

Pressure Washer Safety Program (PWSP)

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Program Statement

A & L Cesspool
Service Corp.

Pressure Washer Safety Program (PWSP)

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Pressure Washer Safety Program (PWSP)

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.

Pressure Washer Safety Program (PWSP)¹

The company PWSP 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.

Craig Forte
Principal

Date

¹ This document is the newest revision of the Company's PWSP.

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Program Statement

Program Overview

OSHA administers a federally required safety program which requires the company to incorporate the following:

- 1) Create a Pressure Washer Safety Program (PWSP);
- 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 safety controls;
- 7) Monitor and evaluate program compliance;
- 8) Maintain appropriate records.

Program Scope

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

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 this 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 Pressure Washer	Washing objects using the Pressure Washer

Program Application

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

- 1) Performing Power Wash operations;
- 2) Working in the proximity of a power washer;

These hazards include:

- 1) Operating the power washer in areas that are covered in grease and located in slippery areas;
- 2) Operating the power washer in areas that are populated with other employees;
- 3) Operating the power washer in areas that are poorly lighted and that have limited view on sloping and uneven terrain.

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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 Table 1 in the Scope and Application section of this program.

In addition, some personnel have expressed a desire to wear respirators during certain operations that do not require protection. As a 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

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):	A principal of the company;
Program Supervisor (PS):	a principal of the company;
Program Coordinator (PC):	the 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) Properly certify hazard areas for access and work;
- 9) Ensure proper entry is conducted;
- 10) Select and monitor PWSP equipment use to ensure proper deployment, maintenance, cleanliness, warranties;
- 11) Ensure selected employees are available for PWSP training;

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- 12) Monitor PWSP certifications;
- 13) Ensure proper PWSP storage procedures;
- 14) Administer and coordinate any medical surveillance responsibilities of the PWSP.
- 15) Ensure the PC has the appropriate resources to coordinate the program;
- 16) Participate in employee training;
- 17) Review contractor credentials and ensure contractor compliance with program standards;
- 18) Audit program record keeping;
- 19) 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

Plant Operations Personnel;

Any other person assigned to work near or around the Power Washer

Compliance Responsibilities

Supervisors

- 1) Become aware of municipal regulation and be thoroughly familiar with program policy;
- 2) Contribute suggestions to the program;
- 3) Train subordinate employees on the standards;
- 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) Contribute suggestions to the program;
- 3) Train subordinate employees on the standards;
- 4) Report accurately and truthfully all program non-compliance;
- 5) Cooperate fully and truthfully in all safety investigations.

Contractors

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

IDLH Procedures

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...”

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 power washer;
- 2) Other than the power washer operator, touch the power washer while the power washer is energized;
- 3) Use the power washer as a mechanism to clean their personal body or anything else not specifically designated to be cleaned by the power washer. In other words; UNLESS the operator has been specifically directed and authorized to clean a specific item, then the use of the power washer is NOT EVER authorized and would be an egregious violation of safety protocol;
- 4) Use the power washer as a mechanism to clean any equipment that they are wearing or to clean any respiratory equipment.

Site Selection and Control Processes

The PS will select specific PPE to be used on-site based on the hazards to which workers are exposed and in accordance with all OSHA standards. The PS will conduct a hazard evaluation for each operation, process or work area for routine operations or emergencies.

The hazard evaluation shall include:

- 1) An identification and development of a list of hazards that may be encountered on- site;
- 2) A review of work processes to determine where potential exposures to these hazards may occur. The review shall be conducted by sample surveying the grease room, reviewing process records, and interviewing personnel and supervisors.

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3) Where possible, third-party contractors may be used, and any special training needed will be contracted-out.

Hazard Assessment

Table 2: FSP Hazard Assessment at A & L Cesspool

DEPARTMENT	JOB	HAZARD	MINIMUM UNPROTECTED EXPOSURE	CONTROLS
Facilities	Grease Recycler or Plant Laborer	General Operations (INDOORS) Catastrophic Eye or Limb Injury	MUST HAVE FULL PROTECTION	WEAR PROTECTIVE EYEWEAR, HEARING PROTECTION, PROTECTIVE RUBBER GLOVES, APPROPRIATE DRESS AND PROTECTIVE TOE BOOTS AND OVERBOOTS. NOTIFY ALL AFFECTED INDIVIDUALS OF YOUR INTENTION TO OPERATE THE EQUIPMENT.
		Greased and Slippery Surfaces Oil mystification which may become airborne and affect vision and respiratory functions Inability to remain balanced	MUST HAVE FULL PROTECTION	SAME AS ABOVE STOP WORKING AND MOVE OUT OF THE AFFECTED AREA PRE-CLEAN THE AFFECTED AREA BY SCRUBBING WITH BRUSH AND CHEMICAL CLEANSING SOLUTION
		Uneven Terrain Possible Slip and Fall	MUST HAVE FULL PROTECTION	SAME AS ABOVE ENSURE PROPER FOOTING BEFORE ENGAGING THE TRIGGER. ALSO, DO NOT MOVE YOUR FEET WITH THE TRIGGER ENGAGED. TURN-OFF THE TRIGGER, THEN WALK.
		Electrocution	MUST HAVE FULL PROTECTION	WASHER MUST BE PLUGGED INTO GFCI OUTLET.
		HAZCHEM Air Quality Hazard	MUST HAVE FULL PROTECTION	USE OF THE GH-3004-SM 10/30 REQUIRES THE WASHER TO BE PHYSICALLY OUTSIDE THE BUILDING OR IF OPERATED IN THE BUILDING, THEN CAN ONLY BE OPERATED IF ALL HUMANS AND ANIMALS ARE OUTSIDE. IN OTHER WORDS, THE

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				<p>WASHER CANNOT BE ENGAGED INSIDE WITH HUMANS OR ANIMALS EXPOSED TO THE DIESEL EXHAUST.</p> <p>WEAR EYEWEAR, HEARING PROTECTION, APPROPRIATE DRESS AND BOOTS.</p>
		<p>Burns Diesel Exhaust Area and Hot Water</p>	<p>MUST HAVE FULL PROTECTION</p>	<p>MUST BE EXTREMELY CAREFUL OF THE DIESEL EXHAUST AREA OF THE WASHER. IT CAN REACH HIGH BURN TEMPERATURES.</p> <p>MUST BE EXTREMELY CAREFUL OF THE HOT WATER TEMPERATURE WHICH CAN REACH SCALDING TEMPERATURE.</p> <p>WEAR PROTECTIVE EYEWEAR, HEARING PROTECTION, PROTECTIVE RUBBER GLOVES, APPROPRIATE DRESS AND PROTECTIVE TOE BOOTS AND OVERBOOTS.</p>
		<p>General Operations (OUTDOORS)</p>	<p>MUST HAVE FULL PROTECTION</p>	<p>SAME AS ABOVE</p>
		<p>Blind Spots</p>	<p>MUST HAVE FULL PROTECTION</p>	<p>SAME AS ABOVE</p>

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.

Air Quality and Respirator Use

It is the policy of the Company that the quality of the air is not affected by using the power washer. Except for a dust particle filter mask (mask which does not require a fitness or seal test), no employee may engage in any PWSP activities with a respirator or mask. This restriction includes all negative and positive pressure masks or respirators.

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Equipment

Lock-out / Tag-out (LOTO)

Personnel that are exposed to machinery or such tools that require other-than-normal maintenance procedures require LOTO training.

Information pertaining to the Company's Lock-Out Tag-Out Program is found in the "Lock-Out Tag-Out (LOTO) Program" located on the safety hub or with the Safety Coordinator.

Equipment Selection

Based on the assessment of the Hazard Level, the nature of the tasks to be performed and the protection of the personnel exposed to these conditions, A & L shall provide the following minimum equipment and PPE:

- 1) Carry Bag containing the following PPE: Hard Hat, Safety Glasses, Reflective Vest, Rubber Glove, Rubber Boots, Rain Gear and ear protection;
- 2) PWSP Checklist or Operators Manual.

Equipment Inspection

Prior to using any PWSP equipment, it is required that all personnel perform the following minimum inspection:

- 1) Presence of all equipment;
- 2) Serviceability of all equipment;
- 3) The PW Checklist and / or Operators Manual.

Equipment Cleaning

Immediately, upon job completion, allow the PW to "cool-down" then "BEFORE" storing the PW, it is required to be inspected and cleaned. Personnel shall consult the manufacturer's maintenance guides for proper maintenance guidelines.

Equipment Parts

All equipment "MUST" be maintained in good working condition. It is the responsibility of the user to maintain his / her equipment in serviceable condition.

Any equipment found to be defective or unserviceable shall "immediately" be reported to a supervisor and the PM.

Equipment Storage

No equipment shall be stored in an unclean or unserviceable state.

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

Other than a safety committee member, no PW equipment shall be issued to any person not enrolled in the PWSP.

Power Wash Procedures

General Rules

- 1) Conduct a pre-operation inspection of the equipment and the affected area;
- 2) Ensure the PW Checklist or the Operators Manual is available;
- 3) Remove or secure all loose objects;
- 4) Alert all affected personnel of impending pressure washer use "BEFORE ENGAGING PRESSURE WASHER";
- 5) Never use the pressure washer without wearing appropriate PPE;
- 6) Only use pressure washer with approved GFCI outlet;
- 7) Never walk with pressure washer engaged;
- 8) When finished, always return the pressure washer to a state of good storage.

Operation

- 1) Read the Operator's Manual to ensure proper star-up, operational, and shut-down procedures are understood "BEFORE" engaging the PW;
- 2) Ensure what is to be washed is secured and nothing can be ejected airborne; then
- 3) Check to ensure GFCI connection; then
- 4) Check all hoses and connectors; then
- 5) Ensure your PPE is on your body; then
- 6) Do a visual 360-degree check of the area to ensure no loose objects are around and no trip, or slip hazards; then
- 7) Notify all affected personnel of start-up; then
- 8) Start-up the machine and pull the trigger and check the jet stream of the water to ensure proper nozzle fixture and jet spray direction; then
- 9) Finger-off the trigger then walk to location of the cleaning then pull trigger to clean; then
- 10) When finished, power-off washer, then pull trigger to de-pressurize or empty the line of pressurized water left in the line from your cleaning; then
- 11) Once line is cleared of pressurized water then un-plug the washer and de-energize machine; then
- 12) Roll-up the hose and place the pressure gun onto the rack.
- 13) Ensure the PW is stored properly and safely.

Emergency Procedures

In the event of an emergency, PWSP 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;

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- 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 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 the injured employee is bleeding, immediately take action to stop the bleeding;
- 5) If a limb is severed, immediately locate the limb, place the limb on ice in a clean container;
- 6) Do not leave the injured employee alone until emergency personnel arrive;
- 7) Assist off-site emergency personnel with the rescue attempt;
- 8) Record and report all information

Training

The PC will arrange the PWSP training for personnel. Training or re-training shall be conducted when hazardous conditions or work assignments change or NLT annually.

Personnel will be trained prior to CSE deployment and supervisors will be trained prior to supervisory assignment.

Training shall cover the following material:

- 1) A & L PWSP;
- 2) OSHA Standard;
- 3) CPWSP hazards and their locations;
- 4) Proper use, maintenance and storage of PWSP equipment.

Retraining

Covered and affected employees shall receive retraining in proper application of PWSP procedures when:

- 1) The yearly refresher update;
- 2) There is a change in Job assignment(s) that expose an authorized employee to new PWSP hazards; or
- 3) Machines, equipment, or processes that present a new hazard or require modified PWSP procedures; or
- 4) PWSP Procedures or Regulatory Policy changes; or
- 5) It becomes known that an employee incorrectly performs PWSP procedures; or
- 6) When a certification expires; or
- 7) When an employee voluntarily requests refresher training.

Program Evaluation

The PS will conduct evaluations of the workplace to determine the hazardous conditions and to ensure PWSP compliance. Problems with PWSP compliance or a material hazardous condition change shall require corrective action, notation and if such is required, then a report shall be created by the PS and submitted to the PC for review and submission to the PM

The PC shall review the program annually and shall make such recommendations as necessary to keep the program up to date.

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Documentation and Record Keeping

A written copy of this program and the OSHA Standard is kept in the Coordinator's office and the entire program statement is available for instant review from the A & L Safety Hub website page.

The PC shall maintain all records for a period of no less than 1 year from the published date.

ADDENDUM A. Mi-T-M Operation Manual

See Operators Manual