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# FALL PROTECTION & WALKING WORKING SURFACES PROGRAM

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**All MEEK'S, HOMEWOOD and  
BETTER BUILT TRUSS LOCATIONS**

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## 1.0 PURPOSE

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1.1 The purpose of All MEEK'S, HOMEWOOD and's Fall Protection and Walking Working Surfaces Program is to establish guidelines to protect all employees falls in the workplace. Tasks where personnel are potentially exposed to heights pose a significant health and safety risk. This program describes a systematic approach that must be used to protect and prevent personnel from falls in the workplace.

## 2.0 APPLICATION AND ASSESSMENT

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2.1 The Fall Protection & Walking Working Surfaces Program applies in when personnel are:

- Exposed to a fall hazard greater than or equal to 4' while working at All MEEK'S, HOMEWOOD and's facilities. (49 CFR 1910 General industry)
- Exposed to a fall hazard greater than or equal to 6' while working at a jobsite. (49 CFR 1926 Construction)
- Exposed to any fall hazard that that presents imminent danger. (Such as a fall from a rail unloading platform onto a rail spur that is less than 4' in exposure at a facility or a fall onto vertical rebar with a total exposure of less than 6').

2.2 The facility and operations were assessed to identify jobs, areas, and/or tasks with potential fall hazards. Proper fall arrest systems will be used for jobs or tasks requiring personal fall protection when elimination of the hazard(s) is not possible. A fall hazards assessment form is used to review jobs or tasks with potential fall hazards. *See Appendix for a Fall Hazard Evaluation Form*

2.3 At the All MEEK'S, HOMEWOOD and, the following jobs require a personal fall protection system to be used while performing the stated tasks:

While at All MEEK'S, HOMEWOOD and's facilities:

- Any time employees are exposed to a fall greater than 4' without guardrails in place.
- Using and working within an aerial (boom-style) lift.
- Using mobile work platforms on powered industrial trucks (rail car unloading , maintenance)
- Any roof work where the employees are not protected by an approved guardrail system or other approved method of protection.
- While working on a mezzanine if railing needs to be removed.
- Climbing fixed ladders. *(See 2.4 otherwise delete)*

While working at a construction site: (installers, delivery personal, warranty work,)

- Any time employees are exposed to a fall greater than 6' without guardrails in place.
- Using and working within an aerial (boom-style) lift.
- Using mobile work platforms on powered industrial trucks
- Any roof work where the employees are not protected by an approved guardrail system or other approved method of protection.

- Anytime guardrails are removed for material delivery through a wall opening.

2.4 Fixed Ladder Systems: All fixed ladder's greater than 24 feet, installed before November 19<sup>th</sup>, 2018, must be equipped with either a personal fall arrest system, ladder safety system, cage and/or well. Fixed ladders greater than 24 feet installed on or after November 19, 2018, must be equipped with a personal fall arrest system or a ladder safety system. After, November 18<sup>th</sup>, 2036, all fixed ladders greater than 24 feet, must be equipped a personal fall arrest system and/or ladder safety system.

2.5 Ongoing Assessments: All MEEK'S, HOMEWOOD and will assess their operations on a regular basis using one or more of the following processes below:

- Fall Hazard Assessment Form. See *Appendix for a Fall Hazard Assessment Form*
- Walking Working Surfaces Assessment Form. See *Appendix for a Walking Working Surfaces Assessment Form*
- OTHER METHOD (HOUSEKEEPING AUDITS, PM PROGRAMS, SITE AUDIT PRO, LAYERED PROCESS AUDITS, ETC.)

2.6 Periodic Assessments: All MEEK'S, HOMEWOOD and will review/evaluate the jobs/tasks that require fall protection as well as the written program and related procedures upon the following:

- When changes occur to the facility.
- When changes occur to 29 CFR and/or other related standards and guidelines that prompt revision of this document.
- If there is an accident or near miss that relates to this area of safety.
- Any time personal fall protection procedures fail.

2.7 Portable Ladder Inspections:

- Any All MEEK'S, HOMEWOOD and employee using a portable ladder will perform a visual inspection of the ladder prior to use.
- The designated employee will perform a documented inspection on all portable ladders on a periodic basis. See *Appendix for a Portable Step/Extension Ladder Inspection Checklist*.
- In addition, the All MEEK'S, HOMEWOOD and facility will ensure that all portable ladders are used in accordance with 29 CFR 1910.23(c).

## 3.0 RESPONSIBILITIES

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### 3.1 Site Manager

- To ensure a safe work environment is maintained for all employees.
- Minimize the need for personal fall protection by implementing engineering and other controls to prevent the need from working at heights in an unprotected manner.

- Provide appropriate and sufficient equipment to support an effective fall protection program.
- Provide for sufficient time and resources to ensure an effective equipment inspection program is maintained.
- Ensure covered employees are trained in personal fall protection upon initial assignment and on a periodic basis thereafter.
- To require managers/supervisors to enforce the use of personal fall protection when applicable.

### 3.2 : Facility Manager

- Promote fall prevention.
- Ensure all jobs that require working at heights above four feet are included in the company's Fall Protection & Walking Working Surfaces Program.
- Review the program on a periodic basis. Review any changes necessary with site management and work with them to incorporate the changes to ensure program effectiveness.
- Evaluate and procure appropriate personal fall protection systems to support the Fall Protection & Walking Working Surfaces Program.
- Ensure initial and refresher training programs are conducted as necessary and appropriate.
- Assist managers & supervisors in the response to any safety concerns associated with fall protection safety.

### 3.3 Managers/Supervisors

- Verify that all employees using personal fall protection systems are properly trained.
- Monitor that all employees are conducting their daily pre-use visual inspections.
- Identify and respond to any safety concerns that develop associated with personal fall protection.
- Enforce the use of fall protection systems during tasks where fall protection is necessary to protect the health & safety of the employee.

### 3.4 Affected Employees

- Attend initial and periodic training sessions.
- Incorporate the safe work practices reviewed in the personal fall protection training into everyday work practices.
- Complete daily pre-use inspections of fall protection equipment.
- Always wear personal fall protection equipment during tasks where required.
- Follow the policy of 100% "tie-off" at all times.
- Recognize that not using personal fall protection systems when required may result in serious injury or death and will result in disciplinary action.

## 4.0 FALL PREVENTION

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- 4.1 The goal of the **All MEEK'S, HOMEWOOD and** Fall Protection & Walking Working Surfaces Program is to prevent injuries associated with falls from elevation. With this said, **All MEEK'S, HOMEWOOD and** looks to eliminate fall hazards through elimination, utilization of engineering controls, or through specified changes in jobs/tasks that have a risk of falling from heights. These methods are always the first option considered in **All MEEK'S, HOMEWOOD and**'s efforts towards fall prevention.
- 4.2 The existing job/tasks listed in the Fall Protection Equipment section of this program are not able to be controlled through elimination, engineering controls, or other means. Personnel performing these tasks will be protected through the proper implementation and use of personal fall protection systems.
- 4.3 New jobs, maintenance tasks, or future changes to the facility processes that may involve the risk for falling will be reviewed prior to implementation to determine if elimination of the fall hazard is feasible. If so, steps will be pursued to eliminate the hazards through elimination, engineering controls, specified changes in job functions, or other means. If they are not able to be controlled in this manner the new jobs/tasks will be added to the fall hazard site assessment and controlled via an appropriate personal fall arrest system.

## 5.0 FALL PROTECTION EQUIPMENT

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- 5.1 Fall protection options are limited to personal fall protection systems and personal fall arrest. If employees cannot be protected, either through elimination of the hazard or via a PPE. The job will not be performed. Jobs of this nature will be completed by an outside contractor who will be expected to establish and follow appropriate fall protection controls.
- 5.2 Personal fall protection systems consist of four elements. This includes an approved Anchorage, Body harness, Connecting device, means of Decent and rescue.
- 5.3 The Location manager is responsible for the selection and procurement of the personal fall protection equipment.
- 5.3.1 The **coordinator** will ensure each employee who is affected by this program is provided with an appropriate-fitting body harness.
- 5.3.2 Employees are to contact their supervisor or the location manger if they need anything related to their equipment (e.g. replacement equipment, auxiliary equipment, etc.).
- 5.4 Connector Equipment Selection:
- 5.4.1 **Self-Retracting Lifeline (SRL) systems and/or Fall Limiters:**
- **Used for work with an anchorage point *under or over* 18.5 feet. SRL systems are used for the following functions:**
    - **List tasks**
- 5.4.2 **Shock-Absorbing Lanyard (SAL) Systems**
- **May only be used for work with an anchorage point *over* 18.5 feet high and when the fall area below the employee is clear. SAL systems are used for the following functions:**
    - **List tasks**

#### 5.4.3 Travel Restraint Systems:

- Are used to eliminate the possibility of an employee going over the edge of a walking-working surface. Travel restraint systems are used for the following functions:

- List tasks

5.4.4 Employees are prohibited from engaging in activities that introduce a swing hazard. If a swing hazard is determined to exist, the job should be stopped, and the Area Supervisor and location manager should be notified.

### 5.5 Fall Protection Equipment Guidelines

5.5.1 Fall protection equipment must always be worn and used when working at heights greater than four feet in General Industry or six feet in Construction. If a personal fall arrest system is the only control in use to prevent a fall, the employee must be “tied off” at all times (100% Tie-Off Policy). A 100% Tie-Off Policy means the use of an approved fall protection system (possibly with two lanyards or a double-leg lanyard) to ensure the employee is at least tied off to one anchor point all times.

5.5.2 Personal fall arrest systems must:

- Withstand the environment to which they are exposed for the maximum period that exposure is expected.
- Limit maximum arresting force on an employee to 1,800 pounds when using a body harness.
- Be rigged such 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 to 3.5 feet.
- Have sufficient strength to withstand twice the potential impact energy from an employee that free falls a distance of six feet or the free fall distance permitted by the system.

5.5.3 Additional Fall Protection System Requirements:

- The use of body belts for fall arrest is prohibited. Body belts are permitted only for travel restraint purposes.
- Harnesses must be fitted and adjusted properly prior to performing tasks that require fall protection.
- Harnesses and lanyards are not to be knotted, wrapped, or choked.
- Items such as pens, keys, and utility knives shall not be attached to a body harness, nor are they permitted to be in employees’ pockets while wearing a body harness.
- Snap hooks are required to be of the double-locking.
- The D-Rings and snap hooks are to have a minimum tensile strength of 5,000 pounds and proof tested to a minimum tensile load of 3,600 pounds. The gate strength of snap hooks and carabiners must be proof tested to 3,600 pounds in all directions.

- The D-Ring at the top of the full body harness is the only location SRLs or SALs should be attached for personal fall protection purposes.
- Connecting devices are only allowed to be attached to approved anchorage points capable of withstanding 5,000 pounds of force per person.
- Personal fall arrest systems must be inspected prior to each use for wear, damage, and other deterioration (see *Inspection Section* of this program for additional details).

## 6.0 STORAGE, CARE, AND MAINTENANCE

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### 6.1 Cleaning

- Harnesses and related fall protection equipment must be cleaned periodically or as needed based on pre-use inspection.
- Excessive buildup of dirt and grime may prevent proper function and inspection. It may also weaken the webbing.
- Clean harnesses with a solution of water and a non-abrasive mild detergent. Strong detergents should not be used for cleaning purposes.
- Do not force or speed drying with heat.
- Dry all hardware with a cloth and then allow the harness to hang in a natural shape and air dry.

### 6.2 Storage

- Hang equipment in a cool, clean, and dry location in a manner that retains its natural shape.
- Keep harnesses and fall protection equipment out of direct sunlight. Avoid areas of excessive heat, moisture, or chemical exposure. These conditions may weaken the harness and related equipment.
- Always properly clean and dry the harness before long periods of storage.
- Damaged equipment should not be stored in the same area as serviceable equipment.

### 6.3 Maintenance

- Corrective maintenance should only be performed by the manufacturer.
  - If this type of service is needed for any of the fall protection equipment at **All MEEK'S, HOMEWOOD and**, it will either be replaced or will be returned to the manufacturer for service.
- Equipment which is damaged or in need of maintenance must be tagged "Unusable" and be removed from service. The equipment will then need to be replaced or returned to the manufacturer for repairs if feasible/appropriate.
- Personnel are not to attempt any field repairs.
- If any fall protection equipment is subjected to a fall or impact load, it will be removed from service immediately and replaced.

## 7.0 EQUIPMENT INSPECTION

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## 7.1 Purpose

7.1.1 To ensure that fall protection systems are ready and able to perform their required tasks, a program of inspection and maintenance will be implemented and maintained. The following will comprise the basic requirements of the inspection and maintenance program at **All MEEK'S, HOMEWOOD and:**

## 7.2 Daily Visual Inspections

7.2.1 All fall protection equipment will be inspected prior to each use. The user will visually inspect his/her equipment prior to use and check the inspection date.

## 7.3 Periodic Documented Inspections. *See Appendix for a Fall Protection Equipment Inspection Form*

7.2.2 Documented inspections will be conducted by a competent person prior to use or in accordance with the manufacturers' guidelines.

- o Completed inspections should be routed to the Program Administrator for review and appropriate follow-up.

7.2.3 The equipment manufacturer's instructions will be incorporated into the inspection and preventive maintenance procedures.

## 7.4 Inspection considerations include: *(match to your PFAS gear)*

1. Hardware should be free of cracks, sharp edges, or burns.
2. Check all equipment for mold, damage, wear, mildew, or distortion.
3. Ensure that no straps are cut, broken, torn, or scraped.
4. Confirm only double-locking type snap hooks are in use and that they are in good condition.
5. Self-Retracting Lifelines should be tested by pulling sharply on the unit to verify the locking mechanism is working correctly. The SRL should be fully extended to check for any cuts, tears, or other damage. Ensure all nuts/rivets are tight and there is no physical damage to the unit.
6. Anchors and mountings will be inspected before each use by the authorized user and the **Area Supervisor** for signs of damage.
7. Be aware of special situations such as radiation, electrical conductivity, and chemical effects.
8. Equipment that is damaged or in need of maintenance will be tagged as Unusable and will be removed from service.
9. A documented inspection will be conducted prior to use on equipment that has been stored for periods exceeding one month.

## 8.0 CONTRACTORS

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8.1 In addition to complying with the fall protection requirements that apply to all **All MEEK'S, HOMEWOOD and** employees, each contractor who is retained to perform operations that

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involves personal fall protection systems will:

8.1.1 Check in with All MEEK'S, HOMEWOOD and Site Contact upon arrival to the facility.

8.1.2 Obtain any available information regarding fall hazards and protective measures from All MEEK'S, HOMEWOOD and prior to beginning work.

8.1.3 Coordinate fall protection operations with All MEEK'S, HOMEWOOD and when both company personnel and contractor personnel will be working in or near recognized fall hazard locations.

8.1.4 Inform All MEEK'S, HOMEWOOD and of the fall protection program that the contractor will follow.

8.1.5 Inform All MEEK'S, HOMEWOOD and if any problems or safety concerns develop during the job.

8.1.6 Notify and debrief All MEEK'S, HOMEWOOD and upon completion of the job/task prior to departure from the facility.

## 9.0 TRAINING

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### 9.1 Training Program

9.1.1 A training program will be provided for all All MEEK'S, HOMEWOOD and employees who are expected to use personal fall protection systems

9.1.2 Training will be conducted by competent personnel.

9.1.3 All MEEK'S, HOMEWOOD and will certify that employee training has been completed. The certification will contain each employee's name, dates of training, and identification of the instructor. *See Appendix for the Training Attendance Roster*

9.1.3 The training program will include the following:

- Fall hazard recognition
- Risk areas and jobs/tasks that possess risk for falling at the facility
- Fall prevention
- Roles and responsibilities
- When fall protection is required
- Fall protection equipment review
- Anchorages, connecting points, and body wear
- Equipment requirements and limitations
- How to put on and adjust the body harness
- Cleaning and storage procedures
- Inspection and maintenance procedures
- Rescue and emergency procedures
- Enforcement & disciplinary action

- Question & answer period

## 9.2 Initial Training

9.2.1 Employee training will be conducted prior to initial job assignment. All MEEK'S, HOMEWOOD and will provide training to ensure that the purpose, function, and proper use of fall protection is understood by employees and that the knowledge and skills required for the safe application and usage is acquired by employees.

## 9.3 Refresher Training

9.3.1 Refresher training will be conducted on a periodic basis or when the following conditions are met, whichever event occurs sooner:

- Whenever (and prior to) a change in their job assignments, a change in the type of personal fall protection systems used, or when a known hazard is added to the work environment which affects the Fall Protection & Walking Working Surfaces Program.
- Whenever a periodic inspection reveals, or whenever All MEEK'S, HOMEWOOD and has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of fall protection equipment or procedures.
- Whenever a fall protection procedure fails.

9.3.2 Retraining will reestablish employee proficiency and introduce new or revised methods and procedures, as necessary.

# 10.0 EMERGENCIES AND RESCUE

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## 10.1 Rescue Methods

10.1.1 Harnesses may include a sub-pelvic strap to assist the fallen employee in hanging in a comfortable position until help arrives.

10.1.2 In the event that a person falls, the All MEEK'S, HOMEWOOD and Emergency Response Team (ERT) should be notified as soon as possible. The ERT will assist with rescue of the fallen employee if it can be done in a feasible and safe manner.

10.1.3 Personnel who have fallen will be retrieved via scissor lift, aerial lift (boom style), or approved forklift man-lift.

10.1.4 Alternate rescue is through local emergency services.

## 10.2 Communication

10.2.1 In the event of a fall, the following people should be notified as soon as possible:

- Emergency Response Team
- Fire Department and/or Emergency Medical Services (if necessary)
- Area Supervisor
- Program Administrator

- Safety Manager
- Plant Manager
- Human Resources
- Regional Safety Manager

### 10.3 Fall Event Investigation

- 10.3.1 All fall incidents will receive a full investigation.
- 10.3.2 All employees who fall will be sent for a medical evaluation and be cleared by a medical professional prior to returning to work.
- 10.3.3 All fall investigations will be conducted by the Shift Supervisor, market safety manager and the Affected Employees.
- 10.3.4 Fall investigations should be documented.

## 11.0 ENFORCEMENT

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### 11.1 Policy

- 11.1.1 Any employee not following the fall protection program will be subject to disciplinary action up to and including termination of employment.
- 11.1.2 Documentation of any violations along with retraining will be retained in the employee’s personnel file.

## 12.0 WALKING-WORKING SURFACES

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### 12.1 Inspection Forms

- A Walking-Working Surfaces Inspection Form will be completed periodically. See *Appendix for Walking Working Surfaces Inspection Form*

### 12.3 Unguarded Edges: Standard Operation Procedures

- 12.3.1 All unprotected edges at **All MEEK’S, HOMEWOOD and** are to be guarded by a standard railing if the fall potential is greater than 48 inches and/or as indicated by 29 CFR 1910 Subpart D. In situations where a railing must be removed (hoist/lift areas, etc.), additional procedures must be in place.
- 12.3.2 Identified Locations with Potential for Unguarded Edge Access & Control Measures

Plant Section	Section Area	Edge Type	Control Measures

			<p>Standard Railing</p> <p>Frequent Access: Gate System</p> <p>Infrequent Access:</p> <ul style="list-style-type: none"> <li>• Opening Procedure</li> <li>• Visual Warning</li> </ul> <p>Roof Edge: Standard Railing</p> <p>Roof Edge (15 Feet): Warning Line</p> <p>Roof Edge (6 Feet): Personal Fall Arrest/Protection</p> <p>Personal Fall Arrest/Protection</p>

### 12.3.3 Procedures for Unprotected Edge Access

- Frequent Access (ie: Material Hoist Areas)
  - Areas frequently accessed requiring opening of protective railings or similar will be guarded by a variation of a double drop or pivoting gate system that does not allow both gates to be open simultaneously. If not feasible, “Infrequent Access Areas” procedures may be followed.
    - If a system is used that does not automatically close the second gate, an automated audible/visual alarm must be installed to alert operators that at least one gate is not in place.
- Infrequent Access Areas
  - Opening Procedures
    - When opening the gate/door, the employee will stand behind the gate/door, ensure that no other employees are in the area of the opening gate/door, and then open the gate/door in a manner that keeps the employee away from the open edge as far as practically possible.
    - Employees are not to break the plane of the edge with their body at any time without the use of a personal fall protection system.
    - The employee must remain in the immediate vicinity and within visual

site of an open gate/door and prevent other employees from approaching the open gate/door.

- The gate/door will be closed as soon as possible.
- When closing, the employee will position themselves in a manner that keeps him/herself away from the open edge as far as practically possible.
- Visual Warning
  - Where practical, such as with solid floors, a visual warning or restricted zone will be painted or similarly marked on the floor near the approach to an open gate/door area.
    - A solid Red Line (approximately 2 to 4 inches wide) will be placed at the leading edge.
    - A solid Yellow Box will be placed up to 4 feet from the leading edge.
  - Where visual floor reminders are not practical (grated floors, etc.), appropriate signage will be posted on each gate/door as a visual reminder.
  - Other methods, such as a visual lighting/projection system and/or audible alarm may be utilized in place of painted areas or when visual floor reminders are not practical.
- Roof Access
  - Roof access is restricted to Maintenance Personnel and Contractors (Authorized Employees) and on occasion via Plant Management approval for specialized purposes.
  - Roof access points will be secured whenever possible when not in use to prevent unauthorized access.
  - Appropriate signage at the roof access points will be in place indicating restricted access.
  - Roof access is preferred via stairway
    - When not possible, fixed vertical ladders meeting the requirements of 29 CFR 1910 Subpart D may be used to access roof areas.
    - As a last resort, portable extension ladders extending 4 feet above the roof edge using the 4 to 1 rule may be used to gain access.
  - When roof hatches are used for access, the roof hatch must be closed at all times except when accessing and egressing from the roof top.
- Work Within 15 Feet of Roof Edge
  - Employees are not permitted within 15 feet of an unprotected roof edge,

expect in rare occasions. On these rare occasions:

- A warning line or flag system must be installed 15 feet from the roof edge.
- Employees are not permitted within 6 feet of a roof edge at any time unless protected by a standard railing or tied off with a personal fall arrest system.
- If frequent work is required within 15 feet of a roof edge, a standard railing will be installed.
- Work Within 6 Feet of Roof Edge
  - Employees are not permitted at any time within 6 feet of an unprotected roof edge unless a standard railing is in place or Personal Fall Arrest System is in use.
- Contractors are expected to follow the same or stricter guidelines as employees.

## 13.0 FALL HAZARD EVALUATION FORM

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INSERT CUSTOMIZED FALL HAZARD EVALUATION FROM

## 14.0 WALKING WORKING SURFACES EVALUATION FORM

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INSERT CUSTOMIZED FALL HAZARD EVALUATION FROM

## 15.0 REVISION HISTORY AND UPDATE STATUS

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REVISION STATUS (DATE)	SECTION No.	DESCRIPTION OF UPDATE OR REVISION
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