

# SAFETY DIRECTOR BULLETIN

April 2021

## Fall Protection at Treatment Plants, Pump Stations, and Wells

The National Safety Stand-Down to Prevent Falls is May 3 through May 7, 2021. The water and wastewater industry has many known work-related hazards and falls from heights is among those hazards. NJ PEOSH requires that employers ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet or more above a lower level is protected from falling. It is important to remember that portable ladders are exempt from this rule.

### Working from Heights above 4 Feet

Employees regularly conduct preventative maintenance operations around wet wells, pits and pump stations. Some of these areas may expose workers to falls into these below-grade areas. Often times these types of jobsites are remote and a single employee may be performing the maintenance work, making the outcome of a fall even more hazardous. Each pump station and treatment plant may have unique features so you may not be able to apply the same fall protection solution to all of your sites. Luckily, there are several options to keep employees safe from falls.

Fall protection systems use tie-off locations and fall arresters to limit the distance and force on the user's body during a fall.

Fall prevention systems, are the preferred method since they prevent the user from being able to proceed past the edge of the fall hazard by using either a physical barrier, such as a guardrail, or fall restraint system, such as lanyards with tie offs, designed to prevent the employee from passing the edge of the wet well.

### Working over Water

Many job tasks require employees to work over or near water such as clarifier tanks at wastewater treatment facilities. NJ PEOSH requires all employees working over or near water, where the danger of drowning exists, to be provided with U.S. Coast Guard-approved life jacket or buoyant work vests. It is recommended that each employer write a "Working Over or Near Water" policy or standard operating procedure for their employees and complete Job Hazard Assessments for these tasks to determine the level of the hazard and appropriate control measures. NJ PEOSH does not specify that any specific type or classification of approval is required. Therefore, irrespective of the type of approval (for example, whether the Personal Flotation Device (PFD) is approved for commercial or recreational use, or as to a particular size boat or vessel), as long as it has a Coast Guard approval, it will meet the requirements.

Prior to and after each use, the buoyant work vests or life preservers shall be inspected for defects which would alter their strength or buoyancy. Defective units shall not be used. Items to look for in your inspections include:

- Check that all hardware and straps are in good shape, are firmly attached, and are in working order.
- Check for leaks, mildew, lumpy or hardened buoyancy material, & oil saturation in the fabric.
- Make sure that there are no rips or tears in the fabric.
- Make sure that the label stating USCG approval is attached, and that it is legible.
- Discard and replace life jackets that show signs of deterioration - tears, mildew stains, punctures, etc.

Ring buoys should also be provided and readily available for emergency rescue operations. Ring buoys should be equipped with at least 90 feet of line. Distance between ring buoys shall not exceed 200 feet. If employees are working over or near water and there is no fall protection methods being used, employees should work in pairs so that in the event of an emergency one employee can throw the ring buoy and summon emergency services.