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1 PURPOSE


- 1.1 To establish a system for the selection and control of the providers of outsourced services to ensure compliance with both the customer and MTS Corporation requirements.
- 1.2 This instruction describes the process for outsourcing activities and the determination of training needs associated with such activities. It also describes the method for providing training or other actions required to meet those needs in accordance with ISO 14001 § 4.4.2 and OHSAS 18001 respectively for the integrated Environmental and Safety Management System.

2 SCOPE – APPLIES TO WHERE & WHEN THE PROCEDURE IS USED

- 2.1 This procedure applies to company purchases from providers who deliver out-sourced services within operations and activities, as referenced within the scope of the EHS Manual.


3 DEFINITIONS AND ACRONYMS

- 3.1 Host – MTS employee that requests a service provider to perform work at MTS
- 3.2 Functional Area Manager – Manager or supervisor of the physical area where work is

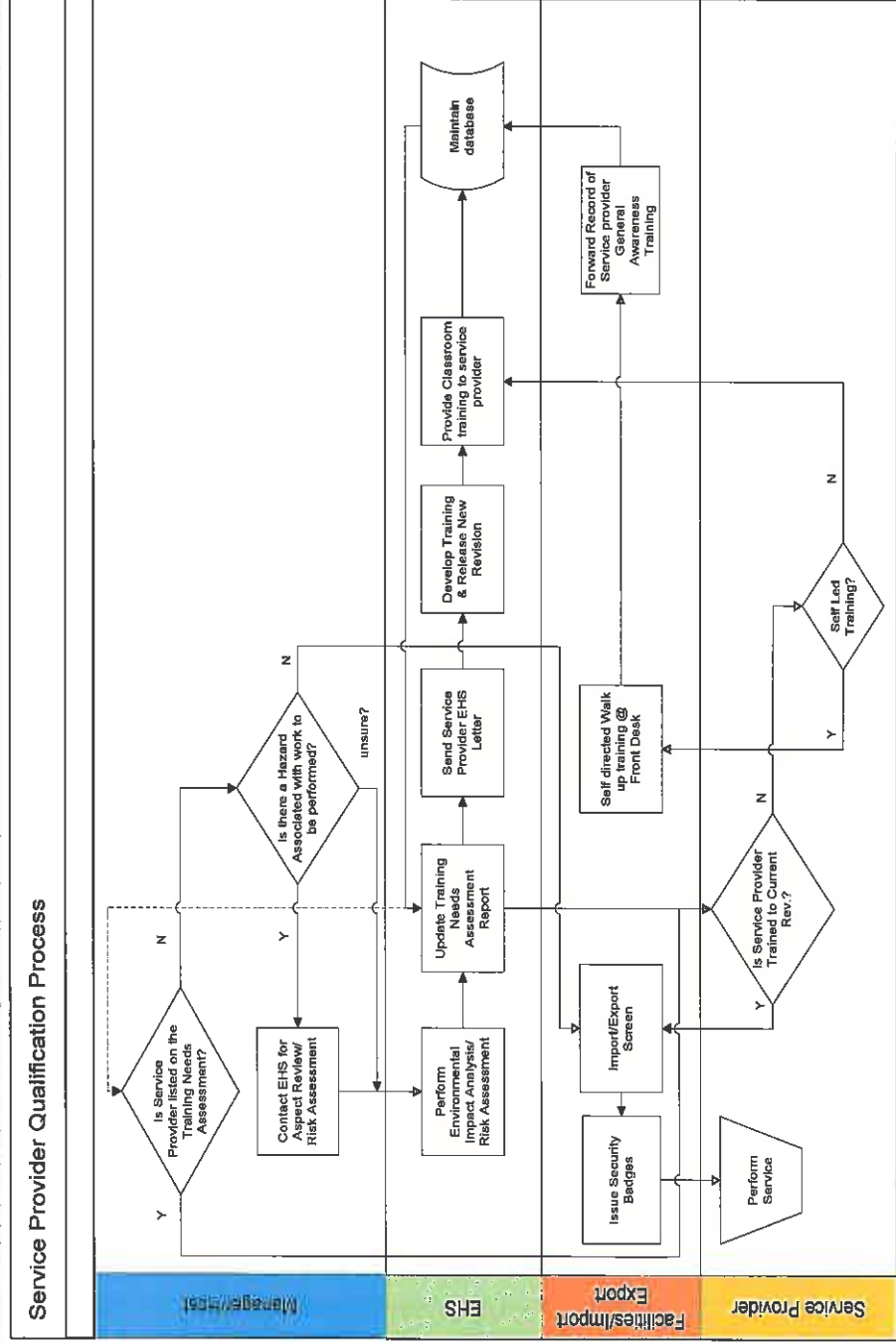
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being performed. This employee may also be the host.

- 3.3 Certified Refrigerant Recovery or Recycling Equipment means equipment manufactured before November 15, 1993, that meets the standards in 40 CFR part 82 subpart F§82.158(c), (e), or (g).
- 3.4 Service Providers-A service provider is defined as personnel employed by the company that perform tasks for or on behalf of the MTS Test Division that have the potential to cause environmental health or safety impact. Examples include but are not limited to construction and building contractors, demolition and excavating contractors, inspection and repair service companies, cleaning and salvage service companies, HVAC repair technicians, pesticide/herbicide applicators or waste transportation companies, etc.). These individuals must be competent on the basis of appropriate education, training or experience to perform their given function. In certain cases, where the provider is not expected to have potential impact, additional training is not required by MTS Test Division beyond the normal training that they would receive from their own company (For example, ATM service providers, vending machine services, etc.)

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4 GRAPHIC (IF NEEDED)




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5 RESPONSIBILITIES

- 5.1 The Host is responsible to:
 - 5.1.1 Ensure service providers being used by the Test Division have the requisite training or qualifications as outlined by this procedure to be used by the organization. Examples of hosts may include: Engineering, Purchasing, Facilities, or Machine Shop,
 - 5.1.2 Notify Environmental Health and Safety Manager that a Service Provider is coming to MTS to perform work.
 - 5.1.3 Provide access to all paperwork, training, or materials required of Service Provider
 - 5.1.4 Hand Service Provider off to Functional Area Manager.
- 5.2 The Site Environmental Health and Safety Management Representative is responsible to:
 - 5.2.1 Send letters to selected service providers in order to ensure that these providers understand MTS Test Division expectations regarding competence training and awareness; and
 - 5.2.2 To inform service providers of the hazards or potential for environmental impact related to environmental aspects or risk assessments that they may be subjected to during the normal course of work activities.
 - 5.2.3 Maintain an EHS database with Information regarding training needs identified by the organization
- 5.3 Functional Area Manager – Oversees work, provides contact information, informs Service Provider of area safety policies/practices (related to severe weather, fire, etc)

6 PROCEDURE

- 6.1 Host
 - 6.1.1 Training Needs Assessment Review-(No Hazard Exists): The Host is responsible to review the Training Needs Assessment (TNA) report to determine if the service

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provider currently being used is listed. If the service provider is not listed on the TNA, and there is no hazard (environmental or OH&S) with the work that is to be out-sourced, then the facilities department may issue a security badge. The service provider is then free to access the facility within the restrictions for the badge provided, and provide the service for MTS.

6.1.2 Training Needs Assessment (TNA) Review- (Hazard Exists): If a hazard exists (environmental or OH&S) with the work that is to be out-sourced, and the service provider is not listed on the training needs assessment report, contact the Site Environmental Health and Safety Management Representative to perform an Environmental Impact Analysis or Risk Assessment, in order to better understand training needs for the activity to be out-sourced.

6.1.2.1 Updating the TNA: The Site Environmental Health and Safety Management Representative will then perform the requisite analysis and update the training needs assessment matrix, in accordance with the requirements of the Quality departments Training Needs Assessment procedure.

6.2 Environmental Health and Safety

6.2.1 Letter to Service Provider: The Site Environmental Health and Safety Management Representative will send a letter to identified Service providers that have the potential to cause a significant environmental impact or that may be introduced to recognized hazards during the course of their work on site. The letter requires the following key elements:


6.2.1.1 That contractors sent to MTS are competent to perform their assigned duties based on appropriate education, training or work experience.

6.2.1.2 That the contractor has some method in place to determine the competency of their employees.

6.2.1.3 That the contractor is notified of the significant risks /hazards identified by MTS that have the potential to cause an incident or environmental impact.


6.2.1.4 To obtain MTS Service Provider General Awareness Training.

6.3 Functional Area Manager Functional Area Manager – Oversees work, provides contact

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information, informs Service Provider of area safety policies/practices (related to severe weather, fire, etc)

- 6.4 Service Provider General Awareness Training: The Site Environmental Health and Safety Management Representative will develop, deliver, and maintain the ISO 14001/OHSAS 18001 service provider general awareness training for the organization. The training will cover at a minimum environmental health and safety requirements as well as the EHS policy, and required emergency notification and response procedures.
- 6.5 EHS Database Management: The Site Environmental Health and Safety Management Representative will develop an active register of service providers *listed on the Training Needs Assessment* within the MTS Test organization requiring training. This information will be entered into a database that the EHS department will maintain. Output from the database includes a report identifying qualified service providers that have received the most current version of 14001/OHSAS 18001 service provider general awareness training. Once trained, the service provider is issued a security badge and is then considered qualified to perform the given service function.
- 6.6 Facilities/Import Export
 - 6.6.1 Import Export Screening: The Import/Export Department will pre-screen all service provider badge applicants. Information required for the pre-screen process will include but is not limited to the following:
 - 6.6.1.1 Name (first, middle, last)
 - 6.6.1.2 Citizenship
 - 6.6.1.3 Company Name
- 6.7 Service Provider Security Badges: The facilities department will issue service provider badges. These badges can be classified into two primary categories as follows:
 - 6.7.1 Service provider not listed on the Training Needs Assessment (TNA)-no training required prior to badge issue.
 - 6.7.2 Service provider listed on the Training Needs Assessment (TNA)-Training required prior to badge issue.
- 6.8 The facilities group is responsible to forward training records of service providers to the EHS Department.

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6.9 Service Provider

- 6.9.1 The service provider is responsible to reference the most current version of the Training Needs Assessment report to determine if they are required to be trained and if so to which revision.
- 6.9.2 If the service provider is not listed on the training needs assessment report, no training is required and they may receive a security badge from facilities and perform the given service for the Test Division.
- 6.9.3 If the service provider is listed on the training needs assessment report, the service provider is expected to be trained to the revision listed on the report in order to receive a security badge.
- 6.9.4 Service Provider General Awareness Training- The service provider may choose to be self trained (self led), or receive formal classroom (instructor led training). Instructor led training times are subject to a training schedule provided by the EHS department.
- 6.9.5 Self Led Training- The service provider may elect to attend self directed training at a walk up station at the front security desk, or review a hard copy printed training program maintained in the facilities department. Once the self led training is completed, the training record /and assessment must be signed and forwarded by the service provider to the facilities department. The facilities group will forward completed training records to the EHS Manager for entry into the database. Incomplete training records will be sent back to the service provider.
- 6.9.6 Instructor Led Training- The service provider may elect to attend a formal classroom training program. Once the instructor led training is completed, the training record /and assessment must be signed. The EHS Manager will enter the completed training information into the database.
- 6.9.7 Service Provider Requirements- Service providers that are listed on the training needs assessment report are expected to meet the following requirements as applicable:
- 6.9.8 Demolition Service Providers
- 6.9.8.1 Stormwater- MTS Test Division has applied for and has received a no-exposure certificate for industrial stormwater. Contractors that are involved with demolition activity on site are required to cover the


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dumpster with a lid or some other cover (tarp for example). The cover must have sufficient durability and integrity and be anchored in such a way as to prohibit stormwater from entering the container. In the event of inclement weather during demolition, the dumpster must be closed, and the cover sufficiently anchored.

- 6.9.8.2 Shelter or enclose stored containers and drums according to regulatory requirements. Remember, even closed containers can leak in a storm event.
- 6.9.8.3 Provide appropriate shelter during loading and unloading activities.
- 6.9.8.4 Proper transfer of liquids- Exposure or leaks during loading and unloading of waste by transportation services must be performed within the covered loading dock area. In the event of a spill or release, the service provider must notify MTS by dialing “0” for the operator to report the spill. The release will be contained in a flammable trap, which will be required to be pumped out. Contact the facilities department for further details.

6.9.9 HVAC Service Providers

- 6.9.9.1 HVAC Service Providers-Technicians who maintain, service, or repair low- and high-pressure equipment must be properly certified as Universal technicians.
- 6.9.9.2 MTS Contracted service providers that maintain company owned comfort cooling appliances normally containing more than 50 pounds of controlled refrigerant must have leaks repaired if the appliance is leaking at a rate such that the loss of refrigerant will exceed 15 percent of the total charge during a 12-month period.
- 6.9.9.3 Repairs must bring the annual leak rate to below 15 percent and the repairs must be documented. Leak rate calculations must be performed in accordance with the requirements of 40 CFR part 82. Controlled refrigerant adds must be logged as well as calculations of leaks, and repair notes on the HVAC units serviced.
- 6.9.9.4 Service providers or technicians that work on MTS owned HVAC equipment must use certified refrigerant recovery or recycling

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equipment on company premises.

6.9.10 Pesticide/Herbicide Service Providers

6.9.10.1 Service providers that apply commercial pesticide or herbicide on MTS premises are required to obtain a license from the Minnesota Department of Agriculture and shall comply with the MDH requirements for such application, and the Federal Insecticide Fungicide and Rodenticide Act (FIFRA).

6.9.11 Hazardous Materials Transportation

6.9.11.1 Service providers that transport hazardous materials for or on behalf of MTS Test Division shall obtain a hazardous materials endorsement on their commercial drivers license. This would be applicable for hazardous waste transportation companies as an example. The service provider must certify that the hazmat employee has been both trained and tested to be competent to perform their requisite duties.

6.9.12 Hazardous Waste and Construction Activities

6.9.12.1 Construction and service contractors commonly work and generate wastes while at MTS Test physical plant locations. When eligible service contractors generate a hazardous waste, the contractor or service provider is responsible to properly manage the hazardous waste as a co-generator in accordance with Minnesota Rules 7045. Eligible contractors may include, but are not necessarily limited to:


6.9.12.1.1 Construction and building contractors

6.9.12.1.2 Demolition and excavating contractors

6.9.12.1.3 Inspection and repair service providers

6.9.12.1.4 Cleaning and salvage service providers

6.9.12.2 As a service provider that generates hazardous waste, the provider may transport the waste to a base location for consolidation or to a Very Small Quantity Generator Collection program for disposal in accordance with Minnesota Rules 7045. The service provider must

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ensure that the waste is managed and disposed of properly.

6.9.13 In order to be eligible to transport and manage the waste the service provider must be:

6.9.13.1 A co-generator

6.9.13.2 Be temporarily, but actively involved in the process(es) that generate the waste

6.9.13.3 Generate 100 kilograms (kg) or less of hazardous waste per site


6.10 Generate the waste at a Minnesota site operated by MTS Test Division.

7 ASSOCIATED QUALITY RECORDS – AS STATED IN THE QUALITY RECORDS LIST

Required Record
Pesticide/Herbicide applicators licenses
40 CFR Part 82 certification for HVAC service providers

8 REFERENCE FORMS / TEMPLATES / DOCUMENTS

Form / Template / Document Title	Location
Service Provider General Awareness Training (HR 400-102)	EHS Department
Service Provider Prequalification Form (EHS 500-112)	\\mspdata1\Environmental_Health_and_Safety\Contractors & Suppliers\Contractors & Suppliers\Pre-qual-Service Providers\Pre-qual-contractors-suppliers.docx

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9 CURRENT REVISION'S TRAINING REQUIREMENTS

Select (mark X)	Training Type	Training Definition
	Awareness	Awareness training is conducted by communication, which is sent/delivered by the approver/author/owner of the document to the affected employees/groups.
X	Formal	Formal training requires the approver/author/owner to collect/store evidence that the affected employees/groups were trained.

Functions/Groups that require Awareness to this procedure:

- Service Provider General Awareness Training (EHS014_ILT) is required for all Service Providers and their associated MTS host employees that can impact the environment or the health & safety of employees. Includes all service providers as currently listed in the Training Needs Assessment Matrix.

10 REVISION HISTORY & APPROVAL

Revision History			
Rev	Description of Change	Author	Effective Date
A	Developed initial procedure for conformance to ISO 14001 § 4.2.2 (most current revision), and OHSAS 18001 § 4.4.2 (most current revision)	Bob Klenotich	10/2/12
B	Section 2 revised scope: removed Chanhassen.	Paula Williams	04/08/2014
C	Updated definitions section 3 to include host employees and updated section 5 to include host responsibilities.	Bob Klenotich	6/16/14

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Approval of Current Revision		
Name / Function	Signature	Date
Bob Klenotich, EHS Manager, EHS Management Representative		6/16/14
Al Rivers, Director of Operations		6/16/14