

Grease Operations Safety Program (GOSP)

August 24

2020

Program Statement

A & L Cesspool
Service Corp.

Grease Operations Safety Program (GOSP)

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Grease Operations Safety Program (GOSP)

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.

Grease Operations Safety Program (GOSP)¹

The company GOSP 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.

Livio Forte
Principal

Date

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

Grease Operations Safety Program (GOSP)

Program Statement

Program Overview

OSHA requires the company to incorporate the following:

- 1) Create a Grease Operations Safety Program (GOSP);
- 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 engaged in certain processes and tasks (as outlined in the table below) must be enrolled in the Company's GOSP.

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 in this type of environment. No supervisor may discipline non-certified personnel for refusing to operate this type of environment.

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
Grease, Oil, and Waste Operations	Cleaning Grease Traps -Removing Used Cooking Oil-Transporting Waste

Program Application

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

- 1) Performing Grease, Oil, and Waste Transportation operations;

These hazards include:

- 1) Improperly staging work area;
- 2) Improperly securing work area;
- 3) Unsafe work operations;
- 4) Unsafe and illegal waste transportation procedures.

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.

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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. There are 2 types of respiratory protection available. Either are available to qualified personnel. See A & L Respiratory Safety Program for details.

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):	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 GOSP equipment use to ensure proper deployment, maintenance, cleanliness, warranties;
- 11) Ensure selected employees are available for GOSP training;
- 12) Monitor GOSP certifications;
- 13) Ensure proper GOSP storage procedures;
- 14) Administer and coordinate any medical surveillance responsibilities of the GOSP.
- 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.

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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

Grease Operations Personnel;

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 immediately, 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 immediately, 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;

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- 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 perform grease operations;
- 2) Smoke or ignite any source of heat on, near, or around any grease operations, vehicle, or oil related waste product.
- 3) Other than the supervisor, stage (prepare) a work area;
- 4) Other than a supervisor, open, clean or secure (close) a grease trap;
- 5) Operate the pumping equipment unsafely;
- 6) Cause any liquid, grease, water or oil-based waste to be removed from any location, without placing it immediately and directly into a tank, machine, container, vessel or vehicle owned and operated by A & L;
- 7) Transport, transfer or unload any liquid, oil, waste, grease or other work-related waste product, in any manner or location, contrary to the A & L Environmental Control Program (ECP) or the laws of the United States, the State of New York or the City of New York. Importantly: at no time, shall any person be permitted to off-load or transfer any liquid, oil or work-related waste product to any other vessel, vehicle or location other than the A & L Cesspool grease recycling plant located at 38-40 Review Ave., LIC, NY 11101.

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 areas where grease operations are performed, reviewing processes, interviewing affected personnel, conducting testing and monitoring the results.
Where possible, third-party contractors may be used, and any special training needed will be contracted-out.

Hazard Assessment

SEE NEXT PAGES FOR INFORMATION

SEE ADDENDUM FOR ILLUSTRATIONS

Grease Operations Safety Program (GOSP)

Table 2: GOSP Hazard Assessment

SITE	JOB	PERSONNEL	HAZARD	PROTECTION
ANY LOCATION	Grease Operations	Technician Helper	<p>Flammability Grease waste is potentially flammable and difficult to extinguish once ignited.</p> <p>Ingestion Grease waste is not consumable.</p> <p>Sensory Deprivation Grease waste can enter the eye, ear or mouth and can cause sensory deprivation or sickness.</p> <p>Odors and Fumes Grease operations can expose personnel to malodorous fumes which can cause nausea and dizziness.</p> <p>Infection Grease waste or containers where grease waste is stored may cause cuts or infections.</p> <p>Slips, Trips and Falls Grease operations expose all personnel, the public and the clients to slip and fall hazards.</p>	<p>THERE SHALL BE, AT ALL TIMES, AT THE EXACT LOCATION WHERE GREASE OPERATIONS ARE BEING PERFORMED, A SERVICABLE, PROPERLY INSPECTED, OSHA COMPLIANT, "CHEMICAL" FIRE EXTINGUISHER AVAILABLE TO DEPLOY IMMEDIATELY.</p> <p>AT NO TIME SHALL ANY PERSON CARRY, EMPLOY, USE, OR STORE, ANY DEVICE THAT MAY IGNITE A HEAT SOURCE.</p> <p>NO SMOKING.</p> <p>AT NO TIME SHALL ANY PERSON INGEST OR CAUSE ANY OTHER PERSON TO INGEST GREASE WASTE.</p> <p>WEAR APPROPRIATE PPE.</p> <p>RESPIRATORY PROTECTION IS AVAILABLE IN ACCORDANCE WITH THE A & L RESPIRATORY PROTECTION PROGRAM (RSP). SEE SAFETY COORDINATOR FOR DETAILS AND ELIGIBILITY.</p> <p>USE MEDICAL KIT TO TREAT WOUND. CLEAN ALL CUTS IMMEDIATELY WITH ANTISEPTIC. IF NECESSARY CALL 911 AND REQUEST TREATMENT.</p> <p>ENSURE</p> <ol style="list-style-type: none"> 1) SPILL KIT IS AVAILABLE; 2) WORK AREAS ARE PROPERLY SECURED AND STAFFED WITH BARRICADES, AND OBSERVER; 3) ALL MACHINERY, TOOLS AND HOSES ARE IN GOOD WORKING CONDITION; 4) WORK AREAS ARE THOROUGHLY CLEANED AND SANTIZED AFTER OPERATIONS.

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Table 2: GOSP Hazard Assessment

SITE	JOB	PERSONNEL	HAZARD	PROTECTION
ON SITE	Grease Operations	Technician Helper	<p>Truck Roll</p> <p>Parked vehicles may move once pumping operations begin.</p> <p>Warning Moving Vehicles</p> <p>When stopped, parked or pumping, personnel are exposed to being hit by moving vehicles.</p> <p>Basement/Cellar Entry</p> <p>Personnel may encounter Grease Traps and Oil Barrels that located in basements or cellars below street or ground level.</p> <p>Personnel may encounter steep stairs, insufficient lighting and improperly secured hatch doors located at street level.</p> <p><u>Improperly secured hatch doors can cause head trauma or limb amputation</u></p> <p>Above Head Grease Trap Cleaning</p> <p>Personnel may encounter Grease Traps that are connected to a ceiling or that are located above their heads.</p> <p>Floor and Rodents</p> <p>Personnel may encounter tools or other objects on basement floors. Personnel may also encounter rodents or insects.</p>	<p>ENSURE ALL VEHICLES HAVE BEEN PROPERLY PARKED, ALL BRAKES EMPLOYED AND THAT THE REAR WHEELS ARE CHOCKED.</p> <p>ENSURE</p> <p>1) IT IS SAFE TO EXIT VEHICLE; 2) ALL PERSONNEL ARE WEARING REFLECTIVE VESTS; 3) CONES AND WARNING TRINGLES ARE IN PLACE</p> <p>ENSURE</p> <p>1) HEADLAMPS ARE WORN; 2) HATCH LOCK-BARS ARE SECURELY EMLPLACED IN BETWEEN HATCH DOORS; 3) BARRICADES AND WARNING LIGHTS ARE PROPERLY PLACED OVER THE HOSE AND BLOCKING THE CELLAR ENTRANCE; 4) THAT THE STREET LEVEL OBSERVER IS MONITORING PEDESTRIAN FOOT TRAFFIC WARNING PEDESTRIANS OF THE HAZARD AND THAT THE OBSERVER IS MONITORING THE HATCH LOCK-BAR FOR CONTINUED SECURITY AND MECHANICAL INTEGRITY.</p> <p>ABOVE HEAD GREASE TRAP CLEANING SHALL NOT INCLUDE CLIMBING ON LADDERS. DO NOT CLIMB ON ANY LADDER OR ANY OTHER OBJECT IN ORDER TO CLEAN A GREASE TRAP.</p> <p>WEAR APPROPRIATE PPE TO PROTECT FROM GREASE FALLING ON FACE.</p> <p>WEAR PPE BOOTS AND GLOVES. DO NOT ENGAGE ANY RODENT OR INSECT. REPORT INFESTATION TO CLIENT.</p>

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Table 2: GOSP Hazard Assessment

SITE	JOB	PERSONNEL	HAZARD	PROTECTION
OFF SITE	Grease Operations	Technician Helper	<p>Leaving Work Site</p> <p>Leaving hazards behind.</p> <p>Transporting Oil and Waste</p> <p>Oil or Grease Trap waste may leak. The vehicle carrying liquid swill in the tanks may cause unusual or unexpected driving conditions.</p> <p>Offloading at the Plant</p> <p>Personnel may encounter hazards while offloading oil or waste.</p>	<p>ENSURE</p> <p>1) ALL GREASE AND OIL IS CLEANED UP; 2) ALL TRAPS AND HATCHES ARE CLOSED AND PROPERLY SECURED; 3) ALL WARNING EQUIPMENT IS REMOVED AND PROPERLY SECURED IN THE VEHICLE; 4) THE AREA IS LEFT SAFE FOR THE PUBLIC.</p> <p>ENSURE</p> <p>1) ALL PUMPS AND HOSES ARE PROPERLY CLOSED AND SECURED; 2) NEVER, UNDER ANY CIRCUMSTANCE, OFF LOAD, TRANSFER OR REMOVE, IN ANY WAY, ANY GREASE WASTE, LIQUID OR OTHER WASTE FROM ANY A & L VEHICLE, TANK OR DRUM UNTIL YOU HAVE ARRIVED AT THE A & L PLANT IN LIC AND YOU MAY ONLY OFF LOAD SUCH ITEMS INTO AN APPROVED A & L CONTAINER LOCATED IN THE PLANT.</p> <p>ENSURE</p> <p>1) YOU FOLLOW ALL INSTRUCTIONS OF PLANT PERSONNEL; 2) USE A REAR GROUND GUIDE BEFORE BACKING-UP; 3) HAVE AN APPROVED WORKING FIRE EXTINGUISHER IN HAND BEFORE OFFLOADING. 4) SECURE HOSES, CONNECTORS AND PUMP BEFORE LEAVING PLANT.</p>

Grease Operations Safety Program (GOSP)

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

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) PPE;
- 2) Truck PPE;
- 3) VSP Pre-operational Checklist.

Equipment Inspection

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

- 1) Presence of all equipment;
- 2) Serviceability of all equipment;

Equipment Cleaning

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.

Grease Operations Safety Program (GOSP)

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 operational capability.

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

Training

The PC will arrange the GOSP 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 GOSP;
- 2) OSHA Standard;
- 3) CGOSP hazards and their locations;
- 4) Proper use, maintenance and storage of GOSP equipment.

Retraining

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

- 1) The yearly refresher update;
- 2) There is a change in Job assignment(s) that expose an authorized employee to new GOSP hazards; or
- 3) Machines, equipment, or processes that present a new hazard or require modified GOSP procedures; or
- 4) GOSP Procedures or Regulatory Policy changes; or
- 5) It becomes known that an employee incorrectly performs GOSP 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 GOSP compliance. Problems with GOSP 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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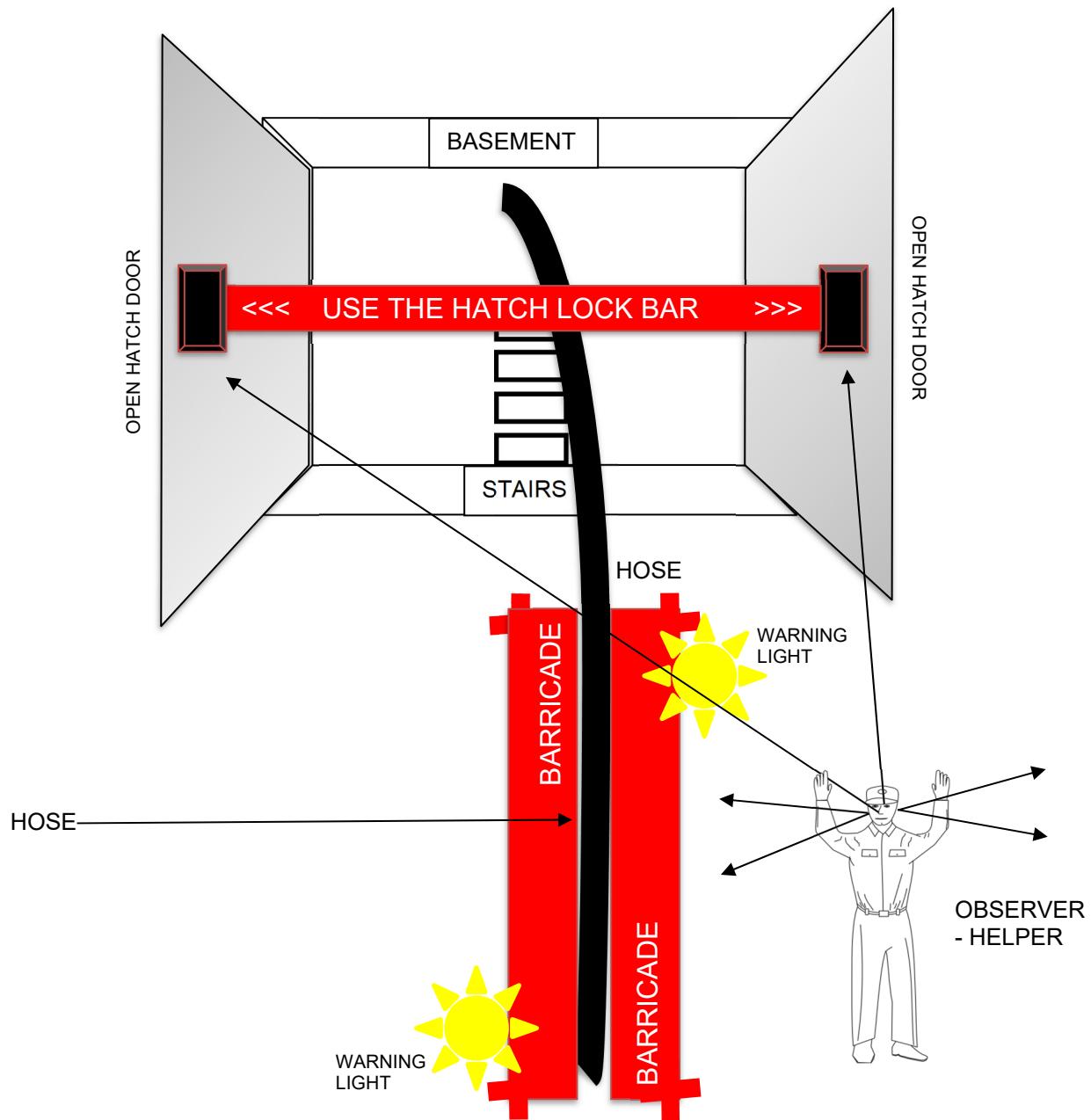
Documentation and Record Keeping

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.

HAZARD ASSESSMENT ILLUSTRATIONS

STREET ACCESSABLE OUTDOOR BASEMENT OR CELLAR



SEE HOW TO USE PICTURES NEXT PAGE

Grease Operations Safety Program (GOSP)

HOW TO USE THE HATCH LOCK BAR AND WHERE TO PLACE BARRICADES

HOW TO USE THE HATCH LOCK BAR



HOW TO USE BARRICADE

