

Respiratory Protection Program (RPP) (29 CFR 1010.134)

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Program Statement

A & L Cesspool
Service Corp.

A & L Respiratory Protection Program (RPP)

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A & L Respiratory Protection Program (RPP)

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.

Respiratory Protection Program (RPP)¹

The company RPP 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 Respiratory Protection program under 29 CFR 1010.134, which requires the company to incorporate the following:

- 1) Create a Respiratory Protection Program (RPP);
- 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 RPP controls;
- 7) Monitor and evaluate program compliance;
- 8) Maintain appropriate records.

Program Scope

All personnel working with hazardous chemicals or personnel requiring or requesting a negative pressure respirator and who are engaged in certain processes and tasks (as outlined in the table below) must be enrolled in the Company's RPP.

Non-trained and non-certified personnel "may not" volunteer to employ respirators. No supervisor may incentivize or reward non-certified personnel to wear a respirator. No supervisor may discipline non-certified personnel for refusing to wear a respirator.

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

Table 1: Voluntary and Required Respirator Use at A & L Cesspool	
PROCESS	R
Voluntary (when half or full-face respirator is not required)	Filtering Face-piece (Dust Mask).
Voluntary (when half or full-face respirator is not required) or when Sanding or Spraying non-hazardous materials or coatings. Must be worn in conjunction with Safety Eyewear.	Half Face-piece (APR or PPR 100) (Organic Vapor)
When working with any of the following materials or chemicals: Caustic Soda 50%, Hydrated Lime, Hydrochloric Acid, PYLA-TEL FLUORESCENT GREEN, Squeaky Clean, Vulcanizing Cement and Cold Galvanizing Compound.	Full Face Piece w/ 3M P100 triple protection filters

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Program Application

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

- 1) Certain Grease Recycling functions;
- 2) Storing and removing hazardous materials;
- 3) Cesspool Cleaning (when deploying Hazardous Chemicals or Materials).

These hazards include:

- 1) Wood dust;
- 2) Particulates;
- 3) Vapors.

Possibly, in some cases, there may be Immediately Dangerous to Life or Health (IDLH) conditions. The purpose of this program is to ensure that all Company personnel are protected from exposure to these respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic material are the first line of defense at A & L Cesspool (A & L); however, engineering controls have not always been feasible for some of our operations or have not always completely neutralized the potential hazards. In these situations, respirators and other Personal Protective Equipment (PPE) must be used. Respirators are also needed to protect personnel health during emergencies.

Some personnel may desire to wear respirators during certain operations that do not require respiratory protection. As a general policy, A & L will review each of these requests on a case-by-case basis. On a case-by-case basis, if the use of respirator will not interfere with the function of the job or jeopardize the health and safety of personnel, then A & L will provide respirators for voluntary use.

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;

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- 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 RPP equipment use to ensure proper deployment, maintenance, cleanliness, warranties;
- 9) Ensure selected employees are available for RPP training;
- 10) Monitor RPP certifications;
- 11) Ensure proper RPP storage procedures;
- 12) Administer and coordinate any medical surveillance responsibilities of the RPP;
- 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 personnel who are required to wear respirators during normal work operations and during some non-routine or emergency operations such as clean-up of a hazardous substance. This includes all personnel performing:

- 1) Grease Recycling in the recycling plant;
- 2) Storing and removing hazardous materials;

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- 3) Cesspool Cleaning (when deploying Hazardous Chemicals or Materials).

In addition, any person who voluntarily wears a respirator when a respirator is not required is subject to the same medical evaluations, cleaning, maintenance and storage elements of this program and must be provided with the information specified in this section of the program.

Personnel who voluntarily wear filtering face-piece (dust masks) are “not” subject to medical evaluation, cleaning, storage, and maintenance provisions of this program.

Voluntary Respirator Use

A & L will provide respirators (at no charge) to personnel for voluntary use for the following work processes:

- 1) While loading or unloading material causing particle or vapor discomfort;
- 2) While spraying or using spray-guns;
- 3) When any other operation exposes the personnel to vapor or dust discomfort.

Personnel voluntarily electing to wear negative pressure respiratory equipment must comply with the same standards of this program as non-voluntary respirator wearers.

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 and certified by the PM before engaging in RPP 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.

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.

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IDLH Warning

No person shall perform Non-Emergency (Routine) Lock-out Tag-out (LOTO) maintenance, whether scheduled or unscheduled, while wearing or employing respiratory equipment. Should any equipment require maintenance under this condition the proper procedure shall be the following:

- 1) Shut-off or Shut-down the equipment; then
- 2) Clear the area of any hazardous condition requiring the use of respiratory equipment; then
- 3) LOTO; then
- 4) Perform required maintenance or repair.

No person shall vomit into a respirator. There is a 100% likelihood of death by choking or asphyxiating if you vomit inside a respirator.

Either;

Best Option: Immediately move-out of the affected area, remove the respirator, vomit, notify a supervisor of any remaining hazard in the area you were working, clear the surrounding affected area of other personnel.

Second Option: Take a deep breath of fresh air inside the respirator, break the seal, vomit until finished, put the mask on, clear the mask, breath fresh air inside the respirator...repeat until vomiting stops or until you can exit the affected area.

Selection and Control Processes

The PM will select respirators 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 airborne contaminants may be present in routine operations or during an emergency.

The hazard evaluation will include:

- 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.

Table 2: Respiratory Hazard Assessment at A & L Cesspool				
DEPARTMENT	CONTAMINATES	EXPOSURE LEVEL	PERMISSIBLE EXPOSURE LEVEL	CONTROLS
All	Non-Hazardous dust particles.	MAX 8 Hrs.	N/A	Filtering Face-piece (Dust Mask). Requires mask change and minimum 30 minutes of non-exposure

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				before returning to affected area.
Section 6, 7, 8 or 9 Cleaning, sanding, or spraying	If not properly vented, then any aerosol listed in the A & L Hazard Material List (see Right-to-Know).	MAX 15 min. if not properly vented. MAX 1 hour or according to MSDS (whichever is shorter)	See each Items' MSDS	Half Face-piece (APR or PPR 100) (Organic Vapor) Must be worn in conjunction with Safety Eyewear
Section 6, 7, 8 or 9 Grease Recycling Operations	When working with any of the following materials or chemicals: Caustic Soda 50%, Hydrated Lime, Hydrochloric Acid, PYLA-TEL FLUORESCENT GREEN, Squeaky Clean, Vulcanizing Cement and Cold Galvanizing Compound.	MAX 3 hours or according to MSDS (whichever is shorter)	See each Items' MSDS	Full Face Piece w/ 3M P100 triple protection filters Personnel must have a minimum 30 minutes of non-exposure before returning to affected area.
Off-Site Job Locations Cesspool Cleaning and Pumping Operations	When working with any of the following materials or chemicals: Caustic Soda 50%, Hydrated Lime, Hydrochloric Acid, PYLA-TEL FLUORESCENT GREEN, Squeaky Clean, Vulcanizing Cement and Cold Galvanizing Compound.	MAX 3 hours or according to MSDS (whichever is shorter)	See each Items' MSDS	Full Face Piece w/ 3M P100 triple protection filters Personnel must have a minimum 30 minutes of non-exposure before returning to affected area.

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 be tested according to the entry permit. Except for a dust particle filter mask (mask which does not require a fitness or seal test), no employee may engage in any RPP activities with a respirator or mask. This restriction includes all negative and positive pressure masks or respirators.

Respiratory Protection Procedures

General

- 1) Personnel shall use respiration equipment only as proscribed and only for the related work purpose for which it was intended;
- 2) All Personnel shall conduct a visual and physical touch inspection as well as seal-check prior to using any respiration device;
- 3) Personnel are permitted, after notifying a supervisor, to leave the work area to fix, maintain or replace any respiration device or its accompanying equipment;

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- 4) Personnel are not permitted to wear any garment or device that affects the proper working condition of the respirator or any of its accompanying equipment;
- 5) Personnel must not suffer from any condition (physical or otherwise) that would interfere with the safe operability of the respirator or any of its accompanying equipment.

Pre-Use Inspection

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

- 1) Outer Area: Start from the center of the face-piece and inspect the left side of the face-piece for cracks, bulges, distortions and visual seal, rotate the mask to look at the left side of the mask checking the respirator skin for cracks or damages, look at the left filter valve area for damage or improper seal, look at the cartridge for damage, wear and tear; then
- 2) Continue to rotate the mask and look at the head-straps for wear, tear, and damage; then
- 3) Continue to rotate the mask while reversing the left side inspection procedure so that you wind-up finishing the outer area inspection looking at the front face-piece again; then
- 4) Inner Area: Rotate the mask to be able to inspect the interior of the mask checking for wear and tear, cracks, rips, obvious gasket or seal abnormalities or any other damage; then
- 5) Check the filters for wear-out / expiration and serviceability.

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

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification.

All filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

Respirator and Filter 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 has selected the 3M Series 7000 or 7800 S Respirator and 3M Multi Gas / Vapor and Particle P100 (60926) filter cartridges to be used for full-face respirator operations and the 3M Series 6000 and 6003/07047 filter cartridges for half-face operations.

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No other respirator or filter types are authorized without expressed written consent of the PC.

Equipment Maintenance

Respirator Cleaning

- 1) Do not ever clean a respirator with solvents or other cleaners containing lanolin, petroleum's, or other oils;
- 2) Masks are to be cleaned after each use;
- 3) The minimum acceptable cleanliness standard is "Complete Wash-down":
 - a) First, clean and remove all grease or other particle and dirt matter from hands; then
 - b) Remove all grease, particle, and dirt matter from the mask; then
 - c) Completely disassemble (as instructed) the respirator; then
 - d) Remove anything that is not supposed to be wet or anything that is not supposed to be washed such as cartridges, filters and/or breathing tubes and remove other mask pieces such as gaskets; then
 - e) At the Respirator Wash Station, clean mask (excluding parts that are not to be wet), by running clean water, wetting the mask, applying the neutral liquid soap and scrubbing with soft brush or soft rag until clean, then rinse all soap residue off the mask; then
 - f) Lightly dry the mask with a dust-free particle-free cloth (no fibers can remain on the mask) and hang the respirator to air dry in a non-contaminated atmosphere (NOTE: DO NOT LEAVE THE MASK UNSECURE FOR ANY LENGTH OF TIME); then
 - g) Disinfect face-piece with non-alcohol swab wipes; then
 - h) Store the dry respirator away from contaminated areas and only in your Respirator Security Locker.

Filter Cleaning

DO NOT WASH FILTERS!

The outside of the filter may be lightly dusted with a clean lint-free rag but may not be cleaned with any substance.

Filter Change-out

All filters must be changed under the following circumstances:

- 1) Unopened Filter Pack: If the date you intend to use the filter is later than the expiration date;
- 2) Once opened and unused: 90 days from the date of installation onto the mask;
- 3) Once opened and used: Either 40 continuous hours of use or, 90 days from the opening of the package, whichever is sooner.

Personnel are required to keep their own schedule of filter use. This schedule is inspectable.

Equipment Storage

- 1) Except for spare and emergency respiration equipment, all half and full-face piece respirators are to be assigned to a specific person;

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- 2) When not using assigned respiratory equipment, “ONLY” store “CLEAN AND DRY” respirators in an assigned secured steel locker provided by located in section 5 of the facility;
- 3) Personnel shall be provided a combination lock to which no other person shall have knowledge of the access combination;
- 4) “NOTHING” other than “CLEAN AND DRY” respiratory equipment shall be stored in the locker;
- 5) No-other person (except RPP Committee members) shall have access to the interior of the locker.

Equipment Parts

All equipment “MUST” be maintained in good working condition. It is the responsibility of the Entrant 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.

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

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

Training and Certification

Medical and Fit Evaluation

- 1) Personnel who either choose or are required to wear respirators must pass a medical exam before being permitted to wear a respirator. No person will be permitted to wear a respirator or to employ the use of any respiration device (unless exempted by this program) unless and until they are deemed medically certified to be able to do so. Any person refusing a medical exam or any person failing to obtain a medical certification will not be authorized to wear a negative pressure respirator. Additionally, if the area or function requires the use of a respirator, those personnel will not be authorized to work in that area or in that function or process until such time as they are medically certified for respirator use;
- 2) Once a medical exam concludes the person is medically fit to wear a respirator, the person must be “sized” to fit by the same certified medical person;
- 3) A licensed physician must conduct all exams and certifications;
- 4) The medical questionnaire is on-location at the physician’s office;
- 5) Personnel are entitled to speak with the physician conducting the exam and to receive a copy of the medical results and any subsequent certifications;
- 6) All results are kept completely confidential unless required to be presented to a competent legal or regulatory authority;
- 7) Follow-up evaluations are done free of charge annually or as required by regulation or this program;
- 8) A copy of this program has been provided to Lovell and Ando;
- 9) After Personnel have received medical clearance and have begun wearing a respirator, additional medical evaluations will be required and provided if: by regulation or if personnel show signs or symptoms of medical

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distress such as wheezing, coughing, shortness of breath, or, if the medical provider informs the PC that personnel need to be re-evaluated, or, changes in workplace environments or other material changes indicate a need for re-evaluation.

RPP Training

Once the employee returns from the medical exam and fit test;

- 1) The PC will ensure the employee turns-in for review and record, their medical exam results, and fit test;
- 2) The PC will conduct the appropriate training on the donning, wear, maintenance, use and storage of the mask;
- 3) The PC will ensure hands-on training and evaluation of successful RPP techniques;
- 4) The PC will note the successful evaluation of each employee and issue each employee a written exam scoring the exam;
- 5) Each employee must receive a 100% on the written exam to qualify certified in the RPP.

Training curriculum includes:

- 1) The RPP;
- 2) OSHA RPP Standards;
- 3) RPP hazards;
- 4) Proper selection and use of respirators;
- 5) Respirator limitations;
- 6) Proper donning techniques;
- 7) Seal and Fit testing;
- 8) Maintenance and Storage;
- 9) Medical signs and symptoms of respiratory protection failure;
- 10) Emergency action in the event of respiratory failure and impending vomiting;
- 11) Filter maintenance.

RPP Re-Training

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

Seal Testing

Once trained the employee will be Seal Tested by the PC.

- 1) The PC will ensure the employee has the proper mask, sized with instructions and filters;
- 2) The PC will seal test the mask of the employee using the Qualitative Bitrex Analysis.

Security

When training is concluded, the PC shall issue the employee 1 Master Lock with private combination capacity and assign the employee with a personal steel storage locker to secure the RPP equipment.

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Documentation and Record Keeping

A written copy of this program and the OSHA RPP 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 RPP training, testing, certifications, inspection, and reports records. All records are updated as required or when new personnel require training.

The Coordinator will only maintain the physician's medical evaluation as it pertains to the certification to wear respirators. Every other medically sensitive document shall be given to the related employee.

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