	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 1 of 10

## **Purpose**

---

Trinity Medical Management ("Trinity") is dedicated to the protection of its employees from on-the-job injuries. All employees of Trinity have the responsibility to work safely on the job. Our Fall Protection Program intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. Fall protection requirements under the OSHA Construction regulations require considerable planning and preparation. The purpose of this program is to:

- Supplement our standard safety policy by providing safety standards specifically designed to cover fall protection on this job.
- Ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of erection.

This program informs interested persons, including employees, that Trinity is complying with OSHA's Fall Protection requirements. This program applies to all employees who might be exposed to fall hazards, except when designated employees are inspecting, investigating, or assessing workplace conditions before the actual start of construction work or after all construction work has been completed.

Written procedures for fall protection establish uniform requirements for fall protection training, operation, and practices. The effectiveness of the written fall protection procedures depends on the active support and involvement of all employees who perform the jobs requiring it. This plan is intended to document procedures that ensure all work requiring fall protection is carried out safely.


All fall protection systems selected for each application will be installed before an employee is allowed to go to work in an area that necessitates the protection. The Operations Manager is the program coordinator / manager and is responsible for its implementation. Copies of the written program may be obtained from the Operations Office. Certain employees are authorized to inspect, investigate, or assess workplace conditions before construction work begins or after all construction work has been completed. These employees are exempt from the fall protection rule during the performance of these duties. They are the Training and Compliance Manager and Site Supervisors.

These authorized employees determine if all walking/working surfaces on which our employees work have the strength and structural integrity to support the employees. Our employees will not be allowed to work on these surfaces until they have the requisite strength and structural integrity.

All employees, or their designated representatives, can obtain further information about this written program, and/or the fall protection standard from the Operations Manager.

## **Administrative Duties**

---

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 2 of 10

The Operations Manager has been designated the competent person(s) to implement the program. The competent person(s) are responsible for developing and maintaining this written Fall Protection Program.

They are qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer and oversee the program and conduct the required evaluations of plan effectiveness.

### **Our Duty to Provide Fall Protection**

---

Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal or fall arrest systems should be used. When the standard methods of protection are not feasible or a greater hazard would be created.

### **Worksite Assessment and Fall Protection System Selection**

---

Because some sites may require fall protection while others may not, this is the written General Plan applying to all applicable worksites. This fall protection plan is intended to anticipate the particular fall hazards to which our employees may be exposed. Specifically, we:

- Inspect the area to determine what hazards exist or may arise during the work.
- Identify the hazards and select the appropriate measures and equipment.
- Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.
- Ensure employees follow procedures given and understand training provided.
- Apprise ourselves of the steps our specialty subcontractors have taken to meet their fall protection requirements.

Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established at 29 CFR 1926.502, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined later in this plan.

### **Unprotected Sides and Edges**


---

Our employees must be protected when they are exposed to falls from unprotected sides and edges of walking/working surfaces (horizontal and vertical surfaces) which are 6 feet or more above lower levels.

We know that OSHA has determined that there is no "safe" distance from an unprotected side or edge that would render fall protection unnecessary.

We have chosen the following fall protection for unprotected sides and edges at our worksites:

- guardrails

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 3 of 10

- safety nets
- personal fall arrest

We maintain the fall protection system(s) chosen until all work has been completed or until the permanent elements of the structure which will eliminate the exposure to falling hazards are in place.

### **Leading Edge Work**

---

Leading edges are defined as the edge of a floor, roof, or formwork that changes location as additional floor, roof, or formwork sections are placed, formed, or constructed. If work stops on a leading edge it will be considered to be an "unprotected side or edge" and will be covered by the section of this plan on unprotected sides and edges.

We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for our leading edge work.

Employees who are not constructing the leading edge, but who are on walking/working surfaces where leading edges are under construction, are also protected from a fall by guardrails, safety nets, personal fall arrest.

### **Hoist Areas**

---

In all situations where equipment and material hoisting operations take place, we protect our employees from fall hazards. When we are involved in hoisting operations we will use the following fall protection systems at these specific locations:

- guardrails
- personal fall arrest systems

When operations require the materials to be lifted by crane to a landing zone (and do not require an employee to lean through the access opening or out over the edge to receive or guide materials), we can select either personal fall arrest equipment or a guardrail system.


When guardrails (or chains or gates) are removed to facilitate hoisting operations, and one of our employees must lean through the access opening or out over the edge to receive or guide materials they will be protected by a personal fall arrest system.

### **Holes**

---

Trinity protects employees from:

- Tripping in or stepping into or through holes (including skylights).
- Objects falling through holes (including skylights).

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 4 of 10

We use the following fall protection system to protect our employees working on walking/working surfaces with holes where they can fall 6 feet or more to a lower surface:

- covers
- guardrails
- personal fall arrest systems

At this worksite employees can trip or step into or through a hole (including skylights) or an object could fall through a hole and strike a worker. In these instances we use covers to prevent accidents.

We understand that OSHA does not intend that a guardrail be erected around holes while employees are working at the hole, passing materials, and so on. Therefore, if the cover is removed while work is in progress, guardrails are not required because they would interfere with the performance of work. When the work has been completed, we will be required to either replace the cover or erect guardrails around the hole.

### **Formwork and Reinforcing Steel**

---

A jobsite may require formwork or reinforcing steel work 6 feet or more above lower levels. We could be involved in work where different systems fit different applications. Therefore, we have chosen the following fall protection systems that might be used to protect our employees:

- positioning device
- safety net
- personal fall arrest system

### **Ramps, Runways, and Other Walkways**

---

We equip all ramps, runways, and other walkways with guardrails when employees are subject to falling 6 feet or more to lower levels.

### **Excavations**


---

Some jobsites may have excavation edges that will not be readily seen (i.e., concealed from view by plant growth, etc.). When it is necessary, and when the excavation is 6 feet or more deep we protect these excavations by:

- guardrail systems
- fences
- barricades

In addition, walls, pits, shafts, and similar excavations 6 feet or more deep will be guarded to prevent employees from falling into them by:

- guardrail systems
- fences
- barricades

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 5 of 10

- covers

## **Dangerous Equipment**

Trinity is committed to protecting our employees from falling onto dangerous equipment. When this equipment is less than 6 feet below an employee, but because of form or function is dangerous, the employee is protected by guardrails or an equipment guard

When this equipment is more than 6 feet below an employee, but because of form or function is dangerous, the employee is protected by guardrails, personal fall arrest system, or a safety net.

## **Roofing Work on Low-Slope Roofs**

Each of our employees engaged in roofing activities on low-slope roofs (4 in 12 or less, vertical to horizontal pitch) with unprotected sides and edges six-feet or more above lower levels will be protected from falling by:

- guardrails
- personal fall arrest system
- safety net
- a combination of warning line and guardrail
- a combination of warning line and safety net
- a combination of warning line and personal fall arrest

We follow the guidelines in Appendix A of Subpart M to determine how to correctly measure a roof that is not a rectangle.


## **Steep Roofs**

We will protect our workers on roofs with slopes greater than 4 in 12 vertical to horizontal pitch (steep roofs) from falling when the roof has unprotected sides or edges more than 6 feet above lower levels by the use of:

- guardrail with toeboards
- personal fall arrest system, or
- safety net
- Wall Openings

Employees who are exposed to the hazard of falling out or through wall openings (including those with chutes attached) where 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 must be protected from falling. We protect our employees from falls out or through wall openings by the following methods:

- guardrails
- safety nets, or
- personal fall arrest systems

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 6 of 10

## **Walking/Working Surfaces Not Otherwise Addressed**

---

We realize there will be situations that are not covered by our written safety plan, for which we have the duty to provide fall protection. All employees exposed to falls of 6 feet or more to lower levels must be protected by a guardrail system, safety net system, or personal fall arrest system except where specified otherwise in the regulation.

We have audited all of our worksites for fall protection hazards that are not covered elsewhere in this plan. We have taken the following measures to address these hazards:

- guardrails
- personal fall arrest system, or
- safety net

## **Protection from Falling Objects**

---

When employees are exposed to falling objects, we ensure they wear hard hats and also implement one of the following measures:

- Erect toeboards, screens, or guardrail systems to prevent objects from falling from higher levels.
- Erect a canopy structure and keep potential fall objects far enough from the edge of the higher level so that those objects would not go over the edge if they were accidentally moved.
- Barricade the area to which objects could fall, prohibit employees from entering the barricaded area, and keep objects that may fall far enough away from the edge of a higher level so that those objects would not go over the edge if they were accidentally moved.
- Cover or guard holes 6 feet or more above a lower level.

## **Controlled Access Zones**


---

A controlled access zone is a work area designated and clearly marked in which certain types of work (such as overhand bricklaying) may take place without the use of conventional fall protection systems, guardrail, personal arrest or safety net to protect the employees working in the zone.

Controlled access zones are used to keep out workers other than those authorized to enter work areas from which guardrails have been removed. Where there are no guardrails, masons are the only workers allowed in controlled access zones.

Controlled access zones, when created to limit entrance to areas where leading edge work and other operations are taking place, must be defined by a control line or by any other means that restrict access. Control lines shall consist of ropes, wires, tapes or equivalent materials, and supporting stanchions, and each must be:



	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 7 of 10

- Flagged or otherwise clearly marked at not more than 6-foot (1.8 meters) intervals with high-visibility material.
- Rigged and supported in such a way that the lowest point (including sag) is not less than 39 inches (1 meter) from the walking/working surface and the highest point is not more than 45 inches (1.3 meters)--nor more than 50 inches (1.3 meters) when overhand bricklaying operations are being performed from the walking/working surface.
- Strong enough to sustain stress of not less than 200 pounds (0.88 kilonewtons). Control lines shall extend along the entire length of the unprotected or leading edge and shall be approximately parallel to the unprotected or leading edge. Control lines also must be connected on each side to a guardrail system or wall. When control lines are used, they shall be erected not less than 6 feet (1.8 meters) nor more than 25 feet (7.6 meters) from the unprotected or leading edge, except when precast concrete members are being erected. In the latter case, the control line is to be erected not less than 6 feet (1.8 meters) nor more than 60 feet (18 meters) or half the length of the member being erected, whichever is less, from the leading edge.
- Controlled access zones when used to determine access to areas where overhand bricklaying and related work are taking place are to be defined by a control line erected not less than 10 feet (3 meters) nor more than 15 feet (4.6 meters) from the working edge. Additional control lines must be erected at each end to enclose the controlled access zone. Only employees engaged in overhand bricklaying or related work are permitted in the controlled access zones.


On floors and roofs where guardrail systems are not in place prior to the beginning of overhand bricklaying operations, controlled access zones will be enlarged as necessary to enclose all points of access, material handling areas, and storage areas.

On floors and roofs where guardrail systems are in place, but need to be removed to allow overhand bricklaying work or leading edge work to take place, only that portion of the guardrail necessary to accomplish that day's work shall be removed.

## Safety Monitoring Systems

When no other alternative fall protection has been implemented, the Company shall implement a safety monitoring system. Trinity will appoint a site Safety Coordinator to monitor the safety of workers and the Company shall ensure that the safety monitor:

- Is competent in the recognition of fall hazards.
- Is capable of warning workers of fall hazard dangers and in detecting unsafe work practices.
- Is operating on the same walking/working surfaces of the workers and can see them.
- Is close enough to work operations to communicate orally with workers and has no other duties to distract from the monitoring function.

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 8 of 10

- Not have other assignments that would take monitors attention from the monitoring function.

Mechanical equipment shall not be used or stored in areas where safety monitoring systems are being used to monitor employees engaged in roofing operations on low-sloped roofs.

No worker, other than one engaged in roofing work (on low-sloped roofs) or one covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system.

All workers in a controlled access zone shall be instructed to promptly comply with fall hazard warnings issued by safety monitors.

### **Selection & Use Guidelines for Fall Protection Equipment**

---

Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established in the Fall Protection Standard, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined later in this plan. When purchasing equipment and raw materials for use in fall protection systems applicable ANSI & ASTM requirements will be met.

### **General Worksite Policy**

---

If any one of the conditions described in the Workplace Assessment is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met. If you cannot remedy the condition immediately, notify a supervisor of the problem and utilize a different piece of equipment or work in a different area, according to the situation.

If the situation calls for use of fall protection devices such as harnesses or lanyards because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.

Only employees trained in such work are expected to perform it. All places of employment, job sites shall be kept clean and orderly and in a sanitary condition.


All walking/working surfaces must be kept in a clean and, so far as possible, dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places should be provided where practicable.

All places of employment, job sites shall be kept clean and orderly and in a sanitary condition

### **Training Program**

---



	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 9 of 10

Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed this company's fall protection training program.

The training program includes classroom instruction and operational training on recognition and avoidance of unsafe conditions and the regulations applicable to their work environment for each specific fall hazard the employee may encounter.

The training program is conducted by the Training and Compliance Manager, a "competent person" qualified in each aspect of the program, and must cover the following areas:


- The nature of fall hazards in the work area.
- Selection and use of personal fall arrest systems, including application limits, proper anchoring and tie-off techniques, estimation of free fall distance (including determination of deceleration distance and total fall distance to prevent striking a lower level), methods of use, and inspection and storage of the system.
- The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used.
- The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.
- The role of each employee in the safety monitoring system when this is used.
- The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
- The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection.
- The role of employees in fall protection plans.
- The standards contained in Subpart M of the construction regulations.

The TCM will identify all current and new employees who require training and schedule the classroom instruction for those employees. Training on the above components will occur both in the classroom and on the job site, as appropriate. Classroom training will cover written policy/procedures on fall protection and include a training video on the subject. Job site instruction will include demonstration of and practice in wearing fall protection equipment and any instruction necessary for a specific job.

The Training and Compliance Manager has overall responsibility for the safety of employees and will verify compliance with applicable regulations, training program, for each employee required to be trained.

The TCM and/or Site Supervisor has the responsibility of determining when an employee who has already been trained, does not have the understanding and skill required by the training program.

A written certificate of training is required which must include:

	<b>FALL PROTECTION PROGRAM</b>	Document No.:	HSE-OP-023
		Department:	Operations
		Revision Date:	05 APR 2010
Release authorized by:	D. Slattery	Page	Page 10 of 10

- The name or other identity of the employee trained.
- The date(s) of training.
- The signature of the competent person who conducted the training or the signature of the employer.
- Date the Company determined training was deemed adequate.

The Company will provide re-training when the following are noted:

- Deficiencies in training.
- Work place changes.
- Fall protection systems or equipment changes that render previous training obsolete.

## Enforcement

---

Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. The jobsite PIC, as well as individuals in the Safety and Personnel Department, reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

## Incident Investigation

---

All accidents that result in injury to workers, regardless of their nature, are investigated and reported. It is an integral part of any safety program that documentation takes place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence.

In the event that an employee falls or there is some other related, serious incident (e.g., a near miss) occurs, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

## Rescue

---

The Company will provide for prompt rescue of employees in the event of a fall or shall assure the employees are able to rescue themselves.

## Changes to Plan

---

Any changes to the plan will be approved by the Operations Manager. This plan is reviewed by a qualified person as the job progresses to determine if additional practices, procedures or training needs to be implemented by the competent person to improve or provide additional fall protection. Workers are notified and trained, if necessary, in the new procedures. A copy of this plan and all approved changes is maintained at the jobsite.