

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT
COMPLIANCE DEPARTMENT**

COM 3070

APPROVED:

DRAFT

Date XXXXXXXX

:

**Ryan Hayashi
Director of Compliance**

TITLE:

AERIAL LIFT REQUIREMENTS

SUBJECT:

**GUIDELINES FOR THE ALLOWANCE OF DISTRICT STAFF TO
UTILIZE AERIAL LIFTS WHILE PERFORMING INSPECTIONS**

OBJECTIVE

The objective of this policy is provide guidance on when District employees are allowed to ride in manlifts in order to conduct inspections. Manlifts are those devices that include extendable or articulating boom platforms (commonly referred to as “Cherry Pickers”), and are commonly used to facilitate oilfield tank inspections. These devices are subject to federal OSHA requirements including operation only by trained and authorized persons.

BACKGROUND

Many oilfield operations use manlifts to facilitate company and District inspections. In some cases there are no ladders on tanks, and a manlift is the only way to conduct an inspection. However, these devices must be operated in a safe manner, and must be operated consistent with OSHA regulations. CFR 1910.67, Section (c) Specific Requirements, (2) Extensible and articulating boom platforms, (ii) states: *Only trained persons shall operate an aerial lift.* Further, the OSHA Fact Sheet on Aerial Lifts states that “only trained and authorized persons are allowed to operate an aerial lift.” This document includes what should be included in the training, and when retraining should be done.

Based on OSHA requirements, it is reasonable to insist that an operator demonstrate that they have had suitable training. This shall include a certification from a training organization demonstrating competence in safe aerial lift operation.

REQUIREMENTS

1. No District employee will ride in an aerial lift unless the operator provides a copy of a valid certification that demonstrates that the issued party is trained to safely use the aerial lift.
2. If a company fails to provide a suitably trained operator within a reasonable time, and if there is no other way to complete an inspection, staff will contact the regional Manager and advise them of the circumstances. The Manager will then decide the appropriate course of action.
3. Companies will be advised of our requirement to have a trained aerial lift operator prior to District staff conducting inspections of equipment necessitating its usage.
4. It is the company's responsibility to ensure that the manlift is operated safely and according to OSHA guidelines at all times.
5. If at any time, District staff feel that the trained person is operating the equipment in an unsafe manner, it is their responsibility to stop the inspection and request to be returned to the ground.
6. Prior to going up in an aerial lift, District staff and the trained person shall survey the site to identify possible hazards, such as:
 - a. Drop-offs, holes, or unstable surfaces;
 - b. Slopes, ditches, or bumps;
 - c. Overhead electrical or communications lines or other overhead obstructions;
 - d. Other hazardous locations and atmospheres (including over tank roofs); and
 - e. High winds or adverse weather conditions.
7. District staff shall only ride in aerial lifts while wearing a body harness and lanyard with the lanyard attached to the boom or the bucket.

VARIATIONS, DEVIATIONS AND AMENDMENTS

Variations, deviations or amendments, including one-time deviations and special case circumstances, from this policy and the work practice standards specified therein require the authorization and approval of the Director of Compliance, or the designee thereof.

Permanent changes to this policy and/or the work practice standards specified therein require the revision and re-approval of this policy. Revisions to policies and procedure documents must follow the established processes.

Please be aware that it is not possible to have a policy that covers every specific scenario, so when in doubt contact your manager or supervisor for guidance.