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POLICY STATEMENT

It is the policy of Pannier Corporation that all employees will be protected from exposure to fall hazards by incorporating engineering controls whenever possible, and by installing or implementing fall protection systems. Fall protection is required for every worker exposed to a fall of 6 feet or more from unprotected sides or edges, holes, leading edges, wall openings, and other fall hazards. All employees and contractors will comply with all requirements related to safely working from elevated work locations. Pannier Corporation management will review and approve the use of any elevated work platforms not addressed in this program. Pannier Corporation will provide a training program for each employee potentially exposed to a fall hazard. The program will enable employees to recognize the hazards of falling and will train them in the procedures to follow to minimize these hazards.

AUTHORITY AND SCOPE

Authority: 29 CFR 1926.500 - 503 [replace with the state regulation if applicable]

[Optional: ANSI Z359.1-1992 (R1999) Safety Requirements for Personal Fall Arrest Systems, Subsystems, and Components]

Scope: All employees with potential exposure to falls of greater than 6 feet, except when an employee is inspecting, investigating, or assessing workplace conditions prior to the actual start of work or after all work has been completed.

PLAN ADMINISTRATION

Table 1 provides the roles and contact information for the administration of the Pannier Corporation fall protection program.

Table #1

Program Contact Information

Task	Name, Job Title, or Department	Phone
Program Administrator	John Visconti	Health and safety director
Supervisor(s)	Bob Barker	Machine Shop
Supervisor(s)	Bob Hallstein	Tag
Supervisor(s)	Rick Paluka	Steel Stamp
Training Coordinator	John Visconti	Health and Safty Director

Program Administrator is responsible for administering the fall protection program.

- Identify work areas, processes, or tasks that require fall protection.
- Evaluate fall hazards.
- Select appropriate fall protection systems.
- Monitor fall protection use to ensure that fall protection systems are used properly.
- Arrange for and/or conduct training.
- Evaluate the fall protection program.
- Update the written fall protection plan as needed.

Supervisors. Supervisors are responsible for ensuring that fall protection is properly provided in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors will also ensure that the program is understood and followed by the employees under their charge. Supervisor will:

- Ensure that employees under their supervision (including new hires) have received appropriate training.
- Ensure the availability of appropriate fall protection equipment.
- Be aware of tasks requiring the use of fall protection.



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- Enforce the proper use of fall protection when necessary.
- Ensure that fall protection equipment is properly cleaned, maintained, and stored.
- Continually monitor work areas and operations to identify fall hazards.
- Coordinate with the Program Administrator on how to address fall hazards or other concerns as they arise.

Training coordinator. The Program Administrator will develop and update training programs and maintain a schedule of training for all employees who may be exposed to fall hazards.

Employees. Employees who may be exposed to fall hazards will:

- Ensure that all fall hazards are addressed before working in an area where they may be exposed.
- Inform the supervisor or Program Administrator of any fall hazards that they feel are not adequately addressed in the workplace and of any other concerns regarding the program.
- Care for and maintain fall protection equipment as instructed.

Plan Review and Update

This Plan will be reviewed whenever:

- Changes at the worksite(s) render any section of this Plan obsolete.
- There are changes in the types of fall protection systems or equipment to be used by employees.
- Incidences of falls resulting in injury demonstrate inadequacies in the design or use of fall protection systems or equipment.

DEFINITIONS

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

Body harness--straps which may be secured about the employee 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.

Competent person (qualified person)--a person capable of identifying existing and predictable hazards in the work area and conditions, and who understands how to control or minimize those hazards.

Connector--a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabiner, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

Controlled access zone (CAZ)--an area in which certain work (e.g., overhand bricklaying, installing decking, etc.) may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.

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 employee during fall arrest.

Deceleration distance--the additional vertical distance a falling employee travels from the moment of activation (at the onset of fall arrest forces) of the deceleration device to the location of the employee when he/she comes to a full stop.

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 employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

Guardrail system--a barrier erected to prevent employees from falling to lower levels.





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Hole---a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, roof, or other walking/working surface.

Infeasible--it is impossible to perform the construction work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

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

*Leading edge--*the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

*Lifeline--*a component consisting of a flexible line for connection to an anchorage. A vertical lifeline attaches to an anchorage at one end and hangs vertically. A horizontal lifeline attaches to an anchorage at each end and stretches horizontally. Both horizontal and vertical lifelines provide a point of connection for lanyards.

Lower level--those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Mechanical equipment--all motor or human propelled wheeled equipment used for roofing work, except wheelbarrows and mop carts.

Opening--a gap or void 30 inches (76 cm) or more high and 18 inches (48 cm) or more wide, in a wall or partition, through which employees can fall to a lower level.

*Personal fall arrest system (PFAS)--*a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, and a body harness, and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

Positioning device system--a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Roof--the exterior surface on the top of a building.

*Roofing work--*the hoisting, storage, application, and removal of roofing materials and equipment, including related insulation, sheet metal, and vapor barrier work, but not including the construction of the roof deck.

*Safety monitoring system--*a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

*Self-retracting lifeline/lanyard--*a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

Snaphook--a connector comprised of a hook-shaped member with a normally closed keeper. Snaphooks will be equipped with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection.

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

Unprotected sides and edges--any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches high.





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*Walking/working surface--*any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork, and concrete reinforcing steel, but not including ladders, vehicles, or trailers, on which employees will be located in order to perform their job duties.

*Warning line system--*a barrier erected on a roof to warn employees 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 guardrail, body belt, or safety net systems to protect employees in the area.

DETERMINATION OF NEED FOR FALL PROTECTION

Fall protection is required wherever the potential to fall 6 feet or more exists.

Program Administrator or designee has identified the following activities where fall hazards exist and fall protection is required:

- Flat and low sloped roof locations, when within 6 feet of the roof edge or during roof repair/maintenance
- Exterior and interior equipment platforms, catwalks, towers, etc. 6 feet or more above the lower level
- Exterior and interior fixed ladders above 20 feet
- Mezzanine and balcony edges
- Open excavations or pits
- Tasks requiring use of articulating aerial lifts
- Tasks requiring employees to lean outside vertical rails of ladders
- Scaffolding erection 10 feet in height or greater
- Wall openings when the outside bottom edge of the wall opening is (6) feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface
- Steel erection for heights 15 feet or greater
- Installation of metal decking for leading edges 30 feet or greater

FALL PROTECTION PROGRAM

Fall protection is a concept that describes the systems, processes, procedures, equipment, and regulations used to protect employees from falls and to reduce the risk of falling. There are five classes of fall protection employed at Pannier Corporation worksites. Each is based on the risk of exposure to hazards, and level of knowledge required by the employee. The first four classes provide 100% fall protection, and will be implemented by Pannier Corporation in descending order with Class 1 as the primary protection. The fifth addresses situations where it has proven to be infeasible to provide a system to prevent or arrest falls.

The classes, in order of priority for implementation:

- Class 1--Hazard Elimination (engineering controls)
- Class 2--Fall Protection System
- Class 3--Fall Restraint System
- Class 4--Personal Fall Arrest Systems
- Class 5--Fall Protection Plan (work procedures)

Hazard Elimination

[In this form of fall protection, a process or work activity is redesigned or engineered to eliminate employee exposure to a fall hazard. This is often not recognized as fall protection because the solution leaves no visible hazard or need for a system to protect the employee. The best means of providing fall protection is always to eliminate the hazard. Work processes can be redesigned, special tools and equipment employed, or the work can be moved to a safer place. A good example of elimination of a hazard is building an





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exterior wall and roof trusses on the ground and then using a crane to lift them into the higher position, rather than having the employee do this work at elevation.]

Pannier Corporation will eliminate employee exposure to fall hazards wherever feasible through the redesign of the worksite or other engineering controls.

Engineering Controls

Pannier Corporation will select appropriate engineering controls to prevent falls as the first option for fall protection. Engineering controls include:

- Relocate certain tasks to ground level
- Use a telescoping arm
- Use a qualified contractor in extremely hazardous areas

Fall Protection System

Fall protection systems passively barricade employees from reaching the hazard. No special training is required to know how to work safely around a fall hazard protected by a fall protection system.

Guardrails

Guardrail systems will be erected at unprotected edges, ramps, runways, or holes where it is determined by the Program Administrator/ Health and Safety Team that erecting such systems will not cause an increased hazard to employees. Guardrails will be made from steel, wood, and wire rope for all worksites. When necessary and feasible on the basis of job location or requirements, they will be placed:

- On all open sided floors
- Around all open excavations or pits
- On leading edges of roofs or mezzanines

When guardrail systems are used to protect workers from falls, the systems will be capable of withstanding a force of at least 200 pounds applied within 2 inches of the top edge in any outward or downward direction. When the 200 pounds test is applied in a downward direction, the top edge of the guardrail will not deflect to a height less than 39 inches above the walking/working level. Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members will be capable of withstanding a force of at least 150 pounds applied in any downward or outward direction at any point along the midrail or other member.

The top edge height of toprails, or (equivalent) guardrails will be 42 inches plus or minus 3 inches, above the walking/working level. When workers are using stilts, the top edge height of the top rail will be increased an amount equal to the height of the stilts. If wire rope is used for toprails, it will be flagged at not more 6 feet intervals with high-visibility material.

Screens, midrails, mesh, intermediate vertical members, or equivalent intermediate structural members will be installed between the top edge of the guardrail system and the walking/ working surface when there are no walls or parapet walls at least 21 inches high. When midrails are used, they will be installed at a height midway between the top edge of the guardrail system and the walking/working level. When screens and mesh are used, they will extend from the top rail to the walking/working level and along the entire opening between top rail supports. Intermediate members, such as balusters, when used between posts, will not be more than 19 inches apart.

Other structural members, such as additional midrails and architectural panels, will be installed so that there are no openings in the guardrail system more than 19 inches.

Guardrail systems will be surfaced to protect workers from punctures or lacerations and to prevent clothing from snagging. In order to prevent cuts and lacerations, toprails and midrails of guardrail systems will be at least one-quarter inch nominal thickness or diameter. The ends of top rails and midrails will not overhang terminal posts, except where such an overhang does not constitute a projection hazard.



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Guardrail Inspections

Temporary guardrail systems will be visually inspected daily by a competent person, and a complete structural inspection will be completed weekly by a competent person.

Permanent guardrail systems will be subject to a structural inspection annually by a competent person.

Guarding Hoist Areas

When guardrail systems are used at hoisting areas, a chain, gate, or removable guardrail section will be placed across the access opening between guardrail sections when hoisting operations are not taking place.

Guarding Holes

When a hole is not in use, it will be covered or provided with guardrails along all unprotected sides or edges. Uncovered holes will be protected by guardrail systems set up on all unprotected sides or edges. When holes are used for the passage of materials, the hole will have not more than two sides with removable guardrail sections.

If guardrail systems are used around holes that are used as access points (such as ladderways), gates will be used or the point of access will be offset to prevent accidental walking into the hole.

If guardrails are used at unprotected sides or edges of ramps and runways, they will be erected on each unprotected side or edge.

Fall Restraint

Fall restraint systems keep employees from reaching the fall hazard and require employees to be trained to recognize hazards and to know how to correctly establish and use the system. This is a type of work restraint for employees who may be working on the tops of round structures such as tanks, or, on roofs adjacent to unprotected edges or openings.

Personal Fall Arrest Systems (PFASs)

Where acceptable fall protection or restraint systems are not feasible, employees will use a PFAS or other fall protection method with equivalent protection. All designated employees will be trained to use and maintain PFASs before entering a worksite.

A PFAS will consist of a full body harness, shock-absorbing lanyard with locking type snap- hook, and an anchor point capable of supporting 5000 pounds per worker. A PFAS will do all of the following:

- Limit maximum arresting force on an employee to 1,800 pounds when used with a body harness.
- Be rigged so that an employee can neither free fall more than 6 feet nor contact any lower level.
- Bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.
- Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet or the free fall distance permitted by the system, whichever is less.

Employees must wear harnesses with the attachment point in the center of the back near shoulder level or above the wearer's head.

All components of a PFAS will meet the specifications of the OSHA Fall Protection Standard, and will be used in accordance with the manufacturer's instructions.

Body belts prohibited as fall protection. The use of body belts in a fall protection system is prohibited, but body belts can be used in a positioning device system.

Snaphooks and D-Rings

The use of non-locking snaphooks is prohibited.





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D-rings and locking snaphooks will have a minimum tensile strength of 5000 pounds and be proof-tested to a minimum tensile load of 3600 pounds without cracking, breaking, or suffering permanent deformation.

Horizontal Lifelines. Horizontal lifelines will be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two. Horizontal lifelines may, depending on their geometry and angle of sag, be subjected to greater loads than the impact load imposed by an attached component. When the angle of horizontal lifeline sag is less than 30 degrees (from horizontal), the impact force imparted to the lifeline by an attached lanyard is greatly amplified. For example, with a sag angle of 15 degrees, the force amplification is about 2:1 and at 5 degrees sag, it is about 6:1. Depending on the angle of sag, and the line's elasticity, the strength of the horizontal lifeline and the anchorages to which it is attached should be increased a number of times over that of the lanyard. Extreme care should be taken in considering a horizontal lifeline for multiple tie-offs. The reason for this is that in multiple tie-offs to a horizontal lifeline, if one employee falls, the movement of the falling employee and the horizontal lifeline during arrest of the fall may cause other employees to fall also. Horizontal lifeline and anchorage strength should be increased for each additional employee to be tied off. For these and other reasons, the design of systems using horizontal lifelines will only be done by qualified persons. Testing of installed lifelines and anchors prior to use is recommended.

Vertical lifelines. When vertical lifelines are used, each employee will have a separate lifeline. The reason for this is that in multiple tie-offs to a single lifeline, if one employee falls, the movement of the lifeline during the arrest of the fall may pull other employees' lanyards, causing them to fall as well. Lanyards and vertical lifelines will have a minimum breaking strength of 5,000 pounds.

Anchorages

Anchorages will be designed, installed, and used under the supervision of a qualified person, as part of a complete personal fall arrest system that maintains a safety factor of at least two, i.e., capable of supporting at least twice the weight expected to be imposed upon it. Anchorages used to attach personal fall arrest systems will be independent of any anchorage being used to support or suspend platforms and will be capable of supporting at least 5,000 pounds per person attached.

One of the most important aspects of personal fall protection systems is fully planning for suitable anchorage points. Properly planned anchorages should be used if they are available. In some cases, anchorages will be installed immediately prior to use. Examples of what might be appropriate anchor points are steel members or I-beams if an acceptable strap is available for the connection (do not use a lanyard with a snaphook clipped onto itself); large eye-bolts made of an appropriate grade steel; guardrails or railings if they have been designed for use as an anchor point; or masonry or wood members only if the attachment point is substantial and precautions have been taken to assure that bolts or other connectors will not pull through. A qualified person should be used to evaluate the suitability of these "make shift" anchorages with a focus on proper strength. A variety of products specifically designed for use as fall protection anchorages (beam clamps, beam straps, roof anchors, etc.) are commercially available.

In instances where workers require greater vertical or horizontal mobility than can be achieved using fixed anchorages, properly designed and installed vertical or horizontal lifelines may be used.

Holes and Covers

Personal fall arrest systems, covers, or guardrail systems will be erected around holes (including skylights) that are more than 6 feet above lower levels. Covers will be able to support at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time. Covers located in roadways will be able to support twice the axle load of the largest vehicle that might cross them. To prevent accidental displacement resulting from wind, equipment, or workers' activities, all covers will be secured. All covers will be color-coded or will bear the markings "HOLE" or "COVER."

PFAS Inspections

PFASs will be inspected prior to each use for wear or damage, and other deterioration. Damaged or defective components will be removed from service. All components will be protected from cuts and abrasions while in use and during storage. PFASs and their components subject to impact loading will be immediately removed from service and not used again unless inspected and determined by a competent person to be suitable for reuse. PFASs will be used only for employee protection and not to hoist materials.





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The following criteria will be utilized to maintain all equipment in good working condition:

Full body harnesses

- Inspect before each use.
- Annually, an inspection will be conducted and documented by a competent person.
- Store hanging in an enclosed cabinet to protect from damage.
- All harnesses involved in a fall will be destroyed.

Lanyards/shock absorbing lanyards

- Inspect before each use.
- Annually, an inspection will be conducted and documented by a competent person.
- Store hanging in an enclosed cabinet to protect from damage.
- All lanyards involved in a fall will be destroyed.

Snaphooks

- Inspect before each use.
- Annually, an inspection will be conducted and documented by a competent person.

Self-retracting lanyards/lifelines

- Inspect before each use.
- Monthly, an inspection will be conducted and documented by a competent person.
- Service per manufacturer specifications. (1-2 years)
- Inspect for proper function after every fall.

Tie-off adapters/anchorages

- Inspect for integrity and attachment before each use.
- Annually, an inspection will be conducted and documented by a competent person.
- All tie-offs and anchorages will be destroyed after every fall

Horizontal lifelines

- Inspect before each use for structural integrity of line and anchors.
- Annually, an inspection will be completed by a competent person.

Storage and Maintenance of Personal Fall Protection Equipment

Following are general requirements for the storage and maintenance of personal fall protection equipment:

- Hang equipment in a cool, dry location in a manner that holds the shape of the equipment.
- Follow manufacturer recommendations for inspections.
- Clean with a mild, non-abrasive soap and hang to dry. Don't use strong detergents.
- Do not store equipment near excessive heat, chemicals, moisture, or direct sunlight.
- Do not use in areas with exposure to fumes or corrosive materials.
- Avoid dirt or other types of buildup on equipment.
- Do not use equipment for other than its intended purpose.
- Once exposed to a fall, immediately remove equipment from service.

Excavations

Fall protection will be provided to employees working at the edge of an excavation that is 6 feet or deeper. Employees in these areas are required to use the fall protection systems as designated in this program.

Excavations that are 6 feet or deeper will be protected by guardrail systems, fences, barricades, or covers. Walkways that allow employees to cross over such an excavation will be equipped with guardrails.





Protection from Falling Objects

When guardrail systems are used to prevent materials from falling from one level to another, openings will be small enough to prevent passage of potential falling objects.

Stored materials. No materials or equipment except masonry and mortar will be stored within 4 feet of working edges. Excess mortar, broken or scattered masonry units, and all other materials and debris will be kept clear of the working area by removal at regular intervals. During roofing work, materials and equipment will not be stored within 6 feet of a roof edge unless guardrails are erected at the edge, and materials piled, grouped, or stacked near a roof edge will be stable and self-supporting.

Toeboards. When toeboards are used as protection from falling objects, they will be erected along the edges of the overhead walking or working surface for a distance sufficient to protect persons working below. Toeboards will be capable of withstanding a force of at least 50 pounds applied in any downward or outward direction at any point along the toeboard. Toeboards will be a minimum of 3.5 inches tall from their top edge to the level of the walking/working surface, have no more than 0.25 inches clearance above the walking/working surface, and be solid or have openings no larger than 1 inch.

Where tools, equipment, or materials are piled higher than the top edge of a toeboard, paneling or screening will be erected from the walking/working surface or toeboard to the top of a guardrail system's top rail or midrail, for a distance sufficient to protect employees below.

FALL PROTECTION PLAN

[Fall Protection Plans are used only when it is clearly infeasible to provide 100% fall protection using conventional fall protection systems. This product contains a sample Fall Protection Plan designed for precast/prestress concrete structures, and contains procedures for controlled access zones, safety monitoring systems, and warning line systems. Other types of work procedures where these Plans are used are during leading edge construction work and roofing activities.]

Acceptable reasons for determining that the use of fall protection systems is infeasible can include the following:

- The duration of exposure to the hazard while installing a fall protection system exceeds the duration of the work.
- The fall protection system unacceptably (dangerously) impedes worker mobility.
- The movements of multiple workers would result in entanglement of employee connections to the system, avoidance of which would require inordinate (dangerous) diversion of employee attention.
- The employees may not be able to escape quickly from a dangerous zone in the event of a mishap.
- The anchorage points elevated above the working surface would interfere with the work.
- The anchorage points below or on the working surface would not provide the required level of protection.

Unacceptable reasons for determining that the use of a fall protection system is infeasible are:

- Cost
- Employee resistance to the use of fall protection systems
- Continued use of current practices which were acceptable in the past
- Determination that insufficient time exists to implement a fall protection system

ACCIDENT INVESTIGATIONS

All incidents that result in injury to workers, as well as near misses, regardless of their nature, will be reported and investigated. Investigations will be conducted by The Program Administrator or other competent person as soon after an incident as possible to identify the cause and means of prevention to eliminate the risk of reoccurrence.

In the event of such an incident, the Fall Protection Program (and alternative Fall Protection Plans, if in place) will be reevaluated by The Health and Safety Team to determine if additional practices, procedures, or training are necessary to prevent similar future incidents.

EMERGENCY RESPONSE





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Pannier Corporation will establish procedures to ensure that employees who do fall receive prompt emergency medical attention. A fall rescue system will provide for prompt (within 15 minutes) rescue; or will ensure the capability of an immediate self-rescue. An emergency procedure/rescue plan is in place at each worksite. These procedures/plans identify key rescue and medical personnel, equipment available for rescue, emergency communications procedures, retrieval methods, and primary first-aid requirements. The rescue plan will be prepared prior to initial startup operations at worksites.

Supervisors will ensure that each employee thoroughly understands the rescue plan and has immediate access to emergency phone numbers.

The following are guidelines for development of emergency response procedures and plans.

- Before on-site work begins, inform emergency responders of any conditions at the site that may hinder a rescue effort.
- Document rescue procedures and post at the worksite/inform employees of locations.
- Post emergency responder phone numbers and addresses at the site.
- Mark the worksite with signs noting the easiest routes in and out of the site.
- Ensure that responders have quick access to rescue and retrieval equipment such as lifts and ladders.

If an emergency occurs:

- Call 911 or other emergency numbers in the response plan.
- Secure the scene from unauthorized personnel.
- Make certain that only qualified personnel attempt a technical rescue.
- Assign personnel to meet rescuers to direct them to the accident scene.
- Provide comfort care and check vital signs if victim is accessible; if necessary, administer CPR and attempt to stop any bleeding per standard first-aid procedures.

TRAINING

The Program Administrator or designee will provide a training program that teaches employees who might be exposed to fall hazards how to recognize such hazards and how to minimize them. Employees will receive training as soon after employment as possible, and before they are required to work in areas where fall hazards exist. Employees will be trained in the following areas:

- Nature of fall hazards in the work area
- Requirements of the OSHA Fall Protection Standard, 29 CFR 1926, Subpart M
- Correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems
- Use and operation of controlled access zones and guardrail, personal fall arrest, safety net, warning line, and safety • monitoring systems
- Role of each employee in the safety monitoring system when the system is in use .
- Limitations on the use of mechanical equipment during the performance of roofing work on low-slope roofs
- Correct procedures for equipment and materials handling and storage and the erection of overhead protection
- Pannier Corporation requirements for reporting incidents that cause injury to an employee
- Employee's role in fall protection plans

Retraining

Refresher training will be provided whenever:

- Changes in the workplace render previous training obsolete; or
- Changes in the types of fall protection systems or equipment to be used render previous training obsolete; or
- 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

Training Certification and Recordkeeping

Training records are kept on file with Pannier Corporation for a term of 3 years.



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CONTRACTORS

All outside contractors working in or on the premises of Pannier Corporation will be required to follow the guidelines set forth in this fall protection program. Contractors in the pre-job meeting will be informed of these requirements as well as the on-site construction rules that apply.

ENFORCEMENT

All staff are subject to discipline for failure to follow fall protection requirements and procedures. Documentation of any violations will be kept in the staff member's personnel file.