



<b>Subject: Elevated Work Policy</b>		<b>Doc ID:</b> #34470	<b>Page 1 of 13</b>
<b>Effective:1/25/24</b>	<b>Document Owner: Safety Manager</b>	<b>Approved By:</b>	

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**I. POLICY/SCOPE**

It is the policy of the Quinnesec Mill that all individuals performing work 4 feet or more above a surface, above an open trench with a depth of 4 feet or greater or any height above dangerous or exposed equipment, shall comply with this Elevated Work Policy. Elevated work shall be accomplished only after all potential hazards have been identified, proper equipment is available and employees have been adequately trained.

Exceptions: Accessing pick-up trucks, flat beds (for unloading), clamp trucks, forklifts, etc. are not covered by this policy or MiOSHA’s standard 2; Rule 220.

**II. INTENT/PURPOSE**

Wherever practical it is desirable to have a permanently installed means of elevated work protection. Where permanent means are not practical it is the purpose of this policy to protect workers by establishing requirements for sound elevated work practices, and to insure equipment used for elevated work is appropriate, used properly and maintained in good condition.

**III. DEFINITIONS**

**Elevated Work** - Work performed at a height of four feet or greater, or above a surface next to an open trench with a depth of four feet or greater or any height above dangerous or exposed equipment.

**Fall Prevention** – Systems designed to prevent a fall. These include guardrail systems, hole covers (Need to be rated for any potential load that may be applied, or marked “NO LOAD”), warning lines or marking systems, fall restraint or positioning systems.

**Fall Protection** – Equipment/system designed to protect a worker in the event of a fall from elevation. A personal fall arrest system (PFAS) has components that work together to protect workers when they fall. Components include an anchorage, connectors, and a full body harness and may include a shock-absorbing lanyard, a retractable lifeline, and/or a deceleration device.

**Fall Restraint** – A system designed to prevent the user from reaching a fall hazard. Fall restraint systems typically involve a fixed-length lanyard and body harness or body belt. The length of the lanyard does not allow the worker to reach the fall hazard.



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**Fixed Ladder** - A ladder permanently attached to a structure, building or stationary equipment.

**Floor Hole** - An opening measuring less than 12 inches but more than one inch in its least dimension in a floor, platform, pavement or yard (such as a belt hole, pipe opening or slot opening).

**Floor Opening** - An opening measuring 12 inches or more in its least dimension, in a floor, platform, pavement or yard, through or into which persons or objects may fall (such as a hatchway, stair or ladder opening, pit or large manhole).

**Full Body Harness** - A belt with a shoulder strap worn around the legs, waist and shoulder capable of restraining an employee from falling or protecting them in a fall.

**In Service Loading** - An imposed physical load on a safety belt or harness from a free fall of more than 3 feet.

**Lanyard** - A tether attached to a safety belt or harness at one end and to a lifeline or fixed object at the other.

**Lifeline** - A vertical line from a fixed anchorage or between two horizontal anchorages, independent of walking or working surfaces, to which a lanyard, safety belt, or full body harness is secured.

**Mobile Elevating Work Platforms (MEWP)** - Any elevating mechanism (vertical rising, telescoping, articulating, or any combination thereof), that is mounted on a powered vehicle or non-powered mobile base.

**Platforms** - Scaffolding or elevated work surfaces.

**Portable Ladder** - A ladder not permanently fixed in place and which may be used at various locations.

**Runway** - A passageway for persons, which is elevated above the surrounding floor or ground level.

**Safety Belt** - A belt worn around the waist capable of restricting the movement of a person towards a potential fall hazard when combined with a lifeline or lanyard. Safety belts can be used for fall restraint only – not fall protection.



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**Scaffolding** - Elevated work platforms, temporary in nature, used for supporting employees and materials.

**Wall Opening** - An opening in a wall or partition which is not less than 30 inches high and 18 inches wide, which persons may fall through or into.

**IV. PROCEDURES/PRACTICES**

A. Access to Elevations - Access to elevations in excess of 16 inches shall be gained by one of the following:

1. Appropriate stairway
2. Ramp
3. Fixed ladder
4. Portable ladder (industrial grade)

B. Performing elevated work using ladders

1. Fixed ladders

a. Fixed ladders shall be constructed to meet the safety standards set forth by the Department of Labor General Industry Safety Standards Commission, Part 3.

b. Ladders are inspected before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury.

Rungs, Cleats and steps shall be secure and free of splinters, sharp edges, hazardous projections, oil, grease or any slippery substance. Outdoor ladders and those in corrosive environments shall be inspected for deterioration due to their environment. Damaged ladders or those not otherwise meeting all requirements shall be tagged and removed from service. Do not make improvised repairs on defective ladders.

2. Portable ladders



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- a. Portable ladders at the Quinnesec mill shall be Type I industrial grade meeting the General Industry Safety Standards Commission Safety Standards, Part 4. Ladders purchased by our mill meet these requirements. Metal step ladders and metal extension ladders are not allowed on site. (Metal Rolling Platforms are allowed.)
  - b. A ladder must be inspected before each use and after it has fallen or been involved in an accident. Ladders must be tagged defective, removed from use and repaired if defects are found.
  - c. Ladders shall not be placed in front of a door that opens toward the ladder unless the door is blocked open, locked, guarded by a person or protected by a barricade. Only use a ladder on a stable base. The top rest of a non-self-supporting ladder should be on a rigid surface. Never use a ladder for any other use than that for which it is intended (example: brace, skid or gang way).
  - d. Non-self-supporting ladders should be erected at a pitch of 75 degrees for maximum balance and strength. This may be accomplished by placing the base out from the wall or other support one-quarter of the working length of the ladder.
  - e. Ladders must be properly secured/supported to prevent movement from side to side and kickback. Straight, sectional or extension ladders shall have safety feet and be placed, tied, or held so as to prevent slipping.
  - f. When using a ladder to go from one landing to another the ladder shall extend above the upper landing by not less than three feet.
- C. Performing elevated work using scaffolding and platforms
- 1. All scaffolding and platforms must be built in compliance with the Department of Labor General Industry Safety Standards Commission Safety Standards, Part 2 Walking-Working Surfaces. Scaffolding 10 feet or more above floor or ground level shall have standard barriers and toeboards. A full body harness and lifeline shall be used where a railing is normally required but not practical.



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2. Maintenance/Inspection - Individuals using scaffolding and platforms shall inspect them before each use to insure they are free of broken, worn, splintered or loose pieces, slippery substances, or any obstacles that would constitute tripping or falling hazards. Material used for repair of these components shall meet the design strength of the component. If equipment is found to be damaged, defective, or otherwise in unsafe condition, it shall be visibly marked and be removed from service until repairs have been made.

3. Use:

- a. No one will be permitted to use makeshift scaffolding for elevated work. Ladders cannot be used as scaffold planking.
- b. When setting up a job that involves elevated work where the potential exists for parts/tools to fall, the area below must be adequately barricaded.
- c. Never use a scaffold as a fulcrum to pry from - you may cause it to become overloaded.
- d. Heavy or cumbersome objects must be laid easily, not dropped on a scaffold.

D. Floor and wall openings

1. Minimum requirements:

- a. All stairways, wall and floor openings, open sided floors, ladder ways, skylights, hatchways and runways shall be guarded by standard barriers and meet design specifications as specified in the General Industry Safety Standards, Part 2. Where there is a danger from falling materials, standard toe boards must be in place. Covers for openings and holes must be rated **at least twice** the normal floor load. No projections greater than one inch above floor level are allowed.
- b. A manhole floor opening shall be covered by a floor hole cover as described in paragraph D(1)(a) above. When the cover is not in place, the manhole opening shall be constantly attended by a person or shall be protected by temporary barriers.



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- c. A temporary floor opening shall have a barrier or shall be constantly attended by a person. All barriers for temporary floor openings shall be identified by barricade tape, fixed barricade, or other similarly effective means.
  - d. A floor hole or floor opening into which persons cannot accidentally walk, on account of fixed machines, equipment or walls, but tools or materials can fall on employees or equipment, shall be protected by a cover that leaves no openings more than one inch wide unless this opening is connected to a chute type device.
  - e. An area below a floor hole or floor opening, or wall hole or wall opening, where material is being lowered shall be guarded by a standard fixed or temporary barrier or attended by a person.
2. Maintenance - floors, platform stair treads and landings shall be maintained free of broken, worn, splintered or loose pieces, slippery substances, or any obstacles that would constitute tripping or falling hazards. Material used for repair of these components shall meet the design strength of the component. If equipment is found to be damaged, defective, or in unsafe condition, it shall be visibly marked and be removed from service until repairs have been made.
3. Use:
- a. Never lean over or stand on a guardrail or toe board to perform work or reach something.
  - b. Always be aware of people and equipment below when working on platforms or near the edge of a wall or floor opening. Take precautions to prevent objects from falling. If the potential exists for falling debris or objects, the area below should be barricaded or blocked off and marked with warning signs or tape to prevent traffic through the area.
- E. **Mobile Elevating Work Platforms (MEWP)** - Scissor Lifts, Man Baskets, etc.
- 1. An **MEWP** must be maintained in a condition free of known defects and hazards that could cause an injury. All **MEWP**'s shall pass the Manufacturer's Pre-Use Inspection and also be Current on their Annual Inspections (no longer than 13



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months from the previous Annual Inspection). There must also be an Annual Inspection Decal on the machines that show the Inspection date. This includes both a "just before use" inspection by the operator and inspections by the controlling department at least annually.

2. A MEWP may be operated only by an authorized person who has been trained to operate that specific device.

3. Training

a. Initial training shall be provided to the member prior to their assignment as an operator of a MEWP. Training will consist of formal classroom review of MEWPs and demonstration of operating skills necessary for safe operation, to include the following:

- i. Purpose, use and limitations of equipment
- ii. How to make inspections.
- iii. The energizing sequence.
- iv. Start-up and shut down procedures.
- v. General operating procedures.
- vi. Review of MiOSHA Part 58 Subrules (1) to (9) of Rule 5815
- vii. Review of Decals/Warnings/Instructions displayed
- viii. Practice in operating the assigned equipment through the mechanical functions necessary to perform the task.

b. Immediate Refresher Training in relevant topics shall be provided to an operator under any of the following conditions.

- i. An operator has been observed to operate a MEWP in an unsafe manner.
- ii. An operator has been involved in an accident or a near-miss incident.
- iii. An operator is required to operate a different type of MEWP.
- iv. A condition in the workplace changes that could affect safe operation of the MEWP.

c. 3-Year classroom refresher training shall be conducted for all MEWP operators.

d. Train-the-Trainer: The mill will provide qualified Level II MEWP trainers with refresher training every 3 years.



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4. Operator Testing

- a. Members shall be tested for their knowledge and ability before being permitted to operate a MEWP. The test shall determine all of the following with respect to the member:
  - i. Ability to operate the equipment through it functions necessary to perform the required jobs.
  - ii. Knowledge of the equipment.
  - iii. Knowledge of inspection requirements.
  - iv. Knowledge of company rules and regulations.
- b. Testing shall be documented, with a copy forwarded to the Safety Department.

5. Controls:

- a. Controls are to be permanently labeled as to their functions and designed to prevent inadvertent actuation.
- b. MEWPs designed as personnel carriers shall be equipped with both upper and lower controls. Upper controls shall be located within reach of the operator. Lower controls shall be capable of overriding the upper controls. The lower controls shall not be operated unless permission has been obtained from the member in the basket or on the platform. However, in an emergency, the lower controls may override the upper controls.

6. Operation:

- a. An in-plant MEWP designed to be used on level surfaces shall not be used on slopes, unless the MEWP is adjusted to a firm level plane.
- b. A safety belt or harness shall be used with a lanyard attached to the boom or basket when working from an extended boom MEWP. Belting off to an adjacent pole, structure, or equipment while working from a MEWP Platform shall not be permitted.





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- c. The designed rated capacity for a given altitude (height) shall not be exceeded.
- d. A person shall stand firmly on the floor of the basket and shall not sit or climb on the edge of the basket, except that a member may sit in the basket if it is equipped with a specifically designed seat. A plank, ladder, or other device shall not be used from a basket.
- e. Any overhead electrical line shall be considered energized until the owner, owner representative or utility indicates otherwise and the line has been visibly grounded. All pertinent information of the job shall be provided before the commencement of operations near electrical lines.
- f. A platform or basket raised by a power truck must be properly secured to the forks and the vehicle must be stationary. There must be solid approved guardrails, mid-rails and toe boards. Ropes are not acceptable as guardrails. Pallets are not acceptable as working platforms.

**F. Performing elevated work using safety belts, harnesses, lifelines and lanyards**

- 1. Minimum requirements of equipment - Safety belts, harnesses, lifelines and lanyards must meet the design specifications stated in the Department of Labor General Industry Safety Standards Commission Safety Standards, Part 33. Equipment purchased by our mill meets these requirements. The maximum length of a lanyard should limit free fall to 6 feet or less.
- 2. Maintenance/Inspection
  - a. A safety belt, full body harness, lifeline or lanyard shall be inspected by the user before each use. Equipment that is damaged, defective or shows signs of excessive wear must be removed from service.
  - b. Safety belts, harnesses, lifelines or lanyards shall be stored in a clean, dry area away from excessive heat, cold, or other deteriorating conditions.
  - c. A full body harness, lifeline or lanyard subjected to in service loading, rather than static loading, shall be removed from service and shall not be used again for employee safeguarding.



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3. Use

- a. Unless an employee is protected by a perimeter guard rail or is working on a portable ladder, the employee must be safeguarded by a full body harness secured to a lifeline or structure capable of sustaining the imposed load whenever the employee's work station is more than 4 feet above the ground, floor, water or other surface.
- b. The use of a safety belt in combination with a lifeline or lanyard shall be for restricting the movement of a person towards a potential fall hazard, not for arresting a fall.
- c. A full body harness in combination with a lifeline or lanyard shall be used whenever a fall hazard exists.
- d. A lifeline or lanyard shall not be kinked, run over sharp corners, used when frozen, left in freezing temperatures when wet, or exposed to sources of ignition or flame.
- e. The tie off point from the lanyard should be at shoulder level or higher whenever possible.
- f. Evaluate your elevated work scenario to determine if a fall would leave you hanging in an open area. If you determine that it would, then a retractable lifeline must be used as opposed to a standard lanyard-shock absorber combination. Retractable lifelines stop a fall quickly and often allow for self-rescue.

a. Roof access

- 1. The roof structures at Quinnesec were not intended for working near the edge of the roof. There are no handrails to prevent a person from falling off the roof. The parapet height, on the original mill structures, does not meet this requirement either. A person working on a roof must stay back from the edge at least 15 feet or be restrained by a qualified tie off system unless a standard railing is in place between the worker and the roof edge.



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**V. RESPONSIBILITIES**

**A. Members**

1. It is the responsibility of each member to receive annual instruction on the Elevated Work Policy.
2. It is the responsibility of those performing elevated work to communicate their activities to the proper departments, to use appropriate equipment, follow manufacturer’s specifications, and to observe the guidelines established in this policy.
3. Regarding the use of **Mobile Elevating** Work Platforms:
  - a. Operate only if trained and permitted.
  - b. Conduct visual inspections of the **MEWP** before each use.
  - c. Report all accidents or near misses involving a **MEWP**.
  - d. Report all **MEWP** problems and tag the equipment when unsafe to operate.

**B. Health and Safety Department**

1. Provide initial employee instruction and contractor training on elevated work.
2. Develop initial training materials for **MEWPs** in conjunction with operating and maintenance departments to ensure regulatory requirements are incorporated into operator training.
3. Keep documentation of training as required.
4. Provide technical guidance on resolving issues related to training and safe operating practices.
5. Assist mill departments in developing area specific evaluations.



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C. Business Units/Departments

1. Ensure that members are fully trained in proper elevated work techniques and the use of elevated work equipment necessary to perform work in their area.
2. Complete all necessary inspections.
3. Develop elevated work procedures for situations where these are deemed necessary.
4. Ensure team members operating **MEWPs** are trained in the safe operating practices associated with the equipment they may be operating, and provide refresher training as outlined in the policy.
5. Ensure that documentation of training is completed and forwarded to the Safety Department.



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APPENDIX A

**SHOCK-ABSORING LANYARD OR SELF-RETRACTING LIFELINE – WHICH TO CHOOSE?**

Definitions:

**Shock-absorbing lanyard:** A type of safety lanyard that contains an energy-absorbing unit to limit fall arrest forces

**Self-retracting lanyard:** A deceleration device which contains a drum wound line which after onset of a fall, automatically locks the drum and arrests the fall. Used in place of a lanyard.

- Decide which lanyard is best for your application based on the height of which you are working at.

**SHOCK-ABSORING LANYARD:**

- Shock-absorbing lanyards must have 18 feet of clearance from anchor point
- Due to the six feet of free falling that catches and 3.5 feet that slowly descend, you need ample room to use a shock-absorbing lanyard

**SELF-RETRACTING LANYARDS**

- Class A self-retracting lanyard placed overhead, must have 4 feet of clearance
- When working at a low height, self-retracting is the best option to use.

Both types of lanyards must be destroyed and disposed if they have arrested a fall

**SHOCK-ABSORING LANYARD OR SELF-RETRACTING LIFELINE?**

