FCX-HS01 Variance Request Form

Complete this form with a detailed description of the area and reason for the variance request. A task review by an engineer or other qualified individual to consider other controls must be completed prior to submitting for approval. The approval authority for either long-term or temporary variance request is specified at the bottom of the form.

Site / Operation: Morenci - Water & Electric	Variance Duration: From Date/Time 01/08/2024 To Date/Time 01/07/2025
Type of Variance (Check Only One) Long-term ☑ Temporary ☐	
Location of Activity: Morenci/Clifton Townsite	Policy: Working at Heights
Purpose of Activity: Construction of underground utility lines	Division Manager: Robert Pollock

Description of Request:

Department requests for project contractors engaging in trenching activities as part of the construction of underground utilities to allow for the working of individuals around trenches with a depth of over 4', but under 6' without the use of personal fall arrest systems during the digging of the trench. This would apply to spotting activities during excavation of trenches and person's securing ladders for access into the trench.

Justification for Variance:

Work is occurring along residential and main traffic access roads and installation of barricades or other stationary fall protection devices would hinder public access or prevent workers' escape during an emergency. OSHA allows for workers to engage in construction activities up to a height of 6' under standard 1926.501. OSHA also states in a letter of interpretation, fall protection is not required around trenches unless visibility of the trench is obscured.

Additional Control Measures:

Where practicable, exposure will be limited by having a spotter positioned further down the trench rather than on the edges at the street level. Spotter assistance on ladders will be limited to entering and exiting the trench only.

Action Plan to Comply with Policy:

There is currently no action plan to comply with policy in this trenching application around the Morenci and Clifton Townsite. Evaluation of industry practices and improvements will occur no less than annually upon the renewal of this document

Responsible Party: William Hansen Expected Date of Completion: 01/07/2025