



Addendum to the Corporate Working at Heights Policy FCX-HS02

- On Miami Operations property, shock absorbing lanyards of any type will not be permitted for use by employees or contractors under any circumstances.
 - In applications where shock absorbing lanyards would have been used, employees and contractors will use self-retracting lanyards.



Working at Heights Policy

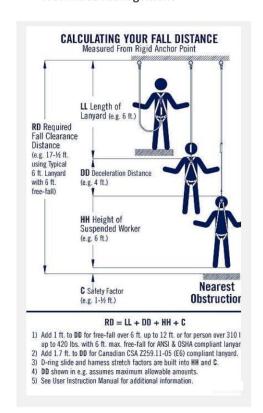
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POTENTIAL FATAL RISKS

Fall from Heights Falling Objects

CRITICAL CONTROLS

- Fall Protection System
- Fixed Work Platform
- Mobile Work Platform
- Leading Edge/Open Hole Protection
- Scaffold
- Barriers and Segregation
- Integrity of Overhead Structures
- Securing Devices
- Work Area Management



TRAINING REQUIREMENTS

SFT_FCX1012C, Initial, Refresher, and Remedial as necessary

POLICY

OVERVIEW

Fall protection/prevention (personal fall arrest systems or guardrails) is required 100% of the time whenever persons are exposed to a fall hazard (including wall and floor openings) that could reasonably result in an injury, including:

- Any unguarded walking/working surface either horizontal or vertical that
 is 4ft (1.2m) above a lower level. If a ladder with a cage is used for access
 and work is not being performed from ladder, it is exempt.
- Work/Walking 4ft (1.2m) above potential hazards.
- Work from a ladder at any height, including levels below 4ft (1.2m) if a person's center of gravity is near the ladder rail or requires them to lean backwards.
- Ensure proper equipment: shock absorbing lanyards (see diagram) or retractable lanyards.

ACTIONS TO STAY SAFE

- Inspect fall protection equipment prior to using. Key items include:
 - Braids, webbing and stitching, fall/wear indicators
 - Condition of grommets, buckles and hardware, anchor points
- Have rescue plan and rescue capabilities available.
- Complete risk assessment prior to work (i.e. JSA).
- Use fall protection systems work inside guardrails and follow manufacturers' requirements for mobile work platforms.
- Secure tools and material when working above ground level.
- Include areas above and below work area in workplace exams and inspections.
- Prior to creating openings in walls or walking/working surfaces, install appropriate temporary barriers.
- Flag lower levels, install fences and toe boards as necessary to guard against falling objects; Reference Flagging and Barricading, FCX-19.
- Permanently installed fall protection systems must be labeled to prevent being used as a lifting device.

Ladders

- Persons may climb a ladder that is 20ft (6.1m) or less w/o fall protection if 'three points of contact' are used.
- Tie off or secure ladders prior to use.
- Ladders must extend 3ft (1m) beyond the access point.
- Never use the top two steps of stepladders.
- Do not reach outside the plane of the ladder to prevent tipping.
- Use 4 -to-1 principal for extension ladders.
- Hot work from a ladder is not permitted without a variance.

Fall Hazard (open hole/leading edge) Management

 When flooring or handrails are removed for work, or openings are created in walls or walking/working surfaces reference the Working at Heights Technical Supplement.