



FALL PROTECTION



Purpose

The purpose of this program is to define the requirements for Validus Energy employees to identify and evaluate fall hazards to which they may be exposed and to provide specific training as required by Subpart D of 29CFR 1910 or Subpart M of 29CFR 1926.

Scope

This program applies to all employees and worksitesites operated by Validus Energy.

Process

Validus Energy employees working in an area four (4) feet or more above a lower level shall be protected from falling using a guardrail system or personal fall restraint or arrest system, except during construction where the requirement is six (6) feet.

If guardrails and/or personal fall restraint/arrest is not practical, a job specific fall protection plan must be implemented and approved in writing by the EHS department.

Personal fall protection systems (harness and **lanyard** combination) must be visually inspected prior to use. If deficiencies are found, the component shall be removed from service and destroyed.

Lanyards must be connected to anchor points designed for the load and above the wearer's head whenever possible.

A specific rescue plan is required prior to work beginning in case an employee falls when using personal fall protection.

Ladders shall only be used as designed and for the load as rated.

Three-point contact is required while on a ladder. While on ladders, both hands and one foot, or both feet and one hand shall always be in contact with the ladder.

If Validus Energy employees are going to work from scaffolding, it must be erected by trained personnel and inspected daily by a competent Validus Energy representative.

Contractors are required to meet the minimum guidelines established in Subpart D of 1910 or Subpart M of 1926. Validus energy will conduct field assessments to exercise reasonable care that the requirements are being met. Stop work will be initiated when a hazardous situation is observed by a Validus Energy employee. Deficiencies will be reported to the contractor's representative.

Responsibilities

Leadership Commit to, follow, and reinforce the requirements set forth in this program. Provide sufficient resources for implementation.

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Supervisors	Ensure Validus employees have the knowledge and skills to follow this program. Verify that all employees using fall protection are trained and that the fall protection equipment has been inspected as required.
EHS	Provide technical advice and resources to monitor compliance. Facilitate employee training.
Validus Employees	Follow the requirements of this program. Use fall protection as required and complete inspections and training in a timely manner.

Definitions

100% Tie-Off – a person must always be properly tied-off while exposed to a fall hazard. The use of two lanyards is required if a person must move or relocate a tie-off point while exposed to a fall hazard to always ensure a positive tie-off connection during the move.

Anchor Point - A secure point of attachment for lifelines, lanyards, or deceleration devices.

Competent Person – A worker who is trained to identify existing and potential hazards and has authorization to take prompt corrective measures to eliminate them.

Lanyard - A flexible line of rope, wire rope or strap that has a connector at each end for connecting the body harness to a deceleration device, lifeline, or anchorage.

Personal fall arrest system- means a system used to arrest a worker in a fall from a working level. It consists of an anchorage, connectors, a body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

Positioning device system- means a body harness system rigged to allow a worker to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Self-retracting lifeline/lanyard- means a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal worker movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.



Policies

Fall Arrest and Restraint Systems

- Use **100% tie-off** at all times while wearing personal fall protection.
- All components of a fall arrest and/or restraint system including connectors, D-rings, snaphooks, lanyards, body harnesses, lifelines, ropes, and straps shall be designed and engineered for use with a fall arrest system and meet all applicable ANSI and OSHA requirements.
- Only dual action latching snaphooks may be used on fall protection equipment.

Fall Arrest System

- **Personal fall arrest systems** shall limit the arresting force on an employee to a maximum of 1,800 pounds, ensure employees can neither free fall more than six feet or contact any lower level as a result of a fall and bring an employee to a complete stop at a maximum of 3.5 feet.
- The potential fall height shall be calculated to ensure that the appropriate length lanyard is selected.
$$\text{Potential fall} = \text{Lanyard Length} + \text{shock absorber} + \text{harness stretch (1 Ft.)} + \text{worker height} + 3 \text{ feet.}$$
- The lanyard shall be attached to the harness in the center of the back near shoulder level unless otherwise specified by the manufacturer.
- Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection.

Fall Restraint System

- A full body harness is required when using a restraint system.
- The restraint lanyard shall be short enough to prevent a fall from occurring; be protected against cutting and abrasion; and attach the body harness directly to the **anchor point** independently of any other lines.

Inspection

- Visually inspect fall arrest and fall restraint system components prior to each use for wear, damage, and other deterioration. Remove any defective equipment from service immediately.
- All fall arrest and restraint equipment used must have a documented inspection within the last 12 months. The Inspection is found on the forms page of Validus.Energy.
- Verify that there are no knots tied in any fall protection equipment.



Storage

- Fall protection equipment including lanyards and body harnesses should be stored in a clean, dry area free from temperature and humidity extremes, corrosive materials, or other contaminants.

Elevated Personnel Platforms

- Work performed, regardless of the nature of the work, from personnel platforms raised by forklifts, cranes, scissor lifts, etc., shall require the use of a full body harness and shall be connected to the platform.

Prompt Rescue of a Worker in the Event of a Fall

- There must be a method to provide prompt rescue of workers in the event of a fall or have a system in place to assure the workers are able to rescue themselves.
- The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of workers involved in a fall.

Ladders

- All ladders must be maintained in a safe condition and inspected prior to use.

Fixed Ladders

- Fixed ladders greater than 24 feet above a lower level installed before 11/19/2018 must be equipped with a personal fall arrest system, ladder safety system, cage or well.
- Fixed ladders greater than 24 feet above a lower level installed after 11/19/2018 shall be equipped with a personal fall arrest system or ladder safety system.

Portable Ladders (straight, extension and "A" frame ladders)

- Maintain three points of contact (e.g., two hands and a foot, or two feet and a hand) when climbing/descending a ladder.
- Only one person shall climb or work from a portable ladder at the same time.
- Metal ladders may not be used around electrical equipment.
- Extension and straight ladders must have a slope of 4 to 1 and extend three (3) feet above the elevated surface they are resting on.



Scaffolding

- During the normal course of business, Validus Employees should not be required to ascend scaffolding. However, if the need arises, the scaffolding must be erected and inspected under the on-site supervision of a **competent person**.
- The base of the scaffold shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement.
- All working levels of scaffolds will be floored completely except where internal ladders require space for ladder openings.
- Scaffolds shall not be altered or moved horizontally while they are occupied. If moved, they must be reinspected by a competent person.
- Overhead protection shall be provided when exposed to overhead hazards.

Training

- Affected Validus Energy will receive fall protection awareness training on an annual basis.
- Those employees issued a personal fall arrest system will receive hands on training for the at-risk worker.
- Retraining is performed, as necessary. Retraining shall be provided when the following are noted:
 - Deficiencies in training,
 - Workplace changes
 - When fall protection equipment is modified.
- Written certification records showing employees, training dates and signatures of attendees will be maintained.
- Contractors are responsible for training their employees in accordance with the requirements established in Subpart D of 1910 or Subpart M of 1926. Deficiencies will be noted and reported to the contractor's representative.

