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# FALL PROTECTION PROGRAM

## Dowdy Corporation

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# TAB 1:

# FALL PROTECTION PROGRAM

## Dowdy Corporation

### 1.1 INTRODUCTION

This Fall Protection Plan has been prepared for the prevention of injuries associated with falls at Dowdy's workplace. It addresses standards established by the Occupational Safety and Health Administration (OSHA) in 29 CFR 1910 - Subpart D, Walking-Working Surfaces. A copy of this standard is provided in Attachment A of this document.

While this plan provides the generic components and parameters for fall protection, it is understood that fall protection must be project-specific, where control measures must be developed and implemented for each identified project and/or job function. In many cases, the fall protection controls are unique to that project and/or job function.

The purpose of this plan is to:

- A. supplement our standard safety policy by providing safety standards specifically designed to cover fall protection, and
- B. ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of each job.

Definitions used in this plan can be found in 29 CFR 1910.21 (Attachment A)

### 1.2 RESPONSIBILITY

#### PROGRAM ADMINISTRATOR – THE GENERAL MANAGER

- Administer, oversee, and maintain this plan.
- Conduct continual observational safety checks of work operations.
- Enforce safety policies and procedures.
- Review and approve any changes or revisions to this plan.

#### MANAGEMENT & PROJECT SUPERVISORS

- Provide fall protection systems for employees in work areas where injury from a fall to a lower level is a recognized hazard
- Ensure that fall protection systems meet OSHA's requirements
- Provide all necessary training to employees
- Correct any unsafe acts or conditions immediately

## EMPLOYEES

- Alert management of any unsafe/hazardous convictions in order to prevent injury to either themselves or any other employees.
- Properly use and maintain provided fall protection systems provided

### 1.3 GENERAL REQUIREMENTS FOR FALL PROTECTION

Each employee on a walking-working surface with an unprotected side or edge that is 4 feet (1.2 meters) or more above a lower level will be protected from falling by one or more of the following measures:

- Guardrail systems
- Safety net systems
- Personal fall protection systems such as fall arrest, travel restraint, or positioning systems.

If Dowdy establishes that it is not feasible to use one of the above measures, or that it creates a greater hazard to use a guardrail, safety net, or personal fall protection system on residential roofs, Dowdy will develop and implement a fall protection plan that meets the requirements of 29 CFR 1926.502(k) and training that meets the requirements of 29 CFR 1926.503(a) and (c).

Additionally, if Dowdy determines that the use of fall protection systems is not feasible on the working side of a platform used at a loading rack, loading dock, or teeming platform, the work may be completed without a fall protection system, provided:

- The work operation for which fall protection is infeasible is in process
- Access to the platform is limited to authorized employees; and,
- The authorized employees are trained in accordance with 1910.30.

In order to comply with OSHA's general requirements covering walking and working surfaces, as outlined in 29 CFR 1910.22 (Attachment A), Dowdy will ensure the following are maintained appropriately:

- All places of employment, passageways, storerooms, service rooms, and walking-working surfaces are kept in a clean, orderly, sanitary condition.
- The floor of every workroom is maintained in a clean and, to the extent feasible, dry condition.
- Where wet processes are used, drainage is maintained and false floors, platforms, mats, or other dry standing places are provided where practicable.
- Walking-working surfaces are maintained free from hazards such as sharp or protruding, loose boards, corrosion, leaks, spills, snow, and ice.
- Each walking-working surface must be able to support the maximum intended load for the surface.
- Safe means of access and egress to and from walking-working surfaces are maintained and are required to be used by each employee.
- Walking-working surfaces are inspected regularly and as necessary, and they are maintained in a safe condition.
  - Hazardous conditions on walking-working surfaces are corrected or repaired before an employee uses the surface again. If the correction or repair cannot be made immediately,

the hazard will be guarded to prevent employees from using the surface until the hazard is corrected or repaired.

- When any correction or repair involves the structural integrity of the walking-working surface, a qualified person performs or supervises the correction or repair.

## **1.4 FALL PROTECTION SYSTEMS**

### **GUARDRAIL SYSTEMS**

Guardrail systems will meet OSHA's requirements, as outlined in 1910.29(b), including, but not limited to, the following:

- Top rail installed 39-45 inches above the walking/working level.
- Mid-rail (or suitable alternative) located 21 inches above walking/working level.
- Able to withstand a force of at least 200 pounds in any outward or downward direction.
- Smooth-surfaced to protect employees from injury such as puncture, laceration, or catching/snagging of clothing.
- Designed so as not to constitute a projection hazard.
- Installed on all unprotected sides or edges when used around holes
- When guardrail systems are used around holes that serve as points of access (such as ladderways), the guardrail system opening:
  - Has a self-closing gate that slides or swings away from the hole, and is equipped with a top rail and midrail or equivalent intermediate member, or
  - Is offset to prevent an employee from walking or falling into the hole.
- Guardrail systems on ramps and runways are installed along each unprotected side or edge
- Manila or synthetic rope used for top rails or midrails are inspected as necessary to ensure that the rope continues to meet the strength requirements in 29 CFR 1910.29(b)(3) & (5).

### **SAFETY NET SYSTEMS**

Safety Net Systems will meet OSHA's requirements, as outlined in 29 CFR 1926, Subpart M, including, but not limited to, the following:

- Installed as close as practicable under the walking/working surface, but in no case more than 30 feet (9.1 meters) below such level.
- Extend outward from outermost projection of the work surface.
- Installed with sufficient clearance under them to prevent contact with the surface due to impact on the net.
- Capable of absorbing an impact force equal to that produced by the drop test specified in OSHA's fall protection standard.
- Inspected at least weekly for wear, damage, and/or deterioration defective components removed.

- Mesh opening not to exceed 36 square inches (230 square centimeters) nor be longer than 6 inches (15 centimeters) on any side.

## COVERS

Each cover for a hole in a walking-working surface will be engineered so that it is capable of supporting without failure, at least twice the maximum intended load that may be imposed on the cover at any one time; and secured to prevent accidental displacement.

## HANDRAILS AND STAIR RAIL SYSTEMS

Dowdy will ensure that all handrail and stair rail systems meet the following criteria:

- Handrails are not less than 30 inches (76 cm) and not more than 38 inches (97 cm), as measured from the leading edge of the stair tread to the top surface of the handrail (see Figure D-12 of this section).
- The height of stair rail systems meets the following:
  - The height of stair rail systems installed before January 17, 2017 is not less than 30 inches (76 cm) from the leading edge of the stair tread to the top surface of the top rail; and
  - The height of stair rail systems installed on or after January 17, 2017 is not less than 42 inches (107 cm) from the leading edge of the stair tread to the top surface of the top rail.
- The top rail of a stair rail system may serve as a handrail only when:
  - The height of the stair rail system is not less than 36 inches (91 cm) and not more than 38 inches (97 cm) as measured at the leading edge of the stair tread to the top surface of the top rail (see Figure D-13 of this section); and
  - The top rail of the stair rail system meets the other handrail requirements in paragraph (f) of this section.
- The minimum clearance between handrails and any other object is 2.25 inches (5.7 cm).
- Handrails and stair rail systems are smooth-surfaced to protect employees from injury, such as punctures or lacerations, and to prevent catching or snagging of clothing.
- No opening in a stair rail system exceeds 19 inches (48 cm) at its least dimension.
- Handrails have the shape and dimension necessary so that employees can grasp the handrail firmly.
- The ends of handrails and stair rail systems do not present any projection hazards.
- Handrails and the top rails of stair rail systems are capable of withstanding, without failure, a force of at least 200 pounds (890 N) applied in any downward or outward direction within 2 inches (5 cm) of any point along the top edge of the rail.

## 1.5 LADDERS

All ladders used by Dowdy must meet OSHA & ANSI specifications, and ladder use must comply with OSHA's requirements for ladders, which are covered under 29 CFR 1910.23. These sections prescribe rules and provide requirements for the construction, care, and use of the common types of ladders. See Attachment A for a copy of these standards.

## **Ladder Inspections**

Ladders are inspected before initial use in each work shift and more frequently as necessary, in order to identify any visible defects that could cause employee injury, including, but not limited to, the following:

- Defects such as broken side rails, missing steps, or corrosion corroded components, structural defects
- Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced when the ladder is in position for use.
- Ensure that the ladder is not loaded beyond its maximum intended load for which it was built, nor beyond the manufacturer's rated capacity
- Ensure that rungs and steps are not coated with any material that may obscure structural defects, and are free of oil, grease, dirt, etc.
- Ladder surfaces must be free of puncture and laceration hazards
- Confirm that fittings are tight
- Make sure that spreaders or other locking devices are in place
- Non-skid safety feet are not damaged
- If a ladder is found to be unsafe, inform your project supervisor. If the unsafe condition is found to be valid, the ladder must be immediately tagged "Dangerous: Do Not Use" and remove from service until repaired or replaced.
- Portable ladder rungs must be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize the possibility of slipping.
- Stepladders and combination ladders are equipped with a metal spreader or locking device to securely hold the front and back sections in an open position while in use

## **Ladder Set Up & Storage**

The following precautions must be followed when setting up a ladder for use:

1. Assess the job and determine the proper ladder type that is needed for the task. Ladders shall be used only for the purpose for which they were designed, and may not be loaded beyond their maximum capacity.
2. Determine the best placement for the ladder. Consider surroundings such as piping, traffic, electric lines, and other workers in the area. Do not block closed doors that might interfere with the ladder. If a ladder must be placed in a location where they can be displaced by other activities or traffic, the ladder must be secured to prevent accidental displacement or be guarded by a temporary barricade.
3. Inspect the ladder to ensure there are no defects. (see Ladder Inspections)
4. Place ladder on a stable and level surface or stabilize the ladder to prevent accidental displacement. Ladders may not be placed on boxes, barrels, or other unstable bases to obtain additional height.
5. If using an extension ladder, make sure that the base of the ladder is  $\frac{1}{4}$  the height of the ladder from the wall.

6. Portable ladders used to gain access to an upper landing surface must have the side rails extended at least 3 feet above the upper landing surface.
7. Fully open and lock spreaders for stepladders in place.
8. Never tie ladders together to make longer sections, unless designed for such use

The following precautions will be followed when storing ladders:

- Store ladders in areas where they cannot be damaged (warping or sagging)
- Do not hang anything on ladders that are in storage

### **Safe Climbing Procedures**

- If you have a fear of heights – do not climb a ladder.
- Wear shoes or boots with heels to prevent slippage through the rungs
- Do not carry anything in the hands when climbing a ladder. Carry tools on belt or raise and lower with hand line.
- Never allow more than one person on a ladder.
- Climb and descend ladders cautiously.
- Face the ladder and hold on with both hands maintaining 3 points of contact at all times
- Never reach too far to either side. Do not lean to the side further than your belt buckle
- Never use second step from the top on a step ladder or the third step from the top for a straight/extension ladder
- Never attempt to move, shift, or extend ladder while in use

### **Ladder Safety Systems**

Ladder safety systems will meet the following requirements:

- Each ladder safety system allows the employee to climb up and down using both hands and does not require that the employee continuously hold, push, or pull any part of the system while climbing;
- The connection between the carrier or lifeline and the point of attachment to the body harness or belt does not exceed 9 inches (23 cm);
- Mountings for rigid carriers are attached at each end of the carrier, with intermediate mountings spaced, as necessary, along the entire length of the carrier so the system has the strength to stop employee falls;
- Mountings for flexible carriers are attached at each end of the carrier and cable guides for flexible carriers are installed at least 25 feet (7.6 m) apart but not more than 40 feet (12.2 m) apart along the entire length of the carrier;
- The design and installation of mountings and cable guides does not reduce the design strength of the ladder; and
- Ladder safety systems and their support systems are capable of withstanding, without failure, a drop test consisting of an 18-inch (41-cm) drop of a 500-pound (227-kg) weight.

## 1.6 HOLES

Dowdy will ensure that each employee is protected from falling, tripping, or stepping through:

- any hole (including skylights) that is 4 feet (1.2 m) or more above a lower level by one or more of the following: covers, guardrail systems, travel restraint systems, or personal fall arrest systems.
- any hole that is less than 4 feet (1.2 m) above a lower level by covers or guardrail systems.
- a stairway floor hole by a fixed guardrail system on all exposed sides, except at the stairway entrance. However, for any stairway used less than once per day where traffic across the stairway floor hole prevents the use of a fixed guardrail system (e.g., holes located in aisle spaces), the employer may protect employees from falling into the hole by using a hinged floor hole cover that meets the criteria in § 1910.29 and a removable guardrail system on all exposed sides, except at the entrance to the stairway.
- a ladderway floor hole or ladderway platform hole by a guardrail system and toeboards erected on all exposed sides, except at the entrance to the hole, where a self-closing gate or an offset must be used.
- a hatchway and chutefloor hole by:
  - A hinged floor-hole cover that meets the criteria in § 1910.29 and a fixed guardrail system that leaves only one exposed side. When the hole is not in use, the employer must ensure the cover is closed or a removable guardrail system is provided on the exposed sides;
  - A removable guardrail system and toeboards on not more than two sides of the hole and a fixed guardrail system on all other exposed sides. The employer must ensure the removable guardrail system is kept in place when the hole is not in use; or
  - A guardrail system or a travel restraint system when a work operation necessitates passing material through a hatchway or chute floor hole.

## 1.7 RUNWAYS AND SIMILAR WALKWAYS

Employees on a runway or similar walkway will be protected from falling 4 feet (1.2 m) or more to a lower level by a guardrail system. If Dowdy demonstrates that it is not feasible to have guardrails on both sides of a runway which is at least 18" wide and used exclusively for a special purpose, the guardrail on one side of the runway may be omitted and each employee will be provided with and uses a personal fall arrest system or travel restraint system.

## 1.8 DANGEROUS EQUIPMENT

Each employee less than 4 feet (1.2 m) above dangerous equipment will be protected from falling into or onto the dangerous equipment by a guardrail system or a travel restraint system, unless the equipment is covered or guarded to eliminate the hazard.

Each employee 4 feet (1.2 m) or more above dangerous equipment must be protected from falling by guardrail systems, safety net systems, travel restraint systems, or personal fall arrest systems.



## 1.9 OPENINGS

Each employee on a walking-working surface near an opening, including one with a chute attached, where the inside bottom edge of the opening is less than 39 inches (99 cm) above that walking-working surface and the outside bottom edge of the opening is 4 feet (1.2 m) or more above a lower level is protected from falling by the use of guardrail systems, safety net systems, travel restraint systems, or personal fall arrest systems.

## 1.10 STAIRWAYS

Dowdy will ensure that all stairways meet OSHA's requirements for stairways (29 CFR 1910.25), including:

- Each employee exposed to an unprotected side or edge of a stairway landing that is 4 feet (1.2 m) or more above a lower level is protected by a guardrail or stair rail system;
- Handrails, stair rail systems, and guard rail systems are provided in accordance with 1910.28.
- Handrails and stair rail systems are installed
- Vertical clearance above any stair tread to any overhead obstruction is at least 6 feet, 8 inches (203 cm), as measured from the leading edge of the tread. Spiral stairs must meet the vertical clearance requirements outlined below.
- Stairs have uniform riser heights and tread depths between landings.
- Stairway landings and platforms are at least the width of the stair and at least 30 inches (76 cm) in depth, as measured in the direction of travel.
- When a door or a gate opens directly on a stairway, a platform is provided, and the swing of the door or gate does not reduce the platform's effective usable depth to:
  - Less than 20 inches (51 cm) for platforms installed before January 17, 2017;
  - Less than 22 inches (56 cm) for platforms installed on or after January 17, 2017.
- Each stair can support at least five times the normal anticipated live load, but never less than a concentrated load of 1,000 pounds (454 kg) applied at any point.
- Standard stairs are used to provide access from one walking-working surface to another when operations necessitate regular and routine travel between levels, including access to operating platforms for equipment. Winding stairways may be used on tanks and similar round structures when the diameter of the tank or structure is at least 5 feet (1.5 m).
- Spiral, ship, or alternating tread-type stairs are used only when Dowdy has demonstrated that it is not feasible to provide standard stairs. These types of stairs will be installed, used, and maintained in accordance with manufacturer's instructions.
- Dowdy will refer to 1910.25 & 1910.28(b) for additional specifications regarding stair angles, riser height, tread depth, and stair height.

## 1.11 PROTECTION FROM FALLING OBJECTS

When an employee is exposed to falling objects, Dowdy will ensure that each employee wears head protection that meets the requirements of 29 CFR 1910, Subpart I. In addition, employees will be protected from falling objects by one or more of the following:

- Erect toe boards, screens, or guardrail systems to prevent objects from falling from higher levels.
- Toeboards used for falling object protection must:
  - Be erected along the exposed edge of the overhead walking-working surface for a length that is sufficient to protect employees below.
  - Have a minimum vertical height of 3.5 inches (9 cm) as measured from the top edge of the toeboard to the level of the walking-working surface.
  - Not have more than a 0.25-inch (0.5-cm) clearance or opening above the walking-working surface.
  - Be solid or do not have any opening that exceeds 1 inch (3 cm) at its greatest dimension.
  - Have a minimum height of 2.5 inches (6 cm) when used around vehicle repair, service, or assembly pits. Toeboards may be omitted around vehicle repair, service, or assembly pits when the employer can demonstrate that a toeboard would prevent access to a vehicle that is over the pit.
  - Be capable of withstanding, without failure, a force of at least 50 pounds (222 N) applied in any downward or outward direction at any point along the toeboard.
- Erect a canopy structure and keep potential fall objects far enough from edge of the higher level so that those objects would not go over the edge if they were accidentally displaced.
- Barricade the area where objects could fall, prohibit employees from entering the barricaded area, and keep objects that may fall far enough away from the edge of a higher level so that those objects would not go over the edge if they were accidentally displaced.
- Where tools, equipment, or materials are piled higher than the top of the toeboard, paneling or screening is installed from the toeboard to the midrail of the guardrail system and for a length that is sufficient to protect employees below. If the items are piled higher than the midrail, the employer also must install paneling or screening to the top rail and for a length that is sufficient to protect employees below; and
- All openings in guardrail systems must be small enough to prevent objects from falling through the opening.
- Canopies used for falling object protection must be strong enough to prevent collapse and to prevent penetration by falling objects.

## SLIPS, TRIPS, AND FALLS

- Keep floors clean and dry. In addition to being a slip hazard, continually wet surfaces promote the growth of mold, fungi, and bacteria that can cause infections.
- Provide warning signs for wet floor areas.
- Where wet processes are used, maintain drainage and provide false floors, platforms, mats, or other dry standing places where practicable, or provide appropriate waterproof footwear.
- Keep all places of employment clean and orderly and in a sanitary condition.
- Keep aisles and passageways clear and in good repair, with no obstruction across or in aisles that could create a hazard. Provide floor plugs for equipment, so power cords need not run across pathways.
- Keep exits free from obstruction. Access to exits must remain clear of obstructions at all times.

- Ensure spills are reported and cleaned up immediately.
- Use no-skid waxes and surfaces coated with grit to create non-slip surfaces in slippery areas such as toilet and shower areas.
- Use waterproof footwear to decrease slip/fall hazards.
- Use only properly maintained ladders to reach items. Do not use stools, chairs, or boxes as substitutes for ladders.
- Re-lay or stretch carpets that bulge or have become bunched to prevent tripping hazards.
- Aisles and passageways should be sufficiently wide for easy movement and should be kept clear at all times. Temporary electrical cords that cross aisles should be taped or anchored to the floor.
- Eliminate cluttered or obstructed work areas.
- Use prudent housekeeping procedures such as cleaning only one side of a passageway at a time, and provide good lighting for all halls and stairwells, to help reduce accidents.
- Provide adequate lighting especially during night hours. You can use flashlights or low-level lighting when entering patient rooms.
- Instruct workers to use the handrail on stairs, to avoid undue speed, and to maintain an unobstructed view of the stairs ahead of them even if that means requesting help to manage a bulky load.
- Eliminate uneven floor surfaces.
- Promote safe work in cramped working spaces. Avoid awkward positions, and use equipment that makes lifts less awkward.

## 1.12 TRAINING

Each employee who may be exposed to fall hazards will be trained, including each employee who uses personal fall protection systems or who is required to be trained as outlined in 29 CFR 1910 Subpart D. This plan enables each employee to recognize fall hazards. Employees will be trained in the procedures to be followed in order to minimize these hazards.

### TRAINING CURRICULUM

Each employee is trained, as necessary, by the Program Administrator or their qualified designate, covering the following topics, at minimum:

- Fall Hazards:
  - The nature of fall hazards in the work area and how to recognize them
  - The procedures to be followed to minimize those hazards
  - The correct procedures for installing, inspecting, operating, maintaining, and disassembling the personal fall protection systems that are used
  - The correct use of personal fall protection systems and equipment, including, but not limited to, proper hook-up, anchoring, and tie-off techniques, and methods of equipment inspection and storage, as specified by the manufacturer.
  - Prevention and avoidance of slip/trip/fall hazards
  - General ladder requirements including inspection, erecting, and securement.

- Equipment Hazards:
  - proper care, inspection, storage, and use of equipment covered by this subpart before an employee uses the equipment
  - Each employee who uses a dockboard must be trained to properly place and secure it to prevent unintentional movement.
  - Each employee who uses a rope descent system must be trained in proper rigging and use of the equipment in accordance with § 1910.27.
  - Each employee who uses a designated area must be trained in the proper set-up and use of the area.

## CERTIFICATION OF TRAINING

Management verifies compliance with the training requirements via the Training Log in Attachment F. Management shall maintain a record of the latest training certification for each employee, and that record shall contain:

- The name, and identification number of person being trained
- Signature of person being trained
- The date(s) of the training
- Identification of person conducting training (i.e., Program Administrator)

## RETRAINING

Documented refresher training will be annually and more frequently when Dowdy has reason to believe the employee does not have the understanding and skill outlined above. In addition, training will be provided and documented under the following circumstances:

- When changes to the workplace render previous training obsolete;
- When changes in the types of fall protection systems or equipment to be used render previous training obsolete or inadequate; or
- When inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee no longer has the requisite understanding or skill necessary to use equipment or perform the job safely.
- Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill

## 1.13 ENFORCEMENT

Constant awareness of and respect for fall hazards and compliance with this plan (and all company safety rules) are considered conditions of employment. Management reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this plan.

## **1.14 ACCIDENT INVESTIGATION REPORTING AND ANALYSIS**

All fall-related incidents shall be documented using the Accident Investigation Report (Attachment C). Each incident will be subsequently investigated using this form. Management shall review each form and provide feedback regarding necessary corrective action. All incidents falling under the parameters of this plan are analyzed at least annually to determine trends and recurring problems and the need for further control measures.

## **1.15 FALL PROTECTION PLAN AUDIT**

An annual management audit of Dowdy's fall protection plan is conducted in order to evaluate the plan's effectiveness and the need for revision and upgrade.

The Fall Protection Plan Audit form (Attachment E) may be used to evaluate the input of the Program Administrator and other representatives of supervision, along with feedback from the employees. This information will be used to gauge the effectiveness of the plan and incorporate the necessary improvements.

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# ATTACHMENT A: OSHA STANDARDS COVERING WALKING-WORKING SURFACES

## **Walking-Working Surfaces – 29 CFR 1910 Subpart D**

|  |   |
|--|---|
| Scope and Definitions  | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.21">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.21</a> |
| General Requirements   | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.22">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.22</a> |
| Ladders  | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.23">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.23</a> |
| Step Bolts and Manhole Steps   | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.24">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.24</a> |
| Stairways  | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.25">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.25</a> |
| Dockboards   | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.26">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.26</a> |
| Scaffolds and Rope Descent Systems   | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.27">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.27</a> |
| Duty to Have Fall Protection and Falling Object Protection                   | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.28">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.28</a> |
| Fall Protection Systems and Falling Object Protection-Criteria and Practices | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.29">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.29</a> |
| Training Requirements  | <a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.30">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.30</a> |

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ATTACHMENT B:      WALKING/WORKING SURFACES  
INSPECTION CHECKLIST

## Walking/Working Surfaces Inspection Checklist

| General Work Environment   | Comments |
|--|----------|
| Is a documented, functioning housekeeping program in place?  |          |
| Are all worksites clean, sanitary, and orderly?  |          |
| Are working surfaces kept dry, or is appropriate means taken to assure the surfaces are slip-resistant?  |          |
| Are all spilled hazardous materials or liquids, including blood and other potentially infectious materials, cleaned up immediately and according to proper procedures? |          |
| Is combustible scrap, debris and waste stored safely and removed from the worksite properly?   |          |
| Is all regulated waste, as defined in the OSHA bloodborne pathogens standard (1910.1030), discarded according to federal, state, and local regulations?                |          |
| Are accumulations of combustible dust routinely removed from elevated surfaces including the overhead structure of buildings, etc.?                                    |          |
| Is combustible dust cleaned up with a vacuum system to prevent the dust from going into suspension?  |          |
| Is metallic or conductive dust prevented from entering or accumulating on or around electrical enclosures or equipment?  |          |
| Are covered metal waste cans used for oily and paint-soaked waste?   |          |

| Walkways  | Comments |
|---|----------|
| Are aisles and passageways kept clear?  |          |
| Are aisles and walkways marked as appropriate?  |          |
| Are wet surfaces covered with non-slip materials?   |          |
| Are holes in the floor, sidewalk or other walking surface repaired properly, covered or otherwise made safe?  |          |
| Is there safe clearance for walking in aisles where motorized or mechanical handling equipment is operating?  |          |
| Are materials or equipment stored in such a way that sharp projecting objects will not interfere with the walkway?  |          |
| Are spilled materials cleaned up immediately?   |          |
| Are changes of direction or elevation readily identifiable?   |          |
| Are aisles or walkways that pass near moving or operating machinery, welding operations or similar operations arranged so employees will not be subjected to potential hazards? |          |
| Is adequate headroom provided for the entire length of any aisle or walkway?  |          |
| Are standard guardrails provided wherever aisle or walkway surfaces are elevated more than 30 inches above any adjacent floor or the ground?                                    |          |
| Are bridges provided over conveyors and similar hazards?  |          |



**Floor and Wall Openings****Comments**

|   |  |
|---|--|
| Are floor openings guarded by a cover, a guardrail, or equivalent on all sides (except at entrance to stairways or ladders)?  |  |
| Are toeboards installed around the edges of permanent floor openings (where persons may pass below the opening)?  |  |
| Are skylight screens of such construction and mounting that they will withstand a load of at least 200 pounds?  |  |
| Is the glass in the windows, doors, glass walls, etc., which are subject to human impact, of sufficient thickness and type for the condition of use?  |  |
| Are grates or similar type covers over floor openings such as floor drains of such design that foot traffic or rolling equipment will not be affected by the grate spacing?                           |  |
| Are unused portions of service pits and pits not actually in use either covered or protected by guardrails or equivalent?   |  |
| Are manhole covers, trench covers and similar covers, plus their supports designed to carry a truck rear axle load of at least 20,000 pounds when located in roadways and subject to vehicle traffic? |  |
| Are floor or wall openings in fire resistive construction provided with doors or covers compatible with the fire rating of the structure and provided with a self-closing feature when appropriate?   |  |

**Stairs and Stairways****Comments**

|   |  |
|---|--|
| Are standard stair rails or handrails on all stairways having four or more risers?  |  |
| Are all stairways at least 22 inches wide?  |  |
| Do stairs have landing platforms not less than 30 inches in the direction of travel and extend 22 inches in width at every 12 feet or less of vertical rise?                              |  |
| Do stairs angle no more than 50 and no less than 30 degrees?  |  |
| Are step risers on stairs uniform from top to bottom?   |  |
| Are steps on stairs and stairways designed or provided with a surface that renders them slip resistant?   |  |
| Are stairway handrails located between 30 and 34 inches above the leading edge of stair treads?   |  |
| Do stairway handrails have at least 3 inches of clearance between the handrails and the wall or surface they are mounted on?  |  |
| Where doors or gates open directly on a stairway, is there a platform provided so the swing of the door does not reduce the width of the platform to less than 21 inches?                 |  |
| Where stairs or stairways exit directly into any area where vehicles may be operated, are adequate barriers and warnings provided to prevent employees stepping into the path of traffic? |  |
| Do stairway landings have a dimension measured in the direction of travel, at least equal to the width of the stairway?   |  |

**Elevated Surfaces****Comments**

|  |  |
|--|--|
| Are signs posted, when appropriate, showing the elevated surface load capacity?  |  |
| Are surfaces elevated more than 30 inches above the floor or ground provided with standard guardrails?                                       |  |
| Are all elevated surfaces (beneath which people or machinery could be exposed to falling objects) provided with standard 4-inch toeboards?   |  |
| Is a permanent means of access and egress provided to elevated storage and work surfaces?  |  |
| Is required headroom provided where necessary?   |  |
| Is material on elevated surfaces piled, stacked or racked in a manner to prevent it from tipping, falling, collapsing, rolling or spreading? |  |
| Are dock boards or bridge plates used when transferring materials between docks and trucks or rail cars?                                     |  |

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ATTACHMENT C: FALL PROTECTION ACCIDENT  
INVESTIGATION REPORT

## Fall Protection Accident Investigation Report

Location: \_\_\_\_\_

Injured: \_\_\_\_\_ Age: \_\_\_\_\_

Department: \_\_\_\_\_

Date of Accident: \_\_\_\_\_ Time: \_\_\_\_\_ AM/PM

Nature of Injury/Illness/Property Damage:

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Medical Treatment By: \_\_\_\_\_

Location of Treatment: \_\_\_\_\_

Description of Accident:

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Contributing Factors:

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Loss Severity Potential: High/Major: \_\_\_\_\_ Med./Serious \_\_\_\_\_ Low/Minor: \_\_\_\_\_

Probable Reoccurrence Rate: Frequent: \_\_\_\_\_ Occasional \_\_\_\_\_ Rare: \_\_\_\_\_

Actions Taken to Prevent Reoccurrence:

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Project Supervisor Print: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Investigated By: \_\_\_\_\_

Date: \_\_\_\_\_

Reviewed By: \_\_\_\_\_

Date: \_\_\_\_\_

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ATTACHMENT D: FALL PROTECTION SAFETY  
MEETING REPORT

## Fall Protection Safety Meeting Report

Department/Location: \_\_\_\_\_ Date of Meeting: \_\_\_\_\_  
Number of Employees Present: \_\_\_\_\_ Incidents Reviewed: \_\_\_\_\_  
Subjects Presented and Discussed: \_\_\_\_\_

Comments/Suggestions/Recommendations:

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Action Taken:

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Additional Comments:

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Project Supervisor Print: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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**ATTACHMENT E:      FALL PROTECTION SAFETY  
INSPECTION FORM, FALL  
PROTECTION SAFETY AUDIT  
CHECKLIST, & FALL ARREST  
HARNES INSPECTION FORM**

## Fall Protection Safety Inspection Report

Department/Location: \_\_\_\_\_

Equipment: \_\_\_\_\_ ID No.: \_\_\_\_\_

| <u>Item</u> | <u>Satisfactory</u> | <u>Needs Action</u> | <u>Follow Up</u> |
|-------------|---------------------|---------------------|------------------|
| 1.          |                     |                     |                  |
| 2.          |                     |                     |                  |
| 3.          |                     |                     |                  |
| 4.          |                     |                     |                  |
| 5.          |                     |                     |                  |
| 6.          |                     |                     |                  |
| 7.          |                     |                     |                  |
| 8.          |                     |                     |                  |
| 9.          |                     |                     |                  |
| 10.         |                     |                     |                  |

Please provide additional comments/recommendations below for all items noted in the "Needs Action" column. Document completion of recommendations and/or "Needs Action" items in "Follow Up" column.

**Comments/Recommendations:**

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Inspected By: \_\_\_\_\_

Date: \_\_\_\_\_

Reviewed By: \_\_\_\_\_

Date: \_\_\_\_\_



## Fall Protection Safety Audit Checklist

Location: \_\_\_\_\_

Instructions: Support each "unsatisfactory" component with appropriate plan for corrective action in "Comments" section. Insert "N/A" for any aspect which does not apply.

| <b>PROGRAM COMPONENTS</b>                      | Satisfactory | Unsatisfactory |
|--|--------------|----------------|
| Statement of Company Policy                    | _____        | _____          |
| <b>Fall Protection Systems:</b>                |              |                |
| Management Responsibility                      | _____        | _____          |
| Walking/Working Surfaces                       | _____        | _____          |
| Protection from Falling Objects                | _____        | _____          |
| Criteria and Practices                         | _____        | _____          |
| Guardrail System                               | _____        | _____          |
| Safety Net Systems                             | _____        | _____          |
| Personal Fall Arrest Systems                   | _____        | _____          |
| Positioning Device Systems                     | _____        | _____          |
| Warning Line Systems                           | _____        | _____          |
| Controlled Access Zones                        | _____        | _____          |
| Safety Monitoring Systems                      | _____        | _____          |
| Covers   | _____        | _____          |
| Training Requirements                          | _____        | _____          |
| Training Curriculum                            | _____        | _____          |
| Certification of Training                      | _____        | _____          |
| Retraining                                     | _____        | _____          |
| Interim Training                               | _____        | _____          |
| Program Enforcement                            | _____        | _____          |
| Accident Investigation, Reporting and Analysis | _____        | _____          |
| Fall Protection Plan Audit                     | _____        | _____          |

Comments/Corrective Action:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Audited By: (Print) \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Fall Arrest Harness Inspection Report

Department/Location: \_\_\_\_\_

Equipment: \_\_\_\_\_ ID No.: \_\_\_\_\_

| <u>Item</u>                                | <u>Satisfactory</u> | <u>Needs Action</u> | <u>Follow Up</u> |
|--|---------------------|---------------------|------------------|
| 1. Harness Inspection (Belts and Rings)    |                     |                     |                  |
| 2. Harness Inspection (Buckles and D-Ring) |                     |                     |                  |
| 3. Harness Inspection (Tongue Buckle)      |                     |                     |                  |
| 4. Harness Inspection (Friction Buckle)    |                     |                     |                  |
| 5. Lanyard Inspection (Snaps)              |                     |                     |                  |
| 6. Lanyard Inspection (Thimbles)           |                     |                     |                  |
| 7. Steel Lanyard                           |                     |                     |                  |
| 8. Web Lanyard                             |                     |                     |                  |
| 9. Rope Lanyard                            |                     |                     |                  |
| 10. Shock Absorbing Packs                  |                     |                     |                  |

Please provide additional comments/recommendations below for all items noted in the "Needs Action" column. Document completion of recommendations and/or "Needs Action" items in "Follow Up" column.

**Comments/Recommendations:**

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Inspected By: \_\_\_\_\_

Date: \_\_\_\_\_

Reviewed By: \_\_\_\_\_

Date: \_\_\_\_\_

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# ATTACHMENT F: TRAINING DOCUMENTATION

## OSHA's Employee Responsibilities

- Read the OSHA Poster at the workplace.
- Comply with all applicable OSHA standards.
- Follow all lawful employer safety and health rules and regulations and wear or use prescribed protective equipment while working.
- Report hazardous conditions to the supervisor.
- Report any work-related injury or illness to the employer, and seek treatment promptly.
- Exercise rights under the Act in a responsible manner.

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ATTACHMENT G: NEW HIRE TRAINING  
DOCUMENTATION

## OSHA's Employee Responsibilities

- Read the OSHA Poster at the workplace.
- Comply with all applicable OSHA standards.
- Follow all lawful employer safety and health rules and regulations and wear or use prescribed protective equipment while working.
- Report hazardous conditions to the supervisor.
- Report any work-related injury or illness to the employer, and seek treatment promptly.
- Exercise rights under the Act in a responsible manner.

## New Hire Training Summary:

*The following items must be reviewed with employees upon hire.*

- Discuss employee roles in this fall protection plan
- Convey company-specific fall safety rules
- The nature of fall hazards in the work area
  - Slips, Trips, & Falls
  - Elevated work surfaces in the workplace (Discuss: Platforms, Wall and Floor Openings, Roofs, Scaffold, Ladders, Man lifts, Other)
- Address appropriate & safe use of ladders
- The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones and other protection to be used
  - Fall protection and/or prevention is required when working 4-feet (if General Industry) or 6-feet (if Construction) above a lower surface.
- The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection
  - Toeboards, when used as falling object protection, must be erected along the edge of the overhead walking/working surface for a distance sufficient to protect employees below.
  - Guardrail systems, when used as falling object protection, must have all openings small enough to prevent passage of potential falling objects.
  - While performing roof work, materials and equipment must not be stored within 6 feet of a roof edge unless guardrails are erected at the edge.

*Upon completing the review of the above information, have new employees sign the new hire training log on the following page.*

