

 Sample Fall Protection Program



Company name here

[Company] Fall Protection Program

To enhance our employees’ health and safety, our company has developed, implemented and maintains a comprehensive Fall Protection Program. The program covers Title 8, California Code of Regulations, General Industry Safety Orders for fall protection, personal fall protection equipment, ladder safety and powered platforms.

The objective of the [Company Name] Fall Protection Program is to identify and evaluate fall hazards to which employees will be exposed, to provide proper and effective control of these fall hazards and provide required training.

With clearly identified procedures outlined in our workplace, it is our company intention to: identify and control fall hazards present in the workplace, promote safe and effective work practices, reduce the possibility of accidents, injuries and workers’ compensation losses and comply with government regulations.

This program establishes standardized requirements to ensure that fall hazards in the workplace are effectively controlled and that this information is communicated and understood by all affected employees through identification and control of the fall hazards, personal fall arrest systems (PFAS) and effective employee safety training. Through this program, our employees will receive the necessary information and our company will take the necessary steps to reduce and eliminate exposures and implement proper work practices. Topics include:

* Assignment of responsibilities
* Fall protection systems
* Elevated work locations
* Standard guardrail systems
* Floor openings, floor holes, skylights and roofs
* Ladder safety
* Elevated work platforms and aerial devices
* Personal fall arrest systems
* Risk assessments for non-routine fall risks
* Contractors, training and recordkeeping

**Elevated locations in our workplace contain:** [Check all those applicable]

[ ]  Elevated work locations

[ ]  Guardrail systems

[ ]  Roofs

[ ]  Skylights

[ ]  Ladders

[ ]  Powered platforms

[ ]  Personal fall arrest systems (PFAS)

TABLE OF CONTENTS

I. Assignment of Responsibilities

II. Fall Protection Systems

III. Standard Guardrail Systems

IV. Elevated Locations

V. Floor Openings, Floor Holes, Skylights and Roofs

VI. Ladder Safety

VII. Elevated Work Platforms and Aerial Devices

VIII. Personal Fall Arrest Systems

IX. Risk Assessments for Non-Routine Fall Risks

X. Contractors

XI. Training

XII. Recordkeeping

XIII. Cal/OSHA References

Reference Tools:

* Fall Hazard Assessment Worksheet
* Fall Protection Program Checklist
* Facility Fall Protection Equipment Inventory List
* General Fall Protection Training Record
* Equipment Specific Fall Protection Training Record
* PFAS Inspection Checklist

I. ASSIGNMENT OF RESPONSIBILITIES

The program administrator, with support from management and employees, will oversee our Fall Protection Program.

Program Administrator

[NAME] has been assigned as program administrator.

The **program administrator** is responsible for the development and administration of the Fall Protection Program and has authority to make necessary decisions to ensure its success. The program administrator has authority to halt any operations where there is risk of employee injury associated with work at elevated heights. The program administrator will review and evaluate this Fall Protection Program on an annual basis, as there are changes to Cal/OSHA standards, when there is an accident or near miss related to falls, or any time the program contents do not appear to be adequate.

In addition, the program administrator will:

* Have the role and responsibility of being a **competent person** *(as defined by Cal/OSHA: A person who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are hazardous to employees. A person who has the authorization to take prompt corrective action to eliminate such hazards).*
* Perform routine inspections in the workplace to ensure fall risks are adequately protected with proper fall protection systems.
* Enforce the company’s safety policies and procedures.
* Correct any unsafe practices or conditions immediately.
* Train employees and supervisors to recognize fall hazards and use fall protection systems.
* Train employees in proper donning and doffing of safety harnesses and use of PFAS.
* Maintain records of employee training and company equipment issue and fall protection systems.
* Conduct equipment inspections based on Fall Protection Equipment Inventory.
* Be involved in performing risk assessments and establishing proper controls for non-routine job tasks where work will be performed at elevated heights.
* Maintain records to document program compliance.

Employees

It is the responsibility of all employees to:

* Understand and adhere to the procedures outlined in this Fall Protection Program.
* Follow all safety rules and policies as outlined in this program.
* Follow the instructions of the program administrator and company supervisors.
* Operate systems and equipment safely and following established requirements.
* Inform management of unsafe and hazardous conditions or practices that may cause injury to themselves or other employees.
* Properly care for, use and inspect assigned fall protection equipment.
* Perform pre-use inspections on PFAS, ladders, powered platforms and any other equipment where required.

II. FALL PROTECTION SYSTEMS

An employee must be protected from falling when working on a surface that has an unprotected side or edge that is 4 feet or more above an adjacent lower level, or when working from personnel lifts with articulating booms. In each case, the fall hazards must be evaluated to determine the preferred method of protecting the employee. One of the following fall protection systems will be in place whenever an employee is exposed to a fall greater than 4 feet.

There are two basic fall protection systems:

* **Passive systems – fall prevention,** such as guardrails and floor covers
* **Active systems – personal fall protection,** such as safety body harnesses and lanyards

Passive systems like guardrails are the preferred system for fall protection. If passive systems cannot be utilized, then personal fall protection is required. At our company, passive systems (guardrails) will always be considered the first control method. We will outline those requirements in this program.

We have evaluated our facility for fall risk hazards and established proper controls using the *Fall Hazard Assessment Worksheet* located in the references section as a tool.

III. STANDARD GUARDRAIL SYSTEMS

The use of guardrail protection is the facilities’ most important priority and control method when employees work at elevated heights. When guardrail protection is required, the following structure will be maintained:

* Standard guardrail will consist of top rail, midrail (or equivalent protection) and posts.
* The guardrail will have a nominal height of 42 inches to 45 inches from the upper surface of the top rail to the floor, platform, runway or ramp level (working surface).
* The top rail will be smooth-surfaced throughout the length of the railing. The midrail will be approximately halfway between the top rail and the working surface.
* The guardrails, all connectors and anchorage will be capable of withstanding a force of at least 200 pounds.

*Note: The minimum value of railing strength specified here may be inadequate for safety under operating conditions where railings are liable to receive heavier stresses. In all cases, we will use professional and qualified building engineers to assist us with any questionable or new installation of guardrail systems.*

Our guardrail systems typically do not expand to a variety of guardrail types, as our elevated locations are typical and meet standard guardrail requirements. For any guardrails, either existing or new installations, or for unique situations or variable construction (such as wood), we will refer to Cal/OSHA Section 3209 for specific requirements.

**Toeboards.** Toeboards are required and will be provided on working platforms where there is a risk of falling objects on employees exposed below. They will be constructed of wood, concrete, metal or other suitable material. They will be installed at not less than 3 ½ inches above the platform, walkway or other working level, and the bottom clearance shall not exceed ¼ inch. In areas where material is piled higher, higher toeboards or paneling from the floor to the midrail or top rail shall be provided for safety below these areas.

IV. ELEVATED LOCATIONS

Working at elevated locations can pose risk and injury to employees. Based on Cal/OSHA guidance requirements and information therein, we will assess work at elevated heights based on the following criteria:

**Elevated locations.** The unprotected sides of elevated work locations that are not buildings or building structures, where an employee is exposed to a fall of 4 feet or more will be provided with guardrails.

**Buildings.** Guardrails will be provided on all open sides of enclosed elevated work locations, such as roof openings, open sides of landings, balconies or porches, platforms, runways ramps or working levels more than 30 inches above the floor, ground or other working areas of a building.

*Note: As it applies to this company, all appendages, accessories, apparatuses, appliances and equipment installed as a part of a building or structure shall be deemed to be a part of the building. “Building” does not include machinery or equipment installed for manufacture or process purposes only. It does not include any construction installations not a part of a building.*

Where overhead clearance prohibits installation of a 42-inch guardrail, a lower rail or rails will be installed. The railing will be provided with a toeboard where the platform, runway or ramp is 6 feet or more above where employees normally work or pass and the lack of a toeboard could create a hazard from fall tools, material or equipment.

**Loading docks.** The loading docks at our facility have been measured to be [insert height] in height. Our fall protection policy is to keep the dock doors closed at all times when a truck is not at the dock. If the dock door is open, and the height is greater than 30 inches, then fall protection that meets the requirements of guardrail systems is required.

**Ladderway access openings at elevated locations.** Openings in guardrails for ladderway access will be protected by guardrails and toeboards meeting the requirements above. The opening through the railing shall have either a swinging gate or equivalent protection, or the passageway to the opening shall be offset so that a person cannot walk directly into the opening.

V. FLOOR OPENINGS, FLOOR HOLES, SKYLIGHTS AND ROOFS

Fall protection requirements from floor openings, floor holes, roofs and skylights will be outlined in this section. Refer to Section III for guardrail requirements and toeboard requirements. Use of covers is also acceptable for openings and holes, and construction requirements will be outlined here. Only authorized personnel are permitted on the roofs based on need, such as working on building equipment and systems.

Floor Openings and Holes

**Floor openings and holes.** Every floor opening in our facility will be guarded by either a cover or a guardrail (or equivalent) on all open sides. While the cover is not in place, the opening will be constantly attended by an employee or will be protected by guardrails. We can utilize portable and freestanding safety guardrails if they meet the guardrail requirements outlined above. We will purchase these through reputable suppliers on an as-needed basis to ensure the job is being performed safely when there is a risk of falls.

**Hatchways and chute floor openings.** These will be guarded by guardrails, hinged or removable covers or removable railings, provided these covers or railings afford the protection equivalent to that provided by a guardrail outlined in Section III.

**Floor and roof open covers.** All our covers will be designed by a qualified professional and be capable of safely supporting greater than 400 pounds or twice the weight of the employees, equipment and materials that may be imposed on any one square foot area of the cover at any time. Covers will be secured at all times to prevent accidental removal or displacement. It will be appropriately marked with not less than 1-inch high legible lettering stating: “Opening – Do Not Remove.” Covers will not project more than 1 inch above the floor level, and all edges shall be chamfered to an angle.

Wall Openings

**Wall openings.** Wall openings will be properly protected to prevent falls associated with these risks. By definition, a wall opening is “*an opening in a wall or partition not provided with a glazed sash, having a height of at least 30 inches and a width of at least 18 inches, through which a person might fall to a level 30 inches or more below.”* Wall openings will be guarded by a guardrail or other barrier of such construction and mounting that the guardrail or barrier can withstand a force of at least 200 pounds applied horizontally at any point on the near side of the guardrail or barrier. If a barrier is to be used it may be of solid construction, grillwork with openings not more than 8 inches long, or of slat-work with openings not more than 4 inches wide with unrestricted length.

Roofs

Guardrails that meet the requirements in Section III will be required at locations where there is a routine need for employees to approach 6 feet of the leading edge of the roof. If performing only intermittent work with no roof guardrail, employees will use appropriate fall protection, such as approved portable railings or personal fall arrest systems. [*Note: For the purpose of the above requirement for roof work, ‘routine’ work means more than four times a year, and ‘intermittent’ work means not exceeding four times a year.]*

Guardrails required for roofs will be provided along the roof edge extending at least 6 feet beyond the areas occupied by the person(s) accessing, servicing or repairing permanently-mounted machinery and equipment, such as our swamp coolers, exhaust systems and HVAC systems.

Where PFAS will be used on the roof in lieu of guardrails, safety lines and/or lanyards shall be attached to the roof tie-backs meeting the requirements for appropriate and approved anchorage points for building systems. For additional information, refer to the Cal/OSHA requirement in Section 3291(f)*.* The building/roof anchorage is to be used solely for fall protection equipment. A manufactured mobile anchorage system that meets fall protection requirements can also be used.

Skylights

Any employee approaching 6 feet of a skylight must be protected from falling through the skylight or its opening. Only authorized employees are permitted on the roof. Skylight designers, manufacturers and installers will be consulted to assist with proper skylight evaluation and fall protection controls.

**Skylights at our facility have been protected from fall risks in the following way(s):** (Check all that apply)

[ ]  Skylight screens. *Above or below the skylight.*

[ ]  Guardrails. *Provided on all exposed open sides to a fall of 6 feet or more.* The design, construction and installation of skylight screens and guardrails will meet the strength requirements equivalent to that of guardrails and covers as outlined in Section III.

[ ]  Use of a personal fall arrest system, which meets the requirements for PFAS outlined in Section VIII.

[ ]  Covers, including the skylight itself, that when installed over the skylight meet fall protection requirements. Or, the skylight itself serves as a cover and meets manufacturer requirements.

[ ]  A fall protection plan. *Refer to the Construction Safety Orders, Section 1671.1.* This can only be used when the above fall protection methods can demonstrably create a greater hazard.

*Exception (to be evaluated and approved by program administrator): When the work is of short duration and limited exposure, such as measuring, roof inspection, electrical/mechanical equipment inspection, etc., and the time involved in installing the safety devices required above equals or exceeds the performance of the tasks identified in this exception, these provisions may be temporarily suspended provided that adequate risk control is recognized and maintained.*

Service Pits and Yard Surface Openings

Unused pits or portions of service pits will either be covered or protected by guardrails. This is to be done with moveable posts or stanchions and chain rails or other guardrails that provide equivalent protection. Permanent yard surface openings like pits or sumps shall be guarded as required above for floor openings and floor holes. Trench or conduit covers and their supports, as well as manhole covers, if they are in the plant or roadways, will comply with local standard highway requirements or otherwise be designed to carry a truck rear-axle load of at least 20,000 pounds.

VI. LADDER SAFETY

This section applies only to use of portable and/or fixed ladders. It is designed to protect employees from fall hazards associated with these types of ladders.

**We use the following ladders:** *(Check all that apply)*

[ ] Portable Ladders. *E.g., A-frame ladder, extension ladder, sectional ladder, side-rolling ladder, stepladder*

[ ]  Fixed Ladders. *Ladders permanently fixed to a building, structure or equipment.*

Portable Ladders

**Selection.** Our company has selected ladders for employee use, which is restricted to the purpose for which the ladder is designed. If work cannot be done safely from a ladder, other positioning equipment will be used (e.g., aerial lifts or scissor lifts). The portable ladder should meet the job requirements of the person, the task and the environment. Selection of ladders for use at our company have been given consideration to ladder length, height required, working load, duty ratings, worker position to tasks and frequency of use.

Care, Use, Inspection, Maintenance and Storage of Portable Ladders

Employees who use ladders must know how to select, set up and properly use ladders, as well as inspect them for visible defects. These company policies have been established:

* We will only use ladders made of fiberglass or composite non-conductive materials. Wood or metal ladders are prohibited.
* Ladders must be long enough to provide access to the work area without standing on the top two steps of a stepladder or the top three rungs of a straight ladder.
* Ladders will be provided that when used to gain access to an upper landing surface, are long enough that the side rails extend above the top support point by at least 36 inches and create a strong upper resting point.
* Arrange ladder storage to allow for easy inspection and reach.
* Store ladders upright and secure to a permanent structure by hooks, brackets or another effective method.
* The ladder selected will be sufficient for the weight of the employee plus the weight of any tools and materials.

**Read the load sticker on the ladder to determine proper ladder is used for the job:**

* + Economical design for lightweight use – Type III, 200-pound load capacity
	+ Basic design for simple projects – Type II, 225-pound load capacity
	+ Designed to handle most projects and jobs – Type I, 250-pound load capacity
	+ Rugged performance designed with the ‘professional’ in mind – Type IA, 300-pound load capacity
	+ Maximum performance and durability for the ‘toughest jobs’ – Type IAA, 375-pound load capacity

Setup for Portable Ladder Use

* Splicing short ladders to form a longer ladder is prohibited. Ladders are not to be tied, fastened together or modified in any way.
* Never place ladders on unstable surfaces, such as boxes, barrels, or any other unstable basis, for additional height.
* Use ladders on only clean, stable and level surfaces unless secured to prevent accidental movement (don’t shim or prop). *Although ladder feet or shoes provide an important measure of safety, they cannot compensate for uneven ground unless they are designed with adjustable feet.*
* Always use the 1-to-4 rule. Place the base of straight ladders away from the wall or edge of upper level one foot for every four feet of vertical height.
* Where possible, secure the top of straight ladders with a rope or wire and the bottom with a block.
* Ensure both automatic locks of an extension ladder are in proper position.
* Provide barricades and warning signs when ladders are placed near doors or other locations where they could be struck by moving equipment or people.

Ladder Inspections

Prior to ladder use, a visual inspection must be performed by the employee using the ladder. Formal, documented ladder inspections will be done on a [monthly, quarterly or semi-annual] basis by a qualified person. Ladder inspections should include the following:

* Check for broken or missing rungs and cleats, broken side rails and other damaged parts. Cleats, rungs and side rails must be free of grease, oil, paint and other slippery substances.
* The ladder should be equipped with feet that are secured in place.
* Where it applies, ladders with levelers will be used to achieve equal rail support on uneven surfaces.
* The joint between steps and side rails must be tight, and hardware and fittings should be securely attached. Moveable parts should operate freely without binding or undue play.
* Check for shakes, warpage, decay or other irregularities.
* Check for dents or bends in side rails, rungs or cleats.
* Check step-to-side rail connections, hardware connections and rivets. If a ladder tips over, inspect for damage.
* Report and remove damaged ladders from service to be properly destroyed.

To document ladder inspections, use the *Facility Fall Hazard Protection Equipment Inventory List,* located in the Reference Tools.

Basic Safety Rules and Policies for Ladder Use

The following are company safety policies for proper use of portable (and fixed, where applicable) ladders. Any employee who violates these policies will be disciplined accordingly.

* Do not use ladders for unintended purposes.
* The top two steps and platform of a stepladder and the top three rungs of a straight ladder shall not be used.
* Do not overreach, jump or slide a ladder while on it. Ladders shall not be moved, shifted or extended while occupied. Employees must leave the ladder to reposition it.
* Face the ladder and use the handrail.
* Always maintain three points of contact with the ladder (i.e., two feet and one hand or two hands and one foot). This applies to ascending and descending the ladder.
* Utilize the “belt buckle rule:” Do not lean so far that your belt buckle would extend farther than the outside of a ladder’s side rails. If your belt buckle extends farther than the outside of the side rails, the ladder is insufficient for the job.
* Raise tools or materials with a rope after reaching the working position. Do not carry heavy loads.
* Ladders are not to be used by more than one person at a time. The bracing on the backside rails of stepladders is intended only for stability, not climbing.
* Step ladders are not to be used as single ladders or in the partially closed position.
* Ladders shall not be used horizontally as platforms, runways or scaffolds.
* Extension ladders must have proper overlap:
	+ Three-foot overlap for 32-foot ladder
	+ Four-foot overlap for 32- to 36-foot ladder
	+ Five-foot overlap for 36- to 48-foot ladder
	+ Six-foot overlap for 48-foot ladder
* Straight ladders and stepladders exceeding 10 feet are to be held stable by another person.
* When a defect or unsafe condition is identified, tag or mark the ladder with the words “Do not use” or similar language until it can be properly destroyed.
* No employee should repair or fabricate improvised ladders. Never try to straighten a bent or bowed ladder. Remove it from service.

Fixed Ladders

Fixed ladders are installed at our facility for safe access to the roof, structures and equipment. Additional fixed ladders will only be installed by qualified companies. The following are general facility guidelines for fixed ladders that meet applicable requirements.

* Fixed ladders are designed to withstand a minimum design live load (weight on ladder) of a single concentrated load of at least 200 pounds.
* Metal ladder rungs must be at least ¾-inch in diameter, at least 16 inches wide and spaced 12 inches apart. The rungs, cleats and steps should be free of sharp edges, burrs or projections that could pose a hazard.
* There must be at least a 7-inch clearance behind the ladder (from ladder to the structure or equipment) for adequate toe space when accessing the ladder.
* There must be a clear width of 15 inches on each side of the center line of a ladder, unless it is equipped with a cage or well. If equipped with a cage, the cages shall not extend less than 27 inches or more than 30 inches from the center line of the rungs of the ladder.
* A platform is required every 30 feet for caged ladders and every 20 feet for unprotected ladders.
* Existing fixed ladders longer than 24 feet must be equipped with PFAS, a ladder safety system\*, cage or well.

**Note: New OSHA Fall Protection Requirements.** The new regulation phases in a requirement for employers to have ladder safety or personal fall arrest systems for fixed ladders greater than 24 feet and phases out the use of cages or wells for fall protection under the following timeline: by Nov. 19, 2018 all new fixed ladders and replacement ladder/ladder sections must have a ladder safety or personal fall protection system. For existing ladders, by Nov. 19, 2018, employers must install a cage, well, ladder safety system or personal fall arrest system on fixed ladders that do not have any fall protection. Within 20 years (2026) all ladders extending more than 24 feet must be equipped with PFAS or a ladder safety system.

**\****Ladder Safety System: A system attached to a fixed ladder designed to eliminate or reduce the possibility of a worker falling off the ladder. A ladder safety system usually consists of a carrier, safety sleeve, lanyard, connectors and body harness. Cages and wells are not considered ladder safety systems.*

**Maintenance and inspection.** All fixed ladders will be maintained in safe condition. All ladders will be inspected regularly by [department or individual name], with intervals between inspections determined based on use and exposure.

Training

Before an employee uses a ladder, he or she will be trained in the safe use of the ladder. Training will include the following topics:

* Importance of using ladders safely, including frequency and severity of injuries related to falls from ladders.
* Selection, including types of ladders, proper length, maximum working loads and electrical hazards.
* Maintenance, including inspection and removal of damaged ladders from service.
* Erecting ladders, including footing support, top support, securing and angle of inclination.
* Climbing and working on ladders, including user’s position and points of contact.
* Factors contributing to falls, including haste, sudden movement, lack of attention, footwear and user’s physical condition.
* Prohibited uses, including improper use and climbing on cross bracing, and protocol for maximum and minimum overlap of extension ladder sections.
* Basic safety rules, company polices and how to perform pre-use inspections of the ladders.

Training will be provided upon employment and on an annual basis. Use the form in the *General Fall Protection Training Record* located in the Reference Tools to document employee training.

VII. ELEVATED WORK PLATFORMS AND AERIAL DEVICES

This section applies if we are using, or going to be using, elevating work platforms and vehicle-mounted or self-propelled aerial devices used to position individuals, and their tools and materials, to work locations.

This section pertains to exposures and controls associated with fall hazards and controls and does not cover all requirements associated with equipment. Our elevated work platforms and aerial lifts will be serviced, maintained, repaired and inspected as required by manufacturer instructions. All equipment instructions and markings will adhere to the manufacturer and be part of our maintenance and repair review program.

Only trained and authorized employees are permitted to use and work on elevating lift devices.

**We use the following at our company:** *(Check which apply)*

[ ]  **Aerial device.** Any vehicle-mounted or self-propelled device, telescoping extensible or articulating, that is primarily used to position individuals.

[ ]  **Elevated work platform.** A device designed to elevate a platform in a substantially vertical axis.

[ ]  Scissor lift

[ ]  Personal lifts (e.g.: Genie lift)

[ ]  Order pickers

**Body harnesses.** Body harnesses must be worn with self-retracting lanyards when working from an elevated work platform. *(Exception: scissor lifts, personal lifts and telescoping lifts that can move only vertically do not require the use of a harness and lanyard, as long as the work platform is fully protected by a guardrail system and meets guardrail system requirements outlined in this program.)* The point of attachment must be the lifts’ boom or work platform with proper anchorage points provided. Personnel cannot attach lanyards to adjacent poles, structures, guardrails or equipment while working from the aerial lift.

**Equipment instructions and markings.** Each device will have a manual with instructions for maintenance and operations (operating instructions) and will be maintained on the equipment in weather-resistant storage. Each device will have a conspicuously displayed legible plate or other marking verifying the aerial device or elevating work platform meets mandated requirements *(Refer to Cal/OSHA Section 3638 for additional information as it applies).*

Basic Safety Rules and Policies for Aerial Lifts and Elevated Work Platforms

This section will address general hazards associated with these devices, with emphasis on fall hazards and controls. Adhere to these basic safety rules:

* Unless recommended by the manufacturer, no elevating work platform shall be used on an inclined surface.
* Always evaluate electrical hazards prior to using equipment in an area.
* All equipment is to be inspected on a regular basis and prior to use by the operator. A checklist, which is part of your aerial lift and elevated work platform program, should be completed and submitted to the program administrator or supervisor.
* The rated capacity of the lifting devices must never be exceeded.
* Always move devices within the proper speed requirements.
* Scissor lifts – employees are not to sit, stand or climb on the guardrails of an elevating work platform.
* Aerial lifts – employees are not to sit or climb on the basket.
* Employees are not to use planks, ladders or other devices to gain greater working height or reach.
* Employees should ensure that access gates or openings are properly closed.
* Body harnesses and self-retracting lanyards are to be used when working on aerial devices or elevated work platforms (exception is scissor lift, personal lifts and telescoping lifts with safety guardrail system).
* Scissor lifts – check to see that a guardrail system is in place, only stand on the work platform – never the guardrails – and keep work within easy reach to avoid leaning.
* Wear a body harness and self-retracting lanyard when operating from an order picker.
* Employees climbing or descending the devices’ vertical ladders shall have both hands free for climbing.
* Where moving vehicles are present, the work area around the lifting equipment shall be marked with warning signs, such as flags, roped off areas or other effective means of traffic controls.
* When used, outriggers shall be positioned on pads or a solid surface.
* Aerial device – the truck shall not be moved when the boom is elevated in a working position with employee(s) in the basket. *(If this must happen, follow Cal/OSHA Requirements in Section 3648, operating instructions for aerial devices.)*

*Note: This section is not all-inclusive for powered platforms and equipment for building maintenance. (Refer to Cal/OSHA, Title 8, General Industry Safety Order, Article 6 for additional requirements).*

Training for Powered Platforms

Before an employee uses an elevated work platform or aerial lift, he or she will be trained in safe operating use of the equipment. Work platforms and lifts are to be operated by qualified persons who are proficient in operation, safe use and inspection of the platform or lift to be operated. Training will include the following:

* Recognition of, and preventative measures for, safety hazards of individual work tasks.
* General recognition and prevention of safety hazards associated with the use of working platforms.
* Emergency action plan procedures for rescue.
* Personal fall arrest system inspection, care, use and system performance.
* Company safety rules and policies.

Training on operation and inspection of working platforms and lifts will be performed by a qualified person at our facility. Written work procedures, or pictorial methods of instruction, must be used. Manufacturer operating manuals for equipment and components will serve as the basis for our procedures.

Training will be provided upon employment and on an annual basis. Equipment training requires us to certify that the employees have received training in operating and inspecting platforms and lifts. A certification record will be maintained. A certification document will be achieved using the form, *Equipment Specific Fall Protection Training*, in Reference Tools.

VIII. PERSONAL FALL ARREST SYSTEMS

Personal fall arrest systems (PFAS) are systems used to arrest an employee falling from an elevated work level. A fall arrest system consists of an anchorage, connectors, a body harness and may include a lanyard, lifeline or suitable combinations of these.

**At [Company Name], body harnesses and lanyards are required for work at elevated heights for the following jobs:**

[ ]  Order pickers

[ ]  Aerial lifts

[ ]  Roofs

[ ]  Unprotected mezzanines

[ ]  Unprotected elevated work areas

**Anchorages.** Anchorages used for attachment of personal fall arrest equipment will be independent of any anchorage being used to support or suspend platforms and will be capable of supporting at least 5,000 pounds per employee attached. Anchorages to which personal fall arrest equipment is attached will be contracted to qualified individuals which are designed under the supervision of a professional engineer registered in the State of California. They will be inspected, tested and maintained in accordance with Cal/OSHA and manufacturer requirements. Documentation will be maintained to demonstrate that the anchorage points meet the weight requirements. Tie-offs to other building support systems must be evaluated to ensure that their integrity meets the support requirements as an anchorage point.

**Horizontal safety line.** We currently have no horizontal safety lines at our company. We would evaluate the need based on identified non-routine job tasks. A horizontal safety line will be designed under the supervision of a professional engineer registered in the State of California to install these devices.

Care and Use

* Body belts will not be used as part of a personal fall arrest system and are prohibited at our company.
* PFAS will be rigged such that an employee can neither free fall more than six feet or contact any lower level obstacle.
* The attachment point of the body harness will be in the center of the wearer’s back near shoulder level, or above the wearer’s head.
* PFAS or components are only to be used for employee fall protection.
* PFAS or components that have been subjected to impact loading will be immediately removed from service.
* We will provide prompt rescue of employee(s) in the event of a fall or will ensure the self-rescue capability of employees.
* Devices used to connect to a horizontal safety line that may become a vertical safety line shall be capable of locking in either direction on the safety line.

Selection and Use

* All body harnesses and lanyards will meet the requirements of ANSI Z359.1 and labeled accordingly.
* All PFAS equipment will conform to the design and performance criteria as required in Cal/OSHA Article 6, Appendix C.
* PFAS will be selected to match the work situations that occur at our workplace, and free fall distance will be kept to a minimum.
* Self retracting lanyards with the body harness will be used on all order pickers.
* Consideration will be given to work conditions and environment, such as the presence of acid, dirt, moisture, temperatures, oil and grease. Wire rope should not be used where an electrical hazard is anticipated.
* The weight of the employee and their tools will be evaluated to ensure properly rated devices are used.
* We recognize that not all PFAS equipment is compatible, and we will review this prior to placing systems into use. Example: A lanyard will not be connected between a body harness and deceleration device of the self-retracting type since this can result in additional free fall from which the system is not designed.
* The manufacturer’s recommendation will be followed for methods of inspection, use, cleaning and storage of equipment.

Inspection Requirements

Personal fall arrest equipment will be visually inspected prior to each use for mildew, wear, damage and other deterioration, and defective components will be removed from service.

As part of the inspection, ensure that manufacturer labels are on the equipment and legible. If they are not listed or legible, the equipment is to be removed from service.

Each PFAS will be inspected not less than twice annually by the program administrator (competent person) in accordance with the manufacturer's recommendation. The date of each inspection will be documented on the *Fall Protection Equipment Inventory* list.

The PFAS inspections will be documented on the *Semi-Annual Inspection Criteria for Personal Fall Arrest Systems* located in the Reference Tools.

Storage and Maintenance Requirements

Personal fall arrest equipment is to be stored properly and away from any workplace components that could damage it. The following storage requirements will be maintained:

* Equipment is to be stored in designated cabinets/lockers.
* Always hang the equipment in this cool, dry location in a manner that it will retain its shape.
* Equipment is to be stored where it will avoid dirt buildup on the equipment.
* The equipment is never to be stored in the bottom of tool boxes, on the ground or on the floor of elevated work platforms.
* Equipment must not be stored outside where it is exposed to weather elements.
* Equipment is not to be stored near any excessive heat, chemicals, moisture or corrosive elements.

Specific Training Requirements

Thorough employee training on the use of our PFAS equipment is imperative. Before the equipment is used, the employee must be trained in safe use of the systems. The training will include:

* Use and limitations of the safety devices.
* Proper anchoring and tie-off techniques at our facility.
* Estimation of free fall distance (including determination of deceleration distance and total fall distance to prevent striking a lower level).
* Proper methods of use.
* Understanding that improper tie-offs (such as using knots, tying around sharp edges) can damage and reduce the strength and integrity of these devices.
* Pre-use inspection criteria *(refer to inspection criteria in Reference Tools).*
* Proper storage requirements for the personal fall arrest equipment.
* Understanding of manufacturers’ use and recommendations.

Careless or improper use of the equipment can result in serious injury or death, and such disregard for proper use will result in disciplinary action.

**Rescue consideration.** When PFAS is used in our facility, we will assure that employees can be promptly rescued or can rescue themselves should a fall occur. The program administrator will assist in assessing proper rescue procedures. Rescue procedures are dependent on the unique job task (e.g., working from order picker, aerial lift, horizontal lifeline). In the unlikely event that a fall arrest occurs onsite, the following methods will be used for rescue:

[ ]  Self-rescue devices

[ ]  Rescue personnel

[ ]  Aerial lift

[ ]  Scissor lift

[ ]  Ladders

[ ]  Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Methods used must be detailed under that category checked above. Specific procedures must be formalized and trained upon. It must be properly communicated to all affected personnel. We will hold mock-drills to practice these procedures.

Communication is the key to prompt rescue. In the event of a fall, the following people will be notified as soon as possible: Designated rescue personnel [List Department, e.g., Maintenance], manager and supervisor, and fire department and emergency medical services, if necessary (911). All employees involved in a fall arrest or fall will be sent immediately for a medical evaluation to determine the extent of injuries. A fall investigation will be performed by [competent individual/program administrator] to determine root cause and to prevent recurrences.

IX. RISK ASSESSMENTS FOR NON-ROUTINE FALL RISKS

It is important that employees understand the risks associated with falls from any elevated work area. This would involve not only routine tasks within our facility and operations, but those tasks that are considered non-routine (i.e., not performed frequently or needing to be done just once) and where fall hazards exist and controls must be implemented.

Whenever an employee identifies a task where fall protection does not exist, they will notify their supervisor and/or program administrator, and a risk assessment will be performed to determine the appropriate fall protection systems for the job.

The program administrator will evaluate the facility and ensure controls are in place as part of a fall hazard risk assessment. The program administrator will oversee development of the risk assessment, which outlines the job tasks and procedures for control of all fall risks associated with that unique job.

If there are other areas where walking and working surfaces may pose additional risks, these will be properly evaluated with approved fall protection systems and approved controls implemented.

There may be instances when other types of approved fall protection systems may be necessary, but this is not typical in general industry, rather used more frequently in the construction industry. These other systems include scaffolding, safety netting and a fall protection plan. If these are required to be used at our facility, the program administrator will investigate the needs and whether they are implemented properly according to Cal/OSHA requirements.

X. CONTRACTORS

All outside contractors working in or on our premises will be required to follow the guidelines set forth in this Fall Protection Program. Contractors, prior to commencing work, will be informed of these requirements and will provide signature as documentation that they have received a copy of this Fall Protection Program and that they have reviewed and understand their responsibilities. This information will be maintained by the program administrator.

XI. TRAINING

All employees who may be exposed to fall hazards are required to receive training on how to recognize such hazards and minimize exposure to them. Employees will receive training as soon after employment as possible and before they are required to work where fall hazards exist. General training guidance is provided here, with specific training requirements covered in their respective sections. The program administrator (competent person) will provide the training.

The program administrator must train employees in the following areas:

* Nature of fall hazards in a work area.
* The use and operation of guardrails, personal fall arrest systems, and other protection systems to be used.
* Fall hazard prevention controls for specific equipment use (e.g., aerial lifts, elevated work platforms, ladders).
* Use and limitations of the fall protection systems used.
* Role of the employees in the fall protection plans.
* Demonstration of the ability to don and doff safety harnesses and PFAS.
* Rescue procedures to follow in the event of a fall.
* Overview of the Cal/OSHA fall protection requirements.

General safety training will be documented in the *General Fall Protection Training Record* (e.g., ladders) located in the Reference Tools. Training provided may include video/DVD, slide presentations, visual demonstrations or other appropriate teaching techniques. All training must be documented. It is necessary to effectively communicate fall risk hazards and controls to employees.

A training certification record will be maintained for each employee for where equipment-specific fall protection training is required. The record will contain the name of the employee trained, date(s) of the training, the specific training topic, and the signature of the person who conducted the training. Retraining will be done if there is a change in the fall protection system being used or if an employee’s actions demonstrate that the employee has not retained the understanding or skills important to fall protection.

Fall protection requirements for general and equipment-specific training frequency will be reviewed with employees on an annual basis. Retraining will be performed if there are any incidents associated with fall risks.

XII. RECORDKEEPING

The program administrator is responsible for maintaining the following records:

* The Fall Protection Program document.
* Fall Hazard Assessment Worksheet.
* The Fall Protection Equipment Inventory for all work at elevated heights.
* A list of all non-routine job tasks for work at elevated heights.
* A list of all personal fall arrest equipment and semi-annual inspections.
* A list of all anchorage points and certifications.
* Written training records for each employee, detailing the extent of training received and the date it was received.
* Annual review of the Fall Protection Program.

XIII. CAL/OSHA REFERENCES

Title 8, Subchapter 7 – General Industry Safety Orders

3209. Standard Guardrails <https://www.dir.ca.gov/Title8/3209.html>

3210. Elevated Locations <https://www.dir.ca.gov/Title8/3210.html>

3211. Wall Openings <https://www.dir.ca.gov/Title8/3211.html>

3212. Floor Openings, Floor Holes, Skylights and Roofs <https://www.dir.ca.gov/Title8/3212.html>

3213. Service Pits and Yard Surface Openings <https://www.dir.ca.gov/Title8/3213.html>

3276. Portable Ladders <https://www.dir.ca.gov/Title8/3276.html>

3277. Fixed Ladders <https://www.dir.ca.gov/Title8/3277.html>

3291. PFAS Anchorage Points <https://www.dir.ca.gov/Title8/3291.html>

Article 24. Elevating Work Platforms and Aerial Devices <https://www.dir.ca.gov/Title8/sb7g4a24.html>

Article 6. Powered Platforms and Equipment for Building Maintenance <https://www.dir.ca.gov/Title8/sb7g1a6.html>

Article 6. Appendix C. Personal Fall Arrest System <https://www.dir.ca.gov/Title8/sb7g1a6apc.html>
Additional Resources for Construction Industry – Subchapter 4, Construction Safety Orders

1637. Scaffolds, General Requirements <https://www.dir.ca.gov/Title8/1637.html>

1671. Safety Nets <https://www.dir.ca.gov/Title8/1671.html>

1671.1 Fall Protection Plan <https://www.dir.ca.gov/Title8/1671_1.html>

REFERENCE TOOLS

* Fall Hazard Assessment Worksheet
* Fall Protection Program Checklist
* Facility Fall Protection Equipment Inventory List
* General Fall Protection Training Record
* Equipment-Specific Fall Protection Training Record
* Personal Fall Arrest Systems Inspection Checklist (Semi-Annual and Visual Pre-Use)

FALL HAZARD ASSESSMENT WORKSHEET

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Fall Hazard Item | Yes | No | N/A | Controls Established orAction Required |
| Do employees work at heights greater than 48 inches (4 feet)?  |  |  |  |  |
| Are there passive systems established? Is there a guardrail safety system in place for work at elevated heights? Does it include a 42-inch top rail, a mid rail and toe guards? |  |  |  |  |
| If PFAS, safety harness and lanyards are used as the control method for work at 4 feet or higher, are they appropriate for the job tasks? |  |  |  |  |
| Are there ladderway access openings at elevated locations? If so, are the appropriate swing gates in place to prevent falls? |  |  |  |  |
| Are there building structures open on all sides of enclosed elevated work locations, such as: roof openings, open sides of landings, balconies or porches, platforms, runways ramps or working levels more than 30 inches above the floor, ground or other working areas of a building? |  |  |  |  |
| Are loading docks measured at 30 inches or greater? If so, is there appropriate fall protection, such as closed doors, a guardrail system, or a barrier system? |  |  |  |  |
| Are there any floor openings or holes in buildings or on the property? Are there appropriate controls in place *(e.g., guardrails on all sides of opening, cover, removeable railing)*? |  |  |  |  |
| Are there any hatchways or chute floor openings in the buildings? Are there appropriate controls in place *(e.g., guardrails, hinged removal covers, removable railings)*? |  |  |  |  |
| If there are any covers, for roof or floor, are they constructed and installed according to requirements? |  |  |  |  |

Assessment Worksheet Page 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Fall Hazard Item | Yes | No | N/A | Controls Established orAction Required |
| Are there wall openings in any buildings? Are there appropriate controls in place for opening *(e.g., guardrail on all sides of opening, cover, removeable railing)*? |  |  |  |  |
| If employees access or work on the roof, is there a need to work within 6 feet of the leading edge of the roof? Is there appropriate fall protection *(e.g., parapet wall, guardrail system)*?  |  |  |  |  |
| Are there equipment systems on the roof, such as HVAC or exhaust systems, that are within 6 feet of the leading edge of the roof? Are there appropriate guardrail systems or PFAS utilized? |  |  |  |  |
| Are there any skylights on the roof? Are they protected according to requirements when authorized employees are within 6 feet? |  |  |  |  |
| Are there service pits or yard surface openings at the facility? Are they covered or protected by approved guardrail systems? |  |  |  |  |
| Do employees use portable ladders? Are they of the correct type? |  |  |  |  |
| Do employees use fixed ladders? Are they constructed according to requirements?  |  |  |  |  |
| Do we have or operate aerial devices? Is equipment maintained and PFAS available for operator safety? |  |  |  |  |
| Do we have or operate scissor lifts? Is equipment maintained and proper safety guardrail system in place? |  |  |  |  |
| Do we have order pickers? Is equipment maintained and PFAS available for operator safety? |  |  |  |  |
| Do we have, or have any need for PFAS *(e.g., safety harnesses, lanyards, self-retracting lanyards, anchorage points, horizontal lifelines)*? |  |  |  |  |
| If PFAS are utilized, have emergency rescue procedures been developed? |  |  |  |  |

Assessment Worksheet Page 2

FALL PROTECTION PROGRAM CHECKLIST

|  |  |  |  |
| --- | --- | --- | --- |
| Fall Protection Item | Yes | No | Action Required |
| Has a written Fall Protection Program been established? |  |  |  |
| Is the program reviewed on an annual basis? |  |  |  |
| Has a formal fall hazard risk assessment been performed at the facility? |  |  |  |
| Has a fall hazard protection equipment inventory been conducted at the facility? |  |  |  |
| Have individual control procedures been developed for each known fall hazard? |  |  |  |
| Are passive systems for fall protection the chosen method of control?  |  |  |  |
| Has a training schedule, including initial and ongoing fall protection training for each employee, been developed? |  |  |  |
| Is all personal fall arrest equipment rated ANSI Z359.1? |  |  |  |
| Are semi-annual PFAS inspections by competent persons properly documented? |  |  |  |
| Do authorized employees inspect fall protection equipment? |  |  |  |
| Are appropriate ladders provided for the job task? |  |  |  |
| Are fixed ladders constructed according to requirements? |  |  |  |
| Are elevated work platforms and/or aerial lifts provided with appropriate fall protection systems? |  |  |  |
| Are PFAS provided and used on all order pickers and aerial devices? |  |  |  |
| Are skylights and roofs properly guarded for fall hazards? |  |  |  |
| Are fall injuries tracked for investigation and program improvement? |  |  |  |
| Are contractors informed of our Fall Protection Program requirements? |  |  |  |
| Are emergency rescue procedures in place? |  |  |  |

FACILITY FALL HAZARD PROTECTION EQUIPMENT INVENTORY LIST

(E.g., Ladders, PFAS, powered platforms)

|  |  |  |  |
| --- | --- | --- | --- |
| Product Name | Identification Number or Location | Manufacturer | Inspection Date |
| **LADDERS** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **POWERED PLATFORMS** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **PERSONAL FALL ARREST EQUIPMENT *(e.g., safety harnesses, anchorage points, lanyards, lifelines)*** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

GENERAL FALL PROTECTION TRAINING RECORD

|  |  |
| --- | --- |
| Date: |  |
| Presenter: |  |
| Topic: |  |
| Employees in Attendance: |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

EQUIPMENT-SPECIFIC FALL PROTECTION TRAINING RECORD

The following employees have been trained on specific fall hazards, fall tasks and fall protection requirements for the job tasks to which they are exposed (e.g., PFAS, order pickers, aerial lifts, elevated platforms).

|  |  |  |  |
| --- | --- | --- | --- |
| **Name and Signature** **of Employee** | **Date of Employee Training** | **Specific****Equipment** | **Name and Signature** **of Trainer** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

SEMI-ANNUAL INSPECTION CRITERIA

PERSONAL FALL ARREST SYSTEMS

This checklist is to be used for required semi-annual inspection of personal fall arrest equipment. This information is to be provided for visual pre-use inspection for employees who wear safety harnesses and use lanyards.

Harness/lanyard model name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Serial number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Lot number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of manufacturer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date of purchase: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Inspected by competent person:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date of inspection:** \_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |
| --- | --- | --- |
| **General Factors** | **Accepted or Rejected** | **Supportive Detail** **Comments** |
| **FULL BODY HARNESS** |
| Verify the manufacturer’s label is on the equipment, securely in place and that it is fully legible. *(Reject if the label is absent.)* |  |  |
| Closely examine all nylon webbing to ensure there are no burn marks *(which could weaken the material).* |  |  |
| Verify there are no torn, frayed or broken fibers, or pulled stitches or frayed edges. |  |  |
| Examine the D-ring for excessive wear, pits, deterioration or cracks. |  |  |
| Verify buckles are not deformed or cracked and that they operate correctly. |  |  |
| Check to see that all grommets (if present) are secure and not deformed from abuse or a fall. |  |  |
| Harness should never have additional punched holes. |  |  |
| All rivets should be tight and not deformed. |  |  |
| Check tongue/straps for excessive wear from repeated buckling. |  |  |

Inspection Page 1

|  |  |  |
| --- | --- | --- |
| **General Factors** | **Accepted or Rejected** | **Supportive Detail** **Comments** |
| **LANYARDS AND SHOCK ABSORBING LANYARDS** |
| Verify the manufacturer’s label is on the equipment, securely in place and that it is fully legible. *(Reject if the label is absent.)* |  |  |
| **Hardware:** *Includes snaphooks, carabiners, adjusters, keepers, thimbles and D-rings.* Inspect for damage, distortion, sharp edges, burrs, cracks and corrosion and ensure proper operation. |  |  |
| **Webbing:** Inspect for cuts, burns, tears, abrasions, frays, excessive soiling and discoloration. |  |  |
| **Stitching:**  Inspect for pulled or cut stitches. |  |  |
| **Synthetic Rope:** Inspect for pulled or cut yarn, burns, abrasions, knots, excessive soiling and discoloration. |  |  |
| **Energy Absorbing Component:** Inspect for elongation, tears and excessive soiling. |  |  |
| **SNAPHOOKS** |
| Inspect snaphook for any hook and eye discoloration. |  |  |
| Verify there are no cracks, pitted surfaces or eye distortions. |  |  |
| The keeper latch should not be bent, distorted or obstructed. |  |  |
| Verify that the keeper latch seats into the nose without binding. |  |  |
| Test the locking mechanism to verity that the keeper latch locks properly. |  |  |

Inspection Page 2

|  |  |  |
| --- | --- | --- |
| **General Factors** | **Accepted or Rejected** | **Supportive Detail** **Comments** |
| **SELF-RETRACTING LANYARDS** |
| Verify the manufacturer’s label is on the equipment, securely in place and that it is fully legible. *(Reject if the label is absent.)* |  |  |
| Test the unit by pulling sharply on the lanyard. Verify that the locking mechanism is operating correctly. |  |  |
| Visually inspect the body to ensure there is no physical damage. |  |  |
| Make sure all back nuts or rivets are tight. |  |  |
| Make sure the entire length of the nylon strap is free of cuts, burns, abrasions, kinks, knots, broken stitches, and excessive wear. Ensure that it retracts freely. |  |  |
| If the manufacturer requires, make certain the retractable lanyard is returned to the manufacturer for a scheduled annual inspection. |  |  |

Inspection Page 3