Dropped Object Prevention Plan

Harris and Ruth Painting

Protect your employees and your business.
(T8CCR) section 3273

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Purpose

The purpose of this Dropped Object Prevention Plan is to establish guidelines for eliminating dropped objects when working at height. This prevention plan is intended to significantly reduce both hazards and serious injury and risks to employees that dropped objects can pose. This plan should help mitigate dropped objects by ensuring workers are properly trained to secure tools at height and understand correct procedures.

Application

This Dropped Object Prevention Plan applies to:

- Harris and Ruth Painting employees working at height or where they may be exposed to a dropped object by working below other personnel, tools, equipment, and platforms.
- The requirements of this plan must be observed by all personnel involved in working at height or below at height activities.
- This plan must be reviewed in any job safety analysis or pre-task planning for activities that require working at height with tools, and in those activities that require working below such activities.
- This plan establishes minimum expectations to mitigate the risk of damage to property or personnel done by dropped or falling objects. It is the expectation of Harris and Ruth Painting that any tools and materials that could be considered drop hazards are secured with secondary drop systems.

Responsibilities

Management, supervisors, and lead personnel are responsible for:

- Communicating the expectation that dropped object hazards will be eliminated and ensuring that this plan and associated procedures are implemented.
- Communicating this procedure and supporting information ton applicable employees.
- Coordinating and conducting assessments to ensure implementation and effectiveness of the procedure.
- Ensuring employees have appropriate equipment and materials to implement the procedure effectively.
- Ensuring workers have necessary opportunity for required training.
- Conducting necessary training with applicable employees.

All employees are responsible for:

- Notifying their supervisor of any drop hazards within their scope of work.
- Conducting work only after all drop hazards have been eliminated or property mitigated.
- Stopping work is hazardous conditions prevent the job from being done safely.
- Immediately reporting any dropped or fallen objects.
- Including potential drop hazards in Job Hazard Analysis and Pre-Job Planning.

Training

In many circumstances additional training related specifically to dropped and falling objects will be necessary for employees. Training will be provided to each employee who may create or be exposed to drop hazards during their work. This training shall include:

- The nature of drop hazards and dropped objects in the workplace.

- Correct procedures and equipment use for drop prevention.
- Purpose and application of applicable Primary and Secondary Drop Systems.
- Proper storage and handling of equipment and materials at height.
- Reporting requirements for incidents and near misses.

When there is reason to believe that an employee who has undergone training does not have adequate understanding or comprehension of Harris and Ruth Painting's standards regarding drop prevention, it will be required that said employee is re-trained.

Drop Prevention Systems Criteria

Tool Attachment Points

Prior to selecting a tool lanyard, a proper attachment point must be established on the tool. If a tool has a built-in connection point placed by the manufacturer for the purpose of drop prevention, this step is not required. Load rating of the attachment point should be appropriate for the tool's weight.

Tool Lanyards/Tethers

After establishing an adequate attachment point on a tool, a proper tool tether will then need to be selected which has an appropriate load rating for the tool to be tethered.

Tool Holsters and Pouches

For some tools and objects, a tool holster or tool pouch may be appropriate. Tools used in these holsters should weigh less than or equal to the manufacturer stated load-rating.

Tool Belts

Upon choosing a proper method for tethering, it becomes necessary to select an appropriate anchor point for the remaining end of the tether device. For many small tools, connecting to the worker can be the best option. This is only acceptable or tools weighing less than 5 lbs. D-Rings on fall protection harnesses which have been designated by the manufacturer for use as a tool connection point are a good option. Tool Belts designated with tether points are also a good option.

Wristbands

Another acceptable option for tethering to the body is with use of a wristband. Wristbands must never be utilized with tools over 5 lbs.

Tool Buckets

For the safe transportation of tools and materials, buckets may be utilized only if there are manufactured with a closure system which allows the user to secure the contents of the bucket from potential spills.

Secondary Drop Systems Criteria

Safety Netting

In applications where the utilization of safety nets is necessary, nets should be designed with specific sized webbing. Approved by the manufacturer for used based on the specific task, location, and type of tools/materials being used. Forged steel safety hooks or shackles will be used to fasten the net to its supports. Nets should be installed as closely below the work progress as is deemed practicable, but never more than 30 feet below. Safety nets shall be hung, maintained, and tested in accordance with the manufacturer's instructions as well as the requirements set forth by OSHA found in CFR 1926.502. Nets designed for use to prevent falling objects shall not be used as fall protection for human beings. These nets may be deployed below fall protection nets in these cases. When falling object nets are used alone, signs will be posted informing employees that "Fall Protection is still required in work areas above

placed netting." Inspections of safety netting should occur weekly and defective netting will not be deployed.

Toe Boards
When being used as a secondary drop system, toe boards will be erected along the edge of overhead work to protect employees below. Toe boards will be capable of withstanding a force of at least 50 lbs. in any downward or outward motion. Toe boards will be at least 3 ½ inches tall with no greater than ¼ clearance over the working surface.

Dropped Object Zones
Dropped Object Zones are to be clearly marked with barricades or caution/danger tape to restrict access. Only employees directly engaged in the activity conducted overhead will be admitted into a Dropped Object Zone.

Guardrail Systems
If guardrail systems are to be engaged as a secondary drop system, they will need to be inspected to ensure any openings are not large enough for tools or materials to pass through. It is recommended they be enclosed with a small mesh netting or screen to prevent materials from passing though.

Human Performance
Housekeeping
Trash and waste should be kept in appropriate bins which are to be located inconvenient locations across the workplace. When at height, these are to be stored in transport buckets with closure systems, couches, etc. With inability to be closed and prevent spillage until the material can be properly stored in a waste bin. Employees should "clean as you go" and maintain an orderly work area, resulting in a lower chance for dropper material. Tools and other materials should also be kept in an organized, orderly fashioned.

Tool and Material Storage
Where tools or materials are stacked higher than the edge of the toe boards, screening or paneling will be constructed from the working surface to the top of the guardrail or mid-rail. This will be done for a sufficient distance to ensure these objects will not have an opportunity to become drop hazards. Unless guardrails with screening or paneling has been erected, materials should not be stored within 4 feet of the leading edge. All stacked materials should be stable and self-supporting.

Tool and Material Handling
Positive tool transfer should be utilized by employees. When transferring a tethered tool from one employee to another, "100% tie off" should be engaged. The tool should be tethered to the passing employee. Prior to handing off, the receiving employee should connect their tether tool as well. After positive connection has been completed, the passing employee may disconnect their tether from the tool. By utilizing this passing method, the tool never has an opportunity to become a drop hazard.

Equipment Inspection
All drop prevention system shall be inspected prior to use. Excessively worn or damaged tools or materials must be immediately removed from service and replaced.

Discipline
Failure to implement these procedures or to use necessary drop prevention systems will be considered a failure to abide by Harris and Ruth Painting's safety rules and result in discipline up to removal from the project.

Definitions

Primary Drop System
Primary Drop Systems are systems which serve as the tools primary form of drop prevention and typically include the workers hand placement or grip on the tool. Other forms of primary protection may include main support systems for the tool (such as holstering a tool on the body or the platform a tool maybe resting while not in use).

Secondary Drop System
Secondary Drop Systems serve as a backup in the event the primary system fails and are utilized to prevent damage from a dropped or falling object after it has fallen. Secondary systems may include passive systems such as guard rails with toe-board and mesh netting, screens, floor/hole coverings, and tool canopies that have side protection. They may also include tool restraint systems which are utilized to secure a tool or object to an employee or stationary structure to prevent it from falling (these include pouches and transport buckets with closure systems). Tool arrest systems include tool tethers, which will arrest the fall of the tool and prevent it from striking the lower level and others below.

Drop Hazard
Any tool, material, or object that has an opportunity to fall from elevation to a lower level causing potential for damage to property, injury, or death.

Mitigation
The elimination or reduction of the frequency, magnitude, or severity of exposure to risk by the minimalization of the potential impact of a threat or warning.

Anchorage
A secure point of attachment for tethers, tools, and transport buckets with closure systems which is independent of an anchorage used for fall protection for personnel.

Attachment Point
He device designed and utilized to create a connection point on a tool to which the user can create a tether or lanyard.

Tool Lanyard/Tether
An extension made of durable materials that is designed to prevent an object from being dropped. These will typically utilize a connection point on either end of the tether for securing an object to a worker or stationary item.

Tool Bucket
A bucket designed for the purpose of carrying tools and materials. These tool buckets must be capable of being closed and secured to prevent the contents of the tool bucket from spilling. All tool buckets being utilized by Harris and Ruth Painting must utilize the closure system.

Tool Pouch
A bag or pouch that is designed to secure its contents from being spilled or dropped. Many tool pouches allow the user to remove a tool for use while preventing it from becoming a drop hazard through the use of tethers, retractors, etc.

Tool Holster
A bag or pouch that is designed to secure single tools or items in order to keep them easily accessible while, in use with other necessary components, helps prevent them from becoming drop hazards.

Tool Belt
A device that is designed to ergonomically support and manage other drop prevention items such as, lanyards/ tethers, pouches, and holsters on the person of the worker.

Dropped Object Zone (DOZ)
An area with potential to be impacted by drop hazards currently present in a work in progress above. These Drop Object Zones are to be secured with barricades to prevent unauthorized entry. Signage stating the hazard and who to contact for information will be posted at the DOZ as well.

Safety Net
A device installed beneath work in progress to catch falling objects or personnel.

Tool Canopy
A structure designed to rest over an area that is capable of withstanding the impact forced of dropped objects or tools. It is recommended that tool canopy's have side protection if a potential for tool deflection exists.