

Forklift Safety Program (RPP) (29 CFR 1910.178)

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Program Statement

A & L Cesspool
Service Corp.

A & L Forklift Safety Program (FSP)

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A & L Forklift Safety Program (FSP)

Policy Statement

It shall be the policy of the company to attempt to provide a safe environment for our workers and the community to which we all belong.

Forklift Safety Program (FSP)¹

The company FSP is designed to address the company policy by:

- 1) Creating a program that conforms to regulatory standards;
- 2) Educating all personnel about the program;
- 3) Enforcing the program and compliance standards.

Vision

An accident and incident free environment.

Mission

Make safety a habit.

Objectives

- 1) Deploy a training program;
- 2) Monitor, record and report program compliance;
- 3) Evaluate performance;
- 4) Correct any deficiencies.

Marc Forte
Principal

Date

¹ This document is the newest revision of the Respiratory Protection Program.

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Program Statement

Program Overview

OSHA administers a federally required program under 29 CFR 1910.178, which requires the company to incorporate the following:

- 1) Create a Forklift Safety Program (FSP);
- 2) Determine which are the affected employees;
- 3) Have the affected employees trained and certified;
- 4) Determine affected job sites;
- 5) Obtain and deploy related safety equipment;
- 6) Employ proper FSP controls;
- 7) Monitor and evaluate program compliance;
- 8) Maintain appropriate records.

Program Scope

All personnel working in the plant and who are engaged in certain processes and tasks (as outlined in the table below) must be enrolled in the Company's FSP.

Non-trained and non-certified personnel "may not" volunteer to operate any equipment they are not trained for and certified to operate. No supervisor may incentivize or reward non-certified personnel to operate this type of equipment or machinery. No supervisor may discipline non-certified personnel for refusing to operate this equipment or machinery.

Personnel participating in the program do so at no cost to themselves. The expense associated with training, medical evaluations and equipment will be borne by the Company.

Table 1: Special Work Processes Assessment	
PROCESS	ACTION
Operating the Forklift	Driving or maintaining the forklift

Program Application

A & L Cesspool has determined that personnel are exposed to hazards when:

- 1) Performing Forklift operations;
- 2) Working in the proximity of a forklift;
- 3) Preparing items for forklift transportation.

These hazards include:

- 1) Moving the forklift in areas that are covered in grease and located in slippery areas;
- 2) Operating the forklift in areas that are populated with other employees;

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- 3) Operating the forklift in areas that have limited view on sloping and uneven terrain.

Possibly, in some cases, these situations may represent an Immediately Dangerous to Life or Health (IDLH) condition. The purpose of this program is to ensure that all personnel are protected from exposure to the hazards associated with these situations.

Not engaging in operations involving these situations are the first line of defense at A & L Cesspool (A & L); however, these measures are not always required or are not always feasible for some of our operations. In these situations, appropriate PPE Equipment and program procedures must be used. The work processes requiring special procedure use at A & L are outlined in this program.

General policy, A & L “DOES NOT PERMIT OPERATION” of forklift’s while using respirator protection, rather it is the policy of the company to “Clear the affected area” from any noxious or uncomfortable vapors or gases.

Program Implementation

Program Management

In order to evaluate the effectiveness and to monitor the implementation of this safety program, a Program Committee shall be established.

The committee (**See Addendum B. (The Program Committee)**) shall be appointed by the safety committee president and shall be comprised of the following:

Program Manager (PM): principal of the company;
Program Supervisor (PS): principal of the company;
Program Coordinator (PC): company safety coordinator.

Program Management Responsibilities

Program Manager

- 1) Understand applicable municipal regulations pertaining to the assigned program;
- 2) Designate program priorities using regulatory standards and job related safety concerns;
- 3) Evaluate the program statement for its compliance with regulatory standards and its applicability to job related safety concerns;
- 4) Monitor compliance with the program, enforce the program standards, sanction those not in compliance and evaluate program effectiveness;
- 5) Assign the PS;
- 6) Ensure the appropriate resources are available to implement the program effectively;
- 7) Identify work areas, processes or tasks that present potential hazards;
- 8) Select and monitor FSP equipment use to ensure proper deployment, maintenance, cleanliness, warranties;
- 9) Ensure selected employees are available for RPP training;
- 10) Monitor FSP certifications;
- 11) Ensure proper FSP storage procedures;
- 12) Administer and coordinate any medical surveillance responsibilities of the FSP;

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- 13) Ensure the PC has the appropriate resources to coordinate the program;
- 14) Participate in employee training;
- 15) Review contractor credentials and ensure contractor compliance with program standards;
- 16) Audit program record keeping;
- 17) Direct the PS to assist as necessary.

Program Supervisor

Assist the PM with all responsibilities above.

Program Coordinator

- 1) Understand applicable municipal regulations pertaining to the assigned program;
- 2) Draft and publish the program statement;
- 3) Coordinate employee training;
- 4) Monitor compliance with the program, enforce the program standards, report non-compliance and evaluate program effectiveness;
- 5) Keep program records and arrange for compliance reporting to regulators;

Program Compliance

Compliance Statement

Compliance with safety programs is a requirement for employment.

Affected and Covered Employees

All employees are subject to this program statement however, the applicability of this particular program statement is for all positions requiring an employee to operate a forklift.

Compliance Responsibilities

Supervisors

- 1) Become aware of municipal regulation and be thoroughly familiar with program policy;
- 2) Contribute suggestions to the program;
- 3) Ensure subordinate employees are trained, certified and licensed by the PM before engaging in FSP activities;
- 4) Lead-by-example;
- 5) Report accurately and truthfully all program non-compliance;
- 6) Cooperate fully and truthfully in all safety investigations;
- 7) Enforce program compliance.

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Employees

- 1) Become aware of municipal regulation and be thoroughly familiar with program policy;
- 2) If employee has not acquired a forklift license: then, employee may not ever operate a forklift without direct supervision of a licensed supervisor for training purposes only; or
- 3) Contribute suggestions to the program;
- 4) Train subordinate employees on the standards;
- 5) Report accurately and truthfully all program non-compliance;
- 6) Cooperate fully and truthfully in all safety investigations.

Contractors

- 1) Become aware of municipal regulation and be thoroughly familiar with program policy;
- 2) Abide by A & L FSP policy and procedures;
- 3) Submit Scope Of Work documentation;
- 4) Submit credentials for examination;
- 5) Report all program non-compliance;
- 6) Cooperate fully and truthfully in all safety investigations.

IDLH Warning

OSHA defines an Immediate Danger to Life or Health (IDLH) condition as:

“Any condition that poses an immediate or delayed threat to life or (... any condition) that would cause irreversible adverse health effects or (... any condition) that would interfere with an individual's ability to escape...”

At no time shall any personnel be exposed to any IDLH hazard without the proper training, certification, evaluation and PPE.

At no time shall any person:

- 1) Under the age of 18 be allowed to operate a forklift;
- 2) Other than the forklift operator, touch the forklift while the forklift is energized or moving;
- 3) Other than the forklift operator, sit or ride-on any part of the forklift;
- 4) Use the forklift forks as a mechanism or platform to raise themselves or another off the ground;
- 5) Use the forklift as a towing mechanism.

Selection and Control Processes

The PM will select PPE to be used based on the hazards to which workers are exposed and in accordance with all OSHA standards.

The PM will conduct a hazard evaluation for each operation, process or work area where hazards may be present in routine operations or during an emergency.

The hazard evaluation will include:

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- 1) An identification and development of a list of hazardous substances used in the workplace, identified by department, or work process.
- 2) A review of work processes to determine where potential exposures to these hazardous substances may occur. The review shall be conducted by surveying the workplace, reviewing process records, and talking with Personnel and supervisors. Updating Hazard Assessment

The PM must revise and update the hazardous assessment as needed. Should personnel feel that any or additional assessment is needed, they are to contact a supervisor, or any program committee member. The PM or PS will evaluate potential hazards and arrange for additional assistance if necessary. The PM or PS will then communicate the result of that assessment back to the affected personnel.

Table 2: FSP Hazard Assessment at A & L Cesspool

DEPARTMENT	JOB	HAZARD	MINIMUM UNPROTECTED	CONTROLS
Facilities	Transporting Material	General Operations (INDOORS)	N/A	WEAR EYEWEAR, HEARING PROTECTION, APPROPRIATE DRESS AND BOOTS. ALWAYS WEAR SEATBELT
		Grease and Slippery Surfaces Inability to stop as perceived	N/A	SAME AS ABOVE SLOW FORKLIFT DOWN AND BRAKE SOONER THAN WHAT MAY APPEAR TO BE NECESSARY

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		Uneven Terrain Possible Forklift Flip Hazard Possible Transport Drop Hazard	N/A	SAME AS ABOVE SLOW FORKLIFT DOWN AND BRAKE SOONER THAN WHAT MAY APPEAR TO BE NECESSARY
Facilities	Transporting	General Operations	NONE	WEAR APPROPRIATE DRESS AND BOOTS.
		Blind Spots	NONE	SAME AS ABOVE SLOW FORKLIFT DOWN AND BRAKE SOONER THAN WHAT MAY APPEAR TO BE NECESSARY
		Slopes, Greasy Wheels and Snow	NONE	SAME AS ABOVE ANGLE FORKLIFT APPROPRIATELY AND/OR SLOW FORKLIFT DOWN AND BRAKE SOONER THAN WHAT MAY APPEAR TO BE NECESSARY

Forklift Procedures

General

- 1) Never operate the forklift without certification, approval and a forklift license;

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- 2) Never operate the forklift unsafely or in unsafe areas;
- 3) Alert all affected personnel of impending forklift use “BEFORE ENGAGING FORKLIFT”;
- 4) Never use the forklift without wearing appropriate PPE;
- 5) Never walk-away while the forklift is engaged;
- 6) Never walk-beside the forklift when it is engaged;
- 7) Never give anyone a ride on the forklift;
- 8) When finished, always return the forklift to a state of proper storage.

Operating the Forklift

- 1) Perform a daily pre-operation inspection. Ensure the Forklift has a Fire Extinguisher; then
- 2) Conduct an inspection of the route that you are expected to travel; then
- 3) Conduct an inspection of the load that you are going to move; then
- 4) Notify all affected personnel of start-up; then
- 5) Do a visual 360 degree check of the area to ensure no hazards; then
- 6) ENGAGE THE SEATBELT; then
- 7) Start-up the machine; then
- 8) Power-down by parking the forklift in the appropriate area, then
- 9) Secure all brakes and rest forks on the ground, then turn-off; then
- 10) Conduct a post-operation inspection with the same pre-operation checklist.

Emergency Procedures

In the event of an emergency, forklift operations shall incorporate the following procedures:

Actions:

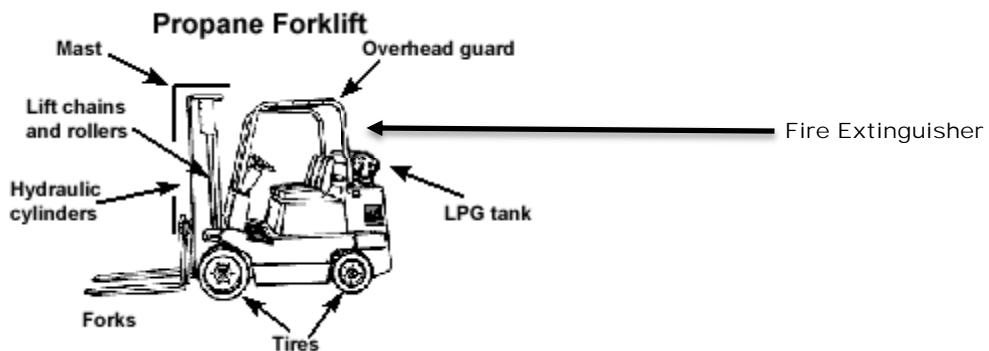
- 1) The first person to the scene is designated as the attendant and the attendant shall immediately call-out or take another action to acquire assistance from other persons;
- 2) The attendant shall make sure that the site is secure from any other person possibly being injured;
- 3) The attendant shall immediately ascertain whether or not there are persons injured. If someone is injured, immediately have another person call for emergency service (ambulance, police, etc.). If there are no other persons available, call yourself;
- 4) If no person is hurt, ascertain whether any person needs to be extracted from a flipped forklift. DO NOT MOVE THEM IF THEY ARE INJURED;
- 5) Simultaneously, the attendant shall notify the duty supervisor of the extraction and request that the duty supervisor immediately contact off-site emergency medical personnel to assist;
- 6) Assist off-site emergency personnel with the rescue attempt;
- 7) Record and report all information.

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Equipment

Inspection

Prior to any use, it is required that personnel perform the following minimum inspection:



Key Off Procedures:	Overhead guard, Hydraulic cylinders, Fire Extinguisher, Mast assembly, Lift chains and rollers, Forks, Tires, LPG tank and locator pin, LPG tank hose, Gas gauge, Check the engine oil level, Examine the battery, Check the hydraulic fluid level, Check the engine coolant level.
Key On Procedures:	Test the front, tail, and brake lights.
Engine Running Procedures:	Oil pressure indicator lamp, Ammeter indicator lamp, Hour meter, Water temperature gauge; Steering, Brakes, Horn, Load-Handling Attachments and Transmission Fluid.

All FSP equipment shall be inspected by supervisors NLT monthly for cleanliness and serviceability and NLT annually by the program Coordinator.

Equipment Maintenance

Cleaning

Ensure the forklift is cleaned after every use.

Parts

Any equipment found to be defective or unserviceable shall "immediately" be reported to a supervisor and the PM. Any defective part must be replaced "BEFORE" operating the forklift. ONLY the PM can order parts for the forklift.

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Storage

No equipment shall be stored in an unclean or unserviceable state. No equipment shall be stored in such a condition, state, or place that may degrade the integrity of the equipment or its extraction capability.

Training and Certification

Medical Evaluation

Not required.

Training

Supervisors will designate employees for training and certification. The PM will approve and assign training and testing for designated employees. The PC will arrange testing and certification.

Training shall cover the following material:

- 1) The A & L FSP;
- 2) OSHA FSP Guidelines;
- 3) FSP Hazards and their locations;
- 4) All appropriate videos, films, tests and written materials;
- 5) Proper inspection and use of the equipment;
- 6) A written test; and
- 7) A road and lift test.

Technical Material

OSHA Forklift Safety

<http://www.osha.gov/SLTC/poweredinustrialtrucks/index.html>

OSHA Forklift Daily Inspection

http://www.osha.gov/dte/library/pit/pit_checklist.html#propane_forklift_truck

OSHA Forklift Standards

<http://www.osha.gov/SLTC/poweredinustrialtrucks/standards.html>

Re-Training

Training or re-training shall be conducted when hazardous conditions or work assignments change.

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Documentation and Record Keeping

A written copy of this program and the OSHA Standard is located on-line at the safety hub and kept in the PM's office and is available to all personnel who wish to review it.

Maintained in the PC's office are the FSP training, testing, certifications, inspection, and reports records. All records are updated as required or when new personnel require training.

These records will remain, on a Best Efforts Basis, confidential. Records may be provided to competent legal or regulatory authorities.