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| Document<br>Elevated Work and Fall Protection Policy | Published<br>9/15/2023 | Valid for<br>Wisconsin Rapids |
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## Document: Elevated Work and Fall Protection

### Purpose

The Wisconsin Rapids Facility will have a fall protection program conforming to the OSHA requirements that includes recognition and elimination of fall hazards through hazard analysis, engineering, controls, training, work audits, and enforcement of the fall protection program. The purpose of this procedure is to prevent falls and resulting injuries to WR Facility team members, vendors, visitors, and contractors through hazard analysis, the engineering and design of walking and working surfaces, work controls for people using scaffolding, mobile elevating working platforms, climbing or accessing elevated work areas for production, maintenance, or construction activities.

### Responsibility

- A. All team members and contractors are required to comply with the Elevated Work and Fall Protection Policy, which includes but is not limited to:
  - 1. Proper selection and use of personal fall arrest systems
  - 2. Inspection of personal fall arrest system prior to usage
  - 3. Reporting of unsafe conditions or equipment
  - 4. Completing required training regarding fall protection as necessary
  - 5. Compliance of policy for any unguarded elevation of four feet or greater
- B. The Safety Department:
  - 1. Ensuring training is developed in compliance with applicable regulations, exceeding regulatory requirements where appropriate
  - 2. Maintaining files for purposes of demonstrating compliance with regulatory requirements
  - 3. Providing resources to ensure compliance with regulations and the fall protection policy
  - 4. Ordering personal fall protection devices and equipment that meets regulatory requirements for all WRCF team members
- C. Management/Supervisors:
  - 1. Auditing selection and use of personal fall arrest systems
  - 2. Conducting spot checks to ensure proper use of fall arrest systems
  - 3. Completing required training regarding fall protection as necessary

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4. Ensuring team members are complying with the Elevated Work Policy
5. Ensuring resources are available for prompt emergency rescue or to document and verify that team members can rescue themselves

## Definitions

*Aerial Platform* - mobile automated elevating work platforms, supported from the ground level below from a structure, generally a cantilever beam called a boom, which is used to position the platform.

*Anchorage* - a secure point of attachment for lifelines, lanyards or deceleration devices.

*Body Harness* - straps which may be secured about the team member in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest, and shoulders with means for attaching it to other components of a personal fall arrest system.

*Connector* - device used to couple (connect) parts of a personal fall arrest or positioning device system together (i.e. a carabiner, buckle, d-ring or snap-hook which is an integral part of the harness or lifeline).

*Competent Person* - One who is capable of identifying existing and predictable hazards in any personal fall protection system or any component of it, as well as in their application and uses with related equipment, and who has authorization to take prompt, corrective action to eliminate the identified hazards.

*Deceleration Device* - any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest or otherwise limit the energy imposed on an team member during fall arrest.

*Elevated Work* - a working location with an elevation 4' above the floor or other working surfaces in construction work and 4' above the floor level as an industry standard.

*Fall Restraint System* - properly utilized restraint systems (harness/tether) rigged in such a way that the team member cannot get to the fall hazard. These systems must have the ability to sustain a tensile load of at least 5,000 lbs.

*Fixed Ladder* – A ladder permanently mounted to a building, structure, or equipment.

*Free Fall* - the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

*Free Fall Distance* - the vertical displacement of the fall arrest attachment point on the team member's body harness between the onset of the fall and just before the system begins to apply force to arrest the fall.

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*Guardrail System* - a barrier erected to prevent team members from falling to lower levels.

*Ladder Safety System* – A system attached to a fixed ladder designed to eliminate or reduce the possibility of a worker falling from a ladder. A ladder safety system usually consists of a carrier, safety sleeve, lanyard, connectors, and body harness (cages and well are not considered safety systems).

*Lanyard* - a flexible line of rope, wire rope or strap which generally has a connector at each end for connecting the body harness to a deceleration device, lifeline or anchorage.

*Lifeline* - a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline) or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline) and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

*Low Slope Roof* - roof having slope less than or equal to 4 in 12 (vertical to horizontal).

*Opening* - a gap or void 30” or more high and 18” or more wide in a wall or partition through which team members can fall to a lower level.

*Personal Fall Arrest System* - a system used to arrest an team member in a fall from a working level. It consists of an anchorage, connectors, a body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

*Qualified Person* - A person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work, or the project.

*Scissor Lift* - a piece of equipment that is self-propelled which raises electrically or hydraulically and supports a working platform that has safety rails installed where an team member can stand to perform work that is beyond the reach of ladders or scaffolding.

*Self-Retracting Lifeline/Lanyard* - a deceleration device containing a drum-wound line, which can be slowly extracted from or retracted into the drum under slight tension during normal team member movement and which, after onset of a fall, automatically locks the drum and arrests the fall. Must be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.

*Snaphook* - a connector comprised of a hook-shaped member with a normally closed keeper or similar arrangement which may be opened to permit the hook to receive an object and when released, automatically closes to retain the object. Snap hooks shall be the locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection.

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*Steep Roof* - a roof having a slope greater than 4 - 12 (vertical to horizontal).

*Toe board* - a low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

*Unprotected Sides and Edges* - any side or edge of a walking/working surface (i.e. floor, roof, ramp, or runway where there is no wall and/or parapet at least 39" high).

*Walking Working Surface* - any surface, whether horizontal or vertical on which an team member walks or works, including but not limited to floors, roofs, ramps, bridges, runways, form work, and concrete reinforcing steel but not including ladders, vehicles or trailers on which team members must be located in order to perform their jobs.

*Warning Line System* - a barrier erected on a roof to warn team members that they are approaching an unprotected roof side or edge and which designates an area in which roofing work may take place without the use of a guardrail, body harness or safety net systems to protect team members in the area.

## Execution

### A. Fall Potential Assessment/Rescue

1. Each facility will conduct a fall potential assessment that will include:
  - a. Identification of fall hazards.
  - b. Identification, evaluation and selection of controls.
  - c. Communication of identified hazards and controls to affected people.
  - d. Rescue plan in place.
  - e. Follow-up to ensure proper planning and action.

### B. Engineering and design of guardrails for permanent walking and working surfaces over 4' high.

1. Guardrail systems
  - a. The top edge height of top rails or equivalent guardrail system members shall be 42" plus or minus 3" above the walking/working level. When conditions warrant, the height of the top edge may exceed the 45" height provided the guardrail system meets all other criteria.
  - b. Midrails shall be midway between the top edge of the guardrail and the walking/working level.

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- c. Guardrail systems shall be capable of withstanding a force of at least 200 lbs. in any direction, at any point along the top rail. Midrail shall withstand a force of 150 lbs.
- d. Guardrails shall be fabricated from materials with dimensions that meet OSHA standards recommendation.
- e. Stanchions shall be spaced not to exceed 8'.
- f. 4" toe boards shall be used as necessary to prevent tools and objects from creating a falling hazard.
- g. If wire rope is used for top rails, it shall not deflect more than 3" and shall be flagged at not more than 6' intervals with high-visibility material.
- h. When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening between guardrail sections when hoisting operations are not taking place.
- i. Prior to the removal and installation of a removable guardrail, the team member shall be protected from fall hazards.

### C. Positioning Device Systems (Fall Restraint Systems)

- 1. Fall restraint systems prevent a worker from approaching a fall hazard.
- 2. Fall restraint is not intended for use where there is a potential for free fall.
- 3. Fall restraint systems must be capable of supporting at least twice the potential impact load or 5,000 lbs., whichever is greater.
- 4. A fall restraint system must be a full body harness, tether and anchor point as long as it provides adequate personal protection

### D. Personal Fall Arrest Systems (Used when other fall prevention systems are not feasible and there is a free fall potential.)

- 1. A system used to arrest an team member in a fall from a working level. It consists of an anchorage, connectors, a full body harness and may include a lanyard, deceleration device, lifeline or suitable combination of these.
- 2. Only full body harnesses are allowed for personal fall arrest.
- 3. Anchorages used for attachment of personal fall arrest equipment shall be:
- 4. Located at or above the team member's shoulders, when possible.
- 5. Capable of supporting 5,000 lbs. per team member attached independent of any anchorage being used to support or suspend platforms.
- 6. Exceptions can be made on anchorages per OSHA standards.
- 7. When stopping a fall, systems shall be rigged such that an team member in free-fall will be short enough to keep the worker from entering in the fall hazard.
- 8. The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level.

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9. D-rings and snaphooks shall have a minimum tensile strength of 5,000 lbs. Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 lbs.
10. Snaphooks shall be a double locking-type.
11. Lifelines shall be protected against being cut or abraded.
12. No looping of lanyards unless they are designed for the purpose.
13. Self-retracting lifelines shall automatically limit free-fall distance to less than 2' (use in vertical application to prevent swing.)
14. Body harnesses and components shall be used only for team member protection and not to hoist materials.
15. Standard fall arrest systems are designed to withstand a maximum load (personnel and equipment) up to 310 lbs. If the person weighs more than 310 lbs., other options must be explored.
16. Once a personal fall arrest system and components have been used in a fall, they shall be immediately removed from service and disposed of appropriately. Arrest systems shall be inspected by the user prior to each use for wear, damage or other deterioration. Defective components shall be removed from service immediately.

**E. Perimeter Warning Line Systems**

1. If other fall protection measures cannot be used, perimeter warning line systems will be used to alert persons of an unprotected edge.
2. When mechanical equipment is being used, the warning line shall be erected not less than 6 feet from the leading edge which is parallel to the direction of mechanical equipment operation and not less than 10 feet from the leading edge which is perpendicular to the direction of mechanical equipment operation.
3. When mechanical equipment is not being used, the warning line shall be erected not less than 6 feet from the leading edge.
4. Warning lines shall consist of ropes, wires or chains and supporting stanchions erected as follows:
  - a. Shall be rigged and supported in such a way that its lowest point (including sag) is greater than 34" from the walking/working surface and its highest point is no greater than 39" from the walking/working surface.
  - b. After being erected stanchions shall be capable of resisting, without tipping over, a force of at least 16 lbs. applied horizontally against the stanchion.
  - c. Shall be flagged at 6 feet intervals with high-visibility material.

**F. Elevated Work from Mobile Equipment**

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1. Body harnesses shall be worn and a lanyard attached to the boom or basket when working from any type of lift (aerial, boom, scissor, etc.). Anchor point provided by manufacturers shall be used. Scissor lifts that do not have a rated, manufacturers installed anchor point can be used without fall protection. If an anchor point exists on the scissor lift, fall protection must be used.
2. Tying off to adjacent structures shall not be permitted when working in the basket.
3. Team members must work from basket or platform floor as opposed to sitting or standing on railing. If task requires a climb from basket or platform to an adjacent structure, a personal fall arrest system with a two-line system must be used to ensure continual attachment.
4. Only trained and authorized personnel will operate aerial lifts or other mobile elevated work platforms.

### G. Ladders (Fixed and Portable)/Stairways

1. New purchases of extension ladders shall be fiberglass side rails with a minimum 300 lb. type 1A rating. Existing aluminum extension ladders will be removed from service.
2. Warning devices such as signs and traffic cones shall be used to provide protection when ladders are placed in an area of vehicular or pedestrian traffic.
3. Ladders shall be equipped with non-slip bases.
4. Ladders must be inspected prior to use. There will be no exceptions to the three point contact rule when climbing. Fall protection is not required but is recommended when working from portable ladders.
5. Fixed ladders shall be designed per OSHA standards.
  - a. Non-skid tread ladder rungs are recommended in slippery environments.
  - b. All new fixed ladders and replacement ladder/ladder sections that extend beyond 24' must be equipped with a ladder safety system or personal fall protection system.
  - c. By November 18, 2036, existing ladders over 24' must have ladder safety systems or personal fall protection installed in lieu of cages or wells.
6. Stairways shall be designed to meet OSHA standards.
  - a. Non-slip tread will be used in slippery work areas.
  - b. Team members will be expected to use handrails provided.
  - c. No running will be allowed on stairways.

### H. Scaffolds

1. If lumber is being used, it shall be scaffold grade planking or lumber approved by a qualified person.
2. The entire working surface of the scaffold system shall be planked over to prevent falls to a lower level.
3. Planking shall extend beyond the end braces between 6" and 12" unless cleated or otherwise secured.

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4. Guardrails and toe boards shall be installed at 10’ unless the scaffolding is so close to the ceiling that guardrails are not feasible. In this situation, personal fall protection equipment shall be used.
  5. Scaffolds shall be secured to the building or structure when the height exceeds 4 times the minimum base width or at 30’ horizontal intervals and 26’ vertical intervals.
  6. A safe means of entering the scaffold is required. Climbing the cross braces is prohibited. (construction standards require ladder access.)
  7. A competent person shall be present during the erection, alteration, movement, and disassembly of the scaffold.
  8. A competent person must inspect scaffold components daily prior to use.
- I. Special Circumstances
1. Leading edge work, overhand bricklaying or precast concrete erection.
    - a. The work noted in paragraph 1 above shall be protected by a guardrail system, safety net system or a personal fall arrest system.
    - b. If methods listed in the paragraph above are infeasible or determined to cause a greater hazard, a fall protection plan must be developed by a qualified person and for the specific site where the work is performed. (Exception: Overhand bricklaying operation in a controlled access zone can be done without a written fall protection plan.)
    - c. The implementation of this fall prevention plan shall be under the supervision of a competent person.
    - d. The areas under this plan shall be classified as controlled access zones.
    - e. A safety monitoring system must be used, where no other alternatives are implemented
    - f. Warning line systems may be used to warn people as to the edge of low slope roofs.
    - g. Framework and reinforcing steel work fall protection, although not normally required while moving vertically or horizontally, will be used when climbing at a height of over 24’.
    - h. Steel erection requires fall protection at 25’.
  2. Entrance and egress to and from elevated work areas (i.e. overhead and gantry crane inspections). A hazard analysis will be conducted on jobs requiring access from mobile elevated work platforms or aerial lifts to the elevated work area.
  3. Floor holes and covers.

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- a. Floor hole covers will be hinged and/or secured or guardrail systems shall be erected around the floor hole. If this is infeasible, other fall protection methods may be required.
  - b. Covers located in vehicular aisles must support at least twice the maximum axle load of the largest vehicle to which the cover is exposed.
  - c. Covers not in traffic aisle must be able to support at least twice the weight of team members, equipment and materials that may be imposed on the cover at any one time.
  - d. Temporary hole covers must be secured and shall be color-coded and/or bear the markings “Hole” or “Cover.”
4. Protection from falling objects.
- a. During performance of overhand bricklaying and related work, no materials except masonry and mortar shall be stored within 4' of the working edge.
  - b. During the performance of roofing, work materials shall not be stored within 6' of roof edge unless guardrails are erected at the edge. Materials which are piled, grouped or stacked shall be stable and self-supporting.
  - c. Canopies used as falling object protection shall be strong enough to prevent collapse and to prevent penetration by any objects that may fall.
  - d. In addition to guardrails, toe boards, etc. to prevent workers below from being struck by falling objects, team members working under these projects must wear hard hats. Barricades shall be installed under overhead projects to prevent entry of unauthorized personnel.
5. Confined space entry.
- a. Fall protection systems shall be used when rope ladders are used for entry or ladders used are over 24' in length. Slippery conditions may warrant a hazard assessment and the use of fall protection.
6. Excavations.
- a. Team members at the edge of excavations 6' or more deep shall be protected from falling by guardrail systems, fences, barricades, or covers. Crossovers on these also require protection.
7. Hoist landings.
- a. If guardrail systems (or chain gate/guardrail), or portions thereof, must be removed to facilitate hoisting operations as during landing of materials and a worker must lean through the access opening or out over the edge to receive or guide equipment and materials, that team member must be protected by a personal fall arrest system.
8. Power generation “pole climbing.”

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- a. The definition of “qualified” under this special industry standard has a different meaning and is used to qualify a person in climbing and other power service work.
  - b. Fall arrest equipment, work positioning equipment, or travel restricting equipment shall be used by team members working at elevated locations more than 4' above the ground on poles, towers, or similar structures if other fall protection has not been provided.
  - c. Fall protection is not required to be used by a qualified team member climbing or changing location on poles, towers, or similar structures, unless conditions, such as but not limited to ice, high wind (> 40 mph), the design of the structure (i.e. no provisions for holding on with hands) or the presence of contaminants on the structure could cause the team member to lose their grip or balance.
9. Production processes (i.e. clothing changes, housekeeping, or roll changes).
- a. A fall hazard analysis shall be conducted when team members work on unprotected edges more than 4' high.
  - b. Fall protection or prevention methods most appropriate shall be applied.
10. Personnel platforms suspended by cranes.
- a. The use of a crane to lift team members on a personnel platform is prohibited except when erection, use and dismantling of conventional means of reaching the worksite, such as a personnel hoist, ladder, stairway, aerial lift, elevated work platform, or scaffold would be more hazardous or is not possible because of structural design of worksite conditions.
  - b. The personnel platform and suspension system shall be designed by a qualified engineer or a qualified person competent in structural design. The rigging, trial lift, pre-lift meeting, and lift will be conducted according to OSHA 1926.550(g).
- J. Inspections/Maintenance of Fall Prevention/Protection Equipment or Systems
- 1. Fall prevention/protection equipment or systems need to be inspected and maintained in accordance with manufacturer’s guidelines. All equipment is required to be inspected by the user prior to usage.
- K. Training
- 1. Team members that conduct elevated work will be provided a training program that teaches team members team members who might be exposed to fall hazards how to recognize such hazards and how to minimize them. The following topics shall be covered.
    - a. The nature of fall hazards in the work area.
    - b. The correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems which they will be expected to use.

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- c. The use and application of guardrail, fall restraint systems, personal fall arrest, warning line, safety net, controlled access zones, and safety monitoring systems.
- d. The role of each team member in the safety monitoring system when the system is in use.
  
- e. The limitations in the use of mechanical equipment during the performance of roofing work on low slope roof when applicable.
- f. The current procedure for equipment and materials handling and storage and the erection of overhead protection.
- g. Team members using aerial lifts or mobile elevated work platforms will be trained and authorized.
- h. Team members erecting and using scaffold will be properly trained.
- i. Team members using ladders will be properly trained.
- j. Trainers utilized will be manufacturer’s training representatives or competent persons as defined in the definitions section. Written certification that identifies the team members trained and the date of training will be maintained and the trainer must sign the certification record. Retraining will be done when there is reason to believe the team member:
  - 1. Does not have the understanding and skill required or
  - 2. Changes in the workplace render previous training obsolete or
  - 3. Changes in the types of fall protection system or equipment render previous training obsolete.

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