

Safety and Health Program Mission

Zimbrick, Inc. is committed to providing a healthy and safe workplace for all its employees. It is Zimbrick, Inc.'s intent to comply with all applicable laws and regulations, including the federal Occupational Safety and Health Act, regulations and standards issued by the Occupational Safety and Health Administration, and state and local laws. Beyond complying with the law, Zimbrick, Inc. will strive to implement a safety and health program that will reduce or eliminate workplace injuries and illnesses.

Employer Responsibilities and Employee Rights and Responsibilities

Safety and health responsibilities are shared by management, supervisors, and employees. Management accepts the responsibility for leadership for the safety and health program, for the program's effectiveness and improvement, and for providing the safeguards required to ensure safe working conditions.

Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in the employees they supervise. Supervisors must also ensure that all operations are performed with the highest regard for the safety and health of all personnel involved.

Employees are responsible for wholehearted, genuine cooperation with all aspects of the safety and health program. Employees should be alert to unsafe conditions and report them immediately to their supervisor. Employees must follow all company safety and health rules. Employees who fail to comply with company safety and health rules are subject to disciplinary action, up to and including termination of employment.

Accident Investigation and Reporting

I. Accident Reporting

When an accident happens, the first response should be to see that the injured employee or employees receive medical attention and that further injuries are avoided.

Zimbrick's general guidelines for handling injuries include:

1. Determine extent of the employee's injury.
2. Send the employee for medical treatment, if necessary. If the employee refuses medical attention, indicate this information in the completed accident paperwork.
3. When the injury requires medical attention, the supervisor should arrange transportation for the employee.
4. The supervisor should suggest the nearest medical provider for immediate care.
5. If possible, the supervisor or the location's office manager will provide the employee with the "Medical Service Form" and a "Prescription Form" to take with them to the medical provider.
6. Once the employee has left for the medical provider, the supervisor or the location's office manager should complete the WC-12 form to the best of their ability.
7. The WC-12 should be sent to the workers compensation carrier and human resources.

II. Accident Investigation

Each store should investigate all accidents and "near-misses". An accident is an unexpected incident resulting in injury or property damage. A "near-miss" is an incident with the potential to have caused serious injury or property damage. Investigating "near-misses" helps managers identify and eliminate hazards that could cause an accident. Accident investigations should never focus on assigning blame for the accident.

The department manager will be responsible for the accident investigation. As soon as the situation has stabilized and there is no risk of further injury, the manager should begin collecting and preserving information regarding the accident. *The standard accident*

reporting form should be used to ensure that accident information is collected in a consistent manner. See section "T" of this manual to locate form.

Other activities to document the accident scene usually include:

- Taking written statements from witnesses to the accident.
- Marking the position of equipment or personnel at the time of the accident.
- Recording information on environmental conditions-ex: temperature, lighting, weather conditions, noise- that might be relevant to the accident investigation.

An accident investigation is not complete until the cause of the accident has been eliminated or controlled. Each store will be responsible for documenting the steps taken to eliminate or control the hazard involved in the accident.

III. Injury and Illness Record Keeping

As an automobile dealership, we are currently exempt from maintaining an OSHA 200 log. However, if we are notified to participate in the annual survey of occupational injuries and illnesses by the Bureau of Labor Statistics (BLS), it is helpful to maintain the OSHA log throughout the year in order to complete the survey.

These records serve several purposes. They provide information to managers and employees about the hazards in their facilities. Also, OSHA inspectors generally review the company's injury and illness data at the outset of the inspection and focus the inspection on any hazards revealed by the records.

OSHA requires employers to allow employees to examine and copy their exposure and medical records. Employers must generally provide employees with access to these records within 15 days of an employee's request. OSHA requires employers to tell employees about the existence of any medical and exposure records when the employee first starts work and at least annually after that. Employers must keep exposure records for 30 years and medical records for at least the duration of employment, plus 30 years.

IV. Modified Work Duty/Return To Work Program

Once the employee has been treated for the work related illness or injury, it is important for that employee to return to work as quickly as possible to encourage the healing process. By encouraging the employee back to work through the modified work duty program, the employee will be able to return to full earnings capacity quicker. The modified work duty program has various advantages. Some of those are:

- An injured employee's desire to return to work is directly proportional to the length of time away from work.
- Employees can be used to do jobs/tasks that need to be done, but which may not be of immediate priority.
- It prevents employees from using the workers compensation system as a vacation supplement.
- It ensures that employees and employers stay in visual and verbal contact. Loss of contact means loss of control.

Each location will work with the medical community and our insurance company to provide an injured employee with work that meets his or her medical restrictions. In addition, since modified duty jobs are temporary in nature, each return-to-work case will be reexamined on a week-to-week or month-to-month basis, depending on the circumstances. It is the intention that no job is to exceed 90 days in duration. However, in the unlikely event that the occasion would arise, management will evaluate the case based on its merit.

NOTE: Our workers compensation carrier is available to review the physical demands of each location's jobs to determine the availability of light duty/modified duty. In general, Zimbrick, Inc.'s light duty/modified duty will be available at all locations and departments.

Workers Compensation – An Overview

The basic premise of our safety and health program is to assure the safety of our employees. However, if an employee is injured or becomes ill, the company is insured through our workers compensation carrier. Zimbrick, Inc. is fully insured through a workers compensation carrier by paying premiums to the carrier. The premiums are determined by the type of industry, the size of the company, and workers compensation claims history. The benefits that we will see through the safety and health program may include:

- Lower insurance rates
- Increased production efficiency
- Better use of workforce

Emergency Response Plan and First Aid

I. Introduction

This emergency response plan is designed to protect employees during emergency situations, including fires, chemical spills, natural disasters, and bomb threats.

Any member of your management team can serve as the facility emergency response coordinator and will have the primary responsibility for responding to and coordinating emergency situations.

All employees should review the procedures. Supervisors must ensure that their employees are familiar with these procedures.

II. Reporting Emergencies

When there is a fire or other emergency that poses immediate danger to people or property, call 911 and sound the fire alarm if you can do so safely before evacuating. Follow emergency evacuation procedures. Remain calm and notify other employees, managers, and customers. Procedures for responding to specific types of emergencies are described below. Do not attempt to handle emergency duties – ex: fire fighting – for which you do not have training.

When you call 911 to report an emergency, provide the emergency dispatcher with the following information:

- The street address for your location
- The building or area name where the emergency response is required
- The location within building or area
- A brief description of emergency
- Your name

The following numbers should be posted near telephones and outside in other conspicuous locations:

- Outside emergency services (police, fire department, ambulance services)
- Hospital
- Poison Control Center

III. Evacuation Procedures

Each Zimbrick, Inc. location has a written emergency evacuation procedure. Floor plans indicating exits and fire extinguishers accompany each of these procedures. The floor plans are kept on the file by the general manager and are posted in each building.

Supervisors are responsible for ensuring that employees know the location of fire extinguishers, fire exits, and alarm systems in the areas in which they work. Training and information is available from the department manager.

Employee Accountability

Each supervisor is responsible for accounting for each assigned employee following an emergency evacuation.

1. Rally points have been established for all evacuation routes and procedures. These points are designated on each posted work area escape route.
2. All work area supervisors and employees must report to their designated rally points immediately following an evacuation.
3. Each employee is responsible for reporting to his or her supervisor so that an accurate head count can be made. Supervisors will check off the names of all those reporting and will report those not checked off as missing to the general manager.
4. The general manager will determine the method to be used to locate missing personnel.

IV. Specific Emergencies

The following sections describe the procedures employees should follow during specific emergencies that may arise at their facilities.

Chemical Spills

The guidelines below should be followed in the event of a chemical incident in which there is potential for a significant release of hazardous materials.

Spill classifications

Spill response procedures vary depending on whether a spill is small, medium, or large. The following are descriptions of each type of spill:

- Small spills : This category includes spills where the major dimension of the spill is less than 18 inches in diameter.
- Medium spills: These are spills where the major dimension exceeds 18 inches, but is less than 6 feet.
- Large spills: This category includes:
 - a. Any spill involving a flammable liquid where the major dimension exceeds 6 feet in diameter

- b. Any “running” spill, where the source of the spill has not been contained or the flow has not been stopped.

Evacuation

Persons in the immediate vicinity of a spill should immediately evacuate the premises. If the spill is “medium” or “large”, or if the spill seems hazardous, immediately notify emergency response personnel.

General Spill Control Techniques

Once a spill has occurred, the employees at the spill site must decide whether the spill is small enough to handle without outside assistance. Only employees with training in spill response should attempt to contain or clean up a spill.

Spill control equipment should be available wherever significant quantities of hazardous materials are received or stored. MSDS sheets, respiratory protection, absorbents, over-pack containers, container patch kits, spill dams, shovels, floor dry, acid/base neutralizers, and “caution-keep out” signs are common spill response items that should be stocked in such areas.

Fires

Workplace fires can be deadly if employees do not know how to respond.

Evacuation

Be prepared! Every employee should be familiar with the evacuation plans posted in each building. If a fire or explosion occurs in your presence, observe the following procedures:

1. Go to nearest alarm pull station to activate the building evacuation alarm.
2. Evacuate the building and call 911 to report the fire.

Follow these steps when evacuating:

- Keep calm. Do not delay evacuating.
- If there is time, close (but do not lock) windows and doors that are not being used for evacuation.

- Proceed at a fast pace (but do not run) to the nearest exit.
3. Once you have evacuated the building, report to the designated gathering area. If you cannot account for everyone, inform the fire department. Do not re-enter the building until management gives the “all-clear” signal.

Emergency Access and Egress

Access and egress are critical during emergencies. During a fire, timing and quick response are essential to save lives and property. Unobstructed emergency access and egress routes ensure that fire fighting and rescue crews are not delayed in doing their jobs and that building occupants can exit to safety.

Maintaining “emergency access” means that facilities and equipment remain available and unobstructed at all times to ensure effective fire detection, evacuation, suppression, and response.

Maintaining “emergency egress” means that individuals have continuous and unobstructed routes out of the facilities in which they work. Each location within a building must have a clear means of egress to the outside.

Corridors, Stairways, and Exits

Exit corridors and stairways are the primary means of egress during an emergency. An exit corridor is a pedestrian pathway that allows direct access to the outside of a building. All corridors, stairways, and exits must provide clearance of at least 44 inches in width.

Observe these guidelines to promote safe evacuation in corridors, stairways, and exits:

- Keep all corridors, stairways, and exits clutter-free at all times.
- Do not place hazardous materials or equipment in areas that are used for evacuation.

- Do not use corridors or stairways for storage or office operations.

Fire Lanes

Fire lanes must be clearly marked and used by emergency personnel only. Never park in fire lanes or within 15 feet of fire hydrants or other fire equipment.

Fire Doors

Fire doors normally are located in stairwells, corridors, and other area required by the fire code. A fire door serves as a barrier to limit the spread of fire and to restrict the movement of smoke. Never tamper with fire doors or block them with equipment, doorstops, potted plants, or other items.

Doors to offices can act as smoke barriers regardless of their fire rating. Keep these doors closed when offices are not occupied.

Fire doors generally remain closed at all times. If it is necessary to keep a fire door open, a special closure system must be installed. The closure system must be connected to the building's fire alarm system so that the fire door will close automatically if the alarm system is activated.

Fire Extinguisher Procedures

The Occupational Safety and Health Administration requires employees to be trained in the use of portable fire extinguishers if the employer has provided the fire extinguishers for employee use. Such training will be conducted when an employee is first assigned to a job and annually thereafter.

Note: The time to learn about fire extinguishers is not during a fire! Take the time to read these procedures so

you will be adequately prepared to use a fire extinguisher in an emergency.

Fire extinguishers provide employees a quick way to put out a fire while it is still small and easily controllable.

Follow these guidelines when using fire extinguishers:

1. You should only attempt to fight a fire if you have been trained in the use of fire extinguishers. Never attempt to fight a fire if it is large, spreading rapidly, or if the atmosphere might be toxic.
2. Go to the nearest fire extinguisher and check the label. Ensure that the fire extinguisher you chose is appropriate for the fire. Extinguishers are classified according to the type of fires they are designed to extinguish. Fire classifications are as follows:
 - **Class A** fires involve ordinary combustible materials such as wood, cloth, paper, rubber, and many plastics.
 - **Class B** fires involve flammable liquids, oils, greases, tars, oil base paints, lacquers, and flammable gases.
 - **Class C** fires involve energized electrical equipment. Class C fire extinguishers use extinguishing mediums that are not electrically conductive.
 - **Class D** fires involve combustible metals such as magnesium, titanium, zirconium, sodium, lithium, and potassium.
3. Fight the fire from a position of escape. Position yourself so you will not be boxed in if the fire should start to spread. Operate the extinguisher in accordance with the following procedure:
 - Remove the ring pin by pulling.
 - Direct the discharge nozzle at the base of the fire.
 - Squeeze discharge lever. Because most extinguishers only work for a short time, employ a sweeping motion and work quickly to control the fire.

- Be sure the fire is completely extinguished before stopping the discharge.
 - Back away from the extinguished fire while watching for flare-ups or re-ignition.
 - Report the fire to your manager and/or general manager. Call 911 if there is any doubt that the fire is out or if there is any chance that it could be re-ignited.
4. Use good judgment in determining your capability to fight a fire. You should only attempt to fight a fire if you have been trained to do so and if the fire appears to be small and controllable. If your first attempt does not succeed in putting out the fire, activate the firm alarm and evacuate the building.

Bomb Threats

If you receive a bomb threat over the telephone, remain calm and act courteous. If possible, notify the general manager or transfer the call to the general manager or available department manager.

The manager should take notes on the caller's threat, tone, voice characteristics, and background noise. Once the caller hangs up, call the police department by dialing 911 and report the call.

Weather Emergencies

All of Zimbrick, Inc.'s locations are subject to the following weather emergencies:

- Tornadoes and high winds
- Lightning
- Winter weather

During a tornado warning or high winds, employees should move to places of maximum protection, such as the interiors of buildings and the lowest floor possible. Keep away from windows. Await specific instructions from your supervisor or your general manager. A tornado watch is issued when weather conditions are ideal for a tornado to form. A tornado warning is issued when a tornado is identified in the immediate vicinity.

During an electrical storm, stay away from windows and open doors. You may be instructed to shut down your computer. Stay clear of metal objects, such as pipes and electrical appliances. Do not go outside. If you find yourself caught in a storm away from a protected building, stay in a closed automobile if possible. Stay away from tree lines, flagpoles, towers, and metal fences. If caught in the open, stay low.

Except during extremely hazardous weather conditions, all Zimbrick, Inc. locations will remain open for business and employees will be expected to report for work. During severe winter weather the general manager of your location may decide to close for business. It is a good idea to call your location before your shift to determine if your location will be open for business. ***Each store will determine the most effective manner in communicating store closings due to weather.***

Drive slowly in winter weather and be sure to clean all ice and snow from vehicle windows.

Personal Protective Equipment

Introduction

The purpose of this program is to establish the procedures under which Zimbrick, Inc. will evaluate the need for equipment to protect employees from workplace hazards that could cause serious injury or death.

Whenever possible, Zimbrick, Inc. will eliminate hazards through the use of engineering controls or through work-process redesign. When hazards cannot be eliminated, Zimbrick, Inc. will select appropriate personal protective equipment (PPE) for use by affected employees.

Protective equipment, including personal protective equipment (PPE) for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers are provided, used, and maintained in a sanitary and reliable condition.

Responsibility

Supervisors have the primary responsibility for implementing the PPE Program within their departments. Each supervisor is responsible for:

- Analyzing hazards in the work areas for which they are responsible
- Updating hazard assessments when new hazards are encountered or when processes are added or changed
- Selecting appropriate PPE to protect employees against hazards in their work areas
- Ensuring that PPE fit employees properly
- Training employees on the proper use, care, and cleaning of PPE
- Supervising employees to ensure that PPE program elements are followed and that employees properly use and care for PPE

Employees are responsible for:

- Wearing PPE as required
- Attending required PPE training sessions yearly
- Caring for, cleaning, and maintaining PPE as required
- Informing supervisors when PPE needs to be repaired or replaced

Hazard Assessment Guidelines

Hazard assessments will be conducted by the manager of the service department and/or body shop, as needed. The assessments will include the following steps:

1. Reviewing injury and illness logs, accident reports, and workers compensation records to identify problem areas and to determine whether any injuries could have been prevented by the use of PPE.
2. Conducting a walk-through survey of each work area to identify hazards, including impact, penetration, compression, chemical, heat, dust, electrical, and light radiation hazards.
3. Analyzing each job or task to identify potential hazards and to assess the need for PPE.

4. Organizing and analyzing hazard assessment data from the walk-through survey to estimate the potential exposure to multiple hazards.
5. Categorizing risks by type of hazard, level or risk, and seriousness of potential injuries caused by the hazard.
6. Documenting the survey and task analysis using a Hazard Assessment Certification Form, which identifies the workplace surveyed, the person carrying out the survey, the survey findings, and the date the survey was conducted.

Hazard assessments should consider employees who occasionally enter hazardous areas, such as administrative or sales staff who must walk through the service and/or body shop. PPE, including safety glasses, should be available for such personnel or customers during the brief time they are exposed to the work area's hazards.

PPE Selection Guidelines

Supervisors, in consultation with the department and general manager, are responsible for selecting and purchasing PPE. Supervisors must be familiar with the potential hazards in the workplace, as well as the types of PPE that are effective in protecting against such hazards. The procedure for selecting PPE is as follows:

1. Compare the hazards found in the workplace hazard assessment with the capabilities of the available PPE.
2. Review whether PPE provides a level of protection greater than the minimum required to protect employees from the hazards.
3. Fit affected workers with the appropriate protective devices.
4. Train employees on the care and use of the PPE, including the limitations of their PPE and the meaning of warning labels for each device.

Note: A worker sometimes must wear one piece of PPE in combination with another piece. In such cases, both pieces of PPE should fit well and one piece of PPE should not interfere with the effectiveness of the other piece of PPE. For instance, if a worker must wear safety glasses while wearing a respirator, both should fit well and remain effective.

Training

Before allowing an employee to perform work requiring the use of PPE, supervisors should ensure that employees receive training regarding:

- When use of PPE is necessary
- How to properly put on, take off, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After training, employees must demonstrate, on an ongoing basis, an understanding of the components of the PPE program and how to use PPE properly.

Supervisors must ensure that employees receive retraining as necessary. Retraining may be required when:

- Changes in the workplace, work processes, or equipments require changes in the way PPE is used or in the type of PPE used.
- An employee fails to demonstrate competency in the use of PPE

Eye and Face Protection

General Requirements

Protective eye and face equipment is provided and required where there is a reasonable probability of injury that can be prevented by such equipment. Eye and face protection used meet the requirements of ANSI Standard Z 81.1-2003 – Eye and Face Protection.

Depending on the type of work performed and the type of protection required, eyewear may have to meet other standards.

Protective eyewear must:

- Provide adequate protection against the eye injury hazards present in the workplace
- Be reasonably comfortable when worn under actual working conditions
- Fit snugly without interfering with the wearer's movements or vision
- Be durable, easily cleaned, and disinfected

- Be distinctly marked to facilitate identification of the manufacturer

Employees working in environments in which any of the following hazards exist must wear eye protectors:

- Flying particles
- Molten metal
- Liquid chemicals
- Acids or caustic liquids
- Chemical gases or vapors
- Potentially injurious light radiation

Safety Glasses

All Zimbrick, Inc. personnel will be required to wear eye protection when any of the above hazards exist or have the potential to exist. Work situations that may require eye protection include, but not limited to:

- Working on car engines
- Working under cars, changing oil, muffler replacement, etc.
- Working with power tools or grinding machines
- Delivering parts to service personnel
- Inspecting cars during repair (i.e. sales personnel)
- Customers inspecting own car during repair

Persons required to wear protective eyewear as part of their normal job duties will be provided:

- First pair of protective eyewear at no charge
- Replacement eyewear will be available. Employees will be charged for 50% of the cost of the replacement pair.

Protective eyewear will be available in the service drive for customers and visitors to the service department and/or body shop.

Persons requiring corrective lenses shall wear spectacles whose protective lenses provide the correction.

Zimbrick, Inc. will supplement the cost prescription protective eyewear. The employee will be reimbursed \$50 for the first pair and

\$25 for any pair thereafter for the prescription safety glasses by presenting receipt of expense to their supervisor. The employee can also use the preferred provider that the store has negotiated a discount on prescription safety glasses. That preferred provider would bill the store for the reimbursable amount.

Where employees provide their own protective equipment as authorized by their supervisors, the equipment must meet all applicable rules, procedures, standards, codes and regulations. Also, the proper maintenance and sanitation of equipment is provided.

Face Shields

Face shields must be used in work environments in which the entire face needs protection against hazards such as flying particles, metal sparks, or chemical splash. Face shields usually consist of an adjustable helmet and face shield made of tinted or transparent acetate or polycarbonate materials. Face shields are available in various sizes. Workers should ensure that the face shield they use has the tensile strength, heat resistance, and light filtering capabilities required by the particular job they are performing. Face shields are available for personnel who use the brake lathes, pressure washers and for other hazards in the work area.

Welding Shields

Workers involved in welding operations must use face shields to protect workers' eyes and faces from infrared or radiant light burns, flying sparks, and metal spatter encountered during welding, brazing, soldering, and cutting operations. A welding shield assembly consists of:

- A vulcanized fiber or glass fiber body
- An adjustable head strap or cap attachment
- A lens to filter harmful infrared or radiant light
 - *Shade 5*: for torch cutting
 - *Shade 10*: for arc welding

Welding shields are provided to personnel who are involved in welding.

Foot Protection

Protective footwear must be worn when an employee's works involves:

- Activities in which heavy objects might fall or roll onto an employee's foot
- Sharp objects that could pierce the sole of an employee's footwear
- Extremely hot materials that could quickly burn through casual footwear, such as athletic shoes
- Exposure to electrical hazards

Safety-toe footwear is required for employees routinely handling solid objects weighing 15 pounds or more that can fall on their toes. These employees may include, (based on the hazard assessment), but not limited to:

- Body shop personnel
- Service personnel including technicians
- Parts personnel

The general purpose safety shoe will include:

- A non-slip sole
- Be non-electrically conductive
- Be resistance to oils and chemical solvents
- Provide toe protection

Reimbursement:

Zimbrick, Inc. will supplement the cost of the safety footwear for required personnel. The employee will be reimbursed \$50 for the first pair of footwear and \$25 for each pair thereafter. The employee will present a receipt of purchase to their supervisor for reimbursement. Each department will maintain reimbursement records.

Hand Protection

Gloves may be necessary when employees' hands or arms require protection from workplace substances or processes. Protective work gloves will be selected based on the hazards present and the protective characteristics of the gloves.

No single type of glove is effective against all types of hazards. Common types of protective work gloves and the hazards against which they may be effective include:

- **Disposable Gloves:** Disposable gloves usually are made of lightweight nitrile, vinyl, or rubber. The gloves may be effective in providing protection against mild irritants. If the gloves are nonporous, they may also provide protection against infectious materials.
- **Fabric Gloves:** Gloves made of cotton or fabric blends generally are used to improve grip when handling slippery objects. They also help insulate hands from mild heat or cold.
- **Leather Gloves:** Leather gloves are used to protect against injuries that may be caused by sparks or by scraping against rough surfaces. Leather gloves may be used in combination with an insulated liner to protect against electricity.
- **Metal Mesh Gloves:** Metal mesh gloves provide workers protection from accidental cuts when working with cutting tools or other sharp instruments.
- **Aluminized Gloves:** Gloves made of aluminized fabric are designed to insulate hands from intense heat.
- **Chemical Resistance Gloves:** Chemical resistance gloves can protect workers' hands from corrosives, oils, and solvents. The gloves usually are made of neoprene, nitrile, or vinyl. When selecting chemical resistance gloves, be sure to read the manufacturers instructions and chemical resistance charts.
- **Rubber Insulating Gloves:** Rubber insulating gloves are used to protect workers against electrical shocks and burns. Insulating gloves must meet the American Society for Testing and Materials (ASTM) standard, D 120-87, "Specification for Rubber Insulating Gloves".

For abrasion/heat protection, appropriate gloves should be provided for each technician.

Head Protection

Employees must wear protective helmets or hardhats when the work environment poses the risk of head injuries from falling or flying objects or from collisions with fixed, overhead equipment. Protective

headwear must resist penetration and absorb the shock of a blow. An ANSI approved safety hat should be available in work areas with potential hazards. A “bump cap” is appropriate when there is a possibility of bumping the head against a fixed object.

Hearing Protection

Guidelines

OSHA regulations require workers to use hearing protection if they work in environments in which noise levels exceed an eight-hour time-weighted average of 85 decibels.

A noise survey should be conducted at all locations in order to determine sound levels. The surveys will be based on:

- Employee complaints about noise in the workplace
- Evidence that employees have suffered hearing loss
- Noisy conditions that made normal conversations difficult
- Workplace measurements indicating a high noise level

Monitoring must be repeated whenever noise levels are increased to a level that makes existing hearing protection inadequate or causes additional employees to be exposed to noise at or above the action level. The department manager must maintain records on noise levels for a period of at least two years following the monitoring.

Types of Hearing Protection

Common types of hearing protectors include:

- Disposable foam earplugs
- Reusable pre-formed earplugs
- Earmuff-style hearing protectors

Note: The noise reduction rating (NRR) of the selected hearing protector will be reviewed to ensure its’ effectiveness for the given environment.

Respiratory Protection

Please refer to the Respiratory Protection Program (separate cover).

PPE Maintenance

PPE must be kept sanitary and in good condition. Employees are responsible for cleaning PPE as necessary and for inspecting PPE before each use.

PPE shared between employees must be properly cleaned and sanitized before and after use. When contaminated PPE cannot be decontaminated, it must be discarded in a manner that protects employees from harmful exposure and that complies with environmental regulations.

Recordkeeping

The department manager is responsible for maintaining written records of hazard assessments and PPE training. Training records must include the names of the persons trained, the type of training provided, and the dates when the training occurred. Employee training and hazard assessment records must be kept for at least three years.

Machine Guarding and Safety

V. General Requirements

OSHA requires that machines be guarded to protect the operator and other employees in the area from hazards of moving machine parts. Guards must be attached to the machine if possible. The guarding device must meet any specific standards issues by OSHA for the type of machine involved. If there is no specific standard, the guarding device must be designed and constructed to prevent the operator from having any part of his body in the danger zone during the operating cycle.

Bench and Pedestal Grinders

- Abrasive wheel safety guards should cover the spindle end, nut, and flange projections.

- Wheel safety guards should not expose the grinding wheel periphery for more than 65 degrees above the horizontal plane of the wheel spindle.
- The protecting member should be adjustable for variations in wheel size.
- The tongue guard should be adjusted to within one-quarter inch of the grinding wheel.
- An adjustable work rest of rigid construction should be used to support the work on offhand grinding machines.
- Work rests should be kept adjusted closely to the wheel with a maximum clearance of one-eighth of an inch.
- All machines designed for a fixed location must be securely anchored to prevent walking or moving.

Air Compressors

- Guarding should be provided to protect employees from hazards such as those created by point of operation, nip points, rotation parts, flying chips and sparks.
- These guards should be such that they do not create a hazard themselves.
- All belts, pulleys, sprockets and chains, flywheels, shafting, and shaft projections, gears, and couplings, or other rotating or reciprocating parts, or any portion thereof, within seven feet of the floor or working platform should be effectively guarded.
- Guards for power transmission equipment should be made of metal or other suitable material.
- OSHA requirements dictate that in the event of an airline blockage, the static pressure to the point of blockage be no more than 30 psi.
- Only safety air guns will be allowed for blowing off debris. Effective chip guarding will be obtained through safety eyewear and/or the safety gun itself.

Cooling Fans

- If the periphery of the blades of a fan is less than seven feet above the floor or working level, the blades should be guarded.
- The guard should have opening no larger than one-half inch in their least dimension.

- Use material that is sufficiently strong with one-half inch opening to modify existing substandard guards is acceptable.

Power Tools

I. General Requirements

As with any safety issue, employee training is the key. Proper training in power tool safety should combine training by a qualified instructor with on-the-job training from a person experienced in the use of the tool. Trial and error is not the way to learn how to use power tools. Part of employee's training should always include a thorough reading of instruction manual that comes with the tool.

II. Employee Preparation

An employee should be properly trained and equipped with appropriate personal protective equipment. Employees should not wear loose clothing or jewelry that could be drawn into the tool. Employees should never operate power tools under the influence of alcohol, drugs that might affect mental acuity, or when fatigued.

III. Worksite Preparation

Clear obstructions that could interfere with safe work procedures. Provide adequate lighting. Make sure that employees don't have to overreach when using the tool. If necessary, provide scaffolding, manlifts, or ladders so that employees will have a firm stance and don't have to overreach to perform the task.

IV. Tool Preparation

The tool should be checked to make sure that it is in good working order and has all safety guards in place. The power supply cord or hose should be checked. Make sure that all accessories are properly rated for use with the tool. Make sure that saw blades and drill bits are sharp and in good condition.

V. Electrical Safety

Tool operators should follow the manufacturer's guidelines for electrical safety to protect the operator from shocks or electrocution.

Employers should provide tools that are double insulated, three wired cords with the ground wire connected, or a ground fault circuit interrupter. Power tools should not be used in damp or wet areas. If this can't be avoided, employees should wear gloves and footwear designed for working with electricity. Tools should be disconnected when not in use and before servicing them or changing accessories.

VI. Use the Tool Properly

Employees should use the right tool for the job, but should also use the right tool the right way.

Note: OSHA prohibits the use of compressed air for cleaning except if it is reduced to less than 30 pounds per square inch and effective chip guarding and personal protective equipment are used.

VII. Finishing the Job

The tool operator should inspect the tool before storing it at the end of the day and correct any problems. If a problem can't be fixed, the employee should report it to the supervisor or put a tag on the tool to alert others of the defect.

Hoists and Lifts

I. General Requirements

Operating automotive lifts is critical to your dealership. The proper use, installation and maintenance of the lifts will insure that your shops are productive, profitable, and safe.

II. Inspections

All lifts should be inspected on a daily basis. Repairs should be made following the manufacturer's requirements using parts approved by the manufacturer. Regularly scheduled maintenance should be done by a qualified lift technician or contractor.

III. Proper Training

Managers and team leaders are responsible for training technicians on the operation of the lift. The training should include:

- Proper spotting of the vehicle

- The use of vehicle manufacturer's lift points
- Lift capacity and that auxiliary adapters may reduce load capacity
- Always use safety stands when removing or installing heavy components
- There should only be authorized personnel in lift area

IV. Overriding Safety Mechanisms

No one should override the operating controls or safety devices. Regular inspection of the lifts by team leaders or managers should be conducted to insure that the operating controls are being used.

V. Proper Use of Automotive Lifts

- Never overload the lift
- Keep lift area free of obstructions. Keep area clean, free of grease, oil, trash, or other debris.
- Removal or installation of some components may cause the vehicle to shift. Refer to the manufacturer's guidelines when performing these operations.

Ladders

VI. General Requirements

OSHA has issued general industry standards for portable wood and metal ladders. The rules establish minimum requirements for the construction, care, and use of these ladders.

VII. Portable Wood Ladders

OSHA has issued the following guidelines for the care of portable wood ladders:

- a. Ladders should be maintained in good condition, the joint between the steps and side rails must be tight, all hardware and fittings must be securely attached, and the movable parts must operate freely without binding or undue play.
- b. Metal bearings of locks, wheels, and pulleys must be frequently lubricated.
- c. Frayed or badly worn rope must be replaced.

- d. Safety feet and other auxiliary equipment must be kept in good condition.
- e. Ladders must be inspected frequently and those that have developed defects must be taken out of service for repair or destruction and marked as “ Dangerous, Do Not Use”.
- f. Rungs must be kept free of grease and oil.

VIII. Portable Metal Ladders

OSHA has issued the following guidelines for the care of portable wood and metal ladders:

- a. Ladders must be maintained in good usable condition.
- b. If a ladder tips over, inspect it for side rail dents or bends or excessively dented rungs. Check all rung to rail connections and hardware connections. Check rivets for shear.
- c. If a ladder is exposed to oil and grease, it should be cleaned.
- d. Ladders with defects must be marked and taken out of service until repaired.

OSHA has issued the following the safety guidelines for using portable wood and metal ladders:

- Place the base of the ladder a distance from the vertical wall equal to one-fourth the working length of the ladder.
- Portable ladders are designed to support one person.
- The ladder base section must be placed with the two rails supported, unless equipped with a single support attachment.
- When ascending or descending, the climber must face the ladder.
- Ladders must not be tied or fastened together to make longer sections. The ladders must be equipped with the required hardware fittings if the manufacturer endorses extended uses.
- Ladders should not be used as a brace, skid, guy or gin pole, or gangway.
- Follow safety precautions working near electric circuits.

Forklift Operating Guidelines

Some of the Zimbrick, Inc. locations own and operate a powered industrial forklift. OSHA requires training for all employees who operate a forklift on employer premises.

A forklift is a four wheeled powered industrial truck. It's used to lift, move, stack, load, and unload various materials. They weight much more than a car, especially when loaded, and are much easier to tip over. A forklift can operate along any passageway that is wide enough to accommodate the vehicle and that can support the vehicle and its load.

Each type of forklift may have different hazards. Some hazards caused by improper operation of forklifts include:

- Falling loads caused by overloading or improper loading
- The vehicle falling from platforms, curbs, trailers, or other surfaces
- Driving while the operator has obstructed view in the direction of travel or is paying full attention
- Allowing employees other than the operator to ride on the forklift, and the passenger either falls from the vehicle or contacts some obstruction
- Hazards resulting from improper maintenance, such as carbon monoxide poisoning

The OSHA standard includes safety requirements for fire protection, design, maintenance, and use of fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines.

Forklift Operations

OSHA has established the following classifications of powered industrial trucks:

1. Diesel powered
2. Battery powered
3. Gasoline powered
4. Liquefied petroleum gas powered

In December 1998, OSHA issued revisions to the operator training provisions of the powered industrial truck standard. The key provision of

the new standard requires employers to implement a training program and ensure that only operators who have completed a training program are allowed to operate forklifts. The training program must include instruction in proper vehicle operation, the hazards of operating the vehicle in the workplace, and the requirements of the OSHA standard for powered industrial trucks.

The training must include a combination of the following elements:

- Formal instruction, such as classroom training, interactive computer learning, videos, and written material
- Practical training, such as demonstrations performed by the trainer and practical exercises performed by the trainee
- Evaluation of the operator's performance in the workplace

Employers must periodically evaluate operators (once every three years) to ensure that their skills remain at a high level. Employers must certify that each operator has been properly trained and evaluated. The certification must include the name of the operator, the date of training, the date of the evaluation, and the identity of the person performing the training and evaluation.

OSHA has issued the following rules for operation of powered industrial trucks:

1. Do not drive trucks up to anybody standing in front of a bench or other fixed object.
2. Do not stand or pass under the elevated portion of any truck, whether loaded or empty.
3. Do not allow unauthorized personnel to ride on trucks.
4. Do not place arms or legs between the uprights of the mast or outside the truck's running lines.
5. When a truck is left "unattended", load engaging means must be fully lowered, controls must be neutralized, power must be off, brakes must be set, and wheels must be blocked if the truck is parked on an incline. OSHA considers a powered industrial truck to be "unattended" when the operator is 25 feet or more away when the vehicle is in the operator's view, or whenever the operator leaves the vehicle and it is not in the operator's view. If the operator is off the truck and within 25 feet of the truck that is still within his or her view, the load

- engaging means must be fully lowered, controls neutralized, and brakes set.
6. Operators should keep forklifts a safe distance away from the edge of ramps or platforms while on elevated docks, platforms, or freight cars.
 7. Brakes must be set and wheels blocked on trucks, trailer, or railroad cars when loading or unloading. Fixed jacks may be required to support a semi-trailer during loading and unloading when the trailer is not coupled to a tractor.
 8. There must be sufficient headroom under overhead installations, such as lights, pipes, and sprinkler systems.
 9. Overhead guards must be used to protect against falling objects.
 10. Overhead guards are intended to provide protection from the impact of small falling objects, but not to withstand the impact of a falling capacity load.
 11. Load backrest extensions must be used if necessary to reduce the chance that the load will fall rearward.

Traveling

OSHA has specified the following rules that apply while a forklift is traveling:

1. Obey all traffic rules, including plant speed limits. Slow down on wet and slippery floors.
2. Avoid running over loose objects.
3. Slow down when going around turns.
4. Maintain a safe distance of approximately three truck lengths from the truck ahead.
5. Yield the right of way to emergency vehicles.
6. Do not pass other powered industrial trucks traveling in the same direction at intersections, blind spots, or other dangerous locations.
7. Slow down and blow the horn at cross aisles and other locations where vision is obstructed. If the load obstructs the operator's forward view, the operator must travel with the load trailing.
8. Cross railroad tracks diagonally if possible.
9. Look in the direction of travel and keep a clear view of the path ahead.
10. Ascend and descend grades slowly. When ascending or descending grades over 10 percent, loading truck must be driven with the load upgrade.

11. Stunt driving and horseplay is prohibited.

Department Managers responsible for the use of the forklift truck at each of Zimbrick, Inc.'s locations will be responsible for the training and enforcement of guidelines for forklift use by designated employees.

Hazard Communication Program

IX. Introduction

This hazard communication program is designed to ensure that all Zimbrick, Inc. locations are in compliance with OSHA's hazard communication standard. The standard is intended to ensure that the hazards of all chemicals used in the workplace are evaluated and that this information is made available to employees who use the chemicals.

Under this program, employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which employees work, safe handling procedures, and measures to take to protect employees from these chemicals. Employees will also be informed of the hazards associated with non-routine tasks, and the hazards associated with chemicals in unlabeled pipes.

X. Objective

The objective of the Hazard Communication Program is to prevent occupational injuries and illnesses related to chemical exposure by educating employees about workplace chemical hazards.

XI. Scope

The Hazard Communication Program applies to all work areas where hazardous chemicals are known to be present both under normal conditions and in a foreseeable emergency.

XII. Responsibilities

The following departments and managers are responsible for implementing the hazard communication program:

- Program coordination-_____
- Ensuring labeling of in store containers-_____
- Ensuring labeling of shipped containers-_____
- Obtaining and maintaining MSDS-_____
- Conducting training-_____

Supervisors are responsible for ensuring that their employees receive the appropriate training at the appropriate time. Employees are responsible for understanding and complying with all phases of Zimbrick, Inc.'s hazard communication program.

XIII. Hazardous Chemicals

The definition of "hazardous chemical" as given by OSHA is "any chemical which is a physical hazard or health hazard." Chemical physical hazard characteristics include substances that are:

- a. Combustible
- b. Compressed gases
- c. Explosive
- d. Flammable
- e. Organic peroxides
- f. Oxidizers
- g. Pyrophoric
- h. Unstable (reactive) or water reactive

Chemical health hazard includes substances that are:

1. Toxic or highly toxic
2. Irritants
3. Sensitizers
4. Carcinogens
5. Those with target organ effect

XIV. Chemical Inventory List

The manager of the service department and/or body shop has the responsibility to maintain an inventory list of known chemicals in the workplace. Any changes to the inventory list should be approved by the manager.

The chemical inventory list is available to employees during their work shift and is located in their work area. Employees who have questions about the chemical inventory list should contact their immediate supervisor.

XV. Container Labeling

Each container of hazardous chemicals must be labeled, tagged, or otherwise marked with the identity of the hazardous chemical or chemicals and appropriate hazard warnings. Labels and other forms of warning must be legible and in English, and will be prominently displayed or readily available in the work area during each shift.

All secondary containers also must be labeled according to the requirements of the hazard communication standard. Secondary containers are containers into which materials are transferred from “in-house” use, other than for immediate use by the employee filling the container. Secondary containers will be labeled with an extra copy of the original manufacturer’s label or with generic labels that have a space to enter the identity of the chemical and a space for the hazard warning.

Zimbrick, Inc. will strive to label the contents of all piping containing hazardous chemicals. Before working on a pipe, employees should contact their supervisors for information on the identity of the chemical in the pipe, the potential hazards of the chemical, and safety precautions that should be observed.

XVI. Material Safety Data Sheets (MSDS)

MSDS’s are written or printed material concerning product hazard determination, which are prepared and distributed with chemicals by chemical manufacturers and distributors. MSDS’s are written in English and contain the following information:

- Identity of the chemical as provided on the container label
- Physical and chemical characteristics of the material
- Physical hazards of the material
- Primary route(s) of entry
- Exposure limits, Threshold Limit Value (TLV), OSHA Permissible Exposure Limit (PEL), or supplier recommended limits
- Whether or not the material or components have been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC), National Toxicology Program (NTP), or by OSHA
- Applicable precautions for safe handling and use
- Applicable control measures
- Emergency and first-aid procedures
- Date of preparation or date of last change
- Name, address and telephone number of the chemical manufacturer, importer, employer or other responsible party, who can provide additional information.

In the event a MSDS is not available, use the following procedures to obtain MSDS's:

1. The supplier will be contacted by telephone and letter, and all correspondence and communication documented as proof of effort to comply.
2. If a supplier should not satisfy the first written request within 30 days, a second written request for a MSDS should be sent to the supplier and the Department of Labor will be contacted if the MSDS is not received within 15 days.
3. All requests to suppliers and the Department of Labor including letters and telephone calls must be documented and maintained on file.

MSDS's are kept at all locations and will be kept so that they are readily accessible by employees during each work shift.

XVII. Employee Training

All new employees who may be exposed to hazardous chemicals must be trained in the requirements of the hazard communication standard. Employees will receive initial training before starting work and will receive additional training if required by changes in job assignments or if new hazards are introduced into the work area. This training is documented in the “New Employee Safety Orientation Checklist”.

Hazardous communication training will cover the following topics:

- An explanation of the hazard communication standard and Zimbrick, Inc.’s program
- A review of the chemicals present in the work area, including the physical and health hazards associated with the materials
- The location and availability of the written hazard communication program and MSDS
- Procedures to be used to detect the presence or release of hazardous chemicals
- Instructions on minimizing exposure to hazardous chemicals through the use of work practices, good housekeeping procedures, engineering controls and personal protective equipment. For example:
 - ❖ Eating, drinking and smoking are prohibited in areas where hazardous chemicals are used. Such restrictions are necessary to avoid “cross contamination”. Cross contamination commonly occurs when a worker’s contaminated hand or glove transfers a hazardous substance to food or a cigarette, from which the hazardous chemicals are ingested or absorbed into the worker’s body.
- Emergency procedures to follow if an employee is exposed to a chemical
- Instructions on reading warning labels and MSDS
- Who to contact to get additional information

XVIII. Non-Routine Work

Employees occasionally may be assigned to perform non-routine tasks during which they may be exposed to hazardous chemicals. Before starting these tasks, supervisors should inform affected employees about the hazards to which they may be exposed.

Supervisors should inform these employees of the following:

- Specific chemical standards
- Protective measures that the employee must use
- Measures that have been taken to minimize the hazards, including ventilation, respirators, presence of another employee, and emergency procedures

Employees share in the responsibility by ensuring their immediate supervisor knows that non-routine work will be performed. Employees should contact their immediate supervisor with questions concerning non-routine work.

XIX. Contractors

It is Zimbrick, Inc.'s policy that when contractors are working on Zimbrick, Inc. property they must comply with all OSHA standards and requirements, where applicable. The Hazard Communication standard requires all contractors working on company property to be informed by the general manager concerning applicable workplace hazardous chemicals which the contractor's employees may be exposed to while performing their work and of appropriate protective measures. This information is provided so contractor employers can properly train their employees. In addition, the contractors will inform the general manager about hazardous chemicals that the contractor brings onto Zimbrick, Inc. property so that precautions can be taken.

Lockout/Tagout Program

XX. Purpose

The purpose of this lockout/tagout program is to prevent employee injuries that can occur during unexpected start-up or energizing of machines or equipment. Performing maintenance or servicing on machines can be dangerous unless the power supply is discontinued and the machinery is isolated from other energy sources.

This document describes when lockout/tagout must be used, devices for lockout/tagout, appropriate procedures, training requirements, inspection procedures, and procedures to be followed by outside personnel servicing or maintaining company machinery. Only employees trained and authorized to lockout/tagout equipment may do so. As a general rule, only the individual who implements a lockout/tagout is authorized to remove it. Employees must not attempt to start, energize, or use any machine or equipment that is locked/tagged out.

XXI. Responsibilities

Department Managers are responsible for:

- a. Ensuring that adequate training is provided to all affected employees
- b. Supplying departments with lockout/tagout devices
- c. Ensuring that all departments comply with lockout/tagout procedures
- d. Reviewing this program annually and updating procedures as needed

Supervisors are responsible for enforcing lockout/tagout procedures and for ensuring that their employees understand all elements of the lockout/tagout program.

Employees are responsible for participating in training and complying with all lockout/tagout procedures. Failure to comply with lockout/tagout procedures may result in discipline, up to and including termination of employment.

XXII. Machines To Be Locked/Tagged Out

All of the following equipment and machinery must be locked/tagged out prior to service or maintenance:

List Equipment:

Other equipment and machinery not listed here also may require lockout/tagout.

Some machines do not require lockout/tagout for servicing if the following conditions are met:

- The machine is connected to it's power source by a plug, AND
- The plug remains disconnected and under the control of the employee working on the machine for the duration of the work.

XXIII. Devices for Lockout/Tagout

Zimbrick, Inc. makes use of individual lockout as well as group lockout devices. Group lockout devices are used on machines if more than one employee is performing service or maintenance on the machine or equipment. The department manager is responsible for supplying all necessary lockout/tagout devices to each department.

Lockout devices are readily available. Each worker is responsible for carrying his or her own key to the lockout devices issued to that employee. The department manager has a master key available for emergency use on a 24-hour basis.

Group lockout devices are used on machines when more than one employee is performing service or maintenance on the machine. The group lockout device used for all stores can be used with up to five individual locks. Group lockout devices are kept by the supervisor responsible for the machinery requiring multiple lockout devices.

Tagout devices are used in all stores to warn others that the machine is being serviced. The tags used in this store have spaces to write (in ink) the time and date that the tag was placed, the expected time the tag will be in place, and the name and signature of the employee placing the tag. These tags must be applied using the self-locking nylon fastener attached to the tag, and must be removed by cutting with scissors. Tags are never reused.

XXIV. Procedures For Lockout/Tagout

See the appendices to this document for detailed lockout/tagout procedures for each type of machine listed above (see “Machines to be Locked/Tagged Out”). The following are general procedures for lockout/tagout. Workers should contact the department manager before servicing or repairing machinery if there is any question about how to implement a lockout/tagout.

XXV. Equipment or Machine Shutdown

Supervisors must ensure that employees understand the effects of shutting down the equipment or machinery. The employee shutting down the equipment or machine must do so according to the procedures for that machine. General procedures for shutting down equipment are as follows:

- Warn all other workers who may be affected by the shutdown
- Place the energy control mechanisms in the “safe” or “off” position
- Release any stored energy – e.g., hydraulic systems, air or gas pressure – as described in the procedures for the equipment or machinery
- Ensure that the machine or equipment is isolated from other hazards

XXVI. Lockout/Tagout

The employee implementing the lockout/tagout must:

- Place a lockout and tagout device on each energy control point of the machine or equipment
- Write his or her name and the time and date of the lockout/tagout on the tagout device (the employee also should include relevant contact information, such as a pager number)
- Verify that the machine or equipment is incapable of working or is otherwise isolated from hazardous releases of energy.

When there is a shift change while lockout/tagout devices are in place, off-going shift employees will remove their lockout/tagout devices in

the presence of oncoming shift employees. The working areas of the machine or equipment must be clear of personnel and equipment during the change. Oncoming shift employees will then apply their own lockout/tagout devices, verify that the equipment or machine is isolated from hazards, and proceed with work.

XXVII. Returning The Machine Or Equipment To Service

After work is completed, the employee who implemented the lockout/tagout must:

- Remove all tools and materials from the machine
- Alert employees in the area that the lockout/tagout is being removed and that they should remain clear of the machinery while it is being re-energized
- Re-energize the machine according to the procedures specific to the machine or equipment
- Verify that the machine is operating normally and safely before allowing a resumption of work in the machine's vicinity

As a general rule, only the employee who implemented a lockout/tagout may remove it. However, if that employee is unavailable to remove a lockout/tagout device, the device may be removed with the approval of the department manager. Before giving approval, the department manager must verify that the employee who applied the device is not at the facility. Every effort must be made to inform the employee that his or her lockout/tagout device has been removed.

XXVIII. Inspections

Inspections of lockout/tagout procedures are conducted annually by the department manager to ensure that the procedures are being carried out correctly and that the procedures are adequate to protect employees servicing or repairing machinery.

The department manager is responsible for reviewing lockout/tagout procedures with all employees authorized to implement

lockout/tagouts. This review will be accomplished at a meeting with all affected staff. The department manager also will walk through lockout/tagout procedures with a representative number of employees. One walk through will be conducted for each type of equipments listed above (see “Machines To Be Locked/Tagged Out”).

The department manager will certify that the inspection took place by creating and signing a memorandum with the following information:

- The date(s) of the employee meeting and walkthroughs
- The identity of the machine or equipment for which walkthroughs were conducted
- The names of the employees attending the meeting and participating in the walkthroughs
- Any deficiencies uncovered – e.g., deficiencies in procedures, training, or supervision
- Any employee concerns or suggestions for improving Zimbrick, Inc.’s lockout/tagout program

XXIX. Employee Training

All employees will receiver training in recognizing lockout/tagout devices as part of their safety orientation and periodic refresher training. Employees who service or maintain machines or equipment (except machines or equipment excluded from lockout/tagout requirements – see “Machines To Be Locked/Tagged Out”) will be trained in hazards and operation of the equipment, along with lockout/tagout procedures. Additional training will be provided if equipment, procedures, or employee responsibilities change.

The department manager is responsible for documenting:

- Training dates
- Participant names
- The content covered in the training
- Standards by which employees’ are evaluated on what they learned

XXX. Outside Personnel

All outside contractors who service or maintain machinery or equipment must receive training and comply with procedures specified in this document. At a minimum, supervisors must ensure that contractor personnel understand not to restart or re-energize machines or equipment that are locked/tagged out.

Manual Lifting and Handling Guidelines and Training

XXXI. Lifting Guidelines

Manual lifting and material handling must be accomplished using methods that ensure the safety of both employees and the materials. Zimbrick, Inc.'s policy requires employees whose work assignments involve heavy or repetitive lifting to be properly trained. These guidelines are intended to reinforce safe-lifting principles, but are not intended as a substitute for training.

XXXII. Preparation

Study the situation before beginning to lift the object. Review these issues to decide the best way to accomplish the lift:

- a. Assess the weight of the object and the distance to be covered.
Do you need additional personnel or equipment?
- b. Survey the pickup and delivery area for:
 1. Tripping hazards
 2. Slippery spots
 3. Tight doorways, low overhead ceilings or spans, or sharp turns, (have a tape measure handy to determine object dimensions and the available clearance room)
 4. Blind spots and potential sources of interfering pedestrian or motor traffic
- c. Inspect the object for sharp corners, staples, splinters, or slivers. Lightweight work gloves with a non-slip grip area might be helpful for some lifts.
- d. Identify appropriate handholds. These may be marked on some boxes, crates, and equipment. However, always consult equipment manuals if you have any doubt about appropriate handholds.

- e. See Section IV, “Team Lifting”, if the lift will require more than one worker.

XXXIII. Manual Lifting

Follow these guidelines when lifting and carrying an object:

- Make sure you have good footing. Set your feet about 10 to 15 inches apart. For some lifts, it might be helpful to have one foot slightly in front of the other. For instance, place one foot close to the side of the object to provide stability and one behind the object to provide lift or thrust.
- Assume a knee-bend or squatting position, keeping you back straight and upright.
- Get a firm grip on the load. Use a full-palm grip to hold the load. Never grip the load with just your fingers. Use any available handles or cutouts that make grasping easier and allow items to be carried near the body.
- Keep your back straight. Your back should be aligned from head to pelvis. Hold in your abdominal muscles to stabilize your back and to maintain proper back alignment.
- Do the actual lifting with you legs.
- Carry the load close to your body, (not on extended arms). Ideally, items should be carried slightly below waist level. Walk upright and avoid stooping.
- To turn or change your position, shift your feet – don’t twist your torso.
- Recognize that your gripping power will weaken over long distances. Lower the object using your legs when the load is too heavy. Communicate to others who are in the area or are assisting with the lift before setting the load down to rest.
- Maintain the same body mechanics when you lower objects – i.e., keep your back straight and lower the load with your legs.
- Provide adequate recovery time before attempting the next lift.

XXXIV. Team Lifting

When lifting large, awkward, or heavy loads, teams should follow the guidelines listed below:

- Review the lift preparation items covered in Section II or these guidelines.
- Ensure that you have an adequate number of personnel for the lift. Lift usually will be easier if the personnel involved are similar heights.
- Personnel should discuss and agree on a lifting plan prior to picking up the object. One person should be designated to give the commands to lift and lower the load. Personnel assisting with the lift should communicate to the leader if they need a rest or need to adjust their grip.
- Arrange personnel appropriately if the object's weight is disproportionately distributed toward one side. Also, more people usually will be required on the first side of an object going down stairs or an incline.
- Each person should use the body mechanics discussed in Section III of these guidelines when lifting the object.
- When two persons carry a long piece of pipe or lumber, they should carry it on the same shoulder and walk in step. Use shoulder pads to prevent cutting into shoulders and to help reduce fatigue.

XXXV. Mechanical Lifting

Mechanical devices must be used for lifting and moving objects that are too heavy or bulky for safe manual handling by employees. Employees who have not been trained must not operate power-driven mechanical devices to lift or move objects of any weight. Heavy objects that require special handling or rigging must be moved only by riggers or under the guidance of employees who have been specifically trained and certified to move such objects.

Follow these rules when using mechanical lifting and moving devices:

- The equipment used must be appropriate for the lifting or moving task.
- Verify that current inspection stickers and proof load tags are in place on all primary lifting equipment for hoists and cranes.
- Make sure that defective equipment is repaired before it is used.
- Do not exceed the rated load capacity of lifting equipment.

- Drive forklifts forward going up a ramp and backward going down a ramp.
- Do not allow traffic or personnel to pass under a raised load.
- Do not allow passengers to be carried on lifting equipment unless it is specifically equipped to carry passengers.
- Select the load path to eliminate the possibility of injury to employees should the material-handling equipment fail.
- Never leave a suspended load unattended. Lower it to the working surface and secure the material-handling equipment before leaving the load.

Safe Driving Program and Vehicle Safety

XXXVI. Policy Statement

Vehicle safety is a management responsibility to develop, implement and effectively direct. Goals of the Zimbrick Safe Driving Program are to reduce vehicle accidents involving bodily injury and/or property damage; reduce operating costs; and protect the public and our employees.

Our Safe Driving Program requires commitment from all employees.

XXXVII. Driver Selection

Every effort will be made to hire the most qualified person to drive company vehicles. Management should make sure that every new hire has been chosen based on quality information gathered during the interview process. Such as:

- a. A completed application form
- b. A valid and current drivers' license for the state of vehicle operation
- c. A check of previous employer references
- d. Successful completion of the trial period

XXXVIII. Driver Training

The most important aspect of our Safe Driving Program is to ensure hired drivers receive the proper training in safe vehicle operation.

Each employee who will be driving company vehicles should receive from their supervisor:

- a. Orientation on company policy for vehicle safety
- b. Review of rules and procedures stressing the driver's responsibilities for vehicle safety
- c. On the job training covering vehicles to be used, maintenance and safe work practices
- d. Continued training as needed based on periodic performance evaluations

XXXIX. Driver Supervision

A manager's attitude toward safe driving can affect the performance of drivers responsible to the department. Managers should be held accountable for safety performance in their department by the general manager. Managers should supervise through proper and safe job performance:

- a. Observation of the driver's performance
- b. Periodic review of driver personnel file/MVR
- c. Listening to comments and/or complaints of others
- d. Remaining alert to personality or performance changes
- e. Evaluating vehicle use (or abuse) and maintenance practices
- f. Always encouraging a safe and high level of performance

XL. Accident Investigation/Reporting

The primary purpose for accident investigation is to determine the cause of the accident to implement corrective action to prevent similar recurrences. It can also assist management to determine whether an accident was preventable or not. Some procedures are:

- a. All accidents should be reported, investigated and reviewed to standard procedures
- b. Accident report forms, witness cards, and list of persons/telephone number to contact should be in every owned vehicle
- c. Initial investigation should be done by the immediate supervisor of the employee involved

XLI. Vehicle Operating Safety Rules

Some safety rules to consider:

- a. Drive slowly in all store lots. Extra caution should always be used driving in and out of service drives and around buildings.
- b. Do not take chances. To arrive safely is more important than to arrive on time.
- c. Do not drive faster than posted speed limits.
- d. Do not drive faster than road, traffic, and weather conditions allow.
- e. Do not attempt to exercise the right of way. Let the other driver go first.
- f. Keep to right lane except when passing or getting into position to make left turn.
- g. Keep adequate distance when following vehicle to make a safe stop.
- h. Turn signals must be used at all times to indicate turns and lane changes.
- i. Slow down for all school zones and watch for children in school zones.
- j. Driving under the influence of alcohol or drugs is prohibited.
- k. Drivers must have a valid drivers' license on their person at all times for type of vehicle they are driving.
- l. Driver's physical condition must enable them to operate vehicle safely.
- m. Vehicles are to be driven by authorized drivers only.
- n. Drivers must report all accidents immediately, or as required by law and company policy.

Welding, Cutting and Brazing Training Program

XLII. Purpose

This policy establishes a policy for managing welding and cutting hazards. Welding and cutting is defined by the OSHA General Industry Standard 29 CFR 1910.252 and the Construction Standard 29 CFR 1926.351. This policy covers our intent to be in full compliance with these standards.

XLIII. Scope

This policy will apply to all employees who conduct hot work operations as well as contractors.

XLIV. Overview

The training will cover procedures and policies governing welding, cutting and brazing.

XLV. Training Objectives

Upon completion of training, the welder or cutter will:

- a. Understand the hazards involved
- b. Know proper procedures for safe welding and cutting operations
- c. Know inspection and maintenance procedures

XLVI. Training Activity Outline

- a. **General Operator Training** – This training is usually conducted as a separate course or study to teach the employee how to weld and cut. *Note: This training program assumes the employee knows how to weld or cut. The purpose of this program is to convey safety and health information to the employee for specific hazards that he employee will encounter in the workplace during welding and cutting operations.*
- b. **Storage and Marking** – Storage and marking welding supplies and equipment will be accomplished according to department procedures.
- c. **Inspection and Maintenance** – Employees are responsible for inspecting and maintaining welding equipment. Employees will inspect the welding equipment at the beginning of each shift or after welding equipment has been moved to a new location to ensure the equipment has been properly set up.
- d. **Set-up and Hook-up Procedures** – These procedures depend upon the process. Welders and cutters shall be trained to identify hazards specific to a given workplace and set-up

welding accordingly. Welders and cutters will consult with the supervisor when they encounter new hazards.

- e. **Fire and Control Measures** – Welders and cutters will ensure the appropriate clearance around the welding and cutting area are established, fire extinguishing equipment appropriate to the hazard is available, and fire watchers are posted.
- f. **Special Environmental Conditions** – Supervisors will analyze new workplaces to identify potential welding and cutting hazards and brief welders and cutters on hazardous conditions likely to be encountered in a given workplace. Supervisors and the welder/cutter will develop safety procedures for such conditions and agree on the procedures before welding or cutting operations begin.

XLVII. Supervisor Training

Supervisors will know:

- a. Procedures and protective equipment requirements
- b. Maintenance and inspection requirements for welding and cutting equipment
- c. Required training for welders and cutters

XLVIII. Hand and Body Protection

Welding will never be accomplished wearing casual or street clothing. Specific clothing and body protection is necessary and required of all welders and cutters. The basic requirements are:

- a. Long-sleeved shirts made of heavy cotton. Synthetic material such as polyester is prohibited.
- b. All collars and sleeves shall be tightly buttoned. Metal zippers, cuffs, and open pockets are prohibited.
- c. Clothing shall be clean and free of grease and oils that could ignite.
- d. Leather aprons and gloves will be worn at all times. Welders will use the appropriate gloves to prevent electric shock when arc welding.
- e. Appropriate face and eye protection that is determined by the operation will be worn at all times.

XLIX. Respiratory Protection

Welding and cutting creates fumes that need adequate ventilation or respiratory protection for the welder or cutter. The department manager and the welder/cutter will evaluate the workplace to determine ventilation needs based on the areas ventilation capability, the material being welded or cut and the type of welding rods being used. If necessary, the welder or cutter will wear respiratory equipment appropriate to the hazard.

Slips, Trips and Falls Hazards

L. General Information

One of the greatest workers compensation and liability exposures confronting dealerships is a slip and fall incident. A fall can result in the loss of valued employee or the filing of a third-party lawsuit. In either case, the dealership often suffers an incalculable loss. Many of these incidents can be prevented.

Two of the most common causes of slips and falls are a slippery walking surface, (either by design – a waxed tile floor; or by contamination – ice, oil, grease, etc.). If these conditions can be avoided or controlled, many slips and falls can be prevented.

High traffic areas for employees and customers should be evaluated closely for unsafe walking conditions. These areas include the sales lots, customer service drive, customer waiting areas, showroom floor, restrooms and service bays. All identified hazards should be taken care of immediately.

LI. High Traffic Areas

- a. Stairs should be in good condition, of equal height and well lit.
- b. Stairs with three or more steps should be equipped with a handrail.
- c. Curbs should be highlighted to warn of the change in height.

- d. Exterior lighting should be adequate and checked frequently for malfunctioning fixtures.
- e. Lot surfaces should be in good repair and free of holes and other obstructions.
- f. A self-inspection program should be implemented to identify hazards and assure that necessary repairs are made promptly.
- g. All inspection programs should be documented and include follow-up procedures.
- h. Redirect downspouts that empty onto walkways. They can create a slip hazard during winter and summer months.
- i. Floor spills should never be left unattended, (especially in customer traffic areas), and should be cleaned up immediately. Post a “Caution – Wet Floor” sign.
- j. An oil absorbing material should be available for use on oil spills.
- k. All entrances into the building should have mats or rugs to help keep the floors clean and dry, especially during inclement weather.
- l. Entrances should be free of obstructions, including promotional displays.
- m. Aisles and hallways should also be free of obstructions.

LII. Snow and Ice Removal

- a. Be prepared in advance for snow and ice.
- b. A snow and ice removal program should be developed and implemented. A single person should be assigned responsibility for monitoring and coordinating the effort.
- c. Assign a coordinator to coordinate in-house snow removal efforts and/or those of professional snow removal contractors.
- d. Have appropriate equipment, tools, and supplies ready for use by internal personnel.
- e. Professional snow removal companies should be contracted/retained in advance of cold weather.
- f. This service should include regular checks on location, 24 hour and on capabilities.
- g. Record pertinent data on a snow/ice removal log.
- h. Allow sufficient time for treatment to take full effect.

- i. High piles of snow can reduce visibility in vehicle traffic areas, especially at corners.
- j. Accident/incident investigations should be conducted immediately.

LIII. Prevention of Trips

Trips account for a significant portion of the general statistical category of falls, and as such should not be discounted. Trips occur when a pedestrian's foot is hindered while walking, usually as a result of striking some type of obstruction. However, trips can also occur where there are unseen elevation changes, and on stairs where improper stair geometry exists.

LIV. Investigation of Slips, Trips, and Falls

The importance of thorough investigations of falls cannot be stressed enough. Proper documentation and investigation can give insight into possible housekeeping and/or maintenance problems. A thoroughly performed investigation enables informed decision making possibilities, which are lost in poorly executed investigations. It can also lead to remedial action(s) that can prevent future accidents.

Smoking and Fire Safety

LV. General Information

Smoking must be evaluated in light of its potential for causing a fire at any one of the Zimbrick, Inc. locations. Gasoline, brake cleaner, flammable paints and thinners are present in large quantities throughout the dealership. The fire hazard created by cigarettes, matches, and other smoking materials must be controlled.

Workplace controls for smoking should include:

- Smoking should be prohibited in hazardous areas including:
 1. Paint mixing room
 2. Spray paint booths
 3. Oil storage areas

4. Waste oil storage
 5. Parts warehouse areas
 6. Battery charging stations
- Post “NO SMOKING” signs in all hazardous areas.
 - Provide proper receptacles at the entrances to all buildings.
 - Establish safe smoking areas.
 - Provide proper receptacles in areas where smoking is allowed.
 - Educate employees and strictly enforce all established rules.

Workplace Violence Prevention Program

All Zimbrick, Inc. locations are concerned and committed to our employees’ safety and health. We refuse to tolerate violence in the workplace and will make every effort to prevent violent incidents from occurring by implementing a Workplace Violence Prevention Program (WPVP). We will provide adequate authority and budgetary resources to responsible parties so that our goals and responsibilities can be met.

Employees that engage in any violence in the workplace, or threaten violence in the workplace, will be terminated immediately for cause. None of the Zimbrick, Inc. locations will tolerate joking about violence. “Violence” includes physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, and threatening or talking about engaging in those activities. Zimbrick, Inc. specifically prohibits the possession of weapons by any employee while on company property.

All managers and supervisors are responsible for implementing and maintaining our WPVP program. We encourage employee participation in designing and implementing our program. We require prompt and accurate reporting of all violent incidents whether or not physical injury has occurred. We will not discriminate against victims of workplace violence.

Our program ensures that all employees, including supervisors and managers, follow work practices that are designed to make the workplace more secure, and do not engage in verbal threats or physical actions that create a security hazard for others in the workplace. All employees, including managers and supervisors, are responsible for using safe work

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practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe and secure work environment.

Employees should report any incidents of workplace violence. All reports will be investigated and kept confidential. Access to Zimbrick, Inc.'s property is limited to those with a legitimate business interest. Employees that see suspicious individuals on the premises should contact their manager or general manager.

Our program will be reviewed and updated periodically. A copy of this Policy Statement is readily available to all employees from each manager and supervisor.

Injury/Accident Report

This form should be completed as soon after the accident as possible. It should be the responsibility of the supervisor or department manager to complete this form.

**Name of
Employee:** _____

Location: _____

Department: _____

**Job
Title:** _____

Supervisor: _____

Date of Accident: _____

Time of Accident: _____

Location of Accident: _____

Describe the chain of events that led to the accident or near miss:

1. _____

2. _____

3. _____

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4. _____

5. _____

6. _____

7. _____

Describe prevailing conditions or environmental factors that could have contributed to the accident or near miss:

- Lighting
- Temperature
- Precipitation
- Other Conditions

Describe other factors that may have contributed to the accident or near miss:

- Training
- Procedures
- Other _____

Describe the location where the accident took place. List any evidence collected from the accident scene:

List any witnesses to the accident:

Describe the victim's injury (indicate body part affected, type of injury, and severity of injury):

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Describe any first aid or medical treatment provided to the victim:

Your Name: _____

Title: _____

Signature: _____

Date Prepared: _____

Modified Duty and Return to Work Program

LVI. Employee Reminders

- If you must seek medical attention for a work related injury or illness, it is necessary to tell the treating physician about Zimbrick, Inc.'s Return to Work and Modified Duty Program.
- Unless otherwise directed, you are expected to return to work with any medical restrictions on the same day as the accident, or if time prohibits, the following day. If there is a question, call your supervisor.
- Make sure that your doctor explains all of your medical restrictions.
- Do not attempt tasks that exceed your restrictions. If you have questions about your tasks, talk to your supervisor.
- If you feel that you can perform certain tasks that exceed current restrictions, talk to your doctor and get new restrictions (in writing) that allow you perform these tasks.
- The medical restrictions are in effect 24 hour per day. Be careful during non-work hours to be sure that the restrictions are maintained. If you have hobbies or outside interests, talk to your doctor about possible conflicts. Follow your doctor's instructions.
- Any employee who engages in activities that are inconsistent with medical restrictions and/or treatment patterns, whether on or off the job, is subject to possible disciplinary action.

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