

PEST CONTROL PROGRAM DOCUMENTATION

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Polar Dynamics Robotics, Inc.

Effective Date: January 1, 2024

Document ID: PDR-REG-2024-001

1. PURPOSE AND SCOPE

1. This Pest Control Program Documentation ("Program") establishes
2. This Program applies to all Company facilities, including:

- a) Main manufacturing facility (Dover, Delaware)
- b) Research & Development Center (Cambridge, Massachusetts)
- c) Cold Storage Testing Facility (Minneapolis, Minnesota)
- d) Regional Service Centers (All locations)

2. REGULATORY COMPLIANCE

1. This Program is designed to comply with:

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FDA 21 CFR Part 110

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EPA pesticide application regulations

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OSHA workplace safety requirements

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State-specific pest control regulations

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ISO 9001:2015 quality management standards

3. PEST CONTROL MEASURES

1. Environmental Controls

- a) Maintenance of negative air pressure in critical areas
- b) Installation of air curtains at facility entrances
- c) Implementation of temperature-controlled vestibules
- d) Regular inspection of door seals and weather stripping

2. Physical Barriers

- a) Installation of rodent-proof barriers around utility penetrations

- b) Maintenance of 18-inch inspection aisles along walls
- c) Implementation of insect light traps at strategic locations
- d) Regular inspection and repair of facility exterior

4. MONITORING AND DOCUMENTATION

1. Inspection Schedule

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Daily visual inspections by facility personnel

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Weekly comprehensive inspections by designated staff

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Monthly professional pest control service visits

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Quarterly audit of pest control documentation

2. Documentation Requirements

- a) Pest activity logs
- b) Service reports from pest control contractor
- c) Corrective action records
- d) Chemical usage logs
- e) Employee training records

5. SPECIAL CONSIDERATIONS FOR ROBOTICS FACILITIES

1. Clean Room Requirements

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Enhanced pest monitoring in clean room environments

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Specialized pest control methods compatible with sensitive electronics

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Additional documentation requirements for clean room areas

2. Cold Storage Areas

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Modified pest control protocols for sub-zero environments

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Special attention to condensation points

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Enhanced monitoring around BlueCore(TM) testing areas

6. CONTRACTOR REQUIREMENTS

1. Pest Control Service Provider Qualifications

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Current state licensing and certification

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Minimum \$2,000,000 liability insurance coverage

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Experience with industrial/technology facilities

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Knowledge of clean room protocols

2. Service Agreement Requirements

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Monthly service minimum

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24-hour emergency response capability

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Detailed service documentation

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Use of approved chemicals only

7. CHEMICAL CONTROL

1. Approved Products

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Only EPA-registered products permitted

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MSDS maintenance required

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Rotation schedule for chemical classes

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Storage and handling protocols

2. Application Restrictions

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No spraying near electronic components

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Restricted application in clean rooms

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Required notification periods

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PPE requirements

8. EMPLOYEE TRAINING

1. Training Requirements

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Initial pest awareness training

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Annual refresher courses

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Documentation of training completion

-

Role-specific training modules

9. EMERGENCY PROCEDURES

1. Response Protocols

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Immediate notification requirements

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Containment procedures

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Documentation requirements

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Follow-up actions

10. PROGRAM REVIEW AND UPDATES

1. Annual Review

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Effectiveness evaluation

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Regulatory compliance verification

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Update of procedures as needed

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Stakeholder feedback incorporation

AUTHORIZATION

This Program is hereby authorized and implemented by:

Dr. Elena Frost

Chief Executive Officer

Polar Dynamics Robotics, Inc.

Sarah Nordstrom

Chief Operating Officer

Polar Dynamics Robotics, Inc.

Date: January 1, 2024

REVISION HISTORY

Version 1.0 - January 1, 2024 - Initial Program Implementation

Version 1.1 - March 15, 2024 - Updated Clean Room Protocols

End of Document

