

CNHI   
Accident Prevention Program

SAFETY PROGRAM

Michelle Talerico | 2022-23

# Note

The CNHI Accident Prevention Program is designed to assist CNHI Safety Leaders and managers train CNHI employees to perform their jobs in a safe manner, to remove hazards from the workplace and to raise safety awareness/involvement of employees.

CNHI management is committed to ensure that all employees are protected from injury and illness hazards while at work. This safety manual contains written policies and procedures meant to assist location management to encourage employee involvement and to develop a process that heightens safety and health awareness among all employees.

# Table of Contents

* 1. Accident/Incident Investigation
  2. Audits
  3. Blood Borne Pathogen
  4. Certified Safety Leader
  5. Confined Space
  6. Emergency Action Plan (EAP)
  7. Emergency Contingency Plan
  8. Emergency Exits
  9. Ergonomics
  10. Fire Extinguisher Safety
  11. First Aid
  12. Floor and Wall Openings
  13. Forklift/Pallet Jack
  14. General and Environmental
  15. Hazard Communication
  16. Hazard Inspection
  17. Hearing Conservation
  18. Incentives
  19. Injury Management
  20. Job Safety Analysis
  21. Lock Out Tag Out (LOTO)
  22. Machine Guarding
  23. Motor Vehicle Reports (MVR)
  24. OSHA Visit Follow Up Procedures
  25. OSHA 300/300A Record Keeping/Log
  26. Personal Protective Equipment
  27. Safety Committee
  28. Safety Posters and Safety Alerts
  29. Sanitation
  30. Safety Toolbox Talks
  31. Stairs and Ladders
  32. Training Requirements
  33. Vehicle Safety Training
  34. Walkways and Exits
  35. Workplace Violence

**First Aid Section (11) contains an emergency phone list. Fill in the information and give to supervisors to post next to phones in their department that would be used for such emergency calls.**

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**Safety Standard 1**

Accident/Incident/Near Hit Investigation

* An Incident or Near Hit is something that could have been prevented. Carelessness is always the cause.
* An Accident is an event that could not have been predicted, resulting in injury and/or property damage.

Accident/Incident/Near Hit investigation is an important part of the Safety Program. An investigation provides crucial information to the Location Safety Committee as to why and how an incident occurred. With this information the Safety Team will make adjustments so that a similar type of accident/incident will not happen again. The investigation will be done in addition to the First Report of Injury.

A near hit can happen for many reasons, but the result is the person involved usually realizes they were almost injured. The result of an accident/incident is the employee is injured, property is damaged or both. The steps employees must be trained to follow are the same for both:

1. Report the Accident/Incident/Near Hit as soon as possible to the Department Head.
2. Appropriate first aid and or emergency action will be taken at this time.
3. After the situation is stabilized, the Department Head will inform the Location Safety Leader.
4. Examine the area in question making notes on the floor condition, overhead condition, loud music, etc. Examine employee equipment such as shoes, glasses, etc.
5. Use available investigation forms to document the occurrence. Talk to all employees in the area to understand and note how the event occurred, filling out forms completely.
6. You may know before the investigation is completed what caused the event. If you can make improvements now that will stop the incident from re-occurring do it now! If you need to stop operations due to hazardous conditions until changes can be made, stop operations. Make the changes!

Once the investigation is complete, the situation should be reviewed by the Safety Committee and location management to ensure everything has been done to remedy the situation so that all employees are safe.

All investigations will be discussed at the monthly safety meeting. Results of the investigation can be posted on the break room bulletin board. It is important for employees that work in the affected area to understand what happened in order to prevent a re-occurrence.

After the investigation, take this opportunity to coach employees on the right way to accomplish the task associated with this incident. Explain the situation, the options, what action was taken and then ask employees what they would have done in the same situation. After the discussion, come to an agreement of what the safety policy is and what must happen in this instance. Coach, coach, coach! Supervisors must take responsibility and be held accountable for what happens in their department.

**Accident/Incident Investigation Form/Near Hit Investigation Form**

**Location#\_\_\_\_\_\_ Name of Employee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_**

The objective of this interview is that through questions and discussion, employees and the Safety Team will understand what caused the incident or near hit and what must be done in the future to prevent the situation from recurring. Describe in detail. Attach additional sheets if needed. This form will be completed by a Safety Committee member or Department Head when an injury does or does not occur.

1. What was the employee doing up to fifteen minutes before the event?
2. How was the employee distracted from their task?
3. What happened around them that may have distracted them?
4. Were they in a hurry? If so why?
5. What surrounding conditions added to the unsafe situation? (Wet floors, debris, limited field of view, missing machine guards, etc.)
6. Was anyone else nearby?
7. How did the unsafe incident occur? What sequence of events caused the unsafe incident?
8. What was done incorrectly?
9. How should the task have been completed to prevent the incident?
10. State the company policy in relation to the incident?
11. What can the employee do in the future to prevent a similar unsafe event from happening again?

**Safety Standard 2**

Audits

Audits of a location’s safety program will be performed by the Risk Management and Safety Department and by the Internal Audit Department.

The Safety Leader at each location will be responsible for the location achieving a favorable report from an audit. The Safety Leader must have the full support of the Publisher, utilize members of the Safety Committee and recruit help from all employees to make the Safety Program a success.

**Safety Standard 3**

Blood Borne Pathogen Training and Exposure Control Plan

**It is imperative for management to photocopy these four pages and give them to all employees during a training session. All employees shall be trained on the risk of blood borne pathogens and the proper handling of blood and other body fluids.**

### **What Everyone Needs to Know**

Blood borne pathogens are microorganisms carried by human blood (and other body fluids) and cannot be seen with the naked eye. They can be spread through contact with infected blood. If they get into the bloodstream, an individual may become infected and sick.

Most personnel cannot reasonably anticipate coming into contact with blood during their day-to-day work duties. That is why it is imperative that all personnel understand the dangers of exposure to blood borne pathogens and know ways to minimize their risk.

Blood borne pathogens may be present in blood and other materials, such as:

* body fluids containing visible blood
* semen and vaginal secretions
* torn or loose skin

Blood borne pathogens can cause infection by entering the body through:

* open cuts and nicks
* skin abrasions
* dermatitis
* acne
* mucous membranes of the mouth, eyes or nose

# **WORKPLACE TRANSMISSION**

The most common blood borne pathogens are HIV, Hepatitis B, and Hepatitis C:

**HIV (AIDS)**

HIV, the human immunodeficiency virus (HIV), attacks the body's immune system causing it to weaken and become vulnerable to infections that can lead to a diagnosis of acquired immune deficiency syndrome or AIDS.

HIV is transmitted mainly through sexual contact and sharing contaminated needles, but also may be spread by contact with infected blood and body fluids. HIV is NOT transmitted indirectly by touching or working around people who are HIV-positive.

## Hepatitis B

Hepatitis is a general term used to describe inflammation (swelling) of the liver. Alcohol, certain chemicals or drugs, and viruses such as hepatitis A, B, C, D, E and G may cause hepatitis.

* Hepatitis B is a serious, sometimes fatal disease, caused by a virus that infects and attacks the liver. The virus is transmitted through direct contact with infected blood, semen, or vaginal fluid. It is primarily spread through sexual contact.
* In studies that examine transmission following injections into the skin, HBV is 100 times more contagious than HIV.
* **HBV can also be transmitted indirectly because it can survive on surfaces dried and at room temperature for at least a week!** That's why contaminated surfaces are a major factor in the spread of HBV.
* Each year there are up to 200,000 new infections and 5,000 hepatitis B related deaths in the U.S. (compared to 40,000 new HIV infections per year).
* One in approximately 20 persons now has, or will one day have, hepatitis B
* Transmission of hepatitis B is preventable:

**Follow the Guidelines for Handling Blood and other Body Fluids listed below**

Get the hepatitis B vaccination

**WORKPLACE TRANSMISSION (continued)**

**Hepatitis C**

Hepatitis is a general term used to describe inflammation (swelling) of the liver. Alcohol, certain chemicals or drugs, and viruses such as hepatitis A, B, C, D, E and G may cause hepatitis.

* Hepatitis C is a serious, often fatal disease, caused by a virus that infects and attacks the liver. HCV is more common than hepatitis B and ranks slightly below alcoholism as a cause of liver disease.
* However, HCV is not as infectious as HBV because there are generally lower levels of the hepatitis C virus in the blood than of the hepatitis B virus.
* HCV is primarily transmitted through blood-to-blood contact -- most commonly through shared needles. The risk of transmitting HCV through sexual contact appears to be low, but precautions should be taken anyway. HCV cannot be transmitted by casual contact such as shaking hands or sharing bathroom facilities.
* Up to 180,000 people may become infected with HCV each year in the U.S.
* Transmission of hepatitis C is preventable:

**Follow the Guidelines for Handling Blood and other Body Fluids listed below.**

HOWEVER, unlike hepatitis B, currently there is NO VACCINE for hepatitis C. And also unlike HBV, there is no drug to prevent HCV infection after exposure.

**Guidelines for Handling Blood and Other Body Fluids**

Many personnel are concerned that HIV may be spread through contact with blood and other body fluids when an accident occurs at work.

HIV, as noted earlier, has been found in significant concentrations in blood, semen, vaginal secretions, and breast milk. Other body fluids, such as feces, urine, vomit, nasal secretions, tears, sputum, sweat, and saliva do not transmit HIV unless they contain visible blood. However, these body fluids do contain potentially infectious germs from diseases other than AIDS. **If an individual has contact with any of these body fluids, they are at risk of infection from these germs**. It should be remembered that the risk of transmission of these germs depends on many factors, including the type of fluid contacted, the type of contact made, and the duration of the contact.

Very simply, it is good hygiene policy to treat all spills of body fluids as ***infectious*** in order to protect personnel from becoming infected with any germs and viruses. The procedures outlined below offer protection from all types of infection and should be followed routinely.

(Blood Borne Pathogen cont.)

**How Should Blood and Body Fluid Spills Be Handled?**

**Blood Borne Spills must be cleaned up by a member of management if the spill is relatively small. Large spills may require an outside company to performing the clean-up duties.**

Employees shall wear disposable, waterproof gloves when they expect to come into direct hand contact with body fluids (when treating bloody noses, handling clothes soiled by incontinence, or cleaning small spills by hand). Gloves used for this purpose shall be put in a plastic bag or lined trash can, secured, and disposed of daily. Hands should always be washed after gloves are removed, even if the gloves appear to be intact.

If an employee has unexpected contact with body fluids or if gloves are not available (for example, applying pressure to a bleeding wound), the employee shall wash their hands and other affected skin for at least 30 seconds with soap and water after the direct contact has ended. This precaution is recommended to prevent exposure to other pathogens, not just HIV. As has been discussed, blood, semen, vaginal secretions, and blood-contaminated body fluids transmit HIV. Wiping a runny nose, saliva, or vomit does not pose a risk for HIV transmission.

### Hand washing

Proper hand washing requires the use of soap and warm water and vigorous washing under a stream of running water for at least 30 seconds. If hands remain visibly soiled, more washing is required. Scrubbing hands with soap will suspend easily removable soil and microorganisms, allowing them to be washed off. Running water is necessary to carry away dirt and debris. Rinse your hands under running water and dry them thoroughly with paper towels or a blow dryer. When hand washing facilities are not available, use a waterless antiseptic cleanser. Follow the manufacturer's directions for use.

### Disinfectants

An EPA approved germicide or a solution of 99 parts water to 1 part household bleach (or ¼ cup bleach to one gallon of water) will inactivate HIV and should be used to clean all body fluid spills. Higher concentrations of bleach can be corrosive and are unnecessary. Surfaces should be cleaned thoroughly prior to disinfection.

### Disinfecting Hard Surfaces and Caring for Equipment

Although hard surfaces have not been found to be a means of transmitting HIV, it is good hygiene policy to clean any soiled hard surfaces thoroughly. To do this, scrub the surface to remove any soil and apply a germicide (like the bleach/water solution described above) to the equipment used. Mops should be soaked in this solution after use and rinsed thoroughly with warm water. The solution should be promptly disposed of down a drainpipe. Remove gloves and discard them in appropriate receptacles, and wash hands as described above.

When Blood Borne Pathogen training is complete, trainees shall print

their name, sign, and date the appropriate roster.

**Safety Standard 4**

Certified Safety Leader

The Certified Safety Leader Program is a CNHI certification process designed to give Location Safety Leaders knowledge, training and recognition for building a successful safety program at their location. It is a goal of CNHI to have one Certified Safety Leader at each Location in 2006.

Safety is a very positive program for all concerned. Its goal is to find hazards before they cause injury and to train employees to recognize and report hazards to keep people safe. Good training is the most effective tool you must make your location a safer place to work. On the job training is something that must be done every day. A pat on the back or some form of positive feedback at the time an employee is observed performing their job safely (or corrective feedback when performing their job in an unsafe manner) is powerful training strategy.

Safety Leaders must have credibility with employees and management. They must be organized and able to follow through on items of importance. Safety Leaders will organize, lead and train the safety committee, location management and employees.

Attached are the requirements and a master copy of the application.

The requirements for the Safety Leader to become Certified are to:

1. be a Department Head or a Manager unless authorized through the Risk Management Department.
2. become familiar with the CAPP and be able to address safety issues.
3. hold and chair the monthly Safety Committee Meetings for 6 months. Hold team members accountable for all safety related activities (training, safety messages, inspections, investigations, etc.)
4. inspect the location (press room included) each month for six months and oversee the monthly inspection for six months and send a fax copy of the inspection to Risk Management.
5. ensure all safety programs and employee safety training are kept up to date. Keep records current-Fork Lift, Blood Borne Pathogen, Walking Working Surfaces, Material Handling, Machine Guarding, LOTO, PPE, Stairs/Ladders, HazCom. (Refer to Safety Standard 32)
6. have in place a tested and working Emergency Action Plan. (Refer to Safety Standard 6)
7. train Safety Committee Members on-Accident/Incident/Near Miss investigations.
8. encourage and oversee the execution of computer-based training.
9. ensure monthly Safety Posters, Safety Alerts and Newsletters are communicated to all departments.
10. ensure that Accident/Incident/Near Miss Investigations are completed, provided to the location’s accident reporting person, discussed with the Safety Committee, discussed with the Publisher, unsafe conditions corrected in a timely manner and the report is filed.
11. check for stocked first aid kits and eye wash stations in the press room and other areas as needed.
12. oversee monthly inspection of fire extinguishers.
13. ensure the sprinkler riser valve is locked in the open position and a path to the valve kept clear. If you have a question, call me.
14. to know what accidents have occurred during the year.
15. be responsible for the location passing the safety portion of the audit.

(Certified Safety Leader cont.)

Training for a Safety Commitment

The highlighted step in this training tool is proven to be effective 80% of the time. It can be used when you are training people for any job (it even works with your kids).

1. Set up area for training. Gather props that will be used: boxes, pallet jack, pallets, etc.
2. Gather employees to be trained.
3. Explain:
4. What type(s) of training employees are receiving: rainy weather, blood borne, ergonomic, lifting, driver or pallet jack.
5. Why they are being trained? To coach and remind them of the safe way of performing a job, function, or movement.
6. Demonstrate the action you want.
7. Ask for questions
8. Ask each person to demonstrate.
9. Ask them to explain to you why they are using a certain posture, tool, technique etc.
10. Ask other employees if they notice a problem with the technique the person may be demonstrating. There may not be anything wrong but ask to find out if teammates understand what you are teaching. You must make sure they understand the reasoning behind the training.
11. After the employees correctly demonstrate the training, ask each person for a commitment to themselves, to their families and to the company. The employee’s commitment to perform their job safely, as trained, will be expressed by signing the training roster.

1. After the employee has signed the roster ask them to explain instances in the past when they have not performed their job as they were just trained. (Everyone has made errors in the past.)
2. After everyone present relates these unsafe behaviors to you, ask again for their commitment to the location and CNHI to work safely.

(Certified Safety Leader cont.)

Training is only as effective as the degree of accountability that employees are expected to meet.

All the training in the world will not make a person safer, stronger, smarter, etc. unless that person is motivated to perform as they were trained.

Supervisors who oversee employees must give accolades when they are deserved or reprimands when they are needed. Positive reinforcement is a great way to motivate people. The right kind of language can really mean a lot to most people, and it can make things easier on everyone concerned. Sometimes retraining will be required. Sometimes an employee will need to be formally “written up”, sometimes an employee will need to be terminated.

Bring as much recognition to employees as you can for working safely. Everyone wants to be recognized for doing a good job. This will persuade other employees to buy into CNHI’s safety culture.

Encourage employees by rewarding them for activities such as:

* Submitting safety suggestions
* Keeping their work area neat and clean
* Alerting their supervisors to unsafe conditions
* Staying current in their training
* Using the First Net online training system at [www.firstnetlearning.com](http://www.firstnetlearning.com)
* Training another employee
* Performing a Job Safety Analysis or a Hazard Analysis
* Holding a Toolbox Talk to train or raise safety awareness on their team
* Ordering shoes from Shoes for Crews
* Participating in the Safety Committee meetings
* Staying in touch with employees that are off duty because of an injury
* Reporting near hits
* Helping with emergency action plans, fire evacuation plans, emergency shelter plans

Safety is about action. Eliminating hazards, training employees, investigating accidents, analyzing jobs, coaching, giving feedback, and documenting your progress.

**Safety Standard 5**

Confined Space

Confined space means an area is large enough to enter and perform work, has limited access and is not designed for continuous employee occupancy.

If you have an area like this at your location, this is considered to be confined space and you must set up and follow strict procedures concerning anyone entering this space. Depending on what is in the space, many hazards could endanger a co-worker’s life. Measures must be taken to protect our employees from these potential dangers.

If you have a confined space that has a hazardous atmosphere, contains material with the potential to be hazardous to a person’s safety, is configured such that a person may become trapped or contains any other safety/health hazard you must:

1. Keep the space locked and place Danger-Permit Required Confined Space-Do not enter signs on all access points.

**Safety Standard 6.**

**Emergency Action Plan**

Purpose:

To establish the policy and procedures regarding management and employee response to various emergency situations. Examples of an emergency are fire, tornado, earthquake, and bomb threat.

Overview:

The procedures cover the following topics:

1. **Fire Reporting and Response**
2. **Evacuation due to fire or chemical release**
3. **Tornado Preparation and Emergency**
4. **Bomb Threat**
5. **First Aid**
6. **Hazardous Material Spill**
7. **Earthquake**
8. **Robbery**

Policy:

CNHI, LLC has developed plans that address emergency situations that may arise in company locations, and which may threaten human health and safety, and damage company assets. Management is responsible for implementing the Emergency Action Plans. These Emergency Action Plans will meet the following objectives:

1. Provide a means of notifying employees, customers and local authorities of an emergency situation. (Usually an alarm system)
2. Provide for a safe and orderly method of evacuation of employees and customers from company premises.
3. Account for all employees who occupied company premises at the time of evacuation, should one occur.

4. Provide emergency first aid treatment or summon emergency medical assistance injured individuals.

5. Provide training and needed information to those employees responsible for taking action in the event of an emergency.

Signs, as required by ordinance, regulation, or law, will identify emergency exits. Employees are required to be familiar with the location(s) of alarm pull stations and emergency exits.

Training on Emergency Action Plans will take place during new employee orientation, whenever changes occur in the action plans, and periodically as coordinated by the Safety Leader.

**Smoking is never allowed anywhere on** CNHI, LLC **premises during an emergency.**

If hazardous materials are involved, disposal must be done in compliance with federal, state, and local environmental laws.

Facility managers will ask for volunteers to act as Wardens during emergency situations. There must be one Warden for every 20 employees. These Wardens will assist persons in moving swiftly to safe areas. They will be trained in the complete layout of the workplace, all escape routes, inside shelter locations and outdoor evacuation meeting areas. All Wardens and employees shall be made aware of employees that may need additional assistance in emergency situations. Before leaving their areas, Wardens should check closed rooms and enclosed spaces for persons who may be trapped or unable to evacuate.

Floor plans or workplace maps which clearly show escape routes and fire extinguishers should be placed throughout the facility. Color coding may help employees determine their route assignment.

Employees trained in first aid should notify management if they want to be designated as a first aid respondent.

Every person who is assigned an emergency duty must have a backup person. This back up person will fill the position when the primary person is absent from work.

Wardens may be needed to shut down equipment, turn off electricity or start up a generator.

1. **Fire Reporting Procedure:**

When formulating a plan for their location, senior management and the Safety Committee shall take into account the number of emergencies exits and where the exits are located. A map of the facility which shows all exit routes and fire extinguishers will be posted in prominent locations around the facility including the break room.

If there are essential functions that must be addressed before total evacuation, (such as shutting down the press, turning off the power, checking the sprinkler valve) personnel performing these functions will receive detailed training as to what is expected in each emergency procedure.

If a fire alarm or alert is sounded or a fire is reported by an employee, regardless of the reason for the alarm or the severity of the fire, the following action must be taken immediately:

**Senior Management**

1. Immediately notifies the Fire Department by dialing 911 (where applicable) or the local fire emergency number:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ .

2. Gives the location name, address, and area where the fire is located.

1. 3. Assigns an employee to wait for the fire department, outside the facility, and direct them to the fire’s location.
2. 4. Announces evacuation instructions over the public address system. “Ladies and Gentlemen: CNHI, LLC is being temporarily closed. We request that you leave the building by the nearest exit immediately. Thank you.”

5. Once outside the facility, department heads should take a head count of employees in their dept. to ensure all were safely evacuated. Dept. Heads will report the head count to senior management. Senior management double checks that all individuals are out of CNHI, LLC premises.

Note: When one or more employees are unaccounted for, employees are not to re-enter the building to conduct a search. Notify the ranking fire or other emergency response official on the scene of the employee’s approximate location.

1. Immediately after the fire, notify the President of CNHI, LLC. and all other management individuals.

**Employee**

7. If trained in the use of fire extinguishers, employees may attempt to suppress a small fire, until relieved by the Fire Department or until it becomes apparent that the fire cannot be controlled by fire extinguishers.

Note: Employees should never attempt to control a fire which endangers their health. They must immediately evacuate the area when it becomes apparent that the fire cannot be controlled or when conditions become more hazardous.

1. **Evacuation:**

**Senior Management**

1. Telephones the local emergency agency (for example: fire, police, hazardous materials team, etc.).

1. Makes the following announcement on the public address system, “Ladies and Gentlemen: CNHI, LLC, is being temporarily closed. Please leave by the nearest exit immediately. Thank you.” Make this announcement twice, and repeat it every minute, or more frequently if needed.
2. Checks all areas of their respective departments, restrooms, and public areas to verify that employees and individuals are evacuated.

4. Secures all cash, checks, and charge documents in the safe if time permits.

5. Designates a safe area outside the facility as a gathering point for all employees. Takes a head count of employees to ensure all were safely evacuated.

Note: Employees are not to re-enter the building. Management will notify the ranking fire or other emergency response official on the scene of a potentially trapped person and their approximate whereabouts.

6. Dismisses all non-essential employees.

1. Telephones the President of CNHI, LLC. and all other management personnel.
2. **Tornado Preparation and Emergency:**

Prior to a tornado emergency, Management will designate safe shelter areas within the building for employees and individuals. There are some general guidelines that may be used to aid in the selection of such spaces. When selecting a safe shelter, consider:

* The lowest floor, preferably a basement
* Interior spaces-rooms with no walls on the exterior
* Areas supported by secure, rigid structural frame members
* Short roof spans

CNHI, LLC safe shelter area is located \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. It will be stocked with a first aid kit or medical supplies and several flashlights.

**Tornado Watch Procedures**

**Senior Management**

1. A Tornado Watch means that conditions are right for severe thunderstorms and possible tornadoes to develop. When notified of a tornado watch in the area, Senior management will tune the radio to the National Weather Service channel to stay current on storm progress.

1. Checks to ensure that all safe shelter areas are unlocked and accessible.

3. Checks to be sure that medical supplies and flashlights are stored in the safe shelter area.

4. If time permits, “X” the windows with tape or secure plywood to the outside of windows.

**Tornado Warning Procedures**

**Senior Management**

1. A Tornado Warning means a tornado has been seen or detected by radar. Senior Management will inform all employees and individuals to take cover in shelter areas immediately.

1. Makes the following announcement on the P.A. System:

“Ladies and Gentlemen: The National Weather Service has issued a Tornado Warning for this area. Due to this warning, CNHI, LLC is being temporarily closed**. Please do not leave the building.** We request that you proceed to the shelter area(s) located in the **name of location**”

1. Assigns someone to shut off the main gas and electrical system.
2. Afterwards, coordinates first aid assistance to individuals.
3. **Bomb Threat:**

When someone calls and says there is a bomb in the building, the following steps will be performed:

**Employee** (Receiving Threat)

1. Keeps the caller on the line as long as possible. Asks them to repeat the message. Tries to write down every

word spoken by the caller.

2. Asks the caller where the bomb is located and when it will go off.

3. Tells the caller that the building is occupied, and detonation of a bomb could result in death and injury to innocent people.

4. Pays particular attention to background noises, such as music playing, engine noises, etc.

1. Listens to the voice, male, female, voice quality, accent, and speech impediments.
2. When the caller hangs up, **do not hang up the phone!**
3. Sometimes, phones can be traced back to the source.
4. Immediately notify management and describe the threat.

**Senior Management**

7. Calls the local Police or Fire Department to report the Incident. Follows all recommendations and instructions provided by either department.

8. If the Police or Fire Department declines to give instructions to evacuate the building, search the premises (if time permits) for any suspicious looking device or package. If one is found, follow the Evacuation Plan.

**Do not touch any suspicious device or package.**

1. **First Aid:**

If an employee/individual is injured, the initial responsibility of management is to provide the needed first aid or arrange for emergency medical response or professional medical care. How long does it take for emergency care to reach the location? The answer to this question is critical to making key decisions.

Senior Management 1. Treats the injured individual using the supplies from the location first aid kit.

1. In the event an employee is seriously injured and requires professional medical care, call 911. If any individual is not mobile or has a life-threatening injury or illness, arrange for emergency care and transportation (call 911).
2. Depending on the injury and when help can arrive, the person may need to be driven to the emergency care facility.
3. **Hazardous Material Spill:**

Management will respond to incidental releases of hazardous substances when the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate area or by maintenance personnel. If a large spill or fire occurs that is not controllable, Management will contact the appropriate local authorities, such as the Fire Department.

1. **Earthquake:**

All employees must be aware of the potential for earthquakes and the resulting damage to buildings and facilities.

1. During an Earthquake:

**Employee**

1. If indoors, stay indoors; if outdoors, stay outdoors. In earthquakes, most injuries occur as people are entering or leaving buildings.

1.a. If indoors:

1. Take cover beneath a desk, table, bench or in doorways, halls or against an interior wall.
2. Stay away from windows and glass doors, and away from containers storing hazardous material.

1.b. If outdoors:

1. Move away from buildings and all structures, and all overhead electrical wires.
2. If operating a vehicle, stop as soon as possible, but stay inside the vehicle.
3. After an Earthquake:

**Senior Management**

1. Coordinates first aid efforts.
2. Turns on the radio to get emergency information from local authorities.
3. Check natural gas lines for leaks. If a leak is detected, shut down the system, and notify the local gas service company.
4. Shuts off the electrical current at the main breaker box if power has been interrupted.
5. Directs employees and individuals to a safe assembly area outside the building.
6. Takes a head count to ensure all employees were safely evacuated.
7. Does not permit individuals to enter the building again until cleared by authorities.
8. Assigns duties to clean up damage and resume business as soon as possible.
9. **Robbery:**

In the event a robbery occurs, the main objective is to reduce the risk of injury to employees and individuals and to get the robber out of the building as soon as possible.

**Employee**

1. Be attentive and calm. Listen to the robber and do exactly what he/she asks you to do.

1. Give up money as demanded.
2. Remain alert. Try to remember details of the robber’s appearance, clothing, speech, etc.
3. If possible, watch the robber’s method and direction of escape.
4. Expect foul/strong language. Expect to lie on the floor.
5. Do not make any sudden movements.
6. Don’t overreact. Do not grab for the weapon or call for help.
7. Do not argue.
8. After the robbery, write everything down.

**Senior Management**

10. Call the Police

11. Call and inform the President of CNHI.

1. Have all witnesses write down everything they can recall.

**Safety Standard 7**

Emergency Contingency Plan

Please submit your contingency plan each year to Michelle Talerico

mtalerico@cnhi.com

**Safety Standard 8**

Emergency Exits

**Purpose**

This safety standard ensures that all emergency exits are maintained in a safe and secure fashion to facilitate safe evacuation during an emergency.

* Emergency exits must be always free of all obstruction.
* Emergency exits must be kept free of all explosives or highly flammable material, furnishing and decorations.
* The exit must not take evacuees toward or through a high hazard area.
* Safeguards must be always in proper working order such as lighting, sprinkler system, and doors.
* Emergency exits cannot be locked when the building is occupied. They must be able to be opened from the inside without the use of a key or other device.
* Each exit must be clearly visible and marked with a sign.
* If the exit route is not obvious, signs must be placed along the route in the direction of travel.
* The signs must be placed in line of sight from sign to sign leading to the closest exit.
* Each doorway along the exit route that is not an exit must be marked “NOT AN EXIT”.
* Your exit routes must lead to an area that will allow evacuees to proceed a safe distance from the building.
* Emergency exit maps of your building should be made. Discuss and train safety committee members and all employees with these maps. Post maps in visible locations in the building.
* Emergency lighting should be checked once a month to ensure it works.

**Safety Standard 9**

Ergonomics/Material Handling

The goal of CNHI’s Ergonomic process is to train employees to recognize the benefits of properly positioning themselves to perform their job duties. Most people think they understand the best, most efficient way to do their job. Sometimes best and most efficient can contradict each other.

Most of the injuries incurred by employees of CNHI are caused by improper positioning. The result is usually a strain, sprain or slip and fall. Some ergonomic injuries can be avoided by simple periodic stretching, changing posture or varying tasks.

Most jobs involve some lifting. It is important to provide employees with help to lift heavy or bulky items. Whether a particular lift will require assistance depends on several factors, including the weight and size of the object, how frequently the object is lifted, how close the object is to the ground, how high it must be lifted, how far it must be carried and whether it has handles. Assistance can include a dolly or cart or help from a co-worker. Employees should be trained in the use of appropriate lifting techniques for different sizes of objects as well as to when it is appropriate to seek assistance.   
  
**When holding, lifting or carrying items**

* Before lifting boxes and cases, check the weight so you can prepare to lift properly.
* If the item is too heavy, ask someone to help you move the item.
* Check the path you intend to travel. Make sure it is clear of hazards.
* If possible, use a cart or dolly to move the item instead of carrying it.
* Squat in front of the item and grasp diagonal corners if possible.
* Keep the item close to your body.
* Look straight ahead, do not look down, when you begin the lift.
* Use your leg muscles to do the lifting.
* Lift smoothly without jerking. Lift the item to waist level.
* Keep your back straight and shoulders back.
* Keep the item close to your body.
* When you must turn, turn the body as a unit and avoid twisting at the waist.
* Do not take overly large steps.
* Get close to where you want to set the item.
* Reverse the order of the lift. Lower the item smoothly, keep your back straight, eyes forward, use your legs, and keep the item close to your body.

FYI-Posture is crucial when lifting anything. If you bend at the waist to pick up a paperclip off of the floor, you will, depending on your height and weight, put the equivalent of 1000- 1200 pounds of pressure on your lower back

Proper lifting and proper turning while lifting take no longer to do correctly than they take to do incorrectly. Lifting incorrectly almost always results in an injury.

Carts are the preferred way to carry items. If you can see your path, push the cart. When you cannot see your path or around a corner, pull the cart or pallet jack to avoid running over someone else.

Make a commitment to work safely.

Safety leaders, perform all training using the Training for Commitment technique.

Training for a Safety Commitment

**The highlighted steps in this training tool have proven to be effective 80% of the time. It can used when you are training people for any job (it even works with your kids).**

1. **Set up area for training. Gather props that will be used: boxes, pallet jack, pallets, etc.**

**Bring training materials to area.**

1. **Gather employees to be trained.**
2. **Explain:**
   1. **What type(s) of training employees are receiving: lifting, blood borne, ergonomic, LOTO, forklift, pallet jack etc.**
   2. **Why they are being trained? To coach and remind them on the safe way of performing a job, function, or movement.**
   3. **What can the results be of this training? A safer place to work, healthier employees, better teamwork, lower insurance costs of the company**
3. **Explain and demonstrate.**
4. **Ask for questions**
5. **Ask each person to demonstrate the correct way to perform the function.**
   1. **Ask them to explain to you why they are using a certain posture, tool, techniques etc.**
   2. **Ask other employees if they notice a problem with the technique the person may be**

**demonstrating. There may not be anything wrong, but ask to find out if teammates**

**understand what you are teaching. You want to make sure they must understand**

**the reasoning behind the training.**

1. **After the employees correctly demonstrate the training, ask each person for a commitment to themselves, to their families and to the company, to perform their job safely as trained, by signing the training roster.**

1. **After the employee has signed the roster ask them to explain instances in the past when they have not performed their job as they were just trained. (Everyone has made errors in the past.)**
2. **After everyone present relates these unsafe behaviors to you, ask again for their commitment to the location and CNHI to work safe.**

(Ergonomics cont.)

## Risk factors that cause MSDs (musculoskeletal disorders)

The physical stresses that can contribute to or cause MSDs are called “risk factors.” The initial symptoms of MSDs may include fatigue, discomfort, and pain. As tissue damage worsens, other symptoms such as weakness, numbness, or restricted movement, may also appear. Work-related MSDs occur when the risk factors that cause or contribute to musculoskeletal system pathology are associated with a person’s job duties. Workplace musculoskeletal disorders are caused by exposure to the following risk factors:

### Repetition

Doing the same motions over and over again places stress on the muscles and tendons. The severity of risk depends on how often the action is repeated, the speed of movement, the number of muscles involved, and the required force.

### Forceful exertion

Force is the amount of physical effort required to perform a task, such as heavy lifting or pushing/pulling, or to maintain control of equipment or tools. The amount of force depends on the type of grip, the weight of an object, body posture, the type of activity, and the duration of the task.

### Awkward postures

Posture is the position your body is in and affects muscle groups that are involved in physical activity. Repeated awkward postures or prolonged reaching, twisting, bending, kneeling, squatting, working overhead with your hands or arms or holding fixed positions can contribute to MSDs.

### Contact stress

Pressing the body against a hard or sharp edge can result in placing too much pressure on nerves, tendons, and blood vessels. For example, using the palm of your hand as a hammer can increase your risk of suffering an MSD.

### Vibration

Operating vibrating tools or equipment that typically have high or moderate vibration levels such as sanders, grinders, chippers, routers, drills and other saws can lead to nerve damage.

# Worksite analysis

A worksite analysis provides for both identification of problem jobs and risk factors associated with these jobs. The worksite analysis can be used to determine what jobs and workstations are the sources of the greatest problems. Recognizing the signs that may indicate a problem through a systematic analysis of injury and illness records can be done to accomplish this step.

(Ergonomics cont.)

## Basic Office Ergonomic Principles

### Correct Body Posture:

* Eye level at top of computer screen or slightly above it.
* Back supported to maintain natural curve.
* Wrists straight – not angled up or down.
* Wrists floating above wrist/palm rests while typing.
* Elbows/lower arms relaxed at right angles or slightly downward.
* Forearms and wrists not resting on sharp edges.
* Knees relaxed at right angle just below hips.
* Feet flat on floor.

## **Work station adjustments*:***

* Computer screen placed 18”-30” away from eyes.
* Screen placed to avoid glare (right angles to windows, screen hood/shield).
* Screen brightness and contrast adjusted properly.
* Documents placed on document holder or raised in some way.
* Document holder placed next to and at same height as screen.
* Document and screen placed to capitalize on dominant eye.
* Work surface and keyboard height adjusted to keep wrists flat and elbows at right angle.
* Mouse positioned next to keyboard to minimize reach.
* Chair has armrests and a five-wheel leg base.
* Footrest used if feet are dangling, or to relieve leg/back pressure at standing workstations.
* Headsets used to replace phone holders or for jobs requiring large phone usage.

Exercises/Breaks:

* Periodic breaks taken throughout the day.
* Eyes refreshed through blinking, yawning and viewing distant object.
* Periodic stretch exercises performed:
  + **Neck Stretch** – slowly drop head to one side; hold with a gentle stretch. Repeat other side. Drop head to chest, then straighten. Turn head slowly to one side, and then repeat to other side.
  + **Upper Back Stretch** – grasp hands behind head, then slowly turn shoulders to one side; repeat other side.
  + **Shoulder Shrug and Roll** – raise shoulders towards ears, hold, and release. Squeeze shoulder blades together, hold, release. Draw shoulders forward, hold, and release. Roll shoulders forward in large slow circles; repeat roll in opposite direction.
  + **Finger Fan** – hold hands out, palms down, spread fingers apart. Hold for 5 seconds. Make fist, then release.

**Safety Standard 10**

Fire Extinguisher Safety

All fire extinguishers must be inspected yearly by a qualified fire protection company. The company will ensure the extinguishers are in proper operating order at the time of inspection. Keep a copy of the inspection on file. They will also supply new tags for the extinguishers.

Each month all fire extinguishers must be checked to make sure each extinguisher is fully charged and holding the right amount of pressure. If the extinguisher is properly charged and the pin is in place, initial the new tag and indicate the month and year.

Make sure that all extinguisher locations are marked with an extinguisher sign.

If trained in the use of fire extinguishers, an employee may attempt to suppress a small fire, until relieved by the Fire Department or until it becomes apparent that the fire cannot be controlled by fire extinguishers.

Note: Employees should never attempt to control a fire which endangers their health.

They must immediately evacuate the area when it becomes apparent that the fire cannot be controlled or when conditions become more hazardous.

**Safety Standard 11**

**First Aid**

**Requirement**

All Locations shall keep as many well stocked first aid kits on premises as necessary to be able to render first aid in a timely manner. Depending on the size of the Location, you may need more than one first aid kit.

Check the first aid kit once a week to once a month. Restock the contents as needed.

Large Locations will have different needs than smaller Locations and Press Locations will have different needs than Non-Press Locations. Consult with a local first aid supply company about the type, size and number of kits your Location may require.

Two Blood Borne Pathogen clean up kits shall be available in Press Room areas. These kits shall contain at a minimum: an apron, goggles, gloves, mask, hazard bag, and spill cleanup tools. All employees are required to be trained to recognize and protect against Blood Borne Pathogen hazards. The Safety Leader has the appropriate training materials.

**Accident and Incident Reporting**

It is important that all incidents are reported to a supervisor immediately so CNHI can investigate the incident and learn how to prevent it from recurring.

**First Aid and Medical Treatment**

Your Location provides a first aid kit on the premises. It is there for your use in the treatment of minor injuries, scratches and burns. Ask your supervisor to show you, its location. Let your supervisor know if you need to use the first aid kit.

**Do not store any personal or store bought medication in the first aid kit. Supplies will be purchased by your location form a reliable source. I**f you have a work-related injury or illness that requires professional medical assistance, notify your supervisor immediately. If you do not report the incident, you may endanger your safety or a co-workers safety.

Print the First Aid Instructions on the next page, fill in the emergency phone numbers, and give to supervisors to post next to phones in their department used for emergency calls.

EMERGENCY PHONE NUMBERS and FIRST AID PROCEDURES AND INSTRUCTIONSIn all cases requiring emergency medical treatment immediately call, or have a co-worker call, to request emergency medical assistance.

EMERGENCY PHONE NUMBERS

Safety Leader: \_\_\_\_\_\_\_\_ Poison Control:

**First Aid: Fire Department:**

**Ambulance: Police:**

**Medical Clinic:**

**Clinic Address:**

**In the case of a death, or where three or more employees are hospitalized due to an accident, notify your publisher. Notify Michelle Talerico in Risk Management immediately at 205-821-4699 and notify your OSHA authority within 8 hours. Messages are not allowed. Notification must be to an individual. The local OSHA number is\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Minor First Aid Treatment**

First aid kits are located in the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ . If you sustain an injury or are involved in an accident requiring minor first aid treatment you must:

* Inform your supervisor so they can provide help and direction.
* Administer first aid treatment to the injury or wound.
* If a first aid kit is used, indicate usage on the accident investigation report.
* Access to a first aid kit is not intended to be a substitute for medical attention.
* Provide details for the completion of the accident investigation report.

**Non-Emergency Medical Treatment**

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

* Inform your supervisor so they can provide help and direction.
* Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
* Provide details for the completion of the accident investigation report.

**Emergency Medical Treatment**

If you sustain a severe injury requiring emergency treatment:

* Call for help and seek assistance from a co-worker.
* Use the emergency telephone numbers and instructions posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
* Provide details for the completion of the accident investigation report.

**First Aid Training**

Each employee will receive training and instructions from his or her supervisor on CNHI’s first aid procedures.

(First Aid cont.)

**WOUNDS**:

Minor: Cuts, lacerations, abrasions, or punctures-

* Wash the wound using soap and water; rinse it well.
* Cover the wound using clean dressing from the first aid kit.
* Stop the bleeding by pressing directly on the wound using a clean bandage or cloth.
* Keep pressure on the wound until medical help arrives.

**BROKEN BONES:**

* Do not move the victim unless it is absolutely necessary.
* If the victim must be moved, "splint" the injured area. Use a board, cardboard, or rolled newspaper as a splint.

**BURNS**:Thermal (Heat)Rinse the burned area, without scrubbing it, and immerse it in cold water; do not use ice water.Blot the area dry and cover it using sterile gauze or a clean cloth.

ChemicalCheck MSDS sheets for recommended first aid.

Flush the exposed area with cool water immediately for 15 to 20 minutes.

**EYE INJURY:**

Small particles

Do not rub your eyes.

Use the corner of a soft, clean cloth to draw particles out, or hold the eyelids open and flush the eyes continuously with water.

Large or stuck particles

If a particle is stuck in the eye, do not attempt to remove it.

Cover both eyes with bandage.

Chemical

Immediately irrigate the eyes and under the eyelids, with water, for 30 minutes.

**NECK AND SPINE INJURY:**

If the victim appears to have injured his or her neck or spine, or is unable to move his or her arm or

leg, do not attempt to move the victim unless it is absolutely necessary.

**HEAT EXHAUSTION:**

Loosen the victim's tight clothing.

Give the victim "sips" of cool water.

Make the victim lie down in a cooler place with the feet raised.

**Safety Standard 12**

Floor and Wall Openings

**Purpose**

To provide the Safety Team with a guideline of unacceptable conditions to be repaired and/or guarded in order to safeguard employees.

**Guidelines**

A floor hole is any opening less than 12 inches but more than 1 inch in its smallest dimension in any floor, platform, or pavement.

A floor opening is any opening measuring 12 inches or more in its smallest dimension in any floor, platform or pavement.

A wall hole is less than 30 inches or greater than 1 inch of unrestricted width in any direction.

A wall opening is at least 30 inches high and 18 inches wide.

Holes and opening should be repaired and/or guarded to meet or exceed OSHA standards.

Every stairway, ladderway, and floor opening should be guarded to meet OSHA standards.

**Safety Standard 13**

Forklift/Electric Pallet Jack/Powered Lift

It is the company’s policy that all personnel who operate powered industrial trucks such as forklifts, electric pallet jacks, pallet stackers or other material handling equipment be trained according to the OSHA subpart N 1910.178.

Each location with the type of equipment listed in the subpart (all types of powered material handling equipment) will supply training to employees by a trainer with knowledge, training and experience to operate the equipment. This includes electric pallet jacks, forklifts, paper lifts, and scissor lifts.

**Powered Industrial Truck Training**

Training and certification must be completed:

* Before operating without supervision
* Every two years
* When equipment changes
* When the employee is involved in an accident
* When the Safety Leader or trainer determines training to be necessary due to unsafe behavior or changing conditions.

Training will include classroom training, online FirstNet Training, practical training (demonstrations performed by the trainee), and evaluation of the operator’s performance in the work area by the trainer.

Classroom training will consist of lecture, discussion and written material covering the following information:

Operating instructions, warnings, and precautions for the lift.

Differences between the lift and automobile-steering include, but are not limited to: lift controls, turning is less stable, less steering control when loaded, braking is different, and it cannot swerve.

Lift controls and instruments: where they are located, what they do and how they work.

Mast, lift carriage, load rest, and overhead guard.

Motor operation.

Steering and maneuvering.

Visibility with and without a load.

Controls and instruments.

Fork Operation, use and limitations.

Vehicle Capacity

Vehicle Stability

Vehicle Inspection and Maintenance-inspect at the beginning of each shift.

Refueling/Recharging of batteries.  
Operating limitations-weight capacities, restrictions on where the lift can operate.

(Fork Lift/Electric Pallet Jack cont.)

Workplace related topics to be discussed

Shift Inspection requirements

Surface conditions

Types of loads to be carried.

Load manipulation, stacking and un-stacking.

Pedestrian traffic.

Narrow aisles.

Hazardous locations/situations

Ramps or other areas that could be dangerous

Closed environments where insufficient ventilation could cause a buildup of carbon monoxide.

Other unique or potentially hazardous conditions in the workplace.

**Powered Industrial Truck Operation Rules**

Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways, and wherever turns or passage must be made.

Aisles and passageways must be kept clear and in good repair. The floor should be level and free of holes. Permanent aisles and passageways shall be marked. Use a painted yellow line to distinguish between a walkway and an equipment passageway.

Only employees of CNHI are allowed to operate company owned lifts and jacks.

Only fully trained and certified employees that are 18 years old or older will be allowed to operate powered equipment. (Forklifts, Electric Pallet Jacks or Pallet Stackers).

The Forklift Trainer at a CNHI location is the only person that can train powered lift operators at the same location. Training is specific to each location and does not transfer to a different location.

Only after attending classroom training and while under the direct supervision of the Forklift Trainer can a trainee operate a lift. Operation by a trainee can never endanger the trainee, other employees or property.

Modifications to a powered forklift will not be done unless authorized by the manufacturer.

Once a trainee has satisfactorily completed all training and the trainer is confident of the operator’s ability, the trainer can certify the trainee. This will include the operator’s name, date of training, date of the evaluation and the name of the Trainer.

A current roster will be kept by the Trainer containing the above information for each operator.

If at any time the lift is found to be need of repair, defective or in any way unsafe, the lift shall be removed from service until it has been returned to safe operating condition.

While operating the lift, the driver must wear the seat belt.

(Fork Lift/Electric Pallet Jack cont.)

Lifts shall not be driven up to anyone standing in front of a wall, bench or any other fixed object.

No person shall be permitted to pass under raised forks, loaded or empty, operating or not operating.

No riders are permitted on a lift at any time, **only** the operator.

No arms or legs are permitted to hang outside the running lines of a lift.

Only loads within the rated capacity of the lift will be handled.

Before a lift is left unattended the load shall be lowered, controls neutralized, brakes set, and power shut off. Wheels will be blocked if on an incline.

A safe distance shall be maintained from the edge of ramps or platforms.

Do not use the lift to open doors.

Before entering a trailer make certain the truck/trailer has the brakes applied so that it cannot roll and that the wheels are blocked.

Drive over dock plates slowly.

Make sure truck floor boards are in good condition before entering.

Fuel tanks shall not be filled while the engine is running.

Fuel cap will be replaced before starting engine.

Open flames, lighters shall not be used to check battery fluid level.

If the lift is battery powered, leave the battery cover open while charging. Hydrogen gas is given off during the charging process and it is highly flammable. Keep cell covers on the battery. Do not use an open flame or smoke around batteries. Wear protective equipment such as rubber gloves, mask, goggles and apron if you are working on a battery.

Know where the nearest eye wash is located before charging batteries.

If battery acid is spilled notify the supervisor before proceeding with clean up.

**Safety Tips**

* Overhead mirrors can be used to improve operator visibility in blind spots
* Avoid quick starts stops and turns
* Keep hands and legs inside the truck at all times
* Never allow anyone to ride
* Never lift anyone
* Be aware of pedestrian traffic and the normal paths of traffic

(Fork Lift/Electric Pallet Jack cont.)

## Daily Inspections

**Prior to use each day** (each shift if more than 1 shift), all operators must inspect each lift truck and motorized pallet truck to ensure the vehicle is in safe working order.

Complete the **“Lift Truck Daily Inspection Checklist”** and maintain completed checklists in the site filing system.

Note: Vehicles in need of repair must be immediately taken out of service and not operated until proper repairs are made.

## Annual Preventative Maintenance

Thorough annual PMs must be scheduled with a representative of the lift truck manufacturer/supplier or contractor knowledgeable on the specific trucks used, and include a thorough check for mechanical or structural problems (i.e. stress fractures along load bearing components) to determine if repairs are necessary.

## Other Safety Features Required of Trucks

### **Overhead guard** – Lift trucks capable of lifting loads higher than the operators head must be equipped with an overhead guard and must not obstruct vision.

* **Load Back Rest** – loads must never exceed the height of the back rest.
* **Warning devices** – Riding type lift trucks must be equipped with a standard horn in the center of the steering column and a strobe and/or alarm that is activated when backing up.
* **Manufacturer Spec Plate** – Every lift truck must be equipped with an ID plate showing the weight of the truck and its rated capacity.
* **Mast Tilt** – Mast tilt should be adjusted to prevent the truck from tipping over in the forward position with the paper roll extended full height over head – 2 degrees forward and 3 degrees back is acceptable. Manufacturers can place restrictions on the mast to limit tilt.

## Battery Charging Stations

Each area designated as a battery charging station must have:

* Eye wash station (and shower or drench hose if batteries are opened or serviced)
* Neutralizing material (non baking soda type) or acid absorption pads for spilled electrolyte
* PPE supplies (rubber gloves, safety glasses, goggles)
* Fire extinguisher
* Adequate ceiling ventilation (to prevent accumulation of explosive hydrogen gas)
* Warning signs posted (i.e. “no smoking” and “gloves and eye protection required”)

## Record keeping

The following documents must be kept on-site and available for possible inspection:

* Operator Training Certification(s)
* Daily Lift Truck Inspection Checklists
* Annual Lift Truck Preventative Maintenance Records
* Truck modification records

Forklift Test

1. Although forklift injuries occur, they are usually not serious and rarely fatal. T F
2. Pre-use inspection of the equipment must be done each week. T F
3. When you are doing work that requires you to get on and off the lift, you do not have

to use the seat belt. T F

1. Each forklift is designed to perform certain tasks and should be not be used in

another way. T F

1. OSHA requires that you be certified to operate each type of powered lift or powered

jack before operating the equipment without qualified supervision. T F

6. Because there is weight on the front wheels and the forks of a lift when loaded, it is more

stable when turning than when it is driven straight. T F

7. Sometimes it is okay for operators to let others ride along on the lift with them. T F

8. As long as the lift is turned off there is no danger in the battery charging area. T F

9. The pre-use inspection is used to identify problem areas and safety concerns with

the forklift. T F

10. If you find a problem during the pre-use inspection you should alert

your supervisor. T F

11. If you have an accident or the lift malfunctions you should alert your supervisor. T F

12. If a propane cylinder is not in use it may be stored inside the building until needed. T F

13. Seat belts keep you from being crushed or thrown from a lift if it tips over. T F

14. A forklift should always be driven in reverse down a ramp. T F

15. It is OK to drive up to someone sitting on a bench or standing in front of a wall. T F

16. If the lift is empty, it is OK to pass underneath the forks. T F

17. An operator’s certification must be kept with them while they are on the job. T F

18. Before entering a trailer to unload, the trailer must be attached to a tractor and the

wheels must be chocked or the dock lock must be attached. T F

19. Drivers are required to slow down and sound the horn at cross aisles or where vision

is obstructed. T F

20. What is the lifting capacity of the lift truck at your location? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Safety Standard 14**

General and Environmental

Safety signs shall be kept in good repair and signs will be replaced when necessary.

Examples of safety signs are:

* EXIT
* Not An Exit
* Caution
* Danger
* Eye Protection Required
* Gloves Required
* Hearing Protection Area
* LOTO tags

All equipment safety placards, or signs shall be kept clean and clearly visible Examples of safety placards or signs may include:

* + Pinch Point, Crush Danger etc.
  + Fire Extinguisher signs
  + Signs labeling pipes
  + “You Must Be 18 Years of Age to Operate This Equipment.”

**Work Areas**

* Work areas will be well lighted.
* All work areas will be cleaned and maintained by removing debris and potential hazards from the work area.
* Floors shall be kept dry.
* Floor mats may be needed in some areas to improve traction.
* Floor cones may be needed to warn people of a wet floor or other unsafe condition
* Bathrooms and washrooms shall be maintained in a sanitary condition and supplied with hand soap and a sanitary means for drying hands.

**Shop Grinders**

Grinder rest plates in the press room and or maintenance areas must be kept adjusted to the following allowances:

* Maximum gap at tool rest is 1/8”
* Tongue guard maximum gap is ¼”
* Grinder must have safety device allowing only 90 degrees of the wheel to be exposed.
* Before installing a new grinding wheel, the wheel must be given a ring test to ensure there are no cracks in the wheel. If a crack is observed at any time, the wheel must be disposed of.

**Safety Standard 15**

Hazard Communication

All employees that use chemicals must receive Hazard Communication Training yearly.

Training must be documented and kept on file by the safety Leader.

See the Hazard Communication Manual

**Safety Standard 16**

Hazard Inspection

**Hazard Inspection**

A Hazard Inspection is a preventative maintenance tool for each location to stop unsafe conditions from arising and causing injury to employees.

The Safety Team should divide the entire facility, office, pressroom, mailroom, loading dock, maintenance, outside premises, even the break room, into areas of responsibility. These areas should be listed in an organized manner. Once listed, assign safety team members to work with employees (the experts) in these areas to develop an inspection sheet (see sample). The Hazard Inspection sheet will be used to assess the area for hazards and unsafe conditions. Stress to employees that they are the experts in the area, and we want them to develop the inspection sheet. The inspections should address any and all potential hazards for the area or machine.

**When there is an incident or accident in an area, the Incident/Accident Investigation may uncover something that needs to be added to the hazard inspection**.

The Hazard Inspection should address machine guards, electrical connections, outlets, lighting, operator positioning, switches, energy isolating devices, tools, power cords, plugs, fire extinguishers, walkways, door ways, emergency exits, exits signs, machinery signage, fork lift hazards, warning lights, fire beacons, sirens, chemicals, chemical storage, labeling, sidewalk conditions, personal protective equipment etc. The list can be very long depending on the area and what is in the area.

**Maintenance employees can be an excellent source of information for tweaking these lists. Unsafe conditions should be described in detail and safe solutions implemented immediately. Avoid yes and no answers to unsafe conditions.**

**Hazard Inspection Sample**

Are fire alarm pull boxes clearly identified and unobstructed?

**Yes No N/A Corrective action to be taken**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are portable fire extinguishers tagged with current annual inspections, inspected each month and initialed?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are the emergency eyewashes for the shop clean and tested (flushed) monthly, with the tests documented and filed? Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are all eyewash stations free of obstructions that would prevent quick access by someone temporarily blinded?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are electrical panels accessible and are circuit breakers clearly labeled**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are employees provided with eye and face protection such as safety glasses and face shields where needed?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are all tools free of defects (such as cracked handles, frayed, or damaged cords) that make them unsafe?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Is there a current file or binder of Material Safety Data Sheets (MSDS) for each chemical stored or used in the work area?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are employees familiar with how to read Material Safety Data Sheets?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are all compressed gas cylinders adequately secured with non-combustible restraints to keep the cylinder(s) from falling? Also, are all compressed gas cylinders capped when not in use?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are all three prong electrical cords in good repair?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are all employees affected by Lock Out Tag Out trained and familiar with its procedures?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are affected employees wearing hearing protection?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are safety procedures followed when an employee must reach into the point of operation of a machine?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Is the fork lift and or electric pallet jack operating properly?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are flammable chemicals locked in the fire box?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are propane cylinders kept in a secured location outside?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are battery chargers in good working order?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are visitors allowed in the production area without a supervisors knowledge?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Is the floor marked with walk paths and fork lift paths?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Are machine guards in place?**

**Yes No N/A Corrective action to be taken:**

**Completion date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Safety Standard 17**

Hearing Conservation

## PURPOSE

To provide the procedures and guidelines necessary for the implementation of an effective hearing conservation program that will protect employees from the harmful effects of overexposure to noise in the workplace.

## Hearing protection

OSHA requires employers to have a hearing conservation program for any employees exposed to an 8-hour time weighted average of 85 dBA or greater. This hearing conservation program must consist of training, an annual audiogram, and the option to use hearing protection equipment, which is supplied by the employer. Employees exposed to an 8-hour time weighted average of 90 dBA or greater must use hearing protection and management is responsible for ensuring that this is being done.

* Employees shall be given the opportunity to select their hearing protectors from a variety of approved hearing protection devices (earplugs and muffs).
* Hearing protection shall be ANSI S12.13.1991 approved and have a *minimum* Noise Reduction Rating of 28 decibels.
* Hearing protection shall be provided and replaced, as necessary, at no cost to the employee(s).
* Employees shall maintain and keep protection devices clean.

Exposure to high noise levels can cause hearing loss or impairment. It can create physical and psychological stress. There is no cure for noise-induced hearing loss, so the prevention of excessive noise exposure is the only way to avoid hearing damage. Specifically designed protection is required, depending on the type of noise encountered.

Pre-formed or molded earplugs should be individually fitted by a professional. Waxed cotton, foam, or fiberglass/wool earplugs are self-forming. When properly inserted, they work as well as most molded earplugs.

Some earplugs are disposable, to be used one time and then thrown away. The non-disposable type should be cleaned after each use for proper protection. Plain cotton is ineffective as protection against hazardous noise.

## Cleaning and storage

Each employee shall clean their selected hearing protection device after each day’s use or more often if necessary. The following steps are recommended:

1. Remove reusable plugs or muffs from the straps or strings and *wash* the accessories in warm soapy water (do not use alcohol or solvents) and gently scrub with a brush.
2. *Rinse* the parts thoroughly in clean water.
3. *Wipe dry* with clean towel or rag and reassemble.
4. *Store* the hearing device in a clean place when not in use (preferably a sealed bag) to protect against exposure to dust, heat, chemicals, and moisture in the workplace.

(Hearing Conservation cont.)

Earmuffs need to make a perfect seal around the ear to be effective. Glasses, long sideburns, long hair, and facial movements, such as chewing, can reduce protection. Special equipment is available for use with glasses or beards.

For extremely noisy situations, earplugs should be worn in addition to earmuffs. When used together earplugs and earmuffs can change the nature of sounds; all sounds are reduced including one’s own voice, but other voices or warning signals are easier to hear.

## Inspection and maintenance of hearing protection devices

Each employee shall inspect his or her hearing protection device before and after each use. The following inspection procedure is recommended:

1. Check plugs for wax buildup, dirt, flexibility, deterioration, cracks, tears, or holes.
2. Check straps, string, or brackets for breaks, tears, loss of elasticity, broken straps, and proper tightness.
3. Check earplugs or muffs for corrosion or tears.

\*It is the responsibility of the employee to report any defect to management for immediate repair or replacement.

## Workplace monitoring

It is the responsibility of management and supervisors to maintain adequate monitoring of work area conditions and the degree of employee noise exposure. The following activities shall be implemented to ensure the continued effectiveness of this program:

**Daily plant walk-through** shall be conducted by supervisors and managers to verify that employees are wearing hearing protection in all posted high noise level areas and this policy is enforced with disciplinary action as required.

**Periodic inspections** shall be conducted by supervisors and managers to ensure that hearing protection devices are in good condition, properly worn and maintained, and have not been altered or modified in any way that may reduce the attenuation of the hearing protection device. Any noted deficiencies shall be immediately corrected.

**Noise level surveys** shall be conducted as follows:

1. To verify that the hearing protection used effectively reduces the noise exposure level in all affected areas to below 85 decibels.
2. Whenever a change in equipment or new installation has the potential to increase employee noise exposure levels.

**Engineering controls** shall be utilized whenever possible to reduce noise levels, before instituting administrative controls or hearing protection requirements.

The following are considered engineering controls:

* Replacing older, noisier equipment with the modern, quieter equivalent.
* Moving equipment to reduce concentrated noise levels.
* Isolating noisy equipment such as compressors or grinders.
* Installing noise-absorbing barriers to interrupt the path of noise.
* Acoustically modifying the work area by installing noise-absorptive panels on a wall, ceiling or equipment.

(Hearing Conservation cont.)

Engineering controls are the preferred method to reduce noise exposure levels. If a noise level measures at or above the OSHA action level of 85 dBA for an 8-hour time weighted average exposure, employers are expected to work towards this reduction through engineering controls.

## Training

Each employee included in the hearing conservation program shall receive *annual* *training*. The information provided in the training shall be updated to be consistent with the changes in protective equipment and work processes. The *annual training* shall consist of the following:

* The effects of noise on hearing.
* The purpose of hearing protection, the advantages/disadvantages and attenuation of various types, including instructions on the proper selection, fitting, use, and care.
* The purpose of audiometric testing, and an explanation of the testing procedures.

## Audiometric Testing

* All employees in the hearing conservation program shall undergo an annual audiometric examination conducted by a certified audiologist or by a technician who is certified by the Council for Accreditation in Occupational Hearing Conservation.
* Baseline audiograms for new employees shall be conducted within six months of employment.
* Audiometric tests shall be pure tone, air conduction, hearing threshold examinations, which test each frequencies including as a minimum, 500, 1000. 2000, 3000, 4000. 6000, and 8000 Hz. Tests at each frequency shall be taken separately for each ear.
* All audiograms shall be reviewed by an audiologist, otolaryngologist, or physician to determine if there is hearing loss and if there is a need for further employee audiological and/or otologic evaluation.

## Posting Signs

The following items shall be clearly posted in all areas where the hearing conservation program is in effect:

* **Hearing protection signs** –at the main entrance to the affected area(s). If possible, post the signs ahead of the entrance to the area.
* **Post signs throughout the affected area as reminders to employees.**

**Safety Standard 18**

Safety Incentives

Currently there is not a companywide incentive program. However, this should not stop locations from developing ways to motivate employees to perform jobs safely. Performance, profit and safety can be improved at the same time with education and creativity.

A good incentive program does take planning and organization, but the rewards far out weigh all costs associated with operating the program. Review the ideas below.

Secret Observer-Caught in the Act, Safe Works Practices Leader- an employee is chosen randomly each week or every other week by the Publisher & Safety Leader, safety committee etc. When the Secret Observer sees another employee working safely, according to company training and policy, the Secret Observer rewards the employee. The immediate reward could consist of a token which would be redeemed for a prize or safety points. The employee could be designated the weekly “Safety Practices Works Leader” and their name and/or photograph could be posted on the break room bulletin board.

Prizes could include many things: gift card to a (advertisers in our publications) local hardware store, local restaurant, movie passes, cash, soda, lunch, phone cards or a long lunch. A pizza lunch could be awarded to the team that has the best overall safety focus for the month. Points are awarded for the following: receiving tokens, suggestions submitted and used to improve safety at the location, safe acts, giving tool box talks in their department, and other acts the Safety Committee decides should be rewarded.

Some rewards could be a daily award, some a weekly award, and some a monthly award. At the time of the award the employee can decide if they want a daily award (see list below and/or go into the pot for a monthly/yearly award like a TV etc.) At the end of the day, week or month they are rewarded with items equaling the token amount. At the end of the year all employees that received tokens go into the hat for a drawing. The Safety Committee could name a Safe Practices Works Leader of the year based on points awarded or accumulated throughout the year.

**Ideas**

Ask employee to rank the list of things they would like to receive:

* Long lunch break
* Go Home one hour early
* Extra break 15 minutes
* Lunch on the house

**Department Competition**

Which department accumulates the most points for safety actions during the month?

Job Safety Analysis (JSA), Hazard Analysis (HA), training, employee training employee, CBT, tool box talks, keeping area clean and orderly, area safety improvement based on HA (more pts are awarded for more difficult improvement and/or when completed within smaller time frame), points can be taken away or penalty accessed if corrected item is reversed and used in an unsafe manner (example safe guards missing).

**Safety Standard 19**

Injury Management

**Purpose**

Injury management is a post injury system designed to ensure quality medical care, maintain medical costs, and return employees to work at the earliest time possible. By following these guidelines, costs associated with employee injuries can be reduced.

The sooner we learn of incidents that happen in the workplace, the sooner we can remedy a possible unsafe condition and contain costs. **Therefore, it is imperative that all employees understand the importance of** **reporting incidents as soon as they occur**. Employees should not fear reporting an incident or near hit. They could be preventing another incident.

When an employee is injured, it is management’s responsibility to make sure the employee understands how workers compensation insurance works. Assure them:

* All treatment documentation is confidential.
* They will not have to pay the bills.
* If there is lost time involved, they may be eligible for lost time wages.

If we do not give our employees good information, an outside attorney might become their source of information.

**When an employee has been injured:**

* Call the injured employee within 24 hours of the injury and then weekly to find out how much progress they are making toward returning to work.
* Also assure them we need them back at work.
* Let them know what is happening at work. The longer someone is away from work, the harder it is for them to come back to work. Make sure you keep them in the loop.

From the time an employee is injured our company’s insurance rates are affected. Return to work light duty is a good way to get an employee back to work soon and help keep costs down.

The employee may not be able to do their old job now but they can perform other duties. You may have to get creative with duties for this person. It may be filing, cleaning, or answering the phone. Think of all the things you want to do that would improve your workplace and possibly morale, but you haven’t had anyone available to perform the work. Make it part of your location’s plan to put employees back to work as soon as possible. The sooner we can get someone back to work, the sooner they will feel better about working again. Rehabilitation will be more productive. Insurance costs will not be as high. It is a win-win situation for everyone.

**Safety Standard 20**

Job Safety Analysis

The purpose of Job Safety Analysis (JSA) is to point out everything, safe and/or unsafe, about a particular job. Employee experts come together as a group (2-4) to document specific methods used to complete the job safely. They will describe placement of tools, equipment, machines, supplies, and co-workers while the task is executed.

A JSA will:

* provide instruction to a new employee
* reduce the number of injuries
* help develop training
* explain difficult and irregular tasks
* help develop safety observations

A JSA should be developed for each job at your location. A short JSA might be titled “Charging the Fork Lift battery”. While this may be common knowledge for “old timers”, because of the potential danger, its importance for keeping people safe is great. Therefore, care must be taken when selecting which jobs will have a JSA written first.

**The most hazardous jobs should be addressed first, in order to have the most impact on safety. What is the most frequent incident at your location? Incident reports can tell where you need to focus your efforts.**

After you list the jobs and the order the JSAs will be completed, complete these three steps for each:

1. Break the job down into steps
2. Identify the unsafe conditions and potential injuries associated with this job.
3. List the “Safe Procedures” to eliminate the hazards and prevent possible injuries.

After a JSA has been written, observe a top employee performing the job function to see if any issues or steps were left out. You may have to consult with other knowledgeable employees. Completely describe each step and action because this may highlight an unsafe act.

After you have listed the steps, list any hazard associated with each step. Talk with employees to find out what type of injuries resulted from performing that job. While you watch, ask yourself “what could happen if” the hand goes here or the footsteps there.

The third list is your Safe Procedures list.

What you have done in this process is to identify the safest way to complete a job. By involving employees, their awareness level has been raised. They may come to you in a week with an improvement on the JSA. Supervisors also become more familiar with the job functions, potential hazards and remedies.

When the final copy of the JSA is written, list the employees that helped as the JSA Team just below the title. When the JSA is complete, all employees in that job need to be trained. Emphasize the fact that the steps were developed by other employees. Highlight known hazards and the requirement that the job be performed according to the JSA and if anyone has a different way (you have probably addressed it in your research) encourage them to let you know their idea.

If an incident occurs on this job function, you have a base of questions to ask. Were procedures followed and if so, what needs to be changed? \*(Print JSA worksheet and insert behind this page.)

**Safety Standard 21**

Lock Out Tag Out

**(LOTO)**

**Purpose**

The LOTO procedure establishes the minimum requirements for the lockout/tagout of energy isolating devices (breaker boxes/fuse boxes) whenever maintenance or servicing is done on machines or equipment (balers, presses and any equipment that uses electricity, hydraulics or natural gas.) This procedure shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before performing any service or maintenance where the unexpected start-up of the machine or equipment or release of stored energy could cause injury.

All employees are required to comply with the restrictions and limitations imposed upon them during the use of LOTO. The authorized teammates (designated by the Safety Team) are required to perform the lockout in accordance with this procedure. Upon observing a machine or piece of equipment, which is locked out waiting for service or maintenance, **no one** **shall attempt to start up, turn on, energize, or use that machine or equipment.**

All employees will receive training on an annual or as needed basis. Retraining shall be provided for Authorized and Affected teammates whenever there is a change in their job assignment, a change in machines, equipment or processes that present a new hazard or when there is a change in the energy control.

Print the LOTO roster. Use one set of rosters for Authorized employees and one set of rosters for Affected employees. Employees should sign, print, list job title and date the roster.

**Definitions**

An Authorized Employee is a person who locks out/tags out equipment due for service or maintenance: Publisher, Department Head, or Safety Leader.

Affected Employee-Any employee that uses the piece equipment or works in the area of the equipment.

LOTO devices will identify the Authorized teammate applying the device.

## Location Safety Leader will conduct periodic and at a minimum, annual inspection, review and certification of the LOTO procedures with each Authorized and Affected teammate to ensure the procedures are understood and followed. (This will be documented on the attached LOTO certification form.)

###### **(Lock Out Tag Out cont.)**

###### Preparation for Lockout Tagout

An outside service technician may be needed to complete this step. The Location’s Safety Leader along with the Department Head will locate and identify all energy sources and energy isolating devices for the equipment in question. (Circuit breakers and fuse boxes with lockable levers etc.) Once located, all Authorized teammates will be trained on LOTO procedures.

**Sequence of Lockout**

1. Authorized employee will notify all Affected employees (everyone that uses that piece of equipment) that servicing or maintenance is required on the equipment and that the machine or equipment must be shut down, locked out/tagged out and cannot be used, because maintenance must be performed.

Whenever an outside vendor is servicing the equipment, the Authorized employee and the outside vendor will explain their respective LOTO procedures to each other. The Authorized employee will ensure that all other employees understand and follow the outside vendors LOTO procedures.

1. The Authorized employee shall identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy, and shall know the methods to control the energy. There may be more than one source of energy and more than one energy isolation device (breaker box, fuse box, switch, or electrical outlet.)
2. If the machine or equipment is operating, shut it down by the normal stopping procedure

(Depress the stop button, open switch, close valve, etc.).

1. De-activate the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s). (Move the breaker switch and/or fuse box lever to the off position so that there is no power to the equipment. If the equipment has an electrical plug, remove the plug from the electrical outlet.)
2. The Authorized employee should fill in the **Do Not Operate** tag (see example) with the appropriate information. Attach the tag to the lockout device and lock out the energy isolating device(s) (breaker box/fuse box) with the assigned individual lock(s). If the equipment has an electrical plug, roll up the cord, wrap tape around the plug and the cord. Tag the equipment “Out of Service”.
3. Stored or residual energy (such as that in hydraulic systems, electric switches, motors etc.) must be released, dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.
4. Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s) or by testing to make certain the equipment will not operate.

Caution: Return operating control(s) to neutral or "OFF" position after verifying the isolation of the equipment.

The machine or equipment is now locked out.

###### **(Lock Out Tag Out cont.)**

**Restoring Equipment to Service**

**When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps shall be taken.**

1. Check the machine or equipment and the immediate area around the machine to ensure that non-essential items, tools, parts etc. have been removed and that the machine or equipment components are operationally intact.
2. Check the work area to ensure that all employees have been safely positioned or removed from the area.

(3) Verify that the controls are in neutral.

1. The Authorized employee who placed the locks on the equipment will remove the lockout devices and energize the machine or equipment. (return breakers/fuse box switches to the ON position)

If the employee who locked the equipment is not in the store, make a reasonable effort to contact this teammate. (Use every available means-home phone, cell phone etc.) Let them know repairs are complete, and the lock is being removed. If verbal contact is not made with the authorized teammate, communicate to them through other usual ways so all Affected teammates will be made aware of the equipment’s status.

**Note**: The removal of some forms of blocking may require re-energization of the machine before safe removal.

1. Before operating the equipment notify all Affected employees that the servicing or maintenance is completed, and the machine or equipment is ready for used.

Authorized employees will be trained to recognize hazardous energy sources, the type and impact of the available energy and how the equipment will be isolated from energy sources. They will follow the Preparation for LOTO procedures and the Sequence for LOTO procedures.

Lockout devices will be placed to prevent movement of the energy-isolating switch from OFF to ON.

Tags must be filled in by the Authorized employee with their name, equipment being tagged and date. The tag will be placed on lockout devices.

Cord and plug connected equipment will be unplugged and tagged at the end of the loose end of the cord.

#### (Lock Out Tag Out cont.)

#### Cardboard Baler

Never use the Emergency Stop Switch as the only means of protection when the baler is being serviced.

The hydraulic system in the baler operates under high pressure. Hydraulic fluid leaking in a fine spray can cause serious injury.

NEVER PLACE HAND FEET OR BODY INTO ANY OPENING ON THE BALER UNLESS ELECTRICAL POWER HAS BEEN DISCONNECTED AND LOCK OUT TAG OUT PROCEDURES HAVE BEEN FOLLOWED.

Balers will be connected to their energy source through an electrical fuse box and/or an electrical breaker box. Whenever both fuse box and breaker box control the energy to the baler, both shall be switched off and locked out by the Authorized teammate.

###### **(Lock Out Tag Out cont.)**

#### Equipment that is plugged into an electrical outlet

When a piece of equipment can be unplugged from electrical outlet to isolate the energy source (examples: grinder, insert machine, etc.) the rules listed below will be followed:

1. Before unplugging equipment, check the surrounding area for hazards such as a wet floor, cracked or broken cord insulation, exposed wiring at plug. With dry hands grasp the plug and remove it from the outlet.
2. Move the switch to the ON position to ensure stored energy has been released. Move switch back to OFF position.
3. Tape the plug so that it cannot be plugged into an outlet.
4. Roll the cord up and tape around the cord.
5. Tag out the machine by fastening the tag near the cord’s plug.
6. If possible, remove machine from the area where it is normally used or turn it so it cannot be used and poses no hazard to other operations.
7. See Lockout Sequence above before restoring power to equipment.

### **Affected Employees**

An Affected employee is an employee that works with or in the area of the piece of equipment being locked out and/or tagged out for maintenance issues.

Each Affected employee shall be instructed in the purpose and use LOTO.

The energy source of equipment to be repaired will be locked out when possible.

The purpose is to isolate the equipment from its energy source so as to prevent accidental operation of the equipment. A DO NOT OPERATE tag will accompany the lock. The tag will indicate the Authorized Employee that locked the device, the equipment locked and the date locked. The tag is to be removed ONLY by an Authorized person.

Affected employees are instructed not to attempt to energize, start, turn on or operate the equipment.

Tags are warning devices and do not provide physical restraint against injury.

Tags are not to be removed without approval of the Authorized employee responsible for the tag in question. **The tag is never to be sidestepped, evaded or gone around to operate the equipment.**

###### **(Lock Out Tag Out cont.)**

Text

Description automatically generatedSee example of tag.



###### **(Lock Out Tag Out cont.)**

 A picture containing indoor

Description automatically generated

Picture of an energy-isolating device. Control panels should ONLY be opened

Note the hole in the lever matches up with hole by qualified electricians.

in the box when in the off position so a lock can

be installed.



This is another type of energy isolating device. It has a toggle type switch with

holes for a lock.

**Safety Standard 22**

Machine Guarding

Safeguards are essential for protecting employees from injuries.

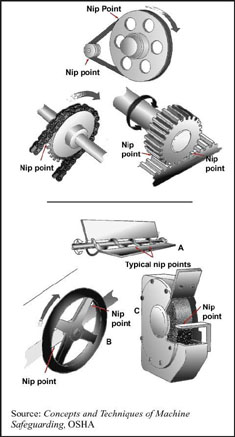
**Any machine part, function, or process which may cause injury must be safeguarded. Where the operation of a machine or accidental contact with it can injure the operator or others nearby, the hazard must be either controlled or eliminated.**

Machine guarding is needed whenever hazardous machine parts are within the reach of workers from any work position. An acceptable guard will prevent employees from reaching over, under or around it to come into contact with the hazard. Mechanical hazards are responsible for many serious physical injuries to workers in industry. Properly guarded equipment, when coupled with an effective lockout-tagout program, can prevent this type of injury.

Dangerous moving parts in three basic areas need safeguarding. The first hazardous area is the point of operation. This is where the work that the operator and the machine are performing on a material is done.

The second hazardous area is where the mechanical components of the machine transmit power to do the work. Such as pulleys, cylinders, flywheels, belts, connecting rods, cams, chains, spindles, gears, cranks, couplings etc. All of these must be guarded.

The third hazardous area is all other parts of the machine that move while the machine is operating.

Figure 1 to the right shows a few examples of nip points and different mechanical devices that can cause injury. All of these nips points must be safeguarded.

Another hazard not shown is parts that can rotate in opposite directions. These parts are often so close together they produce nip points such as in intermeshing gears, rolling mills and calendars.

What must safeguards do to protect employees against mechanical hazards? Safeguards must meet these minimum requirements:

1. The safeguard must prevent fingers, hands, arms, legs or any part of the employee’s body or clothing from making contact with dangerous moving parts.

2. The safeguard must be secure and not easily removed or tampered with causing it to become ineffective. They must also be made of durable material.

3. Safeguards must ensure that no objects may fall into the moving parts.

4. Safeguards must not create new hazards. There can be no jagged edges or sharp surfaces which can cause injury.

5. Safeguards must allow for safe lubrication.

(Machine Guarding cont.)

**Training**

Detailed training explaining how and why the safeguards shall be used is crucial to safe operation of the equipment. Thorough, specific operator training and hands on instruction must include:

a. a description and identification of the hazards associated with a particular machine

b. the safeguards, how they protect and what hazards they protect against

c. how to use the safeguards safely

d. how and under what circumstances safeguards can be removed, and by whom

e. steps to take if a safeguard is missing, damaged or not providing protection (discontinue operation)

f. Lock Out Tag Out

Once an employee is trained, have them sign the training roster. Keep training rosters labeled by department and year.

Machines designed for a fixed location shall be securely anchored to prevent the machine from walking or moving.

As stated earlier all rollers, cylinders, belts, pulleys, gears, shafts and moving parts shall be guarded.

If machines are set to restart after a power failure, provisions shall be made to prevent the machine from automatically restarting when power is restored.

Bench grinder tool rests shall be adjusted closely to the wheel with a maximum opening of 1/8 inch to prevent the work from being jammed between the wheel and the rest which may cause wheel breakage and flying debris.

All grinder wheels shall be closely inspected and tested using the “ring” test, per OSHA standards, to make sure the wheel is not damaged.

## General guidelines

* Safety guards must never be removed except when necessary to make adjustments or repairs, and the guards must be replaced before work resumes
* Jewelry, rings, bracelets, key chains, etc. must not be worn when working on machinery. These items might catch in machines, causing serious accidents such as loss of fingers or hands.
* Loose, ragged, or torn clothing shall not be worn around moving machinery.
* Shut down your machine before cleaning or repairing. Follow the **LOTO** program.
* Use caution and acceptable common safety practices when working on live electrical equipment. Follow the **LOTO** program.
* Do not operate machinery where safety switches have been defeated, bypassed, or falsely activated by temporary or permanent means.
* Never oil machines while they are in motion except where points of oiling are so located or guarded that you are not subject to contact with moving parts.
* Never use your fingers for removing objects from machines. Use a brush or hook.
* Do not operate any machine or moving equipment unless you have permission from your supervisor.

(Machine Guarding cont.)

* Use compressed air only on the job for which it is intended. Do not clean clothes with it; never blow air against anyone as it might enter the body and possibly cause injury or death.
* Never use defective chisels, sledgehammers, punches, wrenches or other tools. Flying chips from tools with mushroomed or split heads cause injuries. Exchange or see that defective tools are repaired.
* If medication is prescribed that carries a warning about working around machinery, it should be reported to the production manager or department supervisor.

# Specific Procedures

#### Offset Web presses

* All in-going nip points 3” or less between components and accessible during normal operation must be guarded by nip guards and/or barrier guards.
* The distance between the nip guard and the adjacent roller/cylinder shall not exceed 6mm when measured at the leading edge of the guard when in operation.
* The angle between the cylinder and the surface of the nip guard must be a minimum of 60 degrees to prevent wedging.

**Safety Standard 23**

Motor Vehicle Reports

**MOTOR VEHICLE RECORD CHECK PROGRAM**

POLICY

It is the policy of CNHI to check the motor vehicle record (MVR) of applicants and current employees who operate personal, or company owned vehicles on business more than once per month.

OVERVIEW

The purpose of this program is to identify drivers (applicants and authorized drivers) whose records may place them, CNHI or the public at risk.

OBJECTIVE

The objective of this program is to identify:

* Applicants, prior to employment, who may pose a driving risk to themselves, CNHI or the general public.
* Authorized Drivers, for the same reason as above and to recognize and correct problems by utilizing Motor Vehicle Reports.

PROCEDURES TO BE FOLLOWED BY ALL CNHI LOCATIONS

DRIVER APPLICANTS

1. An offer of employment into a position requiring that the individual drive a company or personal vehicle on company business more than once per month should be made contingent upon a successful Motor Vehicle Records check. After the contingent job offer has been made, the applicant should sign the attached “Motor Vehicle Report Consent” form. This is required before checking an MVR (if hired, this signed authorization will suffice for future annual MVR checks). The applicant may not start work until their MVR check is returned and the applicant’s MVR is satisfactory under the listed criteria.

1. Fax the MVR Consent form to *Willis of Alabama* point of contact (Hereinafter “POC”) at (334) 265-7639. The location will generally receive the results of the MVR within 5 days, along with instructions if the applicant has a marginal or disqualifying record.

Driver Initials\_\_\_\_\_\_\_\_\_ Rev. 1/07

Page 1 of 5

(Motor Vehicle Reports cont.)

AUTHORIZED DRIVERS

1. Motor Vehicle Reports (MVR) of authorized drivers who operate a company or personal vehicle on company business more than once per month must be checked annually through *Willis of Alabama.*
2. Locations may be contacted by CNHI with instructions if an authorized driver has a marginal or unsatisfactory driving record. At such time you may discuss the appropriate action to be taken.
3. As indicated on the MVR Consent form, authorized drivers must notify the location immediately of all moving violations, arrests or citations issued while on company time or personal time. Locations should contact Terrence Alexander in HR regarding major violations that the authorized drivers report (i.e., DUI, hit and run, license suspension, etc.), or if the driver has multiple violations during the year.
4. The signed MVR consent forms are to be faxed to *Willis of Alabama* immediately, and the originalkept in a separate MVR consent form file.

DRIVER DISQUALIFICATION

* The following criteria disqualify an employee as an authorized driver and will be grounds for termination if, during the last 24 months, the employee has been convicted of, plead guilty to or plead no contest to:
* Three or more moving violations within the preceding 24 months.
* Driving under the influence of drugs or alcohol.
* Hit and run accident.
* Failure to report an accident.
* Operating a vehicle under a suspended revoked or cancelled license.
* Homicide, assault or felony arising from the operation of a motor vehicle.
* Reckless Driving/Racing.
* Attempting to elude an officer of the law.
* Possession of an opened alcoholic beverage container while operating a vehicle.
* The driver will remain ineligible to drive their personal or company vehicle on company business for a period of 24 months from the date of the traffic violation, or in the case of three or more moving violations, until two (2) or less violations remain on the MVR over the previous 24 month period.
* If a driver is at or beyond these criteria, the driver will be ineligible to drive for the company, and this will be grounds for termination. The appropriate action will be determined based upon the circumstances which will certainly vary from case to case. With the understanding that a drivers’ termination of duties may occur, in some instances a driver may be required to attend driving improvement classes, and/or they may be suspended from driving on company business, and/or assigned other duties

Driver Initials\_\_\_\_\_\_\_\_\_ Rev. 1/07

Page 2 of 5

(Motor Vehicle Reports cont.)

* Drivers must be at least eighteen (18) years of age, have a valid driver’s license, and possess and maintain in force automobile liability insurance in amounts required by the respective state laws.
* Drivers are required to immediately notify CNHI of any moving violation(s), arrest(s) suspensions, revocations or citation(s) (whether during business or personal driving) that he/she may receive. Failure to report such violation(s) may result in disciplinary action, up to and including discharge.

ANNUAL MVR REVIEW RESPONSIBILITIES OF EACH LOCATION

Each Location must keep a spreadsheet of all authorized drivers. The spreadsheet should be updated with each newly hired/fired, resigning and authorized driver. This spreadsheet must be reviewed before providing it to *Willis of Alabama* for the annual check. It is important that the annual MVR check be performed within a twelve month time period.

**POINT OF CONTACT (POC)**

**Willis of Alabama**

Becky Blair

Phone: (334) 264-8282

Fax: (334) 265-7639

Blair, Becky <Becky.Blair@wtwco.com>

201 Monroe Street

Suite 2150

Montgomery AL 36104

**CNHI**

Michelle Talerico

Cell: 205-821-4699

E-mail: [mtalerico@cnhi.com](mailto:mtalerico@cnhi.com)

Drivers Initials\_\_\_\_\_\_\_\_\_\_\_

Page 3 of 5 Rev. 1/07

Logo, icon

Description automatically generated

**FAX THIS FORM TO;**

DATE:

Paper Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Location: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

FAX NUMBER: ATTENTION:

**Motor Vehicle Report Consent and Authorization**

I have applied to CNHI, LLC or one of its divisions or related companies (the “Employer”) for employment or I am currently employed by Employer.

I hereby consent and authorize the Employer to obtain a copy of my Motor Vehicle Report from a consumer reporting agency or agencies from time to time.

I understand that the Employer may not obtain a copy of my MVR unless I authorize it to do so.

I understand that authorizing the Employer to obtain a MVR is a condition of employment, and if I refuse to give the Employer authorization, my application for employment will not be considered or it may result in disciplinary action, up to and including discharge.

I understand the Employer may use the MVR for employment purposes, including without limitation, for the purposes of evaluating me for employment, promotion, reassignment and retention as an employee, at any time prior to or during my employment and without giving me any additional notice.

I understand that any personal information requested, including date of birth, is requested solely for identification purposes.

**California, Minnesota, and Oklahoma Residents/Applicants Only**:

Would you like a free copy of the report mailed to your home? \_\_\_\_\_\_\_\_\_ YES \_\_\_\_\_\_\_\_\_ NO

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

First Name Date of Birth

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Last Name Middle Initial

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Maiden Name or Other Names Used

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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City State Zip Code

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Previous Address # yrs at this address

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City State Zip Code

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_

Driver’s License No. State

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

**Safety Standard 24**

OSHA Visit/Follow up Procedures

**OSHA Inspection**

Purpose:

To establish the policy for all managers to follow if an OSHA Compliance inspection will be conducted.

Overview:

The Occupational Safety and Health Administration (OSHA) is authorized to conduct workplace inspections to determine whether employees are complying with standards issued by the agency for safe and healthful workplaces. Many States have their own occupational safety and health programs, and regularly inspect workplaces. Inspections are usually conducted without advance notice and can be conducted for one or more of the following reasons:

* Imminent Danger Situations – Any condition where there is reasonable danger that a situation exists that can be expected to immediately cause death or serious harm.
* Catastrophes and Fatal Accidents – Investigation of fatalities and accidents resulting in the hospitalization of 3 or more employees. Such catastrophes must be reported to OSHA within 8 hours.
* Employee Complaints
* Programmed Inspections – Based on injury rates, previous citation history, and employee exposure to toxic substances or random computerized selection.

This policy details the phases of an OSHA compliance inspection, the response and attitude of management to an inspection and steps to ensure completion of the appropriate follow-up corrective action.

Policy:

CNHI, LLC policy is to demonstrate “**good faith**” effort to comply with all OSHA standards and any health and safety issues raised in an OSHA compliance inspection.

Management is responsible for implementing this policy and correcting all health and safety deficiencies revealed during compliance inspections.

**Admitting an OSHA Compliance Officer:**

If an OSHA compliance inspector requests to conduct an inspection, inform the compliance inspector that your Safety Manager is not present at this time and that you would like for them to be present for the inspection. Ask the officer if there is any way she/he would consider setting up a time when the Safety Manager could be present? If so, reschedule the visit for next week. If the compliance officer indicates they cannot accommodate your request show them to an office area where the opening conference can take place. The senior management member is to ask to see the officer’s credentials. An OSHA inspector carries either U.S. or the state’s Department of Labor credentials bearing their photograph and a serial number. In every case, verify the authenticity of the compliance inspector’s identification by calling the nearest OSHA office.

Note: DO NOT REFUSE THE COMPLIANCE OFFICER ADMITTANCE.

Before the conference begins and while the officer waits, speak to your department heads and let them know what is about to take place. They should at that time police their department.

The senior management member is to contact Michelle Talerico immediately at 205.821.4699.

OSHA Facts:

An OSHA Inspection is divided into three parts:

1. The Opening Conference
2. The Walk Around Inspection
3. The Closing Conference

There are no time limits specifying how long an inspector may remain on the premises.

Violations are considered to be “alleged violations” until they become a final order of the Occupational Safety and Health Review Commission.

1. CNHI, LLC may contest (appeal), in writing any part of the citation within 15 working days after it has received it.

2. The citation must be posted in the workplace for three days following its receipt until the condition creating the alleged violation is corrected.

3. Management will ask for clarification about any point(s) an inspector raises that

are not understood.

1. Management and employees will not admit to violating any safety standard.

If CNHI, LLC contests (appeals) an alleged violation, copies of the appeal will be posted at the work site.

**Opening Conference:**

Before inspecting the premises, the OSHA compliance officer will conduct an opening conference at which they will explain:

* The reason for the inspection (for example. employee or individual complaint)
* Purpose of the visit
* Scope of the inspection
* OSHA Standards that apply

Senior Management must arrange for the following to attend the opening conference:

* The Senior Manager at the location
* Safety Leader
* Other Personnel, as directed

Management must request copies of all applicable safety and health standards as well as a copy of any employee complaint.

The compliance officer may at this time ask to see training records and manuals.

**The Walk Around Inspection:**

After the opening conference, the OSHA compliance officer will go through the facility to inspect for safety and health hazards. At a minimum, the OSHA compliance officer will likely ask for documentation of the following:

* Compliance with the hazard communication standard.
* Compliance with the lock out/ tag out standard.
* Record keeping for employee training
* The employee written safety and health management program

When senior management members and other CNHI employees accompany an OSHA compliance officer on an inspection, they should be respectful while firmly standing up for the Company’s rights and viewpoints. The conduct of company personnel shall be in accordance with the following guidelines:

* Do not physically interfere with the OSHA compliance officer when they are making the inspection.
* Do not give false or misleading information.
* Always accompany the OSHA compliance officer during the inspection.
* Answers to an OSHA compliance officer’s questions are to be responsive to the question asked. Do not offer any information beyond the scope of the question.
* Avoid making any statement that could be construed as an admission of a violation of any recognized health standard.
* Do not discuss with the OSHA compliance officer any previous safety inspections.
* If the OSHA compliance officer wants to take photographs, senior management must request copies of the photographs. Senior management should also ask the officer to take photographs of the area from the same angle with the Company’s camera.

The CNHI personnel shall be in accordance with the following guidelines (continued):

* Watch and take notes regarding all activities of the OSHA compliance officer. Notes should be detailed and should include such pertinent information as to the name(s) of the OSHA compliance officer, time of arrival, activities of OSHA compliance officer, amount of time spent at each location, comments about violations and potential citations, who was interviewed, what was said, etc.

(Employees have the right to be interviewed without management present.)

* Immediately correct minor but apparent safety problems in order to help establish the Company’s “**good faith”** effort to comply with all OSHA health and safety standards.
* The OSHA compliance officer cannot and will not act in a consultative capacity.

If they see or if Company personnel points out a violation, the OSHA

compliance officer is authorized to issue a citation.

**Closing Conference:**

After the walk around inspection, a closing conference is held with the OSHA compliance officer, senior management, and any employee representative. The OSHA compliance officer will discuss all unsafe and unhealthy situations observed and will identify all applicable sections of the standards which may have been violated. Management will ensure that all violations are understood. When appropriate, Management will produce records to show compliance efforts and fully explain any difficulties that will be encountered in the correction of safety hazards. Management and employees will not admit violation or indicate how long it will take to correct a potential violation.

**Post Inspection Activities:**

Time limits to correct violations generally range from 5 to 30 days, unless an extension is requested. Time limits will be given in person at the closing conference or mailed within 30 days in a written report of the inspection findings. Follow-up action will be documented in writing, by senior management, listing specific action steps, the individual accountable, and the target date for completion. Management is responsible for completing all corrective action.

OSHA inspection reports, company response, and all correspondence to and from OSHA will be retained permanently by the Risk and Safety Manager.

**Common OSHA Violations**

1. Failing to provide information about the Hazard Communication standard and the

actual hazards of the chemicals that are present.

1. Not having a Hazard Communication Program.
2. Not having a Lock out Tag out program in place.
3. Not having a written fire prevention program.
4. OSHA Log hasn’t been properly maintained or is missing.
5. Not having an MSDS for every hazardous chemical in use.
6. Not properly labeling all containers or groups of containers containing hazardous chemicals.
7. Not marking exits or accesses to exits.
8. Improper building design, construction, maintenance or occupancy of a building or structure containing employees.
9. Fire extinguishers not located or mounted in an accessible and safe location or not provided.
10. Failure to provide fire extinguisher training.
11. Improper wiring is present in one of the following ways:

* Unused openings and electrical boxes not closed.
* Conductors entering boxes are not protected from abrasion

1. Improperly using a flexible cord in one of the following ways:

* Use of electrical tape to repair a cord
* Flexible cord smaller than a #12 was spliced
* Solder used to splice a flexible cord
* Used as a substitute for fixed wiring
* Ran through holes in the ceiling and/or walls
* Ran through doorways and/or windows

1. Exposed or non-current carrying metal surfaces of fixed equipment are not grounded.

**Common OSHA Violations (continued)**

1. Failing to provide electrical boxes and fittings with an approved cover or failing to ground metal covers.
2. Disconnects, circuit breakers, and other over-current devices aren’t legibly and

permanently labeled.

1. Tongue guard on grinder is more than ¼” from the edge of the stone.
2. Missing or inadequate machine guarding.
3. Work rest is missing or more than 1/8” from a grinding wheel.
4. Not providing a suitable eyewash or shower.
5. Persons without respirators performing tasks that require respirators.
6. Written standard operating procedures governing the use and selection of respirators shall be established.
7. Employers shall make conveniently available protectors suitable for the task to be performed. Protective eye, head, face, body, feet and hand equipment shall be provided when there is reasonable probability of injury.
8. A Platform four feet or more from the ground is not provided with a standard railing (and toe board) where required.
9. Broken or damaged ladders being used.
10. Furniture, barrels, boxes, or other devices used in lieu of ladders.

**The following are questions the compliance office may ask of management and or employees.**

# **Administrative Interview**

1. Do you have a written Hazard Communication Plan?

29CFR 1910.1200 requires employers to have a written plan which describes how the training, labeling, MSDS management and other requirements of "Right-to-Know" will be met. More citations and fines are given for this than anything else.

2. Do you have a complete written inventory (list) of hazardous materials?

29CFR 1910.1200 requires employers maintain a current list of all hazardous materials used in the workplace. This list must be accessible to employees.

3. Has a specific person been assigned responsibility for your safety program?

29CFR 1910.1200 and other regulations require that you assign responsibility for various aspects of the safety program. Some states specifically require that employers name a person with overall safety responsibility.

4. Do you have a formal disciplinary policy relating to safety?

29CFR 1910. Various sections require employers enforce safety rules. Employees may not decide on their own when to follow the rules.

5. Do employees ever complain of headaches, nausea, dizziness or skin problems?

All OSHA standards require that employers evaluate workplace hazards and determine whether material use or employee complaints mean that there is any over-exposure to unsafe conditions. These are typical symptoms of over-exposure.

6a. Do employees wear respirators or dust masks?

6b. If "Yes": Do you have written respirator procedures?

29CFR 1910.134 requires that if any employee uses a respirator, including a dust mask, written procedures must cover use, fit testing, cleaning and maintenance of the respirator.

6c. Do you have records showing fit testing of respirators and training?

29CFR 1910.134 requires employers to test the fit of each respirator on each employee and train the employee to check and properly use the respirator.

7. Do you have written training records?

29CFR 1910.1200, .1450, .1030 and virtually all other OSHA regulations require written training records which document date, subject, attendees and trainer.

8a. Do you have more than 10 employees?

8b. If "Yes": Do you have a written Emergency Contingency Plan?

29CFR 1910.38 outlines the requirements for an emergency contingency plan for those who employ more than 10 at any one time during the year.

8c. Are your Forms 200, 300, 300A and 301 up-to-date and posted from Feb 1 until April 30?

29CFR 1904 requires that employers of more than 10 at any one time in the year maintain occupational illness and injury reports on Form 300 or equivalent and summarize them on Form 300A which is posted from Feb 1 until April 30.

9a. Can you reasonably anticipate that any employees will be exposed to human blood this year because of their jobs?

9b. Have you assigned responsibility for first aid to an employee?

9c. If "Yes": Do you have written Bloodborne Pathogen Exposure Control Plan?

9d. Have employees been trained in protective equipment and procedures?

29CFR 1910.1030 requires that employers develop an Exposure Control Plan, train employees, keep records, and offer Hepatitis B vaccinations if it can be reasonably anticipated that one or more employees could be exposed to human blood or blood products as a result of doing their assigned duties. If you have assigned first aid responsibilities to an employee, you are required to have a Bloodborne Pathogen Program. Special waste management and use of approved disinfectants are also required. The key is "reasonable anticipation". Good Samaritan acts are not covered.

# **Janitorial & Chemical Storage Area Overview**

10. Is the area neat and clean, without spills on the floor?

29CFR 1910.22 requires that all workplaces be clean, orderly and sanitary.

11. Are there any containers without legible labels?

12. Do all secondary container labels list the product, the hazards, and the manufacturer?

29CFR 1910.1200 requires that all containers of hazardous materials be labeled. The manufacturer's label is fine if legible. If materials are moved from the original to a "secondary" container, it must be labeled. The label must include the name of the material, a description of the hazard and the manufacturer's name. Just the name is not enough.

13. Is there an MSDS on hand for each hazardous material?

14. Are always MSDSs accessible to all employees?

15. Pick a product. Ask to see the MSDS. Could an employee have found it in 4-5 minutes?

29CFR 1910.1200 requires that employers have an MSDS for each hazardous material. Employees must always have access to MSDS’s during the work shift and be able to find a specific one in less than 5 minutes without asking for access to the collection.

##### General Work Areas Overview

16. Is the fire extinguisher tag marked for monthly inspections and service in the last year?

29CFR 1910.157 requires that all portable fire extinguishers be visually inspected monthly and serviced annually. If the tag isn't marked it is difficult to prove inspections.

17. Is the area clean and uncluttered?

29CFR 1910.22 requires that all workplaces be clean, orderly and sanitary.

18. Are oily rags kept anywhere but in metal cans with closed lids?

29CFR 1910.38 requires employers to identify and correct fire hazards. Oily rags should be kept in a closed metal container.

19. Are coffee, drinks or food kept near any hazardous materials?

29CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where they could be contaminated with toxic or infectious materials.

20. Are there any unlabeled containers?

29CFR 1910.1200 requires that all containers of hazardous materials be labeled. The manufacturer's label is fine if legible. If materials are moved from the original to a "secondary" container, it must be labeled. The label must include the name of the material, a description of the hazard and the manufacturer's name. Just the name is not enough.

21. Are any respirators stored which are not in bags or cabinets?

29CFR 1910.134 requires that respirators be stored and maintained in a way that they will be cleaned, protected and ready for use. Respirators left in the open may absorb contaminants and become unusable.

22. Are gloves, goggles, or safety glasses clean and in good repair?

29CFR 1910.132 requires that safety equipment be maintained in clean and sanitary condition and that it be used only if in good repair. Broken or dirty equipment raises questions in an inspector's mind and leads to a more intensive inspection.

23. Are there extension cords across aisles or walkways?

29CFR 1910.22 requires that all work place be clean, orderly and sanitary. Cords across aisles present a slip and fall hazard as well as a potential electrical hazard.

24. Look at ladders. Are there broken steps or parts in bad repair?

29 CFR 1910.25 requires employers to "inspect ladders frequently and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use"."

25. Are there any broken or missing electrical switch or outlet covers?

29 CFR 1910.305 requires that pull boxes, junction boxes and fittings have plates or covers. Broken plates and covers do not provide adequate protection.

# **Employee Area Overview**

26. Is the OSHA Poster or state equivalent posted?

27. Are emergency phone numbers posted by telephones?

28. Is an evacuation route map posted?

29 CFR 1910.38.

29. Is there a fully stocked first aid kit?

9 CFR 1910.262 requires that there be a first aid kit stocked with supplies appropriate to the situation. It must be continuously stocked for any emergency.

30. Are lunches, snacks or drinks stored in a cabinet or refrigerator with chemicals?

29 CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where it could be contaminated with toxic or infectious materials.

# **Employee Interview**

OSHA uses "performance based" standards for its enforcement of safety regulations. The best program on paper will mean nothing if your employees cannot do the right thing or do not know where to get information. Whether your employees can answer questions correctly (or not) is the test OSHA inspectors use to evaluate your compliance with OSHA rules.

31a. Please show me the MSDS for \_\_\_\_\_\_ (name a product) \_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Did the employee answer -- "What's an MSDS?"

31b. Did the employee know where the MSDS’s are kept?

31c. Did it take less than 5 minutes for the employee to find the correct MSDS?

29 CFR 1910.1200 Employees should know what an MSDS is and be able to locate a specific one in less that 5 minutes. MSDS’s should be indexed and stored in an organized fashion.

32a. When were you last trained on safety issues?

Did the employee say "I don't remember" or "Never"?

32b. Has training been in the last year?

29 CFR 1910.1200 states that "employers shall provide information and training on hazardous chemicals...at the time of their initial assignment and whenever a new hazard is introduced into their work area." Some states also specifically require annual retraining.

33. If you had to evacuate the building where would you go for a head count?

Did the employee know a pre-determined specific place?

29 CFR 1910.38 requires that emergency contingency plans specify the means of accounting for all employees after an evacuation of the facility.

**Safety Standard 25**

**OSHA Recordkeeping and Posting Requirements**

Purpose:

To establish the policy and procedures regarding CNHI, LLC requirements for compliance with OSHA record keeping and posting guidelines for occupational injuries and illnesses.

Policy:

All locations are to post the “Job Safety and Health Protection” poster (or state equivalent) in prominent places in the workplace.

OSHA requires that employers maintain a record of certain occupational injuries that occur at each business establishment on the OSHA Form Log 300 and 300A: Log of Work-Related Injuries and Illnesses and Summary of Work-Related Injuries and Illnesses. Each year OSHA requires the summary section of the OSHA Form Log 300A to be posted at each business establishment no later than February 1 and remain in place until April 30. CNHI will comply with this requirement. The Safety Leader or a designated person is responsible for maintaining the information on the log in a current status and posting the OSHA Form 300A.

The “Job Safety and Health Protection” poster and the Form Log and Summary of Occupational Injuries and Illnesses can be ordered from OSHA, free of charge, at 303-844-1600. It also can be downloaded from [www.osha.gov](http://www.osha.gov)

**Record Retention:**

Year-end OSHA Form Log 200, 300, 300A, and 301, retain for 5 years following the year to which they relate

**Safety Standard 26**

**Personal Protective Equipment**

Purpose:

To establish the guidelines for employees to wear Personal Protective Equipment.

**Policy**:

CNHI, LLC is dedicated to providing a safe and healthy workplace. All employees are expected to do his or her part to achieve this goal. Employees can do their part by using the proper Personal Protective Equipment (PPE) provided them.

Personal Protective Equipment shall be:

* Provided to and worn in the way the manufacturer intended by all employees and visitors entering a hazardous work area. No exceptions.
* Used and maintained in a sanitary and reliable condition wherever it is necessary to prevent injury

Personal Protective Equipment requirements include, but are not necessarily limited to the items below:

**Protective Headwear:**

Where there is the exposure of overhead danger from falling objects or from electric shock or burns, protective headwear must be worn. Protective headwear is an approved hard hat that meets the requirements of the American National Standards Institute (ANSI Z889.1-1969).

Protective headwear will be issued to the required employees. Employees are responsible for using their hard hats while working. Also, employees must notify their supervisor about a damaged or lost hardhat immediately.

**Protective Eyewear:**

When there is an exposure to the eyes from flying objects, glare or liquids, protective eyewear is required. Protective eyewear is an approved safety eye protector or safety goggle, which meets the standards of the American National Standards Institute (ANSI Z87.1-2003).

Protective eyewear will be issued to the required employees.

(Personal Protective Equipment cont.)

**Disposable Dust Masks:**

When there is the potential of exposure to airborne nuisance dust or particles, disposable dust masks are required.

**Protective Gloves:**

When there is an exposure to the hands, protective gloves are required. Protective gloves are construction type work gloves and chemical resistive gloves.

Construction type work gloves may be needed for, but not limited to, employees that have an opportunity of cutting, pinching, hitting, or burning their hands.

Chemical resistive gloves are required for, but not limited to, employees that handle any chemical, and have an opportunity of spilling hazardous chemicals or corrosive material onto their hands.

**Hearing Protection**:

Employees working in areas designated as “Hearing Protection Required”, will be provided with appropriate hearing protection devices. All such employees will be required:

1. to go through annual training
2. to wear the company provided hearing protection devices at all times when working in designated areas
3. to work in accordance with the CNHI hearing conservation policy

**Safety Standard 27**

Safety Committee

**Purpose**

The purpose of the Safety Committee at each location is to coordinate safety/health related activities, to assure that interest in the safety/health program is maintained and to keep employees safe through good training.

**Guidelines**

The committee will be chaired by the Safety Leader for the location and attended by a combination of managers, supervisors and hourly employees. There must be at least as many hourly employees on the committee as there are managers and supervisors. If there is a press at your location, there must be production personnel on the safety committee. Half of the safety committee should rotate out on a yearly basis so that others can become familiar and involved with the safety process.

The Safety Committee will meet at least monthly. A certain day each month should be set for the meetings to be held. (Example. The second Tuesday of each month.) It could be part of another meeting; however neither meeting should take away from the other.

The Safety Committee will be guided by the Safety Leader and all members will be responsible and accountable for its effectiveness. Therefore it is up to the Safety Committee, directed by the Safety Leader, to determine what issues should be discussed and what goals should be set to achieve the safest work environment possible.

Committee members have the following responsibilities:

Attend each safety meeting

Bring relative issues, positive and negative, to the attention of the committee for resolution

Encourage all employees to work safely and participate in the safety program

The Safety Leader shall:

Organize, oversee and document (or assign this duty to another member) the safety meeting, maintain files on all safety related activities, required training and training documents

Provide handouts to committee members (training, safety concerns, meeting notes etc.)

Follow up on employee suggestions, training, incidents and investigations in a timely manner

Direct committee members on safety requirements-set deadlines on completing safety projects

Hold members accountable to what is decided in meetings

Post Safety meeting minutes in break room answering all employee concerns

Each meeting should at a minimum review:

1. the previous meeting and what actions were taken to correct issues
2. any incidents that have occurred and the investigations of those incidents
3. changes made to alleviate unsafe conditions related to the incidents
4. other unsafe conditions in the workplace
5. employee suggestions
6. new employees and their training
7. training issues
8. safety ideas that may help other locations
9. what safety message will be shared with all employees this month?
10. what has happened or is going to happen that will change production, number of employees, workspace area etc.? These all affect safety.
11. what actions are going to be taken before the next meeting?

Each committee member should be held responsible for passing the monthly safety message along to fellow employees. After each meeting, committee members can be given rosters for their safety teams to sign acknowledging they received the message. The rosters can be used to make sure everyone gets the message. Rosters can be turned in to the Safety Leader and filed.

Unsafe conditions should be brought to a supervisor’s attention as the conditions arise. The supervisor should go through the proper channels to correct the condition and always let the safety committee know about the issue.

Safety Team members should organize and direct safety teams in each department. Departmental Safety Teams can be taught how to:

* complete Job Safety Analysis
* complete Hazard Analysis
* complete inspections of their work area
* understand and comply with safety policies such as Blood Borne Pathogen, LOTO, Hearing conservation, HazMat, Ergonomics, Protective equipment, Forklift safety, and others
* submit suggestions to the safety committee

Safety in the workplace will be as important as each manger and supervisor makes it to be. A safer workplace will give us:

* + Healthier, happier employees
  + Employees who are more confident in their jobs
  + Employees who want to improve their workplace
  + Stronger departmental teams
  + A more reliable workforce
  + Better maintained equipment
  + Reduced medical expenses
  + Reduced insurance costs
  + OSHA ready workplace
  + Superior bottom line

There is no negative to a safer work environment.

The company’s safety will thrive on suggestions from the field. Make a difference in other people’s lives today. Find a way to work safer and pass it on to others.

**Safety Standards 28**

Safety Alerts and Posters

Safety Alerts will be sent out periodically to all locations.

The purpose of the Safety Alert is to provide locations with current information about safety related issues. The Alert may be about a possible unsafe condition to watch for in the press room, on the highway or in the office.

Safety Alerts will usually be sent to the publisher as an attachment to an e mail message. The publisher should read the e mail message and print the Safety Alert. At that time the publisher should review the Safety Alert with the Safety Leader and discuss the best way to make affected employees aware of the Alert.

Safety Alerts should be posted in the appropriate employee break room.

In order to help get the message to all employees, Safety Leaders should use their Safety Committee members and supervisors. The team members should use a roster to obtain employee signatures, names and date of notification. The rosters should be turned into the Safety Leader within a week and filed.

**Safety Standard 29**

Sanitation

It is the responsibility of each location to keep all work areas, rest rooms and break room areas clean, sanitary and as free as possible of clutter. (This is for safety as well as sanitation.)

Each lavatory shall have hot and cold running water or tepid water. Soap shall be supplied as well as a sanitary way to dry hands.

The floor of every work room shall be maintained so far as possible in a dry condition. Drainage shall be maintained for wet processes and dry standing areas will be provided (mats, false floors, platforms etc.).

**Safety Standard 30**

Safety Toolbox Talks

Safety Toolbox talks are a great way to make more employees aware of policies/procedures, safety issues and company news before a shift begins.

Look at the contents of this manual and talk about a section of the manual at a toolbox talk. It doesn’t have to be formal or long. It could be a reminder to wear hearing protection, to pick up strapping or it could be lift training. Encourage others to get involved and to “sponsor” a toolbox talk. It is a fact that when a person teaches something to another, the teacher remembers more about the topic. So get others to help out.

Some other topics are:

* Electrical safety
* Proper safe shoes (Shoes for Crews shoe program)
* Importance of keeping a clean shop
* Report All Incidents to your supervisor immediately. We have a 24 hour deadline with the insurance company.
* Proper way to wear PPE-eye, ear, etc.
* Reminders about the equipment they use everyday
* Talk about an incident that happened recently. It is a good idea to address these issues as soon as possible after an investigation reveals what happened.
* ICE-In case of Emergency-ICE is a name that emergency personnel look for on an injured person’s cell phone. You should list an emergency contact under this name.
* Slip, Trip and Fall Safety
* Hazard Communication-MSDS-chemical safety
* Spills on the floor

After going over a topic ask individuals to name one item discussed or pointed out. If they can repeat something, they will be more likely to remember it. Ask them to commit to doing this job the safe way. Now ask them if they have ever done the task in an unsafe manner. Most everyone has. After they tell their story ask them to commit to the way that was just presented because it is safe and it is company policy. By getting them to relay a story of unsafe behavior and then asking them commit to the correct way, they will retain the information longer.

Safety Toolbox Talks should happen regularly, every day if possible. Most of these dangers are overlooked because employees become complacent.

\*Offer incentives to employees that get involved.

**Safety Standard 31**

Stairs and Ladders

Stairs

* Stair ways with four or more risers must have a hand rail. (If no rail, call Risk Management.)
* Handrail must be securely fastened.
* Stairs must be in good repair and treads should be slip resistant.

Ladders

* Stepladders cannot be longer than 20 feet.
* Stepladders will be equipped with a metal spreader or locking device.
* Notice the weight restrictions on the ladder. Do not overload the ladder.
* Ladders must be inspected before each use. The ladder must be in good condition to be used.
* Inspect the ladder for cracked or broken legs, feet, or rungs. Any of these conditions render the ladder unusable.
* Inspect the ladder for broken spreaders, missing rubber feet or slick rubber feet. Any of these conditions render the ladder unusable.
* Use ladders only in the way they were intended to be used. Do not prop a stepladder against anything and then climb the ladder. You must open the ladder up and lock the braces in place
* Do not use a ladder in a stair well.
* Do not use a ladder in a walkway, doorway, or other traffic area without taking precautions such as using caution signs and having a person on the ground to spot hold your ladder.
* Give your ladder secure footing or lash the ladder in position.
* For every four feet of height, you intend to climb on an extension ladder, the base of the ladder should be placed one foot from the wall.
* If you are climbing to a different level the ladder should extend three feet above the next level to provide a hand hold. Will the next level support you?
* Always face the ladder when climbing up or down.
* The top of a stepladder shall not be used as a step.
* Use both hands when climbing or descending.
* Never use metal ladders near electrical equipment or wiring.

These rules shall be reviewed with all potential users once every three years.

If observed behavior is not in line with these rules or an incident occurs, retraining shall occur.

**Safety Standard 32**

Training Requirements

Good safety training is the single most important part of the safety program after capable employees are in place. If training is done correctly the effects will be far reaching and clearly visible in many positive ways.

If employees do not know what hazards are present in their work environment, they will not know how to work safely. Safety training will give our employees the information they need to make better judgments about the way they work.

Once training has been given, accountability becomes the next step. Employees must be held accountable by all supervisors. Supervisors must be held accountable by their managers and so on.

Safety Training is never complete. It is an ongoing part of any job. When people become complacent, they begin to work in unsafe manners. Employees think they know their limitations and capabilities. This is when incidents happen.

An incident is an unplanned event that results in injury, damage to property, equipment, environment or an event that has the potential to result in such consequences. These events can be predicted. Almost all injuries and property damage are caused by unsafe behavior.

An Accident is an event that occurs which could not have been predicted, planned for or avoided (Example. Lightning strike. No safe behavior can prevent an accident from happening.)

A Near Hit is an event that potentially could have caused injury or property damage.

**The Safety Committee members shall be trained in how to complete the following:**

Hazard Analysis

Accident/Incident Investigation

Job Safety Analysis

**It is mandatory all employees receive the following training:**

Blood Borne Pathogens Each Year

Emergency Action Procedures Once or if plan or persons responsibility changes

Ergonomics Each Year

**The following safety training will be given to employees based on their exposure.**

Confined Space (only if there is a confined space) Each Year

Emergency Action Plan Once or Retrained if job changes

Ergonomics, Lifting Yearly or as needed

Forklift/Electric Pallet Jack Every Two Years or as needed

Hazard Communication Each Year

Hearing Conservation Each Year

Job Safety Analysis Once or as needed

Lock Out Tag Out Each Year

Machine Guarding Each Year

Personal Protective Equipment Each Year

Stairs and Ladders Once every 3 years or as equipment changes

Vehicle Safety Each Year

To make training more effective, make the session more interesting and involve the audience. Before beginning the session, gather props that are easy to use. Perform the training next to the area or the equipment involved. If you are doing fork lift training, make sure the fork lift is nearby so you can use it for examples. If you are training employees on Hazard Communication, make sure the HazCom binder is handy, complete with updated Material Safety Data Sheets.

Ask employees to assist during training. Ask their opinions and ideas. These are the experts at their respective jobs. They are going to have excellent ideas. If you have an employee with a lot of experience at a job, you may want to ask this person a week in advance if they are willing to help with training. The more people you can get involved in the training the more interesting it will be. Also, it is a fact that when someone hears something, talks about it and then demonstrates what was heard and discussed, information will be retained for longer periods of time. Get employees involved.

A real motivator for employees will be rewarding them. A reward can be recognizing them in front of their peers for working safely, bringing a hazard to a supervisor’s attention, or keeping their area clean. A pat on the back or hand shake in front of peers will mean a lot. To reward employees, you should discuss these ideas with your publisher to determine what is appropriate. (See the incentive section of safety manual.)

**Safety Standard 33**

Vehicle Safety Training

**If you are going to pass a car, follow these rules**:

* Make sure you are in a passing zone.
* Be certain that there is no oncoming traffic.
* Look at all mirrors carefully before you make a lane change.
* Look behind you for any vehicles that might be trying to pass you.
* Be aware of any blind spots. Once the lane is clear, signal your move.
* Move into the passing lane and accelerate to pass the car in front of you.

Never look directly at an approaching car's headlights. Use the right edge of the pavement as a lane guide until the other car has passed.

Be aware of any potential road hazards. Watch for cars that suddenly swerve from their lanes to avoid potholes, construction barriers, or stalled vehicles.

Bad weather such as rain, snow, or fog can make driving difficult. Always watch for difficult conditions and be prepared to take defensive action. Follow these bad weather tips:

* The tires on your vehicle can lose traction on wet roads. Slow down if the roads are wet.
* Snow and ice can make roads slippery. If your vehicle goes into a skid, do not push down hard on the brakes. Take your foot off the accelerator and turn the steering wheel in the direction you want to go. Do not turn sharply. Use moderate turns of the wheel until you come out of the skid.
* Slow down as you approach shaded areas, bridges, and overpasses in winter. These areas freeze first and stay frozen longer.

When driving on a highway, always be prepared for drivers to changes lanes suddenly in order to exit.

Do not let your emotions dominate your driving.

Do not drive when you are tired. If you feel tired, pull off the road for some exercise and fresh air or a cup of coffee.

**Vehicle Safety Training**

**Trainer’s guide**

**CNHI is committed to a workplace vehicle safety program that will reduce injury to our employees.**

Motor vehicle accidents are a leading cause of injury in CNHI and to the general public. It is the goal of the company, that by employees participating in the Vehicle Safety Program, driving attitudes, skills and behaviors will improve. Our drivers will become more aware and demonstrate safety conscious behavior not only at work but anytime they drive.

Trainers shall study the following safety training and familiarize themselves with the topics presented. All employees who drive a company vehicle or their own personal vehicle during the course of a work day to complete their work, more than once a month for the company will be trained each year.

Motor vehicle crashes cost employers $60 billion annually in medical care, legal expenses, property damage, and lost productivity. They drive up the cost of benefits such as workers’ compensation, Social Security, and private health and disability insurance. In addition, they increase the company overhead involved in administering these programs. The average crash costs an employer $16,500. When a worker has an on-the-job crash that results in an injury, the cost to their employer is $74,000. Costs can exceed $500,000 when a fatality is involved. Off-the-job crashes are costly to employers as well.

The real tragedy is that these crashes are largely preventable. Recognizing the opportunity that employers have to save lives, a growing number of employers have established traffic safety programs in their companies. No organization can afford to ignore a major problem that has such a serious impact on both their personnel and the company budget.

The increasing traffic congestion on our nation’s roadways wastes significant time and money, reduces productivity and promotes risky driving behavior. Employees may feel pressured to drive faster and for longer periods of time and to engage in potentially distracting in-vehicle activities to meet their job responsibilities. Engaging in unsafe driving practices affects those who occasionally drive their personal vehicles for work purposes as well as those who spend their workday driving a company vehicle.

As a CNHI facility, do your part by keeping your parking lot well lighted and well maintained. Keep roadway and parking spaces properly striped, and clear of debris and snow. Install signs at parking lot exits reminding employees to buckle their seat belts and drive safely. Let your concern for their safety

be their final thought as they leave your parking lot. Employers have enormous power to protect their businesses by educating their employees about safe driving practices. The safety issues described below should be addressed in an employee awareness and training program.

Draw employees into the training by asking them questions relating to the topic. Ask:

* Has anything like this ever happened to you?
* Then ask them to tell the story to the class.
* What caused the incident?
* What would you do differently if in the same situation?
* Did that change the way you drove?

**Employee Handout**

**Safety Belt Use**

Safety belts are the single most effective means of reducing deaths and serious injuries in traffic crashes. **Read that again.** Safety belts are the single most effective means of reducing deaths and serious injuries in traffic crashes.

As the most effective safety device in vehicles, safety belts save nearly 12,000 lives and prevent 325,000 serious injuries in America each year. During a crash, anyone not wearing a safety belt will slam into the steering wheel, windshield, or other parts of the interior, or be ejected from the vehicle. It is company policy to fasten your safety belt before you put your vehicle into gear.

**Driving the Speed Limit**

One of the biggest causes of auto accidents is not obeying the posted speed limit. While driving the speed limit may slow you down a bit, the chances of being able to react defensively to another driver or even to a deer are greater. Driving the speed limit will make you a safer driver.

**Aggressive Driving**

Employees commuting to and from work and traveling for work purposes often find themselves caught up in bottlenecks and traffic delays, wasting their time and reducing their productivity. These situations create a high level of frustration that can spark aggressive driving behavior. The roadway is one place that being aggressive never pays. Aggressive driving acts include excessive speed, tailgating, failure to signal a lane change, running a red light and passing on the right. The best advice is to avoid engaging in conflict with other drivers and to allow others to merge.

**Distracted Driving**

Distracted driving is a factor in 25 to 30 percent of all traffic crashes. With hectic schedules and roadway delays, many employees feel pressured to multi-task just to keep up with their personal and work-related responsibilities. More time on the road means less time at home or at work but “drive time” can never mean “down time.” Since drivers make more than 200 decisions during every mile traveled, it’s critical for employers to stress that when driving for work, safe driving is their primary responsibility.

**Drowsy Driving**

Fatigued or drowsy driving may be involved in more than 100,000 crashes each year, resulting in 40,000 injuries and 1,550 deaths. Sadly, these numbers represent only the tip of the iceberg since these crashes are seriously under-reported. These days, it’s more important than ever for employees to be well rested, alert and sober on the road so that they are in a position to defend themselves from drivers who do not make the same choice. Train employees to make smart decisions when they’re behind the wheel, on and off the job.

**21**

**Alcohol and Drug Impaired Driving**

Alcohol use is involved in 40 percent of all fatal motor vehicle crashes, representing an average of one alcohol-related fatality every 30 minutes. It is estimated that three in every 10 Americans will be involved in an impaired driving-related crash some time in their life. Alcohol, certain prescription drugs, over-the-counter medications, and illegal drugs can all affect a person’s ability to drive safely due to decreased alertness, concentration, coordination, and reaction time. Businesses pay a high price for alcohol and drug abuse; alcohol is a contributing factor in 39 percent of all work-related traffic crashes.

**Secure Materials for Transport**

Papers, product, tools or equipment should be secured while being transported to prevent unsafe movement of materials. During a crash or when making sudden maneuvers, loose objects can slide around or become airborne, injuring the driver and any passengers. Objects that could become a hazard should be secured or stored outside the passenger compartment.

**Young Drivers**

The 16-20-year-old population represents a significant highway safety problem. Traffic crashes are the leading cause of fatalities for teens. Historically, this group is the age group that has the lowest safety belt use rate and is the most likely to engage in risky driving behaviors that include speeding, driving while alcohol or drug impaired and when drowsy.

It is important for employers with young workers to actively promote safe driving practices. We have learned much about teen driver safety during the past decade. There are proven, specific safety benefits from a variety of best practices that are commonly referred to as “graduated driver licensing” or GDL. GDL practices have resulted in substantial reductions in crashes, injuries, and fatalities for novice teenage drivers.

Under Federal law, 16-year-old workers are prohibited from driving as part of their job, and 17-year-olds may drive for work only under strictly limited circumstances. Some state laws may be more restrictive than Federal laws.

**Aggressive Driving**

As traffic congestion continues to grow, motorists commuting to and from work and traveling

for business purposes often find themselves caught up in bottlenecks and significant delays,

wasting time and reducing their productivity. This situation creates a high level of frustration

and can spark aggressive driving among these overwhelmed drivers. To protect against aggressive

driving, remember that your primary responsibility is to drive focused and stay safe

**Safety Facts for the Road**

• A major reason for increased traffic congestion is that our highway system has not kept pace with the growing demands placed on it. Since 1970, the numbers of drivers increased by 64% while the roadway system increased by only 6%.

• Many Americans believe aggressive driving is on the rise. They worry about the behavior of other drivers, but they admit to engaging in aggressive driving themselves.

• A substantial number of the 6.8 million crashes that occur each year are estimated to be caused by aggressive driving.

• Overly frustrated drivers are turning their cars into extensions of their homes and offices, creating a dangerous distraction on the road that fuels aggressive driving among other drivers.

**Drive Focused. Stay Safe. Avoid Aggressive Driving.**

Correct your own unsafe driving habits that are likely to endanger, antagonize or provoke other drivers.

• Keep your cool in traffic; be patient and courteous to other drivers and don’t take their actions personally.

• If you think you have a problem, seek help. Look for anger or stress management classes or self-help books.

• Reduce your stress on the road by allowing plenty of time to reach your destination, plan your route in advance and alter your schedule or route to avoid busy roads.

• If despite all your planning, you’re going to arrive late, accept it and avoid aggressive driving.

• Make every attempt to safely move out of an aggressive driver’s way. If a hostile motorist tries to pick a fight, do not make eye contact, and do not respond. Ignore gestures and refuse to return them.

• Report aggressive driving to the police. Provide a vehicle description, license number, location, and the direction of travel.

**Are you “just driving like everyone else” or are you driving aggressively?**

The Nerves of Steel Survey is a national survey that reveals how Americans define aggressive driving:

* Tailgating 95%
* Making rude gestures 91%
* Passing on the shoulder 90%
* Pulling into parking space someone else is waiting for 88%
* Failing to yield to merging traffic 85%
* Flashing high beams at the car in front of you 74%
* Waiting until the last second to merge with traffic on the highway 66%
* Changing lanes without signaling 66%
* Driving through a yellow light that is turning red 62%
* Honking the horn 53%
* Double parking 53%
* Driving 10 mph or more under the speed limit 27%

**Distracted Driving**

Longer commutes, an increase in heavy traffic, the availability of in-vehicle technology are all factors that result in driver distraction. More time in your vehicle results in less time at home or on the job, causing drivers to feel the pressure to multi-task to keep up with their responsibilities. Countless distractions tempt drivers to forget that their primary responsibility is to drive focused and stay safe.

**Safety Facts for the Road**

• Distracted driving is estimated to be a factor in 25 to 30% of all traffic crashes—that’s 4,000 or more crashes a day.

• Events inside and outside the vehicle can distract a driver. Adverse roadway and weather conditions require a driver’s full attention.

• While taking one's eyes off the road presents obvious risks, activities that take a driver's mind away from driving are just as risky.

• A driver's ability to manage distractions varies widely and can change from day-to-day depending on their level of stress and fatigue.

• Distracted drivers fail to recognize potential hazards in the road and react more slowly to traffic conditions, decreasing their “margin of safety.”

• Research suggests that distracted driving increases the risk of rear-end and single-vehicle crashes.

**Do you know when you're driving distracted?**

• Has a passenger in your car screamed or gasped because of something you did or did not do?

• Did you run a stop sign unintentionally?

• Have you slammed on your brakes because you didn’t see the car in front of you stop?

• You do not remember driving from one place to another?

**Drive Focused. Stay Safe. Avoid Distracted Driving.**

• Safe driving practices require that you constantly search the roadway ahead for situations that

could require you to take quick action.

• Recognize that driving requires your full attention.

**Did you know that even the most routine activities are potentially distracting while driving?**

A national survey revealed the activities that distract today's drivers.

**Activities Drivers Engage in While Driving**

* 96% Talking to passengers
* 89% Adjusting vehicle climate/radio controls
* 74% Eating a meal/snack
* 51% Using a cell phone
* 41% Tending to children
* 34% Reading a map/publication
* 19% Grooming
* 11% Preparing for work

**Drowsy Driving**

As a driver, your number one responsibility is to get yourself and your passengers to your destination

safely. When behind the wheel, you always need to be alert and focused. At 55 mph, a vehicle travels the length of a football field in 3.7 seconds. This is no time for a “mini” snooze. Being an attentive driver, and looking out for the driver who isn’t, is increasingly important.

**Safety Facts for the Road**

• Drowsy driving causes more than 100,000 crashes each year, resulting in 40,000 injuries and 1,550 deaths.

• Crashes caused by drowsy driving are often serious crashes and occur most often on high-speed rural highways when the driver is alone.

• Drowsy driving can happen to anyone. A recent National Sleep Foundation study revealed that one half (51%) of adults have driven while drowsy and 17% report having fallen asleep while driving within the past year.

**Drive Focused. Stay Safe. Avoid Aggressive Driving.**

• Be aware of your behavior and the behavior of others on the road during the late night, early morning, and mid-afternoon hours when drowsy driving crashes are most likely to occur. Plan a rest stop during these hours.

• Get a full night of rest before driving. If you become tired while driving, stop. A short nap (15 to 45 minutes) and consuming caffeine can help temporarily.

• Stop at regular intervals when driving long distances. Get out of the car every 2 hours to stretch and walk briskly.

• Avoid taking medications that cause drowsiness.

**Do you know when you’re driving drowsy? Some warning signs of fatigue are:**

•You can’t remember the last few miles driven.

•You hit a rumble strip or drift from your lane.

•Your thoughts are wandering and disconnected.

•You yawn repeatedly.

•You have difficulty focusing or keeping your eyes open.

•You tailgate or miss traffic signs.

•You have trouble keeping your head up.

•You keep pulling your vehicle back into the lane.

If you’re tired and are in danger of falling asleep, then you cannot predict when a “mini” sleep may occur. A driver cannot react to road dangers when tired. Getting enough sleep will not only help you feel better, but it can also save your life.

**Impaired Driving**

On our congested roadways, it’s more important than ever to drive with a clear head and a sharp focus. Make it a life-governing rule not to drive when you’ve had too much to drink. On average, a driver makes over 200 decisions per mile, so it’s critical that a driver make the decision to drive alert before getting behind the wheel. Not only will you be a safer driver, but you will be in a much better position to defend yourself from the driver who doesn’t make that choice.

**Drive focused. Stay safe.**

**Safety Facts for the Road**

• Alcohol impaired driving accounts for about 40% of fatal crashes.

• About three in every 10 Americans will be involved in an alcohol-related crash at some time in their lives.

• Research shows that alcohol is a contributing factor in 39% of all work-related traffic crashes.

• Nearly 1.5 million people are arrested each year for driving while intoxicated (DWI). Two-thirds of all drivers arrested for DWI are first time offenders.

• A DWI/DUI conviction on a person’s driving record may prevent them from getting a job, receiving a promotion or even result in a job loss.

• Many companies have corrective action programs that suspend company driving privileges for a DWI/DUI violation.

• Nine out of 10 insurance companies automatically cancel the policy of a driver convicted of a DWI/DUI violation. Consequently, the driver must find a high-risk insurance company and face substantial rate increases.

**Drive Focused. Stay Safe. Avoid Aggressive Driving.**

• Alcohol involvement is highest at night (9 p.m. to 6 a.m.), on weekends and on holidays.

• Driving skills, especially judgment, are impaired in most people long before they exhibit visible signs of drunkenness.

• Celebrations are a part of our lives and sometimes they include alcohol. They should not, however, involve impaired driving:

• Decide who is the designated driver before the party starts.

• Be the kind of co-worker who will take the keys if someone has had too much to drink.

• If you’re impaired, make the safe choice – ride with a designated driver, call a taxi, stay where you are, or call a sober friend or family member. Making the safe choice could save your life.

**Can you spot an impaired driver on the road?**

Drivers under the influence of alcohol often display certain characteristic driving behaviors. Keep these in mind to avoid a dangerous situation.

• Weaving, swerving, drifting or straddling the center line.

• Driving on the wrong side of the road.

• Driving at a very slow speed.

• Stopping without cause or braking erratically.

• Turning abruptly or responding slowly to traffic signals.

• Driving with the window down in cold weather.

• Driving with headlights off at night.

If you spot an impaired driver, stay a safe distance from their vehicle. Alert the police that there is an unsafe driver on the road.

Company Vehicles for Personal Use:

Personal use of company vehicles is prohibited without prior permission from management. If permission is granted, the employee assigned to the vehicle will be the only driver allowed to operate the vehicle. Use of the company vehicle is limited to travel to and from work and work related events. The vehicle is not to be used for personal and/or entertainment purposes. Employees are expected to use their discretion.

**Basic Driver Rules:**

* Always wear your safety belt.
* No cell phone use while driving. Before making a phone call, drive the vehicle to a safe area and stop.
* Do not exceed the speed limit.
* Do not use devices with headphones while driving.
* Be aware of your following distance and know the proper following distances. Proper distances for a van   
  are 2 seconds under 40 MPH. When driving over 40 MPH add a second and if poor driving conditions   
  such as rain, sleek, or construction exit add another second. (You may need to leave earlier to be on time.)
* If visibility is reduced slow down or stop
* Do not drive under the influence of drugs or alcohol.

**Expect other drivers to make mistakes at intersections. Four preventative rules to follow are:**

* When approaching a green light, be prepared for it to turn red. It may have been green for a long time.
* When stopped at a red light and it turns green, proceed slowly. Look left and right before you drive through the intersection.
* Yellow lights mean proceed with caution, not speed up to get through the intersection before the light turns red.
* Turning right at a red light is not permitted in every state. Even in states where it is permitted, turning right is not allowed in some intersections. Watch for signs at the intersection.

**If you are going to pass a car, follow these rules**:

* Make sure you are in a passing zone.
* Be certain that there is no oncoming traffic.
* Look at all mirrors carefully before you make a lane change.
* Look behind you for any vehicles that might be trying to pass you.
* Be aware of any blind spots. Once the lane is clear, signal your move.
* Move into the passing lane and accelerate to pass the car in front of you.

Never look directly at an approaching car's headlights. Use the right edge of the pavement as a lane guide until the other car has passed.

Be aware of any potential road hazards. Watch for cars that suddenly swerve from their lanes to avoid potholes, construction barriers, or stalled vehicles.

Bad weather such as rain, snow, or fog can make driving difficult. Always watch for difficult conditions and be prepared to take defensive action. Follow these bad weather tips:

* The tires on your vehicle can lose traction on wet roads. Slow down if the roads are wet.
* Snow and ice can make roads slippery. If your vehicle goes into a skid, do not push down hard on the brakes. Take your foot off the accelerator and turn the steering wheel in the direction you want to go. Do not turn sharply. Use moderate turns of the wheel until you come out of the skid.
* Slow down as you approach shaded areas, bridges, and overpasses in winter. These areas freeze first and stay frozen longer.

When driving on a highway, always be prepared for drivers to changes lanes suddenly in order to exit.

Do not let your emotions dominate your driving. Do not drive when you are tired. If you feel tired, pull off the road for some exercise and fresh air or a cup of coffee.

**Safety Standard 34**

Walkways and Exits

Openings into exits must be protected by a self-closing fire door. All exits must be unlocked while the building is occupied. Employees should not have to use keys or tools to unlock the door. A device such as a panic bar that prevents the door from being opened from the outside is permissible.

A clear path the width of the exit must be always kept. Objects along the path must not reduce the path width or protrude into the path.

Each exit route must be adequately lighted. Each exit must be marked by a sign reading “EXIT”.

Each exit route door must be free of decorations or signs that would obscure the visibility of the EXIT.

If the direction of travel to an exit is not immediately apparent, signs must be posted along the exit route indicating the direction of travel to the nearest exit. Also, the line of sight to the exit sign must be clearly visible at all times.

Each doorway along an exit route that could be mistaken for an emergency exit, must be marked “NOT AN EXIT” or labeled by a sign indicating its actual use. (Example: closet, mop room electrical room.)

Each EXIT sign must be illuminated to meet OSHA subpart 1910.137 b 6.

Exit routes must be always maintained. During construction, maintenance etc., exit routes shall be kept clear.