

Fall Protection Plan

Purpose

Written fall protection procedures establish guidelines to be followed whenever an employee works on ladders, at heights, or with fall protection at UMA. The rules established are to be followed:

- ▶ Provide a safe working environment
- ▶ Govern all use of fall protection procedures and equipment

The effectiveness of the written fall protection procedures depends upon the active support and involvement of all employees who work with the procedures and jobs requiring it. This written plan is intended to be used in implementing procedures to ensure that work with fall protection is carried out safely to minimize the possibility of injury or harm to our employees.

These written fall protection procedures establish uniform requirements designed to ensure that fall protection training, operation, practices, and Personal Protective Equipment are communicated to and understood by the affected employees. These requirements are also designed to ensure that procedures are in place to safeguard the health and safety to all employees.

It is policy of Uchiyama Manufacturing America LLC to permit only employees who are trained in fall protection procedures to work in areas where fall hazards occur, to reduce the likelihood of fall accidents and to help ensure a safe workplace.

Administrative Duties

The Projects, Environmental & Safety Manager is responsible for developing and maintaining this written Fall Protection Plan. The PESM is responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. The PESM is also competent, by appropriate training and experience that is commensurate with the complexity of the plan, to administer and oversee UMA's Fall Protection Plan and conduct the required evaluations of plan effectiveness.

If, after reading this plan, one finds that improvements can be made, please contact the PESM. We encourage all suggestions because we are committed to creating a safe workplace for all our employees, and a safe and effective Fall Protection Program is an important component of our overall safety plan. We strive for a clear understanding, safe work practices, and involvement in the program from every level of the company.

List of Affected Areas

The following lists all areas with fall hazards, the type of fall hazard in the area, and the employees who are affected by the fall hazard:

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Area/Department	Type of Fall Hazard	Employees Affected
Shipping	Shipping docks	Logistics
Office and Cafeteria	Stairs, Product elevator	All personnel
Maintenance	Roof, Stairs, Ladders, & Scissor Lift	Maintenance
Gasket MFG	Machines	Technicians
NL-22 & NL-24	Machine	Engineering, Maintenance, & Technicians
Oven Room	Machines (Ovens)	Technicians

Pre-Work Check

Prior to beginning work in any area or on any device where fall hazards exist, a pre-work check must be completed that includes the following items:

- ▶ **Stairs**
 - All required covers or guardrails must be in place.
 - All handrails or guardrails are in place on stairways.
 - All treads and risers on stairs are in good repair.
 - Non-slip surfaces are in place on stairs.
 - All stairs must meet OSHA and ANSI specifications for design and safety.
- ▶ **Ladders**
 - Any employee using a ladder over 4' shall wear a hard hat.
 - Gripping safely, feet in place and secure on ladders
 - Wooden ladders are coated with suitable protective material
 - All parts and fittings on ladders are secure
 - When setting a ladder up, footing of ladder is secure on a firm, level, and non-skidding surface and top of ladder is placed against a solid, stationary object.
 - When ascending or descending a ladder, the user shall face the ladder.
 - Each employee shall use at least one hand to grasp the ladder when progressing up and/or down the ladder and shall follow the 3 points of contact requirement.
 - All ladders must meet ANSI specifications for design and safety.
- ▶ **Loading Dock Areas**
 - Dock blocks are up and in place when dock is not in immediate use.
 - Only trained loaders and unloaders perform loading and unloading duties in that area.
 - Dock doors kept closed when a truck is not backed against it.
- ▶ **Platforms/Roofs and over any Machinery**
 - Any employee performing work on a platform, roof, or above any machinery shall wear a hard hat.
 - Guardrails are in place and securely attached.
 - Toe boards are in place and secure
 - All platforms meet ANSI specifications for design and safety.

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Work Procedures

If any one of the conditions described in Pre-Work Check is not met for the area of piece of equipment posing a potential fall hazard, then employees may not perform that work until the condition is met. If the condition cannot be remedied immediately, a supervisor or the Projects, Environmental & Safety Manager, shall be notified of the problem.

If the situation calls for the use of fall protection devices, such as harnesses, or positioning or restraining devices, such as belts, then employees must wear such protective equipment before beginning the work and use it as intended throughout the duration of the work.

The following procedures at UMA require the use of such protective equipment while operating the Scissor Lift, and when anyone is closer than six feet from the edge of the roof while on top of the roof.

Only employees trained in such work are expected to perform it. The following employees at our company are trained and authorized to perform such work:

- ▶ Projects, Environmental, & Safety Manager
- ▶ Maintenance
- ▶ Technicians
- ▶ Contractors on an as needed basis

To prevent slipping, tripping, and falling, all places of employment, passageways, storerooms, and service rooms must be kept clean and orderly and in sanitary condition. The floor of every workroom will be maintained in a clean and as much as possible, dry condition. Where wet processes are used, drainage will be maintained, and false floors, platforms, mats, or other dry standing places are provided where practicable.

To facilitate cleaning, every floor, working place, and passageway will be kept free from protruding nails, splinters, holes, or loose boards.

Training Program

Under no circumstances will an employee work in areas of high fall hazards, do work requiring fall protection devices, or use fall protection devices until he/she has successfully completed UMA's fall protection program. This includes all new employees, regardless of claimed previous experience.

The training program includes classroom instruction and operational training on each specific area of fall hazard involved in the work of the employee. The Projects and the Environmental Health & Safety Manager is responsible for conducting the training.

Supervisors shall identify all new employees in the Employee Orientation Program and make arrangements with department managers in coordination with the PESM to schedule the classroom instruction for those employees previously identified in this

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Classroom Training consists of:

- ▶ Review of policy and written procedures
- ▶ Review of Fall Protection Video
- ▶ Successful completion of examination

Operational Training consists of:

- ▶ Pre-operational check
- ▶ Operational review of use of hard hats, lanyards, belts, and harnesses, and accessing of areas with fall hazards

Recordkeeping

Training records are maintained in JJ Keller, on the floor computers, and/or in the QA Lab for each authorized employee.

Disciplinary Procedures

Constant awareness of and respect for fall protection procedures and compliance with all safety rules are required conditions of employment.

Supervisors and individuals in the Safety and Personnel Dept. reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safe practices. Therefore, the PESM are responsible for evaluating and updating this written plan. The Evaluation will include a review of reported accidents and as well as near misses, to identify areas where additional safety measures need to be taken.

They may also conduct a periodic review to determine the effectiveness of the program. This review may include:

- ▶ A walk-through of the facility
- ▶ Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.

Additional Information

Working together, we shall provide Uchiyama Manufacturing America LLC a compliant and efficiently managed safe workplace.