



# Tooele Technical College Fall Protection Program

## **Purpose**

The purpose of this policy is to provide information regarding access to campus building roofs. This policy is intended to supplement OSHA's Fall Protection requirements as found in 29 CFR 1910.28 and 29 CFR 1910.29. This program is also in place to satisfy R23-14-4 of the Utah Administrative Code.

## **Scope**

This policy applies to all employees who may reasonably expect to require limited access to the rooftops of selected college buildings in the course of their work but are NOT engaged in activities that require application of the OSHA's Fall Protection Program. For roof access requiring fall protection please the facilities manager for equipment and training to be in compliance.

Only authorized employees are permitted to have limited access to the rooftops of college buildings. Access by others is not permitted. The college specifically prohibits students from being on the roof of any building.

## **Program Components**

*Authorization:* The Facilities Manager, or his authorized representative, must authorize employees to gain limited access to selected rooftops for legitimate purposes. Access falls into three categories:

1- Employees with the need for regular roof access that are trained according to the standards of the Fall Protection Program may be issued an appropriate hatch key for a roof hatch that is not accessed from a locked custodial closet or mechanical equipment room. For the roof hatches that are accessed from those locked rooms, the same standards of notification and fall protection training apply. All ladders in locked locations will have a clip on the roof hatch so that it cannot be opened from the outside. The list of all employees with a hatch key will be maintained by the risk manager and reviewed at least annually. Training for fall protection and roof access will be provided on a regular basis by the Facilities Department.

2- College and Security personnel will also be issued roof hatch keys, but their use will be limited to emergencies and notification shall be made to the Director of Facilities or his authorized representative if access to the roof is necessary or has occurred. Issuance, replacement or retrieval of hatch keys will be established by the Director of Facilities.

*Emergency Exemption:*. While security personnel must comply with this policy in the course of normal operations, they are exempt during emergencies and may provide access to authorized technical personnel and first responders as needed.

3- All other authorized employees requesting periodic roof access must submit a Work Order for the event and may be accompanied by the appropriate Facilities Department personnel if necessary to provide access and direct supervision of their activities. The issuance of a hatch key for roof access must be specifically approved by the Director of Facilities and logged in. No key may be loaned to or used by anyone other than the person to whom it was issued.

4. Contractors requiring roof access will be required to check out the appropriate key or a hatch key from Facilities on an as needed basis, once their work has been cleared by the appropriate Facilities Project Manager. These keys will be returned and accounted for at the end of each project.

**Hazard Determination:** The Facilities Manager will be responsible for reviewing requests for limited roof access. Criteria for review will include:

1. The purpose for the access is limited to; legitimate maintenance or security/emergency purposes, and activities necessary to the school's operations;
2. The activity being conducted will not cause damage to college property, or present unreasonable hazards to those involved;
3. The area being accessed and the activity being conducted does not require application of the Fall Protection Program or other college safety policies.

**Fall Protection Program Exemption.** The requirements of the Fall Protection Program need not be applied for limited rooftop access so long as the following criteria are met:

1. The area is accessed through a viable doorway or hatchway that does not require special measures (i.e., a safety harness);
2. The area being accessed is flat, safe to walk on in all weather conditions, and purposefully designed for occasional use by workers for maintenance activities.
3. The area being accessed does NOT come within 6 horizontal feet of the roof's outer edge or other location presenting a potential fall distance of greater than 4 vertical feet (i.e., from a higher portion of a flat roof to an adjacent lower portion) NOTE: before work operations commence, movable plastic or metal post flag barriers shall be installed 6 feet away from the leading edge of the roof as a warning system.
4. The work area is currently protected by a parapet or other solid barrier at least 39 inches in height.
5. A movable metal guardrail system shall be installed to protect a hatch opening from accidental falls.

Authorized employees should operate using the "buddy system" whenever possible when accessing rooftops. All other circumstances involving roof access require application of the Fall Protection Program.

## **Fall Protection Systems**

Any work procedures with at least a 48 inch fall hazard necessitating close proximity of a worker will require one of the following fall protection methods:

1. The use of a full body harness with a rip-stop lanyard and a tie-off point capable of at least 5000 pounds shock load;
2. Placing a scaffold against the leading edge of a building that provides a fall potential of 47 inches or less from the edge to the floor of the scaffold planking;
3. Providing a guardrail system with vertical posts that can withstand at least 200 pounds of side force, a top rail of a nominal height of 42 inches, +/- 3 inches, and a mid-rail for the guardrail system half way up to the top rail from the working surface.
4. The use of an articulated lift will require the use of a full body harness and tie-off, even when the lift is being moved from one location to another.
5. Workers will stand on the floor of a scissor or articulated lift at all times. Ladders, buckets for standing and guardrail use to rise to a higher level is prohibited.

### **Training**

The school district will provide fall protection training that will include the following:

1. How to properly don and doff a full body harness
2. The process of inspecting a body harness and lanyard for damage
3. School district policies and procedures related to fall protection
4. Open hatch fall protection guarding, and security
5. Various fall protection methods that will comply with OSHA fall protection regulations
6. How to properly operate a scissor or articulated man-lift

Records of all fall protection training will be kept in employee personnel files.