



APPENDIX O. MOBILE ELEVATED WORK PLATFORM (MEWP) SAFETY POLICY

Sept. 2023

Purpose

This safety Policy contains the operational safety requirements for all VSC Fire & Security, Inc. (VSC) employees operating, occupying, or otherwise responsible for the safe operation of Mobile Elevated Work Platforms (MEWPs).

Regulatory Scope

The Policy addresses OSHA regulatory requirements found in 29 CFR 1926.453, 29 CFR 1910.67 and non-mandatory standards and

The manufacturer's operations manual must clearly list the make, model, operational functions and features, operating characteristics, limitations, and devices. If the manual is missing from the MEWP's weather resistant compartment, do not operate the equipment and immediately notify your supervisor.

- Operators must conduct a pre-start inspection every day, or at the beginning of each shift. Immediately report any problem to the supervisor. Do not operate the equipment until the problem(s) is properly resolved.
- Do not exceed the manufacturer's specified boom and basket load limits. Ensure all load limit decals are visible.
- All MEWP operational platform and secondary emergency controls must function properly and have clearly visible indicator symbols and markings.
- Upper controls must be in or beside the platform and within easy reach of the operator.
- Secondary manual emergency descent controls must be readily accessible.
- Lower-level controls are not to be operated unless permission has been obtained from the operator or occupants in the lift, except in case of emergency.
- Do not operate MEWPs when the operational control symbols and labels, including weight limits, are not both visible and legible. Report missing or illegible symbols or labels to the supervisor immediately.
- When outriggers are used, they must be positioned on pads or a solid surface.
- Install wheel chocks before using a MEWP on an incline; but only if they can be installed safely.
- Before moving MEWPs, the boom(s) will be inspected to see that it is properly cradled, and the outriggers are in the stowed position.
- Do not move MEWP when the boom is elevated in a working position with people in the basket, except for equipment specifically designed for this type of operation as explained in the owner's manual.
- Operators are responsible for the safety of each occupant and must ensure occupants have a basic understanding of how to work safely on the MEWP.
- Teach at least one occupant how to operate the MEWP controls in case an emergency arises where the operator becomes incapacitated. This does not give the occupant the authority to operate the MEWP except in an emergency.
- When climbing in or out of the MEWP, employees must maintain 3-point contact while facing the equipment.
- When working from the MEWP:
 - The brakes must be set on the MEWPs' wheels.
 - Always stand firmly on the floor of the basket and do not sit or climb on the handrails of the basket.
 - Do not use planks, ladders or other equipment or devices to create a work position, or to gain additional height.
 - Operators and occupants must always wear a full body harness with a restraint lanyard.
 - Attach the restraint lanyard to the MEWPs designated anchorage points. The anchorage points must have legible markings.
 - Do not tie-off to an adjacent pole, structure, or equipment.
 - Do not wear climbers.

Training

Employees must be trained in the safe use of MEWP *prior* to operating the designated equipment. Only authorized personnel can operate equipment covered by this safety policy.

A qualified and authorized instructor designated by VSC's Risk & Safety Department (Risk-Safety) will conduct training. Operator training and familiarization specific to the MEWP of the group and type classified will be delivered in accordance with applicable ANSI 92.24 operation standards. The training will focus on the same make and model of MEWP to be used during the actual jobsite operation or one with operating characteristics consistent with the piece of equipment that will be used on the jobsite.

Trainer

The trainer designated by Risk-Safety must meet the following requirements:

- Experienced with the classification of MEWP.
- Knowledgeable regarding the laws, regulations, safe practices, and manufacturer's requirements.
- Recognition and avoidance of hazards associated with MEWP.

If the trainer is a vendor or other non-VSC employee, Risk-Safety must review and approve all training provided to verify compliance with ANSI A92.24 MEWP training standards *prior* to Risk-Safety authorizing the employee to operate the designated MEWP.

Authorized Operators

After an employee has successfully completed training and practical evaluation the employees Department Manager, Supervisor, or other authorized person, as designated by the District Manager, must sign the Operators card to certify that the employee has demonstrated competency in experience and knowledge with the equipment, work site environments, and job tasks associated with the subject MEWP.

Training Content

The training content must cover both theory (classroom) and practical (hands-on) training. Each trainee will demonstrate competency and show proficiency in both theory (classroom) and practical (hands-on). Results of both theory (classroom) and practical (hands-on) evaluations must be documented and include a hands-on practical evaluation.

A practical evaluation is required for each MEWP classification (type and group) that the operator is authorized to operate.

Operators must deliver training to MEWP occupants to prepare occupants for their role in emergencies.

Trainees

Trainees may operate a powered platform only:

- Under the direct supervision of a person approved by Risk-Safety who has the knowledge, training, and experience to train operators, and evaluate their competence.
- Where such trainee operations do not endanger the trainee or other employees.

Refresher Training

Refresher training, including an evaluation of the effectiveness of initial training, will be conducted to ensure that the operator has the knowledge and skills needed to operate the equipment safely. Refresher training will be provided to the operator when:

- The operator operates the vehicle in a poor or unsafe manner.
- The operator has an accident or near miss incident.
- The operator receives an evaluation that reveals unsafe operating practices.
- The operator is asked to use a MEWP that has new or different systems, controls, or features.
- Work conditions change that can affect the safe operation of the equipment.
- The operator has not used a MEWP over an extended period.
- The operator's 3-year MEWP certification has expired.

Supervisors Training

Supervisors who directly supervise one or more MEWP operator must receive training on:

- MEWP classification by groups and types to determine which MEWP is appropriate for the job.
- The rules, regulations and standards that apply to MEWPs as defined in ANSI A92.22, including the safety procedures defined in the risk assessment.
- The hazards associated with MEWPs and the prevention of accidents.
- Location and the importance of using the MEWP Operator's Manual.
- Ensuring the Operator's Manual is safely stored, easily accessible and used for inspections.
- Maintenance Requirements: Only technicians trained to inspect and service the MEWP according to the manufacturer's recommendations are permitted to maintain equipment owned by VSC.

Occupant Training (Note: training can be performed by a VSC authorized operator)

All personnel who will occupy the platform with the MEWP operator must receive training that provides basic knowledge to ensure their own safety. Training will include the following focus:

- Proper use of PFAS (Personal Fall Arrest System) and location of manufacturer provided anchors for tie-off.
- How their actions can affect the stability of the MEWP.
- Safe use of MEWP accessories that they are assigned to use.
- Site-specific work procedures the occupant must follow related to the operation of the MEWP.
- Emergency Descent Procedures. At least one occupant must be trained to operate the controls in an emergency when the operator is unable to perform, including emergency shutdown and lowering procedures.
- Manufactures warnings and instructions.
- Hazards related to job tasks and prevention.

Operators Certification Card

Operators must maintain on their person a MEWP operator's certification / card with the minimum following information:

- Name of entity providing training.
- Name and signature of trainer.
- Clear identification of the classification of MEWP covered in training, including group and type.
- Name of trainee.
- Date range training is valid.
- Name and signature of authorizing person.

Evaluation of operators who received training from an outside source:

- New or current employees who have received training from an outside source or from a previous employer must provide the required documentation as described in this Policy and pass a practical evaluation before Risk-Safety will authorize the employee to operate MEWPs.
- Training documentation that does not meet VSC requirements or expired certifications will disqualify the employee from operating an MEWP. Employees seeking authorization to operate MEWPs will be required to complete all training described in this Policy.
- Employees who do not pass the practical evaluation are not authorized to operate MEWPs.

Training Records

Risk-Safety will retain all relevant employee training documentation for a period of 4 years.

Temporary Workers

Temporary employees who operate MEWPs under the direct supervision of VSC must comply with all requirements identified in ANSI A92.20, A92.22 and A92.24. The temporary agency employer must provide documentation and meet all recordkeeping requirements prior to assigning an employee to VSC.

Provide all relevant training records to Risk-Safety when the temporary employees' VSC assignment includes operating identified MEWPs. Temporary employees who cannot meet the documentation requirements will not be authorized to operate MEWPs. The VSC office using the temporary employee must notify the temporary agency provider and seek a substitute employee who can meet the requirements.

Safe Use

Establish a Safe Use plan for each specific MEWP. The plan should include worksite risk assessment to identify hazards, evaluate risk, create control measures, and communicate results with all affected employees.

Planning

Conduct an Activity Hazard Analysis (AHA) to identify hazards and potential risks when using a MEWP on the job site for the identified purpose and implement corrective actions and/or control procedures to reduce the risk(s). The plan must include:

- Task(s) to perform, when to perform task(s) and where.
- Selection of the appropriate MEWP for the task(s) and identified hazards, including all location conditions.
- Assessment of the support surface on which MEWPs will be located.
- Assessment of the risk presented by any hazard identified for the involved task(s).
- Identification of safe work procedures and backup contingencies needed to perform the task(s).
- Communication plan to notify affected personnel of the risk assessment findings.
- Method to monitor, review and update the plan throughout the use of the MEWP for the identified task(s).
- Means to confirm familiarization of operator with specific MEWPs to be used.
- Process to complete and document Pre-start Inspections and ensure required maintenance and repairs are completed in accordance with applicable industry standards and manufacturer requirements.
- Process for trained and qualified supervisor(s) to monitor the operators work performance to ensure safe operation of MEWPs.
- Strategy to ensure prevention of unauthorized use of MEWPs.
- Hazard assessment and safe work procedures communicated to personnel working near MEWPs, but not operating or occupying the MEWPs.
- Communication plan to ensure operator notifies Supervisor prior to performing any manufacturer authorized disassembly, reconfiguration, disconnect or re-attachment of any structural or mechanical components. Plans must include requirement that Supervisor will evaluate the need for the procedure and verify reassembly of the equipment per the MEWP specific operators' manual instructions, include re-assembly and securing all safety devices prior to operation.
 - Note: Disassembly, reconfiguration, re-attachments or disconnects of any safety features, structural, operational, or mechanical components *not authorized by the MEWP manufacturer is **strictly prohibited!***

Use of client's Mobile elevated work platform equipment.

VSC employees are only allowed to operate MEWP provided by general industry clients. For example, manufacturing, warehousing, retail, health care, schools, industrial operations, distribution facilities, corporate business & administrative locations.

VSC may only use a client's MEWP equipment in compliance with the following standards:

- VSC operator's current certification must match the type of MEWP provided.
- VSC operators must obtain written authorization from the client to use MEWP via the **VSC MEWP authorization form**.
- VSC operators must complete a documented inspection & functional test of the MEWP prior to use.
- DO NOT USE MEWP if the inspection reveals damage or any condition that disqualifies the equipment for use.
- Report any damage or unsafe conditions to the client immediately via written communication (example Email or Text) and retain the document.
- Inspect work zone areas for any unsafe conditions and post a spotter or set up proper barricade as needed to avoid contact with clients' employees, customers, or residents.
- Do not allow unqualified VSC employees to operate MEWP.
- Operation of MEWP must comply with all safety polices in this MEWP safety policy.

Use of other contractors MEWP on construction sites.

- **VSC employees are prohibited from operating or occupying MEWP equipment borrowed from other contractors!**
- **Do not loan MEWP rented or owned by VSC to other contractors.**
- **When operating MEWP on construction projects always remove operators key and control console when not in use.**

Rescue Plan

A rescue plan is required to ensure the safe and timely rescue of workers from heights in the event of platform entanglement or equipment failures that create situations where the platform cannot be safely lowered, or a fall from the platform leaves occupants suspended by the personal fall arrest system (PFAS). The plan must address limiting the time an occupant is suspended following an arrested fall. As such, the plan will specifically address:

- Self-Rescue – occupant has the means and ability to safely rescue self.
- Assisted Rescue – other workers at the job site can safely rescue the occupant(s).
- Technical Rescue – emergency crews are engaged to rescue occupant(s).

At least one occupant must be trained in emergency controls. Per the emergency control procedures found in OSHA standard 29 CFR 1926.453 and ANSI A92.20, the lower controls of the mobile elevated work platform must be able to override the upper controls in an emergency. Thus, when employees are working from the basket on the lifts, the key must not be removed from the switch control panel when the setting is in the upper control position, unless the key or a duplicate key is in possession of a person who is readily available and immediately accessible to the MEWP. **IF THE KEY FOR LOWER CONTROL OVERRIDE PANEL IS NOT IMMEDIATELY ACCESSIBLE, THE MEWP IS NOT ALLOWED TO BE OPERATED.**

When operating an MEWP, at least one additional person qualified to operate auxiliary and manual emergency controls, and who is not an occupant, must always be on site.

Capacity Limitation

When loads are transferred to the platform, at no time, and under no circumstances, will the rating capacities be exceeded while operating the MEWP at any height.

The load capacity label/decal must be legible. If the label is missing or illegible, the MEWP cannot be operated and must be reported to the supervisor immediately.

Work Area

The employee operating the MEWP will take responsibility for ensuring that the area surrounding the platform is clear of personnel and equipment before raising or lowering the platform.

Platform Positioning

At no time will the MEWP be positioned against another object to stabilize it; at no time will the MEWP be used as a crane.

Inspection & Maintenance

Complete inspections to identify and correct malfunctions and/or problems associated with the MEWP before placing the MEWP into service. Frequent and Annual Inspections are owner obligations.

- When VSC rents or leases equipment, the company that owns the equipment must confirm that they have met these inspection obligations.
 - Prior to operating the MEWP, the operator must verify equipment delivered to the job site has current and documented Frequent and Annual mechanical inspections.
 - A tag or sticker with dates and initials of the qualified person who inspected the MEWP certifying the equipment for use must be reflected on the MEWP.
 - If the operator cannot verify the inspections, the operator is *not permitted* to use the MEWP and must immediately notify the Supervisor.
 - When the inspection cannot be verified, the Supervisor must request that the rental company replace the MEWP or have the rental company complete an authorized inspection prior to use by VSC.
- When VSC owns the equipment, VSC is obligated to have the Frequent and Annual Inspections performed by a “qualified person.”
 - Frequent Inspections – performed prior to initially placing the equipment into service and after the unit is out of service for three months unless environmental conditions require a shorter period.
 - Annual Inspections - performed at least once every 12 months. The inspection must include all items checked on the frequent inspection and any additional items specified by the manufacturer.
 - Annual Inspections will be conducted in accordance with the manufacturer’s instructions.
 - Annual Inspection records will be maintained for the life of the equipment.
- VSC will maintain written repair records on company-owned platforms for at least three (3) years. The record will include:
 - The date of repair.
 - A description of the work completed.
 - The name of the individual(s) and company that completed the repairs.
 - Note: technicians who are properly trained and qualified to service MEWPs as outlined in the applicable ANSI standard will complete all service and repair. This will include any service work on active load sensing and tilt warning systems.

Daily Testing of Lift Controls/Inspections

Employees operating MEWPs will conduct a pre-start inspection. Inspections must be performed daily. The authorized operator will complete the daily equipment inspection and functional test form provided in the manufacturer’s Operation & Safety manual, prior to use. If the platform is used for multiple shifts, the inspection and test will be completed prior to each shift. The testing procedure will include, but is not limited to inspecting or testing:

- Operating and emergency controls.
- Safety devices.
- Personal protective devices, including fall protection.
- Air, hydraulic, and fuel system leaks.
- Cables and wiring harness.
- Loose or missing parts.
- Tires and wheels.
- Placards, warning signs, control markings, and operating/safety manual(s).
- Outriggers, stabilizers, extendible axles, and other structures.
- Guardrail systems.
- Other items as specified by the manufacturer. (Review the Operator’s Manual for specifics)

The Department Manager of the MEWP operator must retain daily inspection records for a period of three (3) months. The inspection records will include:

- The date of the inspection.
- Identification of the person(s) performing the inspection.
- Any deficiencies found.
- The corrective action recommended

Fall Protection Requirements

Any person occupying a MEWP is required to wear a PFAS. Train VSC employees on the use of the PFAS *before* occupying a MEWP. Guidance for Fall Protection training is in Appendix D. "Fall Protection Safety Policy" of the VSC [Health & Safety Program](#).

- Employees working from any MEWP must always wear fall protection. Attach the harness system securely to the lift as outlined by manufacturer placards located on the lift, or as stated in the Operator's Manual. Never tie-off to an adjacent structure.
- When exiting the basket of an elevated boom platform that is adjacent to an elevated surface, 100% fall protection with two lanyards must be used. The second lanyard must be connected to an appropriate anchorage point on the surface or structure to which an occupant is accessing, before detaching the first lanyard inside the basket to exit the platform.
- For Operations Over Water - Employees will wear personal floatation devices in addition to the PFAS.

Exiting and entering MEWP platform at height.

- Workers must enter or exit the platform only through the sliding mid-rail entry or gate provided, never climb over the platform guardrails.
- The designated access to adjacent structure must have a self-closing swing gate or removable guardrail. Never climb over perimeter edge or roof guardrail or other obstructions when access structure at height.
- When positioning the machine for entry/exit, the platform should be situated within 12 inches of the surface, and workers should not enter/exit the elevated platform in winds exceeding 20 mph. The operator must ensure 100% tie-off when entering/exiting the platform.
- To ensure 100% tie-off, the operator's primary lanyard must remain attached to the platform lanyard attachment point before exiting and attaching his/her secondary lanyard to the approved attachment point on the adjacent structure. Only then may the operator detach his/her primary lanyard from the platform. When returning to the platform, the operator must attach the primary lanyard to the platform anchor point before detaching the secondary lanyard from the adjacent structure.
- Take precautions to prevent falling tools, equipment or material during transfer from platform to structure.

Operational Requirements for Overhead Work near Electrical Power Lines

Employees will not operate MEWP such that any part of the work comes within prescribed distances set forth in the following table.

Minimum Safe Distances to Exposed Energized Overhead Power Lines and Parts Voltage Range (Phase to Phase)

	Minimum Safe Distance (Feet [m])
0 to 300v	Avoid Contact
Over 300v to 50kv	10 [3.0]
Over 50kv to 200kv	15 [4.6]
Over 200kv to 350kv	20 [6.1]
Over 350kv to 500kv	25 [7.6]
Over 500kv to 750kv	35 [10.7]
Over 750kv to 100kv	45 [13.7]

- If work is to be performed near overhead lines, the lines will be de-energized, grounded, and properly locked out, or other protective measures will be provided before work is started.
- If the lines are to be de-energized, the VSC Field Supervisor responsible for the employees involved in the job assignment will coordinate with the person or organization that operates or controls the electrical circuits involved to ensure that they are de-energized and grounded.
- Communications will also include the requirement that VSC employees apply lockout/tagout control devices on the energized line's control device.
- VSC will provide protective measures, such as guarding, isolating, or insulating, to prevent employees from contacting lines directly with any part of their body, or indirectly through conductive materials, tools, or equipment.

