

Standard Operating Procedure: **FALL PROTECTION**

Low Clearance on Vertical Surfaces June 2021



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Low Clearance on Vertical Surfaces

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1.0 STANDARD OPERATING PROCEDURES

For the purposes of this document, standard acceptable work practices related to fall protection for specific work scopes and/or challenges. These SOPs are to be used for creating a standard for the best practices known for accomplishing our work in the safest manner possible and offering our employees the best possible protection.

SOPs must be submitted to the corporate safety department for review and approval before distributing across the company.

2.0 SCOPE OF WORK

Working on vertical surfaces such as wall or column forming operations.

3.0 SOP CHALLENGE STATEMENT

OSHA requires fall protection when exposed to a 6-foot fall (4 foot in the State of WA), while requiring the employer to ensure employees using fall arrest are arrested before contacting the lower level.

This creates a challenge with maintaining the appropriate fall clearance outlined by the manufacturers supplied instructions/calculations while using fall arrest gear at lower elevations on vertical surfaces, even with an overhead anchorage point.

For example, a Nano-Lock Edge requires a 7-foot fall clearance with a worker between 220lbs – 310lbs when anchored directly overhead. When moving side-to-side, the required clearance increases to 10 to 12-foot depending on the employee's exact position relative to their anchor point. This creates a challenge between the regulated 4 to 6-foot protection requirement and the fall clearance required by the equipment. Examples of this work would be installing a wall form, column form, or rebar cage, and likely includes many other operations.

The following operational controls will be implemented when working at lower elevations utilizing a Nano-Lok Edge or other anchor mounted SRLs outlined in our Fall Protection Guide. Work plans and fall protection plans should be developed and executed with the following method:

- 1) Employees will exhaust other methods for fall protection as outlined in the hierarchy of controls.
- 2) Employees will always maintain connection to suitable fall arrest anchor points while climbing and in position working.
- 3) Anchor mounted SRL shall be placed to minimize lateral movement below the anchorage point, reducing swing fall hazards.
- 4) Once an employee has reached their work location, at any location/elevation the manufacturer's fall distance chart does not provide the necessary fall clearance, they must engage a positioning device as an additional fall protection system.
- 5) The positioning device (P-Hook) shall be anchored to a suitable positioning anchorage of at least 3,000lb, or meet local agency regulations for capacity.
- 6) During this application, the positioning device must have full closure of the gate on the snap hook while it is anchored.



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4.0 ILLUSTRATIONS / VISUALS



Utilize Nano-Lock while climbing/traversing



At work location engage P-hook to reduce fall distance to 2 feet



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APPROVALS (FOR CORPORATE SAFETY USE)

(Document reviewers such as: OSHA, State OSHA, MFGR Experts, Legal, Operations, District Managers)