

24-Hr Fall Protection Competent Person Module 7

Hazard Identification and Written Fall Protection Program

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Section 7.1 Fall Hazard Identification

The development of a comprehensive Fall Protection Program begins with the identification of all potential fall hazards within the workplace. These fall hazards must be noted in the Activity Hazard Analysis (AHA), even if it is not feasible to provide conventional fall protection for the hazards. It is important to note that any time an employee operates at a height exceeding six feet (4 feet for USACE jobs), a fall hazard is present. In such cases, there are two viable options: elimination of the hazard or provision of protection against it. While complete elimination of the hazard is the preferred approach, it is often unfeasible, requiring the use of alternate measures such as Personal Protection Equipment (PPE).

Section 7.2 Fall Protection Plan

In instances where traditional fall protection measures like guardrails, fall protection systems, and distance application are not applicable, administrative controls must be implemented. In such situations, the mitigation of hazards through an administrative control strategy, specifically a written Fall Protection Plan, is crucial and the details of which are given below. Note that this plan is for employees involved in general construction work, including leading edge work, precast concrete erection work, or residential construction work. It is only suitable for tasks where conventional fall protection equipment is not feasible or poses a greater risk. Requirements for the Fall Protection Plan are outlined in §1926.502(k) and are summarized below:

- The plan must be completed by a QP and its implementation shall be supervised by a CP.
- The plan must outline the actions to be taken to diminish or eliminate fall hazards for workers who cannot be provided with protection from conventional fall protection systems.
 - This includes assessing the extent to which scaffolds, ladders, and vehicle-mounted work platforms can be utilized to provide a safer working environment and reduce the risk of falling.
- Each location where conventional fall protection methods cannot be utilized must be identified and classified as Controlled Access Zones (CAZs).
 - Employees that are designated to work in CAZs must also be specified.
- If relevant, the plan must elucidate the reasons why the use of conventional fall protection systems, such as guardrail systems, Personal Fall Arrest Systems (PFAS), restraint, or positioning device systems, is impractical or would pose a greater hazard.
- Accurate and up-to-date records must be maintained, with any modifications approved by a QP.
- Updates to the plan should be made at least once a year or if conditions change.
- A copy of the plan, including all approved changes, should be accessible at the jobsite.
- In the event an employee falls, the employer must investigate the circumstances and implement changes to prevent similar types of falls.

Section 7.3 Fall Protection and Prevention Plan

For USACE jobs, a Site-Specific Fall Protection and Prevention Plan must be developed any time employees are engaged in tasks at elevated heights or face the risk of falling. This differs from OSHA's Fall Protection Plan in that it must be completed any time elevated heights are involved, not just when administrative controls are being used. Requirements for the Fall Protection and Prevention Plan are specified in EM 385-1-1. This plan must be created and implemented by a CP or QP and include the following components:

- An assessment of the potential fall hazards and the steps to minimize the risks
- A description of the fall protection and equipment used (tailored to the worksite)
 - This includes anchorages and fall arrest systems
- Assignment of personnel and their roles, along with necessary qualification documentation
 - If specialized knowledge is needed, the plan should detail the identity, qualifications, and duties of the QP and/or CP
- Procedures for inspecting, maintaining, and storing fall protection equipment
- Monitoring and evaluation techniques to ensure the plan is followed
- Guidelines for conducting fall hazard surveys and preparing survey reports for all facilities
- Training requirements for employees exposed to fall hazards
- Rescue Plan/procedures (explained in the next section)

The Fall Protection and Prevention Plan should have the following detailed information as well:

- A complete setup procedure for access
- The amount of space needed for clearance
- Potential free fall/ total fall distance
- Instructions for setting up, using, and taking down the system and a description of all the parts
- Specification of how many people can use the system at one time
- Limitations of the system
- Manufacturer's standards and drawings (if applicable)
- Detailed directions for inspecting each part of the system (and how often to check them)

Section 7.4 Rescue Plan

If workers have fallen, they need to be rescued in a swift and efficient manner; having a plan is necessary. Various factors such as weather conditions, physical obstacles, and the condition of the victim can pose challenges and complications during rescue operations.

Key rescue guidelines include:

- Urgent extraction of suspended workers
- Awareness of the potential risks of orthostatic intolerance and suspension trauma

- Recognition of signs and symptoms of orthostatic intolerance
- Understanding of the elevated susceptibility of unconscious or head-injured suspended workers to orthostatic intolerance
- Recognition of factors increasing the risk of suspension trauma

For general construction, a written Fall Rescue Plan (FRP) is needed in situations involving the use of Personal Fall Arrest Systems, and for USACE jobs a FRP is needed for all jobs where employees are working at elevated heights. This plan must be developed by a Competent Rescuer and encompass the following:

- Methods for rescue, along with the necessary rescue equipment
 - Rescue can be performed through self-rescue, assisted rescue, local emergency services, in-house professionals, CPs, QPs, or contractor services.
 - If other rescue methods are intended, the plan should outline how to contact and direct these entities to the site.
- Identification, selection, and documentation of anchorages for self-rescue and assisted rescue, if required
 - Anchorages chosen for rescue purposes must be capable of withstanding static loads of 3,000 pounds or five times the applied loads as designed by a QP.
- Use of rescue equipment, such as self-retracting lanyards (SRLs) with rescue capability, which must adhere to ANSI/ASSP Z359.4 and Z359.14 standards
- Identification of assigned safety spotters, commonly referred to as the "buddy system," who will be within visual and verbal range to initiate the rescue of a fallen worker, if necessary

It is imperative that all personnel engaged with any aspect of the fall protection system are well-informed about the Rescue Plan. This is vital to ensure the prompt and effective rescue of any workers who have fallen.