligations, and plant rules/procedures. As a minimum, the following areas must be included:

   - GENERAL PLANT POLICIES
   - SITE SAFETY AND HOUSEKEEPING OPERATIONS
   - BASIC PROTECTIVE EQUIPMENT USAGE
   - PERSONAL HYGIENE PRACTICES
   - GENERAL INDUSTRIAL HYGIENE
   - HAZARD COMMUNICATION

   Supplementary information along with basic orientation information shall be reviewed with all Contractor employees upon first entry to the site. The Monsanto Contract Administrator along with safety and health staff should coordinate the orientation sessions.

8. Prior to beginning work in the field, Monsanto Representative and area supervision shall apprise Contractor of known industrial hazards (including chemical health hazards) and safety procedures specific to the assigned work area. Relevant permit procedures (i.e., hot work, tank entry, lock-out, etc.) should also be discussed to avoid any later misunderstanding on applicability.

9. Contractor shall furnish and require the use and wearing of proper personal protective equipment and clothing by its employees. Special work clothing such as goggles, gloves and other body, face, and head protection, as a minimum, must be used as recommended by the Monsanto Contract Administrator or Monsanto Representative. If Contractor does not have the specific equipment, the task shall be delayed until such equipment can be obtained by Contractor. Personal protective clothing and equipment shall not be supplied by Monsanto, unless dictated by an emergency.

10. Use of respiratory protective devices typically requires proper written standard operating procedures, selection and fitting, training, assignment, cleaning and disinfection, storage, inspection and repair, surveillance, periodic evaluation, medical approval, and NIOSH approval when available per current OSHA regulations. Accordingly, each Contractor employee who may have need to wear a respirator shall be properly fitted and trained in its use prior to beginning work. If the Contractor represents that it is not capable of

properly fitting and training its employees, Monsanto will consider, upon written request, providing such services. Contractor, however, shall be responsible for furnishing the proper devices to his employees and assuring that they have been medically certified to wear the equipment. The appended "Respirator Certificiation Assurance Form Letter" should be used to obtain written verification from the Contractor.

In the event that Contractor's employees have not or can not be properly fitted and respiratory protection is deemed necessary, only positive pressure, supplied air equipment should be used. In all cases, location policy regarding facial hair in the sealing area of respirators must be adhered to by the Contractor.

11. Contractor shall assure that medical facilities are available for his employees. All medical services (e.g., routine physicals, pre-placement exams, etc.) shall be provided by the Contractor. However:

- WHERE THE SEVERITY OF THE INJURY DICTATES IMMEDIATE ATTENTION ON-SITE, MONSANTO MAY PROVIDE FIRST AID TREATMENT, BUT ONLY TO THE EXTENT NECESSARY TO STABILIZE THE CONDITION OF THE CONTRACTOR'S EMPLOYEE FOR TRANSPORT TO THE CONTRACTOR'S MEDICAL SERVICE OR FACILITY.

- WHEN UNIQUE BIOLOGICAL MONITORING OF BODY FUNCTIONS/FLUIDS AS REQUIRED BY MONSANTO WHEN HANDLING OR EXPOSED TO SELECT PROCESS CHEMICALS, MONSANTO WILL UNDER THESE SITUATIONS CONDUCT OR ARRANGE FOR APPROPRIATE TESTS AND PROVIDE THE DATA TO THE CONTRACTOR OR ITS MEDICAL SERVICE. THE CONTRACTOR SHALL BE MADE AWARE OF THESE PROVISIONS PRIOR TO BIDDING WITH SUCH REQUIREMENTS WRITTEN AS PART OF THE CONTRACT. WHERE "BASELINE" DATA ON CONTRACTOR EMPLOYEES IS REQUIRED PRIOR TO WORKING IN AN AREA, SUFFICIENT LEAD TIME FOR COLLECTION AND ANALYSIS OF SAMPLES WILL BE NEEDED IN SCHEDULING THE WORK.

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12. It is preferred that breathing air for respirator usage be supplied by the Contractor. If this is not feasible or practical , Monsanto will consider, upon written request, furnishing breathing air. In <u>all</u> cases, the Contractor will test <u>each</u> cylinder of breathing air for adequate oxygen content and ensure that the breathing air meets specifications in 29 CFR 1910.134 and grade D as described in the Compressed Gas Association Commodity Specification G-7.1-1966 prior to use, whether Monsanto or Contractor supplied.

13. Contractor personnel delivering or picking up materials in the plant must have and use appropriate protective equipment consistent with the hazards of the material being transferred and the work procedures of the area being entered.

14. All Contractor tools and equipment on site shall, as a minimum, conform to plant standards. Such standards and specifications shall be communicated to Contractor prior to equipment usage. Monsanto shall have the right to refuse or restrict the use of tools, equipment, or chemicals on the site. Contractor shall provide all tools, equipment, and safety paraphernalia necessary to perform the Work required under this Agreement. In no event shall Monsanto's tools, equipment or safety paraphernalia be used by Contractor, Contractor's employees, agents or subcontractors without obtaining Monsanto's express permission in writing prior to any such use.

15. In the event Contractor is permitted to use Monsanto's tools, first aid/medical facilities, breathing air, or other services (as provided in paragraphs 10, 11, 12, and 14), Contractor must first agree in writing (either in the contract or by separate letter from Contractor to Monsanto) to the following:

> Contractor expressly agrees to assume all risk of and responsibility for any personal injury, including death (including, but not limited to, Contractor's employees), and/or property damage (including, but not limited to, Contractor's property) arising out of the condition or the use by Contractor or his employees, agents or subcontractors of any of Monsanto's _____ _____[FILL IN APPROPRIATE ITEMS, SERVICES OR FACILITIES INVOLVED] and Contractor shall indemnify and hold Monsanto harmless from and against any and all claims or suits asserted against Monsanto related to or arising from the above described use of the items, services or facilities.

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Should Contractor refuse to agree to the above, Monsanto's Law Department should be contacted.

16. Contractor must ensure that its eating facilities are separate from work areas, kept clean, and have proper washing facilities. Each location shall institute an industrial hygiene approval system.

17. Contractor, at a minimum, must comply with proper plant procedures for securing permits involving hot work, tank entry, breaking into pipelines, lock-out, etc. Permits will be coordinated through the Monsanto representative. Initially, Monsanto will isolate equipment and/or facilities

and test atmospheres prior to releasing these to any Contractor for confined space entry. Monsanto and Contractor must agree in writing on whose responsibility it is to provide subsequent isolation, testing, and fire watches before contract work commences.

18. Contractor change and shower facilities, if required, will be arranged by the Contractor. Monsanto shall have the right to inspect these facilities.

19. Monsanto Representative shall be immediately notified of any OSHA recordable injury sustained by Contractor employees. The incident will be investigated following site procedures. Contractor shall provide copies of OSHA 200 summary log (or equivalent) upon request of Monsanto Representative.

20. In situations where personnel (industrial hygiene) monitoring is required by OSHA standards for substances to which Contractor employees may reasonably be exposed, the Contractor shall be advised of his legal obligation prior to entering the plant and within the context of the contract. Monsanto will consider providing necessary monitoring services upon written request of the Contractor. Normally, Monsanto sampling instruments shall not be loaned to or used by the Contractor.

21. Each Contractor shall have a competent responsible supervisor in charge at the site at all hours during which his workers are employed. To maintain the independent Contractor status, Monsanto shall avoid supervising or controlling Contractor employees whenever possible.

    It must be emphasized that direct supervision of Contractor's employees by Monsanto must be considered only as a last resort and to be practiced only on an extremely limited basis.

22. Contractor operations shall be periodically audited to determine if the Contractor is making proper use of tools and equipment, follows Monsanto health and safety procedures, and assures that their operations do not endanger Monsanto personnel and property.

    For example, the audit team would typically consist of:

    - MONSANTO REPRESENTATION
    - CONTRACTOR SUPERVISORY REPRESENTATIVE
    - SITE SAFETY/HEALTH STAFF MEMBER
    - MONSANTO AREA SUPERVISOR

    Follow-up surveys shall be conducted to ascertain compliance with recommendations previously put forth to the Contractor.

23. Failure to comply with the contract agreement or supplemental conditions may result in removal of the violator from the plant and/or contract termination.

24. Where a Contractor's employee creates an imminent danger situation, immediate corrective action must be taken by the Contractor. The Monsanto Representative should bring any violation of normal safe practices to the Contractor's attention. Upon request of the Monsanto Contract Administrator, the Contractor will remove any worker violating any plant operations and safety rules. The severity of the infraction will impact the final decision on removal of Contractor's employee.

RESPIRATORY CERTIFICATION ASSURANCE FORM LETTER

RE: Contract No. _____

Monsanto Plant: _____

Dear

It has been determined that your employees may be required to wear respirators in the performance of the subject contract. Monsanto Company requires that any employee of a contractor who might use respiratory equipment must be medically certified for respirator use.

In 29 CFR 1910.134, OSHA has adopted standards regarding proper respiratory protection including requirements regarding respirator written standard operating procedures; selection and fitting; training; assignment; cleaning and disinfection; storage; inspection and repair; surveillance; periodic evaluation; medical approval; and, when available, NIOSH approval. Section 1910.134(b)(10) recommends that a physician determine whether each employee wearing a respirator is physically able to perform the work while using the respiratory equipment.

In order to fulfill Monsanto's requirement regarding medical certification, the statement at the bottom of this letter must be executed and returned. I must receive this assurance of respirator certification before on-site work may proceed under the subject contract.

Very truly yours,

We (I) certify that all employees assigned by the undersigned to work at the referenced Monsanto Company site in tasks which have been identified as possibly requiring the use of respirators have been medically certified by a physician on a current basis for use of such equipment.

COMPANY: _____

BY: _____

TITLE: _____

DATE: _____

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LAM013109

Monsanto

DEPARTMENT OF MEDICINE & ENVIRONMENTAL HEALTH

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

(Date)

(Firm Name)
(Firm Address)
(Firm City, State, Zip Code)

Gentlemen:

From time to time your firm performs services for Monsanto Company ("Monsanto"). Proper performance of these services generally requires that you, your employees, agents and subcontractors enter upon, and perform work at Monsanto's facilities.

We are sure you are aware that much of the information used at Monsanto's facilities is considered to be proprietary information of considerable value to Monsanto. You will understand our desire to protect such information from disclosure.

It is also important to recognize that Monsanto's facilities on which you, your employees, agents and subcontractors may perform work can be hazardous if appropriate safety measures are not observed. In this connection, you will understand our desire to protect Monsanto from loss which might result from the presence of non-Monsanto employees at such facilities.

Therefore, in consideration of the future employment of your firm by Monsanto for the performance of certain services (if, when and as such employment may occur), and in consideration of Monsanto's granting your employees access to Monsanto's facilities, you are requested to agree as follows:

1. You agree that any and all information obtained by you, your employees, agents and subcontractors while on Monsanto's facilities or performing work on behalf of Monsanto will be kept confidential, and not used, duplicated or disclosed to others.

2. You agree to indemnify and hold Monsanto, its officers, directors and employees harmless from loss, expense, claim, suit or damage resulting from injury or death to any person (including your own employees) and/or damage to property, whatever the cause may be (unless caused solely by Monsanto's negligence), arising from the activities of you, your employees, agents and subcontractors on Monsanto's facilities.

3. You agree to take out and maintain the following minimum insurance:

(a)	Workmen's Compensation	Statutory
(b)	Employer's Liability	$500,000 each occurrence
(c)	Comprehensive General Liability (Bodily Injury)	$500,000 each person $1,000,000 each occurrence
(d)	Comprehensive General Liability (Property Damage)	$500,000 each occurrence
(e)	Comprehensive Automobile Liability (Bodily Injury)	$200,000 each person $500,000 each occurrence
(f)	Comprehensive Automobile Liability (Property Damage)	$100,000 each occurrence

These obligations are in addition to, not in lieu of, any other obligations you may have assumed, or may assume, by contract with Monsanto.

Please indicate your agreement with the terms of this letter by having an authorized official of your firm sign both enclosed copies of this letter in the space provided below, and return one signed copy to me. Your understanding and cooperation in this matter is appreciated.

Yours very truly,

MONSANTO COMPANY

By_____

Title_____

Accepted and agreed to this
_____ day of _____, 19__.

FIRM NAME

By_____

Title_____

PROCEDURE BULLETIN — TEXAS CITY PLANT P-0106

CONTRACTOR SAFETY PROGRAM

I. PURPOSE

This bulletin sets forth a guideline for safety and occupational health considerations for contractor personnel working for the Texas City plant.

II. SCOPE

This bulletin covers procedures for dealing with contractors and responsibilities of the contractor and Monsanto representatives. This guideline cannot be expected to cover every situation, but it provides a framework within which sound field decision can be made. This bulletin compliments the plant's "Contractor Guide to Accident Prevention" and the "Plant Chemical Safety Manual."

III. DEFINITIONS

A. Monsanto Representative: The person requesting services and having responsibility for the job. Normally a maintenance supervisor, CED supervisor, or project engineer.

B. Contractor: In this document, generally understood to mean contractor supervision.

IV. PROCEDURES AND RESPONSIBILITIES

A. Once the need for contractor services is determined, the Monsanto Representative should define those safety/health requirements called for to properly do the work. "General conditions," "specific condition," and a description of specific hazards involved in the work should be reviewed with the prospective contractor(s) prior to submission of bids and be incorporated into the written contract. Provisions for the following items must be considered:

- Respiratory Protection
- Biological Health Monitoring
- Personnel Protective Clothing and Equipment
- Supervision of Contractor Employees
- Contractor Safety/Health Orientation
- Hygiene Facilities and Practices
- Exposure Monitoring
- Emergency Medical Care
- Injury Reporting
- Use of Plant Permit Systems
- Environmental Control Procedures
- Hazard Communication
- Safety Supervision (monitoring)

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On larger jobs, the Monsanto Representative should consult with the Loss Prevention and Safety Department (LP&S). It may then be determined that a Loss Prevention Review (LPR) be conducted prior to starting work.

B. All services performed on Company property by outside contractors shall be covered by written contracts. When appropriate, Monsanto's purchase orders, signed by the contractor, may be used. Contracts drawn by contractor must be reviewed and approved by Monsanto's Law Department.

Prior to issuing the contract, Purchasing shall verify that the Monsanto Representative has reviewed job and safety requirements with the contractor.

C. In all contractor work on Company property, contractor supervision is expected to maintain responsibility for the safety and health of his employees. Monsanto will advise contractor of known safety, environmental and health hazards associated with the work place in order that the contractor may carry out his obligations. Monsanto will also advise on the appropriateness of special protective clothing and equipment specific to operating areas in which contractor personnel will work.

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D. The Monsanto Representative is responsible to see that a general safety orientation is given to contractor personnel immediately after entering the plant. LP&S has the responsibility to conduct this orientation. As a minimum, the following areas must be included:

- General Plant Policies
- Plant Emergency Procedure and Alarms
- Traffic Rules
- Basic Protective Equipment Usage
- Personal Hygiene Practices
- General Industrial Hygiene
- Hazard Communication
- Plant Safety and Housekeeping Operations
- Plant Health and Safety Personnel

To identify contractors who have received the orientation, a sticker is placed on the contractor's safety hard hat indicating that they have attended the orientation. In addition, a log is kept to verify attendance. To keep the program current the orientation is renewed with the contractor employees on a yearly basis.

E. Prior to beginning work in the field, the Monsanto Representative is responsible to conduct a more detailed orientation. As a minimum, the following areas must be included:

- Apprise the contractor of known industrial hazards (including chemical health hazards), hygiene facilities, and safety procedures specific to the assigned work area.
- Apprise the contractor of relevant permit procedures (i.e. hot work, tank entry, lockout, etc.)
- Advise the contractor of special protective clothing and equipment specific to the assigned work area.
- Apprise the contractor of his responsibilities and restrictions while on site.

F. The Monsanto Representative shall coordinate and monitor contractor's work on site and be primarily responsible for communication with the contractor. He will maintain close contact with the contractor on job progress and scheduling. The Monsanto Representative enforces plant policies and practices and is responsible to provide feedback to Purchasing on contractor performance. (See appended "Contractor Performance Form".)

G. Monsanto cannot assume responsibility for contractor compliance to all State and Federal regulations governing health and safety. Monsanto will attempt to utilize those contractors who have demonstrated a high degree of compliance with work place laws/standards, plant policies and practices, and have a history of good safety performance. This however, does not preclude Monsanto from enforcing plant safety rules and policies.

H. Contractor shall furnish and require the use and wearing of proper personal protective equipment and clothing by its employees. Purchasing is responsible to communicate these minimum requirements. If the contractor does not have the specific equipment, the task shall be delayed until such equipment can be obtained by the contractor. Personal protective clothing and equipment shall not be supplied by Monsanto, unless dictated by an emergency.

I. Use of respiratory protective devices typically requires proper written standard operating procedures, selection and fitting, training, assignment, cleaning and disinfection, storage, inspection and repair, surveillance, periodic evaluation, medical approval and NIOSH approval when applicable per current OSHA regulations. Accordingly, each contractor employee who may have need to wear a respirator shall be properly fitted and trained in its use by the contractor prior to beginning work. The contractor shall be responsible for furnishing the proper devices to his employees and assuring that they have been medically certified to wear the equipment. The appended "Respirator Certification Assurance Form Letter" should be used to obtain written verification from the contractor by Purchasing at the time of contract negotiation. In the event that contractor's employees have not or cannot be properly fitted and respiratory protection is deemed necessary, only positive pressure, supplied air equipment should be used. In all cases, plant policy regarding facial hair in the sealing area of respirators must be adhered to by the contractor.

J. Breathing air for contractor respirator usage will be supplied by Monsanto. If for some reason breathing air is supplied by the contractor, the contractor will test each cylinder of breathing air for adequate oxygen content and ensure that the breathing air meets specifications in 29 CFR 1910.134 and Grade D as described in the Compressed Gas Association Commodity Specification G-7.1-1966 prior to use.

K. Contractor shall assure that proper medical care is available for his employees. Medical services are the responsibility of the contractor. However, when unique biological monitoring of body fluids is required by Monsanto when contractor's employees are handling or exposed to select process chemicals, Monsanto will under these situations conduct or arrange for appropriate tests and provide the data to the contractor or its medical service. The contractor shall be made aware of these provisions prior to working in an area, sufficient lead time for collection and analysis of samples will be needed in scheduling the work. When the severity of an injury dictates immediate attention on-site, Monsanto may

provide first aid treatment, but only to the extent necessary to stabilize the condition of the contractor's employee for transport to the contractor's medical service or facility.

L. Contractor personnel delivering or picking up materials in the plant must have and use appropriate protective equipment consistent with the hazards of the material being transferred and the work procedures of the area being entered.

M. All contract tools and equipment on site shall, as a minimum, be in safe working condition and conform to OSHA standards. Monsanto shall have the right to refuse or restrict the use of tools, equipment or chemicals on the site. Contractor shall provide all tools, equipment and safety paraphernalia necessary to perform the work required. In no event shall Monsanto's tools, equipment or safety paraphernalia be used by contractor, contractor's employees, agents or subcontractors without obtaining Monsanto's prior written consent, unless otherwise specified by contract.

N. Contractor must ensure that its eating facilities are separate from work areas, kept clean, and have proper washing facilities. The contractor shall institute an industrial hygiene approval system at each facility.

O. Contractor must comply with proper plant procedures for securing permits involving hot work, tank entry, breaking into pipelines, lockout, etc. Permits will be coordinated through the Monsanto Representative. Monsanto will isolate equipment and/or facilities and test atmospheres prior to releasing these permits to contractor for work. The contractor will check the adequacy of the preparations and then sign the permit before work commences.

P. Contractor change and shower facilities, if required, will be arranged by the contractor. Monsanto shall have the right to inspect these facilities.

Q. Monsanto Representative shall be immediately notified of all injuries sustained by contract employees. The incident will be investigated following site procedures as outlined in Procedure Bulletin P-0113. Contractor shall provide copies of records and reports (including OSHA 200 summary log, or equivalent) of all injuries upon request of Monsanto.

R. In situations where personnel (industrial hygiene) monitoring is required by OSHA Standards for substances to which contractor employees may reasonably be exposed, the contractor shall be advised of his legal obligation prior to entering the plant and within the context of the contract. Monsanto will consider providing necessary monitoring services upon written request of the contractor. Normally, Monsanto sampling instruments shall not be loaned to or used by the contractor.

S. Each contractor shall have a competent responsible supervisor in charge at the site at all hours during which his workers are employed. To maintain the independent contractor status, Monsanto shall avoid supervising or controlling contractor employees whenever possible. It must be emphasized that direct supervision of contractor's employees by Monsanto must be considered only as a last resort and be practiced only on an extremely limited basis.

T. Contractor operations may be periodically audited to determine if the contractor is making proper use of tools and equipment, following Monsanto health and safety procedures, and assuring that their operations do not endanger Monsanto personnel and property. Depending on the job, the audit can be conducted by the Monsanto Representative or an audit team. The audit team would typically consist of:

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- Monsanto Representative
- Contractor Supervisor Representative
- LP&S Representative
- Monsanto Area Supervisor

Followup surveys may be conducted to ascertain compliance with recommendations previously put forth to the contractor. Purchasing should receive a copy of the audit.

U. Failure to comply with the contract agreement or supplemental conditions may result in removal of the violator from the plant and/or contract termination.

V. Where a contractor's employee creates a known imminent danger situation, immediate corrective action shall be taken. The Monsanto Representative should bring any violation of normal safe practices to the contractor's attention. Upon request of the Monsanto Representative, the contractor will remove any worker violating any plant operations and safety rules. The severity of the infraction will impact the final decision on removal of contractor's employee.

W. For service personnel spending only a short time in the plant (truck drivers, vendors, service personnel working on their equipment, visitors, etc.), a short orientation shall be conducted including:

- Traffic Rules
- Emergency Procedures and Alarms
- Safety Rules (personal safety equipment, matches, etc.)

The Security Department is responsible to enforce this orientation.

The length of time spent in the plant or type of work performed does not exempt contractors or service personnel from wearing necessary personal protective equipment (hard hats, safety glasses, sleeves where required, etc.).

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Hard hats and safety glasses will be issued and collected by the Security Department to service personnel who do not have this personal protection equipment.

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