

MANAGEMENT OF CHANGE

REQUIREMENT FOR THE SAFE USE OF
STEP, EXTENSION & PORTABLE
LADDERS FOR ALL COOSA EMPLOYEES
AND **ALL CONTRACTOR EMPLOYEES**

February 26, 2018

RFP Management Team

BACKGROUND INFO

- EVERY YEAR, SOME OF OUR EMPLOYEES, **CONTRACTORS AND OTHERS** AROUND US LOSE THEIR BALANCE WHILE **CLIMBING UP/DOWN STEPLADDERS /PORTABLE LADDERS OR WORKING FROM ONE.**
- POTENTIAL CONSEQUENCES OF RELATED **INJURIES ARE USUALLY SEVERE:** FRACTURES, CONCUSSIONS AND POSSIBLY A FATALITY ON OUR SITES.
- A TRUE CHOICE OF ZERO INJURIES IN OUR SITES RESTS FIRST AND FOREMOST ON THE **EFFECTIVE AND RIGOROUS MANAGEMENT OF RISKS THAT ARE IDENTIFIED AND NEED TO BE CONTROLLED.**
- THIS IS NOT A WISH, BUT A **BUSINESS CHOICE** THAT ENTAILS THAT **EMPLOYER'S REPRESENTATIVES** HAVE THE **RESPONSIBILITY AND ULTIMATE DUTY TO ENSURE OUR EMPLOYEES AND PEOPLE ON OUR SITES ARE PROTECTED AGAINST WORK-RELATED HAZARDS.**
- TWO (2) OF OUR EMPLOYEES **RECENTLY LOST THEIR BALANCE** (ON FEBRUARY 7 & 23) AS THEY WERE **CLIMBING DOWN A STEPLADDER OR LADDER AT A HEIGHT OF ≈4'-5'**, AS THEY WERE NOT MAINTAINING **REQUIRED 3-POINT CONTACT. RESULT: SEVERE CONTUSION AND CUT/FRACTURED WRIST.**

BACKGROUND INFO

- Recognizing these failures, **RFP Senior Management** has no choice but to determine that **total absence of injuries resulting from the use of this type of tool** normalized over time is the only goal acceptable for our employees and our contract workers.
- Consequently, our only option is to **modify our level of tolerance to human failure** when **this type of tool/equipment** is involved.
- To control fall hazards with this equipment, it has become imperative to raise the Risk Reduction level from **Administrative Control UP TO CONSEQUENCE REDUCTION** and **FREQUENCY REDUCTION** as often as possible, despite short-term constraints and the efforts required **AND not TOLERATE DEVIATION TO OUR ADMINISTRATIVE SAFETY REQUIREMENTS FOR THIS EQUIPMENT, IF THIS IS THE ONLY OPTION AVAILABLE FOR A SPECIFIC JOB/TASK**

SENIOR MANAGEMENT'S POSITION STATEMENT

- We have the opportunity and duty to apply the principles of fall hazard control to make ANY fall unlikely in our sites, IN EVERY WORK SITUATION currently done using a stepladder or ladder that exposes our people to potentially severe or critical injuries.
- Keeping this SENSE OF URGENCY in mind, we are hereby issuing MANDATORY control measures to support all our Business Units as they start implementing these fall control measures with their managers and **employees/contractors AS OF FEBRUARY 26, 2018.**
- **The goal for all Business Units is as follows:**
 - Make falls from different level unlikely even in case of human error, by following the attached Corporate Guidelines.
 - Have all our managers/employees apply the same level of intolerance and effective control for this type of risk.

Hazard Control Levels for Working at Heights

LEVEL 1

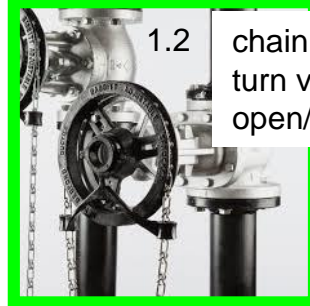
1. WORK FROM A PERMANENT PLATFORM EQUIPPED WITH GUARDRAILS
2. WORK FROM GROUND LEVEL USING AN EXTENDABLE TOOL/MIRROR/CAMERA



1.1



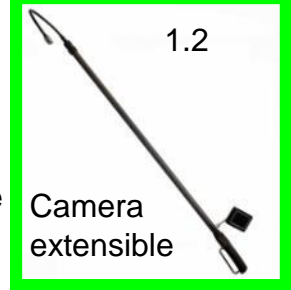
mirror
extensible
pour
inspection



1.2
chain to
turn valve
open/close



1.2
pole extensible
pour ampoule



1.2
Camera
extensible

LEVEL 2

1. WORK FROM A MOBILE PLATFORM OR FIBERGLASS STEPLADDER EQUIPPED WITH GUARDRAILS & ACCESS HANDRAILS
2. WORK FROM A MAN BASKET, SCISSOR/BOOM LIFT
3. WORK FROM SCAFFOLDING EQUIPPED WITH GUARDRAILS

2.1



2.1



2.1



2.2



2.2



2.2



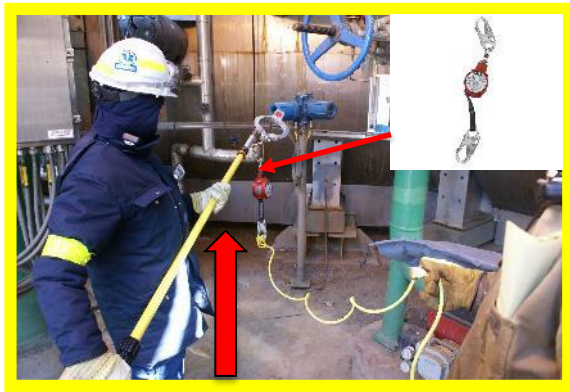
2.3

6 ft Height Shown

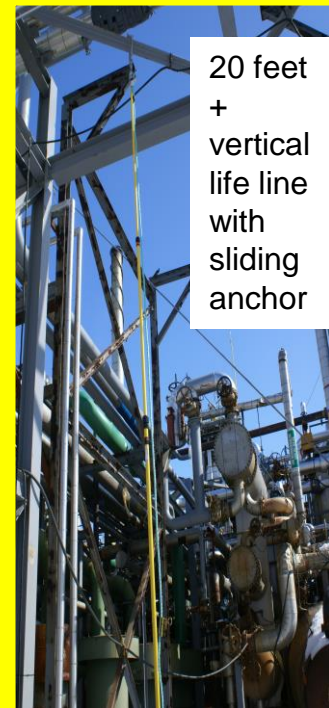
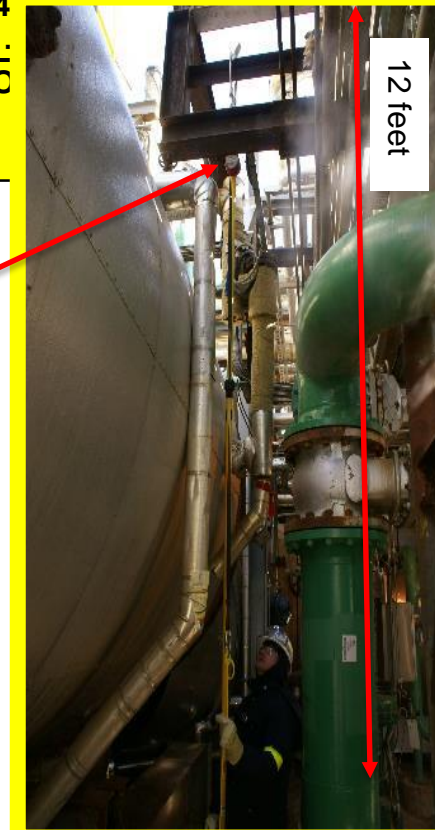
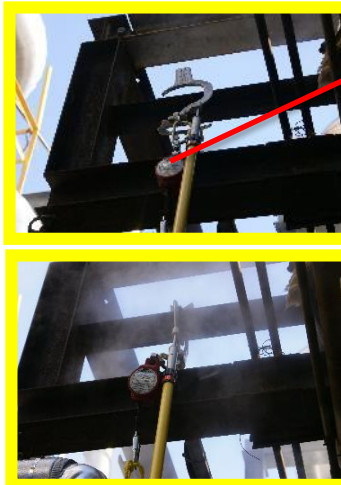
Hazard Control Levels for Working at Heights

LEVEL 3

WORK DONE FROM A STEPLADDER OR LADDER AT ≥ 4 GROUND LEVEL, WITH FALL PROTECTION (HARNES . RETRACTOR) ATTACHED TO A PORTABLE ANCHOR PC ACCESSIBLE FROM THE GROUND OR A PLATFORM



+ =



E.G. EXTENDABLE 20' PIKE POLE WITH PORTABLE ANCHOR CONNECTOR 18KN MILLER # 10 028 99

Hazard Control Levels for Working at Heights

LEVEL 4

ANY WORK DONE FROM A STEPLADDER OR LADDER MUST BE CONTROLLED BY A MANDATORY (LWP) “STEPLADDER/LADDER SAFE USE PERMIT” AND BE SUPERVISED

1. Any person who CANNOT USE ONE OF THE LEVELS 1 TO 3 CONTROL METHODS to work at any height and **MUST use a portable ladder or stepladder to perform a job must have their SWP and (LWP) “STEPLADDER/ LADDER SAFE USE PERMIT” co-signed by a SUPERVISOR OR co-worker qualified in the application of said permit rules.**
2. Co-signee of the LWP (Ladder Work Permit) and “STEPLADDER/LADDER SAFE USE PERMIT” **must remain on-site during the entire time the ladder/stepladder is used** to ensure, with the worker involved, compliance with the safety permit administrative control measures to be applied when this type of tool is used.
3. **Person that the contractor is working for is responsible and must be the one present while contractor performs and completes task with the portable ladder.**
4. **IMMEDIATELY, ALL PORTABLE LADDERS AND STEPLADDERS MUST BE CONTROLLED (LOCKED-OUT) WITHIN ALL RFP SITES AND ONLY A SUPERVISOR OR TEAM LEADER MAY AUTHORIZE THE USE OF THESE EQUIPMENT UNTIL FURTHER NOTICE.**
5. Completed LWP and ladder inspection form must be returned back to safety dept. when completed.