	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 12

## Purpose

The purpose of this program is to provide fall protection procedures to prevent injury to employees while performing work assignments at elevated levels.

## Qualifications of the Person or Position That Prepares Plans

Any changes to this Fall Protection Program must be approved by the Safety Manager, who is designated the Qualified Person to prepare plans for specified work sites. This is based on training received in fall protection planning and has demonstrated skills and knowledge in the preparation of fall programs, plans and the hazards involved.

## Scope

Applies to all KARRAS PAINTING LLC employees who have work assignments at work levels that exceed 6 feet in height where guardrails or nets are not utilized. This includes work near and around excavations. Guardrails, safety nets, or personal fall arrest systems shall be used where feasible. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers KARRAS PAINTING LLC employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

## Definitions

"Anchorage" means a secure point of attachment for lifelines, lanyards or deceleration devices.

"Body belt (safety belt)" means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

"Body harness" means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

"Buckle" means any device for holding the body belt or body harness closed around the employee's body.

"Carabineer" - see Snaphook

"Connector" means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

"Deceleration device" means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 2 of 12

"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

"Equivalent" means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

"Failure" means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

"Free fall" means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

"Free fall distance" means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

"Guardrail system" means a barrier erected to prevent employees from falling to lower levels.

"Infeasible" means that it is impossible to perform the inspection work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

"Lanyard" means a flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

"Leading edge" means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

"Lifeline" means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

"Lower levels" means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 3 of 12

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

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

"Rope grab" means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

"Safety Nets...Safety nets shall be provided when workplaces are higher than 25 feet above ground or water surfaces or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or safety belts are impractical.

Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below the work surface. Nets shall be positioned in a manner to prevent the user from coming into contact with below surfaces or structures. Proper clearance positioning of nets shall be determined by impact load testing. Work procedures shall not begin until nets are in place and have been properly tested.


New nets shall meet accepted performance standards of 17,500 foot pounds minimum impact resistance as determined and certified by the manufacturers and shall bear a label of proof test. Edge ropes shall provide a minimum breaking strength of 5000 pounds.

"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 employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.


"Snaphook" means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types: (1) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or (2) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

"Unprotected sides and edges" means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

"Walking/working surface" means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 4 of 12

"Work area" means that portion of a walking/working surface where job duties are being performed.

	<b>KARRAS PAINTING LLC</b> Safety Management System	Doc No: FALLPROTECT
		Initial Issue Date: 5-13-19
<b>FALL PROTECTION</b>		Revision Date: Initial Version
		Revision No. 0
		Next Review Date: 5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety
		Page: Page 5 of 12

**Drawing of Components**



Figure A



Figure B

- |                            |
|----------------------------|
| 1. Tie-off Point           |
| 2. Lifeline                |
| 3. Rope Grab               |
| 4. Shock Absorbing Lanyard |
| 5. Cross-Arm Strap         |
| 6. Retractable Lifeline    |
| 7. Full-Body Harness       |
| 8. Restraining Belt        |
| 9. Restraining Lanyard     |
| 10. Carabineer             |

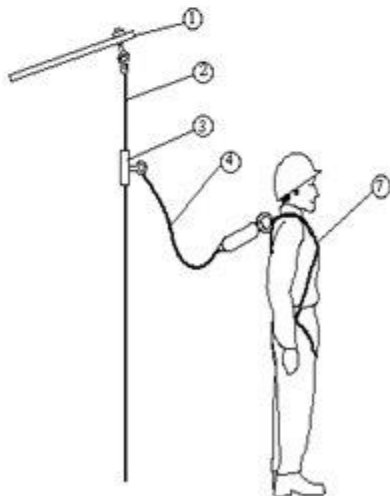


Figure C

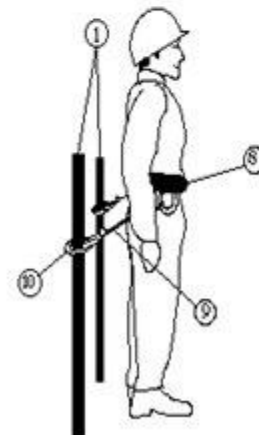


Figure D

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 6 of 12

## Responsibilities

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### Operations Manager

It is the responsibility of the local operations manager (designated competent person) to implement this Fall Protection Program. Continual observational safety checks of work operations and the enforcement of the safety policy and procedures shall be regularly enforced. All jobs shall be pre-planned prior to the start of work.

### Supervisor

The Supervisor shall ensure that all persons assigned to work at elevated levels, exceeding 6 feet in height or more above lower level and where guardrails or nets are not utilized, be protected by personal fall protection equipment.

- Supervisors shall make exposure determinations and shall discuss with their employees the extent to which scaffolds, ladders or vehicle mounted work platforms can be used.
- Ensure that fall protection equipment is available and in safe working condition.
- Provide for emergency rescue in the event of a fall. Pre-plan the job to ensure that employees have been properly trained in the use, limitations, inspections and rescue procedures and that training records are on file.

### Employees

Employees shall ensure they have and use the fall protection equipment as required by this program and:

- Understand the potential hazards of working at elevated levels as well as gaining access to and from the work location.
- Understand the use and limitations of such equipment.
- Pre-plan the job with his/her supervisor to agree that the job can be done safely.
- Inspect such equipment before each use and to report defective equipment immediately to their supervisor.


## Procedure

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Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal fall arrest systems should be used when the standard methods of protection are not feasible or a greater hazard would be created.

### Industry or Regulatory Standards

Fall protection equipment meets industry or regulatory standards. Fall protection equipment meets the requirements of applicable ANSI Z 359.1, ASTM or OSHA requirements. When purchasing equipment and raw materials for use in fall protection systems all applicable ANSI and ASTM requirements should be met.

	<b>KARRAS PAINTING LLC</b> Safety Management System	Doc No:	FALLPROTECT
		Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>		Revision Date:	Initial Version
		Revision No.:	0
		Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 7 of 12

### Minimum Standards

Fall protection must be provided to employees working at heights that exceed applicable regulatory thresholds.

### The Height at Which Fall Protection is Required

Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds. Guard rails, safety nets or personal or fall arrest systems should be used. Some applicable regulatory thresholds may include:

- General Industry 1910.23(b) - Protection for wall openings and holes. Every wall opening from which there is a drop of more than 4 feet shall be guarded.
- Construction Industry 1926.501(b)(1) - Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.
- Marine Terminals 1917.112(b)(1) - Guardrails shall be provided at locations where employees are exposed to floor or wall openings or waterside edges, including bridges or gangway-like structures leading to pilings or vessel mooring or berthing installations, which present a hazard of falling more than 4 feet (1.22 m) or into the water.
- Shipyard Industry 1915.73(d) - When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than 5 feet above a solid surface, the edges shall be guarded by adequate guardrails.
- Steel Erection 1926.760(a)(1) - Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 m) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

The following are minimum standards for KARRAS PAINTING LLC employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.
- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.

	<b>KARRAS PAINTING LLC</b> Safety Management System	Doc No:	FALLPROTECT
		Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>		Revision Date:	Initial Version
		Revision No.:	0
		Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 8 of 12

- Lifelines shall be protected against being cut or abraded.
- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
- Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
- The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.
- 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 until inspected and determined by a competent person to be undamaged and suitable for reuse.
- Provide for prompt rescue of employees in the event of a fall or shall assure the employees are able to rescue themselves.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

**Stopping a Fall**

The arresting force on an employee stopped by a fall shall be limited to a maximum arresting force of 1,800 pounds when wearing a body harness.

The fall arrest system shall be rigged such that an employee can neither free fall more than 6 feet, nor contact any lower level.

The fall arrest system shall bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.

The fall arrest system shall have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less.

**Protection From Falling Objects**

When employees are required to work in the near vicinity of others working with materials, tools, or equipment at elevated levels, Barricades around the immediate area of the overhead work shall be erected to prohibit employees from entering the barricaded area.



	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 9 of 12

Employees performing work at elevated levels shall keep tools, materials, and equipment away from the edge to keep potential objects from falling over the side. Where practical, tools, etc. shall be secured with rope, wire, etc. to keep them from falling.

**Portable Ladders**

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

Tools required to perform a task shall be transported by a mechanical carrier such as a tag line, suspended bucket or tool belt.

- Tools shall not be carried by hand while climbing.
- Hands must be free to grip the ladder.
- Tools shall not be carried in clothing pockets.
- Tools shall be pulled up to the job site only after reaching the area of work.

When work is to be performed from straight/extension ladders, fall protection shall be utilized when heights exceed 6 feet.

Straight ladders shall be tied off at the top to prevent them from moving. A second person shall steady the ladder at the base while it is being tied off at the top by another employee. Do not tie off fall protection equipment to the ladder.

**Storage**

A dedicated storage area shall be provided for the storage of fall protection equipment and all components. The storage area shall keep the equipment clean, dry, and free from oils, chemicals, paints, and excessive heat.

**Inspections**

Fall protection equipment shall be inspected before each use for wear, damage, other deterioration, or other defects.

**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 an Employee in the Event of a Fall**

KARRAS PAINTING LLC shall provide for prompt rescue of employees in the event of a fall or shall assure the employees 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 employees involved in a fall.

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 10 of 12

**Fall Protection Plan**

This option is available only to employees engaged in leading edge work who can demonstrate that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan shall conform to the following provisions:

- The fall protection plan shall be prepared by a qualified supervisor and developed specifically for the site where the leading edge work is being performed.
- The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety net systems) are infeasible or why their use would create a greater hazard.
- The fall protection plan shall identify each location where conventional fall Protection methods cannot be used.
- These locations shall then be classified as controlled access zones.

**Site Specific Fall Protection Plan**

A site specific Fall Protection plan is developed by a qualified person. The fall protection plan shall be prepared by a qualified person for the specified work site.

**Controlled Access Zones**

When used to control access to areas where leading edge or other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access.

When control lines are used, they shall be erected not less than 6 feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge.

The control line shall extend along the entire length of the unprotected or leading edge and shall be approximately parallel to the unprotected or leading edge.

The control line shall be connected on each side to a guardrail system or wall.

- Control lines shall consist of ropes, wires, tapes, or equivalent materials.
- Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.
- Each line shall be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches (1 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m).
- Each line shall have a minimum breaking strength of 200 pounds.

Only employees engaged in the related work shall be permitted in the controlled access zone.

**Safety Monitoring System**

When the use of conventional fall protection equipment is deemed infeasible or the use of this equipment creates a greater hazard a Fall Protection Plan which includes a safety monitoring system shall be implemented by the supervisor.

Supervisors shall designate a competent person to monitor the safety of other employees. The competent person shall be assigned to:

	<b>KARRAS PAINTING LLC</b> Safety Management System		Doc No:	FALLPROTECT
			Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>			Revision Date:	Initial Version
			Revision No.:	0
			Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 11 of 12

- Recognize fall hazards;
- Warn employees if they are unaware of fall hazard or are acting in an unsafe manner;
- Be on the same working surface and in visual contact of working employees;
- Stay close enough for verbal communication; and
- Not have other assignments that would take his/her attention from the monitoring function.

**Incidents Involving a Fall are Investigated**

Incident investigations shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures or training in order to prevent reoccurrence.

Changes to the fall protection program shall be implemented if deemed appropriate from incident corrective actions.

**Training**

Employees are provided training on fall protection. A training program shall be provided for each employee who might be exposed to fall hazards. Training shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to follow to minimize these hazards.


The employee will be trained in the use and operation of fall arrest systems, inspections and maintenance procedures.

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.

Fall protection training is documented. Written certification records showing participants, training dates and signatures of instructors must be maintained.

Training records shall be retained in the corporate office.

	<b>KARRAS PAINTING LLC</b> Safety Management System	Doc No:	FALLPROTECT
		Initial Issue Date:	5-13-19
<b>FALL PROTECTION</b>		Revision Date:	Initial Version
		Revision No.:	0
		Next Review Date:	5-13-20
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 12 of 12

**FALL PROTECTION SYSTEM INSPECTION FORM**

<b>INSPECTED BY (Designated Competent Person)</b>	<b>DATE</b>
<b>AREA</b>	<b>CRAFT</b>

**BODY HARNESS**

<p>All parts of body harness and attachments are to be checked for excessive wear and damage.</p> <p>Y symbol is for YES or OK.</p> <p>N symbol is for NO or REPLACE. Any N means immediate destruction of harness or lanyard.</p> <p>Body harness to be inspected monthly and report is to be turned in to Safety Department. User to visually inspect prior to each use.</p>		<b>Harness Webbing</b>	<b>All Stitching</b>	<b>Rivets and Eyelets</b>	<b>D-rings &amp; Buckle</b>	<b>Body Pad (if applicable)</b>	<b>Lanyard</b>	<b>Carabineer</b>	<b>Fall Warning Tag Intact</b>	<b>No Cuts, Corrosion, Burning</b>	<b>Overall Condition</b>
<b>EMPLOYEE NAME</b>	<b>HARNESS SERIAL #</b>										

**FALL PROTECTION SYSTEMS**

<b>SYSTEM</b>	<b>LOCATION</b>	<b>Yes</b>	<b>No or Repair (Take Out of Service)</b>	<b>Comments</b>
Vertical Lifeline				
Horizontal Lifeline				
Warning Lines				
Guard Rails				
Retractable Lanyards				
Hole Covers				
Positioning Devices				