

PUBLIC UTILITY DISTRICT NO. 1 OF SKAGIT COUNTY  
BOARD OF COMMISSIONERS

**AGENDA**  
MAY 12, 2026  
4:30 PM

The public is invited to attend in person or via Zoom.

Join meeting via Zoom: <https://skagitpud.zoom.us/j/84039095413?pwd=GjD5tFa8IPxIT4XG3pHu2K66vR7BGr.1>

Meeting ID: 840 3909 5413  
Passcode: 030272  
Or dial: 1-253-215-8782

*Please turn your audio and video off during the meeting. Use the "Raise Hand" feature if you would like to speak during Audience Comments.*

If you have a question or comment for the Board, please submit it by 5 p.m. the Monday prior to the meeting by calling (360) 848-4460 or send an email to [pud@skagitpud.org](mailto:pud@skagitpud.org)

CALL TO ORDER

PLEDGE OF ALLEGIANCE

CONSENT AGENDA

1. Approval of Agenda 5/12/26
2. Approval of Minutes 4/28/26 Regular Meeting
3. Ratification of Voucher 5/5/26
4. ~~Voucher Approval 5/12/26~~

AUDIENCE COMMENTS

OLD BUSINESS

5. General Manager's Report
6. Community Relations Department Update
7. [Water Rights Lease Program](#)

NEW BUSINESS

INFORMATION

8. Public Comments on Water Rights Lease Program
9. [Underground Solutions Sole Source](#)
10. [Safety Practice and Procedure \(SP&P\) 3011, Asbestos Safety](#)
11. [Safety Practice and Procedure \(SP&P\) 3012, Fall Protection, Ladder, and Elevated Work Platform Safety](#)
12. Judy Reservoir Data Report

COMMISSIONER COMMENTS

ADJOURNMENT

MINUTES OF THE REGULAR MEETING OF THE COMMISSION  
PUBLIC UTILITY DISTRICT NO. 1 OF SKAGIT COUNTY, WASHINGTON

April 28, 2026

The regular meeting of the Commission of Public Utility District No. 1 was held in the Aqua Room of the utility located at 1415 Freeway Drive, Mount Vernon, Washington.

The meeting was called to order at 4:30 p.m. Commissioner Andrew Miller, president; Corrin Hamburg, vice president; and Commissioner Joe Lindquist, secretary, were in attendance.

In attendance were also George Sidhu, Nick Semrau, Pete Gilbert, Mark Handzlik, Brian Henshaw, Kevin Tate, Alistair Boudreaux, Mike Fox, Cecily Gubitosi, Kathy White, Mark Semrau, Tony Wisdom, Mikala Staples Hughes, John Roozen, Shawn Hulbert, and Laura Clause.

Participating remotely were Michael (no last name given), Courtney Shilling, and Kurt Van Burkleo.

Commissioner Miller led the Pledge of Allegiance.

### CONSENT AGENDA

Commissioner Hamburg moved to approve the Consent Agenda for April 14, 2026, as presented.

1. Approval of Agenda 4/28/26
2. Approval of Minutes 4/14/26 Regular Meeting
3. Ratification of Voucher 4/21/26 No. 3235 (\$593,496.30)  
Accounts Payable Voucher No. 34266-34322 (\$194,586.17)  
Electronic Funds Transfer (\$133,791.23)  
Payroll Electronic Funds Transfers and checks No. 049024-049109 (\$265,118.90)
4. Voucher Approval 4/28/26 (\$246,067.49)  
Accounts Payable Voucher No. 34323-34377 (\$103,027.57)  
Electronic Funds Transfer (\$143,039.92)

The motion passed unanimously.

### FIRST QUARTER FINANCIALS

Finance Manager Henshaw gave an overview of PUD funds of \$2.76 million, Local Government Investment Pool (LGIP) returns and 2-year treasury rates, new meters, consumption comparison, water sales of \$7.8 million, operating expenses of \$5.2 million, capital contributions of \$373,000, cash flow summary, Capital Improvement Plan (CIP), capital projects of \$830,000, and 2026 CIP project status.

### AUDIENCE COMMENTS

Tony Wisdom, of Skagit Valley Farms, expressed gratitude on behalf of the agricultural community for the additional water gained through the seasonal water rights transfers, and wanted to highlight that he understands that the primary goal of the PUD is to provide service to its piped water customers, but is hoping the PUD will continue supporting the agricultural community through unpiped water with whatever water is left.

Mikala Staples Hughes, President of the Western Washington Agricultural Association and Vice President of Sakuma Bros Farms and Processing, echoed Tony's comments and stated that the county is strong because of its agricultural base, and without the water they need, that base can be impacted. She also voiced appreciation for the considerate and thoughtful approach to addressing the water program.

John Roozen, a Mount Vernon resident, gave a brief overview of the history of water rights, the exceptions given to public utility districts to allocate water for future use, and how water is available for agricultural use.

Shawn Hulbert, of Skagit Seeds Services, expressed gratitude for the water they have had over the last few years and explained that without the water rights transfers, they would not be able to produce clean seeds that not only impact their local customers but also their customers around the world.

Laura Clause, Executive Director for Skagitonians to Preserve Farmland, stated that this is a unique opportunity to have local control and positive influence on the agricultural community and is supportive of the relationship between the PUD and the agricultural community.

## **OLD BUSINESS**

5. Manager's Report: General Manager Sidhu provided an update on the following:
  - The PUD recently received approval from DOE for the seasonal change authorizations to Drainage and Irrigation Districts No. 15 and 22 and Skagit Valley Farms for the year 2026.
  - The PUD will be holding community tours at the water treatment plant on May 14.
  - The WPUDA Annual Conference is being held from April 29 to May 1 in Squamish, WA.
  - The old admin building is officially up for leasing.
  - The new Skagit PUD signs have been installed.
  
6. HR Department Update: HR Manager White gave an HR Department update on the following:
  - Staffing updates, including new hires, rehires, promotions, transfers, and upcoming retirements, and open positions.
  - There is no scheduled union bargaining. However, due to the upcoming Paid Family Medical Leave, HR may be looking to revisit its voluntary plan. HR is also working with the Union to develop an effective Labor Management Committee (LMC).
  - All staff will be completing Discrimination and Harassment Training in May. The Leadership Team will also complete additional supplementary training.
  - Changes will be made to the annual evaluation process to simplify and streamline the process.
  - A Request for Proposals for the PUD's employee benefits package was conducted, and Alera Group was re-selected.
  
7. Water Rights Lease Program – Policy Framework Discussion: General Manager Sidhu explained that the intent of today's discussion is to start the development of the framework for developing a policy for water rights transfers and acknowledged that this process will take time. Manager Sidhu also provided an overview of the draft executive summary, including references and background information. A discussion ensued.

## **NEW BUSINESS**

None.

## **INFORMATION**

8. Public Comments on Water Rights Lease Program
9. Monthly Budget Status: March 2026
10. Judy Reservoir Data Report

## **COMMISSIONER COMMENTS**

Commissioner Hamburg expressed appreciation for the conversations that are possible, even if they are difficult and complex, but necessary.

## **ADJOURNMENT**

Having no further business to come before the board, Commissioner Miller moved for adjournment. The motion passed, and the April 28, 2026, meeting adjourned at 6:33 p.m.

ATTEST

---

Andrew Miller, President

---

Joe Lindquist, Secretary

---

Corrin Hamburg, Vice President

As of May 5, 2026

No. 3237

We, the undersigned Board of Commissioners of Public Utility District No. 1 of Skagit County, Washington, do hereby certify that the merchandise and /or services hereinafter specified have been received and are hereby approved for payment in the amount of \$538,849.04 this 5th day of May, 2026.

The total is comprised of the following:

Accounts Payable voucher No. from 34378 through 34422 in the amount of \$113,255.53, Electronic Funds Transfer in the amount of \$160,124.53. Payroll Electronic Funds Transfers and checks No. 049110 through 049195 in the amount of \$265,468.98.

Attest:

  
\_\_\_\_\_  
Manager  
  
\_\_\_\_\_  
Auditor

\_\_\_\_\_  
President  
\_\_\_\_\_  
Vice - President  
\_\_\_\_\_  
Secretary

Date: 05/04/2026

Page - 1

Voucher	Claimant	Amount
34378 - EDI	AMERITAS LIFE INSURANCE CORP	601.80
34379	ASTOUND BUSINESS SOLUTIONS LLC	307.64
34380	B & H PHOTO-VIDEO INC	1,124.52
34381	BEN LAMB	159.34
34382	CENTRAL WELDING SUPPLY CO INC	108.30
34383	CINTAS	189.78
34384	CORE & MAIN LP	11,811.40
34385	D.K. SYSTEMS, INC.	340.14
34386	DAVID EVANS AND ASSOCIATES, INC	10,376.00
34387 - EDI	ELECTRONIC FEDERAL TAX PAYMENT	100,916.38
34388 - EDI	EMPLOYMENT SECURITY DEPARTMENT	12,138.21
34389 - EDI	EMPLOYMENT SECURITY DEPARTMENT	9,160.61
34390 - EDI	EMPOWER RETIREMENT	1,509.79
34391	EVOQUA WATER TECHNOLOGIES LLC	2,723.28
34392	FARMERS EQUIPMENT CO	331.21
34393	GENERAL PACIFIC, INC.	14,592.60
34394	HD FOWLER COMPANY INC	3,490.33
34395	HOT TUBS NORTHWEST LLC	1,052.99
34396	JOHN S & CHRISTINA J DILLEY -	11.85
34397	K&D SERVICES INC	200.00
34398	KAPTEIN'S ACE HARDWARE	11.96
34399	LAUTENBACH INDUSTRIES INC	29.00
34400	LINDE GAS & EQUIPMENT INC	5,280.89
34401	MARTIN MARIETTA MATERIALS	292.40
34402	MEYER SIGN	25,224.29
34403 - EDI	Mutual of Omaha	3,978.09

Voucher	Claimant	Amount
34404	NORTH HILL RESOURCES	144.50
34405 - EDI	NORTHWEST ADMINISTRATORS	649.80
34406	ODP BUSINESS SOLUTIONS, LLC	435.92
34407	ORKIN LLC	152.16
34408	PAPE MACHINERY INC	29.25
34409	PLATT ELECTRIC SUPPLY	56.09
34410	QCC QUALITY CONTROLS CORP	2,248.79
34411	SECURITY SOLUTIONS NORTHWEST	221.99
34412	SIGN PRO OF SKAGIT VALLEY	1,501.44
34413	SKAGIT FARMERS SUPPLY	1,728.04
34414	SKAGIT VALLEY PUBLISHING	64.56
34415	TACOMA SCREW PRODUCTS INC	2.42
34416	TEAMSTER UNION LOCAL 231	4,757.72
34417	TREVOR DEVLIN	159.70
34418 - EDI	WA STATE DEPT OF LABOR &	20,071.17
34419 - EDI	WA STATE SUPPORT REGISTRY	273.49
34420 - EDI	WA STATE TREASURER	10,825.19
34421	WASHINGTON ELEVATOR	898.43
34422	WESTERN CONFERENCE OF	23,196.60
		273,380.06



1415 Freeway Drive | Mount Vernon, Washington 98273 | (360) 424-7104 | SkagitPUD.org

---

May 12, 2026

**MEMORANDUM**

**TO:** Board of Commissioners  
**FROM:** George Sidhu, P.E., General Manager  
**SUBJECT:** Water Rights Lease Program

**Requested Action:**  
For discussion only.

**Background:**  
There is no planned discussion of the Water Rights Lease Program at today's meeting, but I have updated the schedule to reflect the addition of a meeting that I think would be important. I have added a review of water rights regulations and operational considerations for the June 9 meeting, which will allow us to review and discuss valuable foundational information prior to moving to the stakeholder meetings.

**Fiscal Impact:**  
N/A

Enclosures: 1. [Schedule Update 05-12-26](#)

# Skagit PUD Water Rights Lease Program

## Meeting Schedule

Revised 5-12-26

Tuesday, April 14, 2026 Process Discussion

### Phase 1

Tuesday, April 28, 2026 Initial Policy Framework Discussion

Tuesday, May 12, 2026 Commissioner Miller absent, **no discussion**

Tuesday, May 26, 2026 PUD Water Rights Background and Operational Considerations review

Tuesday, June 9, 2026 Water Law and Water Rights Transfer regulatory review

Tuesday, June 23, 2026 ACE 26 Conference, **no discussion**

Tuesday, July 14, 2026 Operational, legal and regulatory review discussion and stakeholder meeting preparation

Week of July 20 Stakeholder meeting

Tuesday, July 28, 2026 Review of stakeholder input

Tuesday, August 11, 2026 Draft policy discussion

TBD Develop draft policy

TBD Policy adoption

TBD Program structure discussion

### Phase 2

TBD Program discussion

TBD Program creation

### Phase 3

TBD Pilot program discussion

TBD Pilot program creation  
Lease Agreements

## Cecily Gubitosi

---

**From:** George Sidhu  
**Sent:** Tuesday, May 5, 2026 9:13 AM  
**To:** Shannon Patiño  
**Subject:** FW: Support Agricultural Water Transfers in Skagit County

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### George Sidhu P.E.

General Manager  
(360) 848-4436  
sidhu@skagitpud.org

---

**From:** Corrin Hamburg <Hamburg@skagitpud.org>  
**Sent:** Tuesday, April 28, 2026 1:02 PM  
**To:** George Sidhu <sidhu@skagitpud.org>  
**Subject:** Fw: Support Agricultural Water Transfers in Skagit County

### Corrin Hamburg

Commissioner  
(360) 424-7104  
[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)

---

**From:** Rene' Hulbert <[rene@skagitseedservices.com](mailto:rene@skagitseedservices.com)>  
**Sent:** Monday, April 20, 2026 2:16:46 PM  
**To:** Andrew Miller <[miller@skagitpud.org](mailto:miller@skagitpud.org)>; Joe Lindquist <[lindquist@skagitpud.org](mailto:lindquist@skagitpud.org)>; Corrin Hamburg <[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)>  
**Subject:** Support Agricultural Water Transfers in Skagit County

Some people who received this message don't often get email from [rene@skagitseedservices.com](mailto:rene@skagitseedservices.com).  
[Learn why this is important](#)

Dear Commissioners,

Thank you for partnering with District 15 the past three years on a pilot project focused on seasonal irrigation transfers. The transfers have provided a critical water supply to our family farm. Our farm used this water to grow beet, cabbage, and spinach seed crops. Irrigation is essential to the successful production of these crops. Seed produced from our farm and others in Skagit Valley is sold all over the world. Skagit County Agriculture honestly feeds the world and keeping it viable is important. Access to reliable irrigation water is essential to keeping family farms viable into the next generation.

Please continue to support Agriculture by maintaining and expanding seasonal agricultural water transfers in Skagit County. Agriculture is a central part of our local economy, community, and landscape. Access to reliable irrigation water is essential to keeping farms productive and viable. The seasonal transfer pilot program over the past several years has demonstrated that water can be responsibly and effectively allocated to support agricultural needs.

As the Skagit County PUD considers development of a new water transfer program, I respectfully ask that you:

1. Establish a clear goal of supporting agricultural water solutions
2. Ensure the program prioritizes water availability for farming and irrigation
3. Include agricultural stakeholders early and throughout the development process

It is critical that any future program builds on the success of seasonal transfers and remains focused on sustaining agriculture in Skagit County. Without adequate water access, our family farm cannot continue to operate at the level needed to support our region and produce seed that feeds people all over the world.

Sincerely,

Rene' Hulbert

**Hulbert Farms, Inc.**

17297 Hulbert Road

Mount Vernon, WA 98273

360-466-3191

## Cecily Gubitosi

---

**From:** George Sidhu  
**Sent:** Tuesday, May 5, 2026 9:13 AM  
**To:** Shannon Patiño  
**Subject:** FW: Support Agricultural Water Transfers in Skagit County

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### George Sidhu P.E.

General Manager  
(360) 848-4436  
sidhu@skagitpud.org

---

**From:** Corrin Hamburg <Hamburg@skagitpud.org>  
**Sent:** Tuesday, April 28, 2026 1:02 PM  
**To:** George Sidhu <sidhu@skagitpud.org>  
**Subject:** Fw: Support Agricultural Water Transfers in Skagit County

### Corrin Hamburg

Commissioner  
(360) 424-7104  
[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)

---

**From:** Sean Hulbert <[Sean@skagitseedservices.com](mailto:Sean@skagitseedservices.com)>  
**Sent:** Wednesday, April 22, 2026 9:31:46 PM  
**To:** Andrew Miller <[miller@skagitpud.org](mailto:miller@skagitpud.org)>; Joe Lindquist <[lindquist@skagitpud.org](mailto:lindquist@skagitpud.org)>; Corrin Hamburg <[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)>  
**Subject:** Support Agricultural Water Transfers in Skagit County

Some people who received this message don't often get email from [sean@skagitseedservices.com](mailto:sean@skagitseedservices.com).  
[Learn why this is important](#)

Dear Commissioners,

I am writing to express my strong support for maintaining and expanding seasonal agricultural water transfers in Skagit County.

Agriculture is a foundational part of our local economy, community, and landscape. Access to reliable irrigation water is essential to keeping farms productive and viable. The seasonal transfer pilot program over the past several years has demonstrated that water can be

responsibly and effectively allocated to support agricultural needs.

As the Skagit County PUD considers development of a new water transfer program, I respectfully ask that you:

1. Establish a clear goal of supporting agricultural water solutions
2. Ensure the program prioritizes water availability for farming and irrigation
3. Include agricultural stakeholders early and throughout the development process

It is critical that any future program builds on the success of seasonal transfers and remains focused on sustaining agriculture in Skagit County. Without adequate water access, farms cannot continue to operate at the level needed to support our region. Water access is critical for our regions growers to stay competitive globally with competitors. Economies of scale are small in Skagit valley, to be profitable in Skagit county our growers must make every acre of cash crop (potatoes, pumpkins, seed crops etc) count, and that means having a supply of water on a wet, and a dry year.

Thank you for your time and consideration, and for your commitment to serving our community.

Sincerely,

Sean Hulbert

Hulbert Farms, Skagit Seed Services  
Mount Vernon, WA

Thank you,

Sean Hulbert  
509-567-5959

## Cecily Gubitosi

---

**From:** George Sidhu  
**Sent:** Tuesday, May 5, 2026 9:14 AM  
**To:** Shannon Patiño  
**Subject:** FW: Seasonal Water Transfers

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### George Sidhu P.E.

General Manager  
(360) 848-4436  
sidhu@skagitpud.org

---

**From:** Corrin Hamburg <Hamburg@skagitpud.org>  
**Sent:** Tuesday, April 28, 2026 1:04 PM  
**To:** George Sidhu <sidhu@skagitpud.org>  
**Subject:** Fw: Seasonal Water Transfers

### Corrin Hamburg

Commissioner  
(360) 424-7104  
[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)

---

**From:** Amy Hughes <[amycarolhughes@hotmail.com](mailto:amycarolhughes@hotmail.com)>  
**Sent:** Sunday, April 26, 2026 1:18:22 PM  
**To:** Andrew Miller <[miller@skagitpud.org](mailto:miller@skagitpud.org)>; Corrin Hamburg <[Hamburg@skagitpud.org](mailto:Hamburg@skagitpud.org)>; Joe Lindquist <[lindquist@skagitpud.org](mailto:lindquist@skagitpud.org)>  
**Subject:** Seasonal Water Transfers

Some people who received this message don't often get email from [amycarolhughes@hotmail.com](mailto:amycarolhughes@hotmail.com).  
[Learn why this is important](#)

Dear PUD Commissioners Miller, Hamburg, and Lindquist,

Abraham Lincoln established the USDA on May 15, 1862, recognizing the importance of agriculture in supporting our nation. Lincoln viewed agriculture as the "largest interest in the nation" and believed it deserved a dedicated department to support farmers.

"The agricultural history of Skagit County dates back to the 1850's when the first commercial crop of cultivated potatoes was planted. By 1870, oats were being sent to markets in Seattle, and by 1908, the Skagit Delta was producing more oats and hay per acre than any other place in the United States at that time. The County's

agriculture industry is also recognized for its environmental services, providing habitat for thousands of birds and contributing to the region's biodiversity and quality of life." (HistoryLink.org)

In our world's unpredictable and ever-changing climate situation, Agriculture must have access to available non-treated water for agriculture irrigation! We ask of you to establish a PUD Policy Goal to utilize available non-treated water for agriculture irrigation!

Our County has a rich history of farming, with over 160 years of farming history and continues to make significant contributions to the agricultural industry in Puget Sound. Skagit Valley farmers continue to supply the region, state and world with nearly every crop imaginable! Please assist our efforts to continue this legacy.

Sincerely,

Amy and Tom Hughes  
16423 Fir Island Road  
Mount Vernon, WA



1415 Freeway Drive | Mount Vernon, Washington 98273 | (360) 424-7104 | SkagitPUD.org

---

May 12, 2026

**MEMORANDUM**

**TO:** George Sidhu, P.E., General Manager  
**FROM:** Mark Handzlik, P.E., Engineering Manager  
**SUBJECT:** Underground Solutions Sole Source

**Requested Action:**  
Information only.

**Background:**

The Alger pipe relocation project has been designed to be located within (under) the shoulder and on top of the new Lake Samish Road fish passage culvert. In this location, there is very little room between the road (shoulder) surface and the top of the new fish passage culvert. Making it more challenging is the WSDOT requirement to put a casing on the crossing.

To meet these design requirements and maintain adequate capacity, an 18-inch-diameter steel casing was selected, and a fused 12-inch-diameter PVC C-900 was selected for the carrier pipe. The advantage of using a fused pipe is that it does not require bell-and-spigot joints, which necessitate a larger-diameter casing.

Underground Solutions, Inc. is the sole supplier of fused PVC C-900 pipe. They are also the only authorized welder of the pipe.

**Fiscal Impact:**  
N/A

Enclosures: 1. [Underground - Solutions PVC - Fusing Sole Source](#)



spigots was required. This PVC has a thinner wall and was the best choice, and only choice if we also consider placing a fiber optic conduit in the casing. This design has been approved by WSDOT for Skagit PUD installation.

4. What steps were taken to verify that these features are not available elsewhere? (list names and phone numbers of other vendors and explain why they were not suitable)

This is a proprietary product and process. Third parties can purchase the pipe and facilitate fusion; however, the best price is obtained by purchasing the pipe and fusion directly from the manufacturer.

Statement of Requestor

My department's recommendation for sole source is based upon an objective review of the goods/services being required and appears to be in the best interest of the District. I know of no conflict of interest on my part or personal involvement in any way with this request. No gratuities, favor or compromising action have taken place. Neither has my personal familiarity with particular brands, types of equipment, materials or firms been a deciding influence on my request to sole source this purchase when other suppliers are known to exist.

  
\_\_\_\_\_  
Signature of Requestor

*Brian Henshaw*

\_\_\_\_\_  
Finance Manager

\_\_\_\_\_  
April 24, 2026

Date

\_\_\_\_\_  
Apr 27, 2026

Date

General Manager Approval



Approved



Denied

  
\_\_\_\_\_  
George Sidhu, P.E., General Manager

George Sidhu, P.E., General Manager

\_\_\_\_\_  
Apr 28, 2026

Date









# Underground Solutions - PVC Fusing - Sole Source

Final Audit Report

2026-04-28

Created:	2026-04-24
By:	Catherine Price (price@skagitpud.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAIJDPGYWsHa9Sw3Ye2DQ67pFIS53AGDCU

## "Underground Solutions - PVC Fusing - Sole Source" History

-  Document created by Catherine Price (price@skagitpud.org)  
2026-04-24 - 4:04:43 PM GMT
-  Document emailed to Brian Henshaw (henshaw@skagitpud.org) for signature  
2026-04-24 - 4:05:06 PM GMT
-  Email viewed by Brian Henshaw (henshaw@skagitpud.org)  
2026-04-24 - 4:19:41 PM GMT
-  Document e-signed by Brian Henshaw (henshaw@skagitpud.org)  
Signature Date: 2026-04-27 - 5:02:19 PM GMT - Time Source: server
-  Document emailed to George Sidhu (sidhu@skagitpud.org) for signature  
2026-04-27 - 5:02:22 PM GMT
-  Email viewed by George Sidhu (sidhu@skagitpud.org)  
2026-04-27 - 5:14:06 PM GMT
-  Document e-signed by George Sidhu (sidhu@skagitpud.org)  
Signature Date: 2026-04-28 - 3:21:53 PM GMT - Time Source: server
-  Agreement completed.  
2026-04-28 - 3:21:53 PM GMT



1415 Freeway Drive | Mount Vernon, Washington 98273 | (360) 424-7104 | SkagitPUD.org

---

May 12, 2026

MEMORANDUM

**TO:** George Sidhu, P.E., General Manager  
**FROM:** Jay Sedivy, C.S.P., Safety Manager  
**SUBJECT:** Safety Practice and Procedure (SP&P) 3011, Asbestos Safety

**Requested Action:**  
For information only, no action required.

**Background:**  
SP&P 3011 was created to ensure compliance with Washington Administrative Code (WAC) 296-62, Part I-1, WAC 296-65, DOSH Directive 23.10, Washington State Regulation (WSR) 25-05-055, 40 CFR 61, Subpart M, 42 USC 7401, and 15 USC 2601. There is currently no written PUD policy or practice document for controlling asbestos-related hazards. The goal of this SP&P is to clearly define a consistent approach and to describe how the PUD will manage and reduce the hazards of asbestos exposure for our employees. This SP&P will ensure the PUD complies with WAC 296-800 core rules, which require written safety programs to maximize the effectiveness of our program and safeguard the health and safety of our employees.

**Fiscal Impact:**  
There are no anticipated fiscal impacts.

Enclosures: 1. [SPP 3011 Asbestos Safety](#)



## **Asbestos Safety Program Safety Practice & Procedure #3011**

### **Purpose**

This Standard Practice and Procedure (SP&P) establishes requirements and adopts industry best practices and processes that protect employees, contractors, and the general public from the hazards of exposure to airborne asbestos fibers.

This SP&P ensures compliance with WAC 296-62, Part I-1, WAC 296-65, DOSH Directive 23.10, WSR 25-05-055 (NWCAA Permanent Rules), 40 CFR 61, Subpart M (NESHAP), and 42 U.S.C. 7401 (Clean Air Act), and 15 U.S.C. 2601 (Toxic Substances Control Act).

### **Scope**

This SP&P applies to all PUD personnel and contractors performing work at PUD-controlled facilities and job sites.

The information provided in this SP&P does not address all possible scenarios for controlling hazards. If the requirements of this SP&P cannot be implemented, those PUD personnel responsible for work that requires exposure to asbestos-containing materials (ACM) must confer with their supervisors and the safety manager. The procedures and associated materials in this SP&P are to be used in conjunction with sound judgment, proper planning, a safety-conscious attitude, and full participation from all individuals involved in the work.

### **Discussion**

For almost a century, ACMs have been widely used in building and construction materials. Before regulations curbed their use, asbestos was used in roofing shingles, water pipes, and floor and ceiling tiles. The PUD has some ACM in its facilities and systems that were installed between the 1950s and the late 1970s.

As of 2026, the PUD has almost 630 miles of water pipes. Of that, 67 miles (or 11%) are active AC water pipes. While the PUD is working to reduce its use of AC water pipes, there is still a risk to those who must work with and near them.

The PUD acknowledges that when employees repair asbestos-cement pipes in its water system, they may be exposed to airborne asbestos fibers.

### **Responsibility**

The PUD shall:

- Be responsible for developing, implementing, and maintaining safe work practices that support asbestos safety; and

- Provide required training for employees who could be exposed to ACM in its facilities and processes; and
- Provide its employees with the personal protective equipment (PPE), administrative oversight controls, and engineering considerations needed to protect them from ACMs; and
- On an as-needed basis, provide medical pre-screening and post-exposure monitoring for ACMs as directed by applicable regulations; and
- Assist departments with identifying exposures to ACMs and appropriate protection measures; and
- Provide safety and health coordination for non-routine situations that require expertise beyond the standard level of competency in a water utility; and
- Ensure ACMs are not used in new facility or system construction; and
- Make sound decisions regarding how to manage or abate ACMs in existing facilities and systems; and
- Work to correct discovered asbestos hazards in existing facilities.

The safety manager shall:

- Assist facilities management staff with composing and maintaining a list of PUD sites with ACMs and the methods chosen to manage those areas; and
- Provide exposure assessment air monitoring for employees performing asbestos cement (AC) pipe work; and
- Coordinate bulk sampling of building materials to determine if they are ACMs; and
- Support and coordinate asbestos safety program requirements with managers, supervisors, and employees; and
- Consult with federal, state, and local agencies to obtain proper permits and dispose of ACMs.

Managers and supervisors shall ensure:

- That their employees who are affected by this procedure understand that they are responsible for following applicable regulations, and this SP&P; and
- The safety manager is engaged when their activities appear to challenge the ability of their employees and/or equipment; and
- That the safety manager is consulted in the planning phase of projects to ensure that exposures to ACMs are mitigated before beginning work; and
- Their employees are trained and competent in the methods to control exposures to ACMs before performing work that exposes them to those hazards; and
- Employees perform no unauthorized work involving exposure to ACMs unless adequately competent or qualified.

Employees shall:

- Be aware of and responsible for controlling the exposures to ACMs in the areas where they work; and
- Use engineering controls, administrative controls, and PPE controls when they are required; and
- Ensure protective equipment and processes are working correctly and in place before beginning work that potentially exposes themselves and others to ACMs; and

- Only perform tasks involving ACMs for which they possess the training, authorization, and proper protective measures to conduct; and
- Notify their supervisor or the safety manager of any concerns or questions that arise regarding ACMs; and
- Follow this SP&P and all instructions from competent supervisors and colleagues.

### **Facilities asbestos management plan**

The PUD has identified ACMs in the floor tiles of the older portions of the 1969-built main campus building. In addition, there is some suspected ACM pipe insulation on the older heaters in the south end of the warehouse and the mechanic's shop.

The PUD has chosen to manage the ACM floor tiles in place by ensuring they are encapsulated in a thick floor coating, by carpeting over the tiles, and by using chair mats and other devices to prevent abrasion of the tile surface. The PUD manages the old pipe insulation by ensuring it is intact and kept covered and encapsulated in paint or jacketing.

Damage to the encapsulation of the ACMs in any building materials must be reported to the facilities management staff immediately, and the safety manager notified, so that appropriate steps can be taken to correct the issue and mitigate exposure to friable ACMs.

When possible, the PUD plans to abate the ACMs during building renovation.

Employees who work in areas where the ACMs are present must be notified of their presence during initial orientation.

ACMs in the water distribution system consist of roughly 67 miles of active pipes (as of 2026) made of asbestos-cement (AC). Those pipes shall be left in the ground, as intact as possible, under at least three feet of clean fill, whether they are actively used for water distribution or not. Abandoned and active AC pipes shall be mapped in a GIS application. To maintain compliance with the Toxic Substances Control Act (TSCA), the Clean Air Act, and the National Emission Standards for Hazardous Air Pollutants (NESHAP), AC pipes shall not be purposefully damaged or destroyed in place by pipe bursting or any method not approved by the Northwest Clean Air Agency (NWCAA), Washington Department of Ecology (DOE), or U.S. Environmental Protection Agency (EPA). AC pipe abatements of more than 3 linear feet may only be performed by contractors licensed by the Washington Department of Labor and Industries (L&I) as certified asbestos abatement contractors.

### **Discovered ACM and PACM**

PUD employees may inadvertently discover or disturb ACM or presumed asbestos-containing material (PACM) on occasion. When this occurs, they must stop their work process and notify their supervisor and the safety manager immediately. The safety manager, in collaboration with supervisors and employees, will determine the best course of action.

PUD employees are not authorized to handle or dispose of ACM that is inadvertently discovered or disturbed without consulting the safety manager in any case.

PACM is material that includes building materials used before 1980 and otherwise assumed to contain asbestos until proven otherwise. Such materials include:

- Thermal system insulation (TSI)
- Roofing materials
- Non-porous flooring materials
- Spray-on fireproofing
- Popcorn ceiling material
- Ceiling tiles

PUD employees must not remove any ACM or PACM that exceeds 3 linear feet or 3 square feet under any circumstances. Employees must notify their supervisor and the safety manager if they encounter ACM exceeding 3 feet in length or area. The safety manager and the appropriate supervisor will engage a licensed asbestos abatement contractor to properly address large ACM components.

ACM and PACM that is less than 3 feet in length or area can be handled and disposed of by PUD employees if the material is non-friable and typically part of a water distribution system, such as piping or concrete valve cans (stone heads). Otherwise, PUD employees must not remove or work with any ACM or PACM that is not part of the water distribution system.

The safety manager and appropriate supervisors will decide whether PUD employees can safely handle inadvertently discovered ACM or PACM, or whether a licensed asbestos abatement contractor must be used.

### **Disposal of ACM**

All ACM must be double-bagged in durable and properly sealed plastic bags. The bags must be at least 6 mil thick and labeled with their contents and place of origin. Proper disposal bags, duct tape, permanent markers, and labels can be obtained in the PUD warehouse.

The Northwest Clean Air Agency (NWCAA) allows temporary storage of smaller ACM wastes in the tool counter area of the PUD warehouse. The temporary storage container is an airtight, properly labeled, yellow waste container. ACM wastes found or generated by PUD operations are not authorized to be stored anywhere except in the dedicated waste container in the PUD warehouse. The safety manager is responsible for ensuring the temporary ACM storage container is emptied at least every 90 days and for disposing of ACM waste in accordance with NWCAA rules.

### **Asbestos cement pipe work and safety**

The following practice applies to all PUD employees working to repair or otherwise service asbestos-cement (AC) pipe in its water distribution systems. The procedures follow the curriculum of the Washington Environmental Training Center (WETRC) and the industry standard practices set by the American Water Works Association (AWWA).

### Negative exposure assessments

Several exposure assessments have been conducted by many water utilities since 1989. No known exposure assessments conducted where industry-standard practices for working safely with AC pipe have shown asbestos fiber counts approaching, meeting, or exceeding the permissible exposure limit (PEL) of 0.1 fibers/cc of air over eight hours, or the excursion limit of 1.0 fibers/cc of air over 30 minutes.

The following negative exposure assessments are recorded:

Date	Utility	Results
July 1989	City of Tacoma	No exposure $\geq$ 0.09 fibers/cc of air
September 1989	AWWA PNW Section	No exposure $\geq$ 0.019 fibers/cc of air
October 1989	AWWA California	No exposure $\geq$ 0.07 fibers/cc of air
June 1990	AWWA New Jersey	No exposure $\geq$ 0.05 fibers/cc of air
February 1992	City of Portland, Oregon	No exposure $\geq$ 0.074 fibers/cc of air
April 2000	City of Portland, Oregon	No exposure $\geq$ 0.04 fibers/cc of air
June 2012	Skagit PUD #1	No exposure $\geq$ 0.045 fibers/cc of air
August 2016	Okanagan PUD #1	No exposure $\geq$ 0.039 fibers/cc of air
June 2022	Chelan PUD #1	No exposure $\geq$ 0.036 fibers/cc of air

All the utilities listed in the above table are (or were) members of AWWA and subscribe to the AWWA/WETRC industry standards for AC pipe work. For the purposes of exposure assessments, the PUD adopts the almost four decades of negative exposure assessments conducted as its own negative exposure assessment.

#### Personal protective equipment (PPE)

This section describes the PPE specifically intended and required to protect employees when working with AC pipes. While working with AC pipes, employees must use the following PPE:

- Disposable coveralls (or full-body rain gear)
- Rubber boots
- Gloves made of non-fabric, water-impermeable materials (latex, nitrile, rubber, etc.)

Duct or similar type waterproof tape must be used to close gaps between gloves and rain jackets (or disposable coveralls), and gaps between boots and rain pants (or disposable coveralls).

Air-supplying respirators or HEPA air-purifying respirators are not required if proper wet methods are used, and if the equipment used on the pipe is not motorized. However, employees can voluntarily wear such respiratory protection if they choose. If employees opt to wear air-supplying or HEPA air-purifying respirators, the requirements of the PUD respiratory protection program shall be followed. The PUD will provide voluntary respiratory protection, fit testing, and medical clearances to employees at no cost.

The requirement to use additional PPE, such as hard hats, depends on other hazard exposures. Employees must follow the requirements of the PUD PPE program.

#### Wet methods using amended water

Amended water is water with a tiny amount of dish soap or another surfactant added. Employees will only work with AC pipes when the tools, pipe, immediate surroundings of the pipe, and any items that will contact or disturb the pipe or pipe materials are completely wetted with amended water. Amended water must be applied continuously while cutting or otherwise working with the AC pipe. Manual pump-pressurized spray cans are the best tool for delivering amended water to AC piping. Piping and tools must be kept visibly wet throughout the entire work process.

#### Procedure

1. Ensure that the excavation is controlled to prevent entry by any person who is not trained, equipped, or protected from exposure to AC pipes.

A control zone around the excavation can simply be an employee acting as a top person who prevents pedestrians and others from wandering into the work zone. For robust protection, warning tape and candlestick delineators can be used to close off the work area visibly.

2. Expose the pipe using soft methods, such as vacuum excavation or hand shoveling.

If mechanical excavation equipment must be used, it must not excavate within 2 feet of the marked location of the pipe. When excavation is within 2 feet of the pipe's marked location, employees must use soft excavation methods to access the pipe.

3. If employees must dewater the excavation, a pump with a sediment sock placed over the discharge shall be used. The discharge sock shall be disposed of in the excavation with disposable AC-pipe-specific PPE.
4. Ensure only properly trained employees are performing work on AC pipes.
5. Employees must put on AC pipe work-specific PPE and ensure the amended water is ready to be used.
6. Clean and wash the pipe surface with amended water in the area where the cut, tap, or repair is to be made, and attach the cutting or repair equipment to the pipe.

NOTE: It is essential that, once the AC pipe is exposed, it is not inadvertently abraded or otherwise disturbed.

7. While keeping the pipe and tools visibly wet with amended water, make the cuts, taps, or repairs.
  - a. Cutting or trimming of the AC pipe can only be done with a manual saw. The ideal cutting tools are a large-toothed, cross-cut hand saw or a bow saw with a reversed carbide-tipped blade.
  - b. Repair bands can be used to repair small breaks or circumferential cracks.
  - c. Failures of direct service taps can be repaired and replaced with a tapped repair band that is lined up over the existing tap hole in the pipe.

NOTE: Care must be taken to ensure that the repair band and valve are flushed clean of all AC pipe debris within the excavation before employees remove their PPE.

- d. Tapping into a live AC water main (hot tapping) is completed using a shrouded, completely enclosed tapping bit and a powered driver motor. All AC pipe debris from this process should be contained within the shroud.

NOTE: Care must be taken to ensure that the tapping sleeve and valve are flushed clean of all AC pipe debris within the excavation. In addition, clearing the tapping sleeve of the pipe coupon must be done using wet methods. Before the equipment used to perform hot tapping is put away, it must be carefully rinsed or wiped with paper rags wetted with amended water within the excavation.

- e. Sections of AC pipes that have failed beyond repair shall be replaced with non-AC pipe and appropriate flexible couplings. Trimming of the ends of the remaining AC pipe may be necessary and should follow the requirements for cutting or trimming AC pipe.
8. Any broken AC pipe pieces up to 3 linear feet must be kept wetted, be properly packaged for disposal, and be removed from the excavation. Such pieces include AC pipe trimmings, coupons from hot tapping, and failed-pipe pieces.
  9. Large intact AC pipe sections that are more than 1 linear foot in length must remain in the excavation and be set in the ground parallel to the active pipe.

NOTE: Employees must ensure that abandoned AC pipe lengths and pieces are correctly mapped and accounted for in asset-tracking GIS software.

10. Cover all AC pipes with an initial layer of dirt.
11. Remove all disposable AC-pipe-specific PPE in the excavation.
12. Rinse all reusable PPE (rain gear, boots, etc.) and hands in the excavation.
13. Exit the excavation.
14. Backfill the excavation with at least 3 feet of clean fill to encapsulate the AC pipe and any AC pipe-contaminated items left in the excavation.

## **Training**

### Awareness-level training

PUD employees who may be exposed to ACMs as part of their work must receive initial awareness-level asbestos training. Asbestos awareness training will be provided to all employees upon orientation. This training shall be refreshed annually and consist of the following topics:

- The location of ACMs in PUD facilities and the plan to manage them
- The health effects of asbestos exposure
- Being able to recognize the deterioration of ACMs
- Requirements to not disturb ACMs and PACMs
- The notification process for potential asbestos exposures

Class II and III-level worker training (AC-pipe specific)

Only PUD employees who are expected to work with or respond to damage and failures in the PUD water distribution systems must be trained in AC-pipe work practices. Employees must receive an initial 8-hour class that includes all the awareness-level topics and a hands-on skills demonstration of the best work practices taught by WETRC and approved by Washington Labor and Industries (L&I). Employees must refresh their skills annually with a 4-hour class.

**Recordkeeping and Confidentiality**

Asbestos disposal records must be kept indefinitely. Asbestos program training records must be kept for the trained employee’s entire period of employment plus 30 years. Bulk and material sampling records must be kept for the duration of the PUD’s ownership of the facility or system that the tested material originated from, plus 30 years.

Any medical evaluations and any findings related to the employee’s possible exposure to ACM or PACM must be kept for the duration of employment, plus 30 years. Medical assessment, exposure assessments, and related documents are protected information. They shall be stored in a secure area in the employee record or in a secure electronic format in the PUD’s electronic systems.

If a situation arises that impacts an employee’s health or their ability to perform their duties, employee health data shall be shared only with the affected employee and Human Resources, as appropriate and necessary. In all other cases, employee health and exposure data will be kept confidential.

Former Title/Policy #: _____	N/A
Effective Date:	
Revision Date:	
General Manager Signature: _____	Date: _____



1415 Freeway Drive | Mount Vernon, Washington 98273 | (360) 424-7104 | SkagitPUD.org

---

May 12, 2026

MEMORANDUM

**TO:** George Sidhu, P.E., General Manager

**FROM:** Jay Sedivy, C.S.P., Safety Manager

**SUBJECT:** Safety Practice and Procedure (SP&P) 3012, Fall Protection, Ladder, and Elevated Work Platform Safety

**Requested Action:**

For information only, no action needed.

**Background:**

SP&P 3012 was created to ensure compliance with Washington Administrative Code (WAC) 296--880, WAC 296 24-735, WAC 296-155, WAC 296-869, WAC 296-870, WAC 296-874, and other applicable regulations. There is currently no written PUD policy or practice document for controlling the hazards associated with working at heights. The goal of this SP&P is to clearly define a consistent approach and to describe how the PUD will manage and reduce the hazards of working at heights for our employees. This SP&P will ensure the PUD complies with WAC 296-800 core rules, which require written safety programs to maximize the effectiveness of our program and safeguard the health and safety of our employees.

**Fiscal Impact:**

No anticipated fiscal impact.

Enclosures: 1. [SPP 3012 Fall Protection Ladders and EWPs](#)



## **Fall Protection, Ladders, and Elevated Work Platforms Safety Practice & Procedure #3012**

### **Purpose**

This Standard Practice and Procedure (SP&P) establishes requirements and adopts industry best practices and processes that protect employees, contractors, and the general public from fall hazards.

This SP&P ensures compliance with WAC 296-880, WAC 296-24-735, WAC 296-155, WAC 296-869, WAC 296-870, WAC 296-874, and other applicable regulations.

### **Scope**

This SP&P applies to all PUD personnel and contractors performing work at PUD-controlled facilities and job sites.

The information provided in this SP&P does not address all possible scenarios for controlling hazards. If the requirements of this SP&P cannot be implemented, those PUD personnel responsible for work that exposes them to fall hazards or working from heights must confer with their supervisors and the safety manager. The procedures and associated materials in this SP&P are to be used in conjunction with sound judgment, proper planning, a safety-conscious attitude, and full participation from all individuals involved in the work.

This SP&P does not address fall protection or the safety of walking and working surfaces accessible to non-PUD employees, contractors working for the PUD, or members of the general public. Those considerations and surfaces are addressed in building, fire, and other relevant codes and regulations.

### **Discussion**

Falls from height and ladders are among the most common causes of serious work-related injuries and deaths. The PUD is committed to protecting employees and others from fall hazards through safe design, hazard elimination, engineering controls, safe work practices, training, and the use of personal protective equipment (PPE). If a fall hazard cannot be eliminated, effective fall protection must be planned, implemented, and monitored to control the risk of falling-related injuries.

### **Responsibility**

The PUD shall:

- Be responsible for developing, implementing, and maintaining safe work practices that support a program to reduce or eliminate fall hazards; and

- Provide required training for employees who could be exposed to fall hazards in its facilities and processes; and
- Provide its employees with the personal protective equipment (PPE), administrative oversight controls, and engineering considerations needed to protect them from fall hazards; and
- Assist departments with identifying fall hazards and appropriate protection measures; and
- Provide safety and health coordination for non-routine situations that require expertise beyond the standard level of competency in a water utility; and
- Ensure fall hazards are, as much as possible, designed out of new facility or system construction; and
- Make sound decisions regarding how to manage or abate fall hazards in existing facilities and systems; and
- Work to correct discovered fall hazards in existing facilities.

The safety manager shall:

- Assist managers and employees by maintaining this SP&P; and
- Work with supervisors and employees to formulate effective fall protection work plans and practices, as needed; and
- Assess facilities and systems for fall hazards; and
- Support and coordinate fall protection program requirements with managers, supervisors, and employees.

Managers and supervisors shall ensure:

- That their employees who are affected by this procedure understand that they are responsible for following applicable regulations, and this SP&P; and
- The safety manager is engaged when their activities appear to challenge the ability of their employees and/or equipment; and
- That the safety manager is consulted in the planning phase of projects to ensure that exposures to fall hazards are mitigated before beginning work; and
- Their employees are trained and competent in the methods to control exposures to fall hazards before performing work that exposes them to those hazards; and
- Employees perform no unauthorized work involving fall hazards unless adequately trained and found competent.

Employees shall:

- Be aware of and responsible for controlling the exposures to fall hazards in the areas where they work; and
- Use engineering controls, administrative controls, and PPE controls when they are required; and
- Ensure protective equipment and processes are adequate and in place before beginning work that potentially exposes themselves and others to fall hazards; and
- Only perform tasks involving fall hazards for which they possess the training, authorization, and proper protective measures to conduct; and
- Notify their supervisor or the safety manager of any concerns or questions that arise regarding fall hazards; and
- Follow this SP&P and all instructions from competent supervisors and colleagues.

## General requirements

All walking or working surfaces that are four feet or more above the ground or surface below shall be assessed for fall hazards, guarded by some form of fall protection, and kept free from falling object hazards.

NOTE: The above statement does not apply to loading docks.

PUD employees are not authorized to:

- Work under the protection of a fall arrest system, except:
  - ✓ When using affixed fall arrest or retrieval systems to enter or exit a confined space
  - ✓ When climbing a fixed ladder that is 24 feet or more in height to access a work area
  - ✓ When using a scaffold that is 10 feet or more tall, which cannot provide the user with a guardrail to protect them from falling
- Utilize a safety monitor or watch system as a form of fall restraint
- Use fall restraint or arrest equipment for rigging or as a material handling system, or vice versa
- Work closer than 15 feet from the unprotected edge of an elevated walking or working surface that is 4 feet or more from the level below, without being protected by a fall restraint system

NOTE: The exception to the requirement above is loading docks

- Use a safety net system or a catch platform system for the purposes of protecting employees from falling

NOTE: If supervisors or employees cannot mitigate fall hazards under the above constraints, they must consult the safety manager to find a safe solution.

Fall protection requirements are excluded under the following circumstances on a **low slope** (4:12 or less) roof, walking, or working surface:

- When installing fall protection anchors and equipment before the start of other work activity, or when disassembling fall protection after all other work is completed.
- Inspecting, investigating, or assessing roof-level conditions before starting other work. Examples include evaluating the area to determine what method of fall protection will be used by employees.

## Rooftop utility maintenance

Rooftop utility maintenance, or similar work done on an elevated low-sloped surface, generally does not require fall protection systems to be in place or worn. Examples of this type of work include working on HVAC control units on a low-sloped roof or fixing a small area of roofing on a low-sloped roof. These exceptions to fall protection requirements are only allowed if:

- Work is done on a low-sloped surface
- The work is infrequent (less than 4 times in a year)
- The activity is temporary (expected to last less than 2 hours)
- The work requires no large machinery or equipment to be used

- The employees performing the work can access the work area from a ladder or stairs that access the elevated work area at least 15 feet away from the edge of the low-sloped surface
- The work area is at least 15 feet from the elevated surface's edge
- The work is not construction

Roof access must be secured and posted in all PUD buildings, and access must be restricted to authorized personnel. Authorized personnel include PUD employees and contractors who need to be on a roof.

### **Excavation fall protection**

Employees directly involved in excavation operations do not need to be protected by a fall protection system. PUD policies elsewhere require that those who are not engaged in excavation operations be excluded from the work area to prevent them from falling into an excavation.

### **High-voltage electrical fall protection considerations**

The PUD's only high-voltage facility is the transformer enclosure at the Skagit River Diversion facility. PUD employees are generally allowed to access the enclosure only when they need to supervise qualified high-voltage contractors working in it. PUD employees may not work at heights more than 4 feet within the enclosure or in the airspace above it. Any elevated work within or above the enclosure must be contracted to qualified, equipped contractors.

### **Suspended maintenance operations**

Suspended maintenance operations include window cleaning, pressure washing, and other activities from a suspended standing platform (includes spider cages) or a seated bosun's chair.

PUD employees must not engage in suspended maintenance operations. Managers and supervisors must find alternative access to suspended maintenance operations, such as mobile elevated work platforms or ground scaffolding. If this type of work falls outside the scope of PUD employees' training, competence, and resources, supervisors must select a contractor capable of performing it.

### **Tree work**

Employees shall not do arbor work that requires them to climb the tree directly to spar, limb, or fell any part of the tree from a height greater than 4 feet above the ground, unless the employees are using a mobile elevated work platform. A contracted specialist must do on-tree arbor work with experience in this type of work.

Felling large trees by employees shall only be authorized at the ground level.

Orchard ladders may be used to access and work on smaller trees and larger shrubs.

### **Walking and working surfaces**

Walking and working surfaces are those surfaces on or through which an employee walks, works, or gains access to a work area or workspace location. These surfaces must be protected from fall hazards. Hazards include falls to lower levels and falls at the same level caused by tripping.

Walking and working surfaces must be kept clean, orderly, and as clear as possible. Maintain work area floors in a clean and dry condition. For wet processes, drainage must be maintained, and dry places to stand must be provided when possible. Walking and work surfaces must be kept, to the extent possible, free of sharp or protruding objects, loose materials, spills, snow, and ice. Walking and working surfaces must be safely accessible and able to support the intended load by a safety factor of at least 2.

### **Low-slope roofs and surfaces**

Any walking or working surface with a pitch of 4:12 or less is considered to be a low-sloped surface.

Generally, if passive fall restraint systems are present on a low-sloped surface, worn personal fall restraint systems are not required. As mentioned in other sections, passive fall restraint systems include guardrails, parapet walls, hole and skylight covers, and warning line systems.

If passive fall restraint systems are not present or are inadequate, employees must wear a personal fall restraint system.

### **Stairs and stairways**

In addition to the requirements for walking and working surfaces, all stairs must:

- Provide a handrail or stair rail system
- Provide a minimum vertical clearance of at least 80 inches, measured from the leading edge of the stair tread
- Have uniform riser heights and tread depths between landings
- Provide landings and platforms that are at least the width of the stair and at least 30 inches in depth along the path of intended travel
- Have platforms that accommodate the opening of a gate or door that don't reduce the platform's usable depth to less than 22 inches
- Support 5 times the anticipated live load, but never less than 1,000 pounds applied at any part of the stair
- Not be spiral, ship, or alternating tread-type stairs unless standard stair installation is not possible

NOTE: Ship ladders may be used if installed, used, and maintained in accordance with the manufacturer's instructions.

- Have tread noses with an even leading edge
- If composed of 4 or more risers, or rising more than 30 inches (whichever is less), it possesses at least one handrail on each unprotected side

### **Steep-slope roofs and surfaces**

Any walking or working surface with a pitch greater than 4:12 is considered to be a steep-sloped surface. All activities (including inspection) on a steep-sloped surface require the use of worn personal fall restraint systems. PUD employees must not perform work on any steep-sloped surface where the use of worn personal fall restraint systems is not possible.

PUD managers and supervisors must seek qualified contractors to perform work on steep-sloped surfaces where active fall arrest must be used to protect workers.

### **Fall arrest**

Fall arrest systems safely stop a worker's fall after it has already begun. Fall arrest systems usually consist of a harness, a lanyard, and an anchor point. Usually, a deceleration device is used to slow the user's fall. Wearable fall protection systems used when any portion of the wearer's body is beyond the edge of a roof or other elevated surface are considered fall arrest systems. Fall arrest is the last resort for fall protection.

### **Parapet walls**

Parapet walls are the best and most aesthetic way to provide a passive fall restraint system on roofs and other elevated walking or working surfaces.

For parapet walls to be considered a fall protection system, they must be between 39 and 45 inches from the surface of the walking or working surface. In addition, they must withstand a force of 200 pounds applied to the top of the wall, as evidenced by the original construction details or a statement from a registered structural engineer.

### **Guardrails**

Guardrails are the passive fall-restraint system of choice for protecting employees from fall hazards. Guardrails are required for open-sided floors and other elevated walking and working surfaces. Additionally, guardrails can be placed along all exposed sides of floor and roof openings that are 12 inches or more in diameter. If permanent guardrails are not available, retrofitting a guardrail system shall be strongly considered.

The PUD shall install guardrails on the tops of all new water reservoirs, wherever feasible, and shall plan to retrofit guardrails on existing water reservoirs whenever possible.

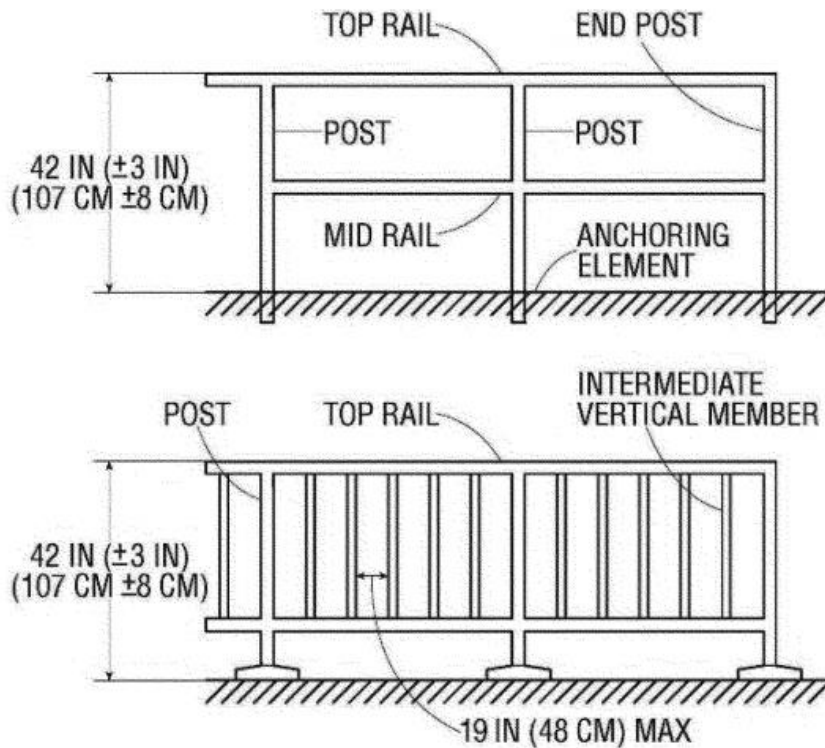
Below is a typical permanent guardrail system installed around the perimeter of the Bayview Ridge water reservoir.



Guardrails must consist of:

- A top rail that is between 39 and 45 inches from the walking or working surface
- A mid-rail that is midway between the bottom of the top rail and the walking or working surface, or intermediate vertical members evenly spaced no more than 19 inches apart between the top rail and mid-rail
- Vertical posts spaced no more than 8 feet apart on center
- Materials able to withstand a load of 200 pounds applied to the top of the rail

Below is a diagram of the typical requirements for a standard guardrail system.



### Fall restraint

Any system that keeps an employee from approaching the edge of a roof or elevated surface, or a worn system that keeps the wearer from falling from a purpose-built accessway, such as a fixed ladder.

Passive fall restraint systems include guardrails, parapet walls, hole and skylight covers, and warning line systems. Passive fall restraint systems are the first choice for engineered fall protection.

Active personal fall restraint systems use personal protective equipment (PPE), such as harnesses, fixed-length lanyards, self-retracting lanyards, anchor points, horizontal lifelines, vertical lifelines, and restraint-specific positioning systems.

Below are photos of a typical fall protection lanyard and harness.



### **Anchors**

Fall protection anchors are an engineered and designed point of attachment for lifelines, lanyards, deceleration devices, and retrieval equipment.

Permanent anchors include any anchors designed to be left in place and used repeatedly. Such permanent anchors include davit bases used for entry into water system vaults, or affixed D-bolt anchorages atop a water reservoir.

Below is a photo of a typical D-bolt anchorage and permanent lanyard structurally affixed to the top of the Eagle's Nest standpipe.



Vertical lifelines are suspended from a top anchorage point with a stop at the bottom. Examples of vertical lifelines include a fall protection system on a fixed ladder used to access the top of a water reservoir and an anchored lifeline with a rope grab used to provide fall restraint at the top of a water reservoir.

Horizontal lifelines are suspended between two anchorage points, with a connector for a personal fall restraint system connected to the line. Examples include the horizontal lifeline on the Division Street water reservoir, pictured below.



Temporary anchors are intended to protect employees when permanent fall protection anchors are unavailable. Examples of temporary anchorages include beam straps wrapped around a structural element on top of a water reservoir.

For simplicity, the PUD requires all fall protection anchorages to support 5,000 pounds per person attached, or to provide a safety factor of at least 2, as specified by the manufacturer's design, use, and installation instructions.

Permanent and temporary anchors must be installed in accordance with the manufacturer's instructions and used only for fall protection.

Deviations to this requirement may be made only by the safety manager on the advice, findings, or statements of a registered structural engineer.

When choosing an anchoring point, the order of preference for materials is steel supporting members, wood supporting members, and attachment to poured concrete. Other attachment points may only be made after consulting a structural engineer or the safety manager.

The following must not be used as an anchorage point:

- Standard guardrails
- Wiring harnesses of any size
- Standard railings
- Rebar
- Ladders and ladder rungs (except for designed ladder safety systems)
- Other lanyards (in tandem lanyards)
- Unistrut and other all-thread materials
- Light fixtures
- Vents (except vents made of structural steel on water reservoirs)
- Conduit or plumbing
- Ductwork or pipe vents
- Anything not capable of supporting 5,000 pounds per person

## Hole and opening protection

Skylights, roof hatches, or any opening on an elevated surface that is at least 2 inches or more in its least dimension, and 4 feet or more to the level below, is considered a fall hazard to employees. Employees must be protected from the hazards posed by these types of openings. Opening must be protected by one of the following:

- A guardrail system along all exposed sides of the opening.
- A covering capable of supporting twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time. Coverings must be secured in place and marked with the word “hole” or “cover” to warn of the hazard.
- A barrier that is secured and withstands a load of at least 200 pounds applied from any direction (except upward)
- Any screen that is secured and withstands a load of at least 200 pounds

Roof hatches located within 10 feet of the edge of a walking or working surface must have a standard guardrail system along all exposed sides.

Roof hatches left open at any distance from the edge of a walking or working surface must be protected on all sides with a guardrail system (except at the access opening), with a passage through the railing provided by a one-way swinging gate that closes itself behind the user.

Roof hatches must be positioned so that a person climbing out of the hatchway is climbing away from the edge of the roof or walking or working surface.

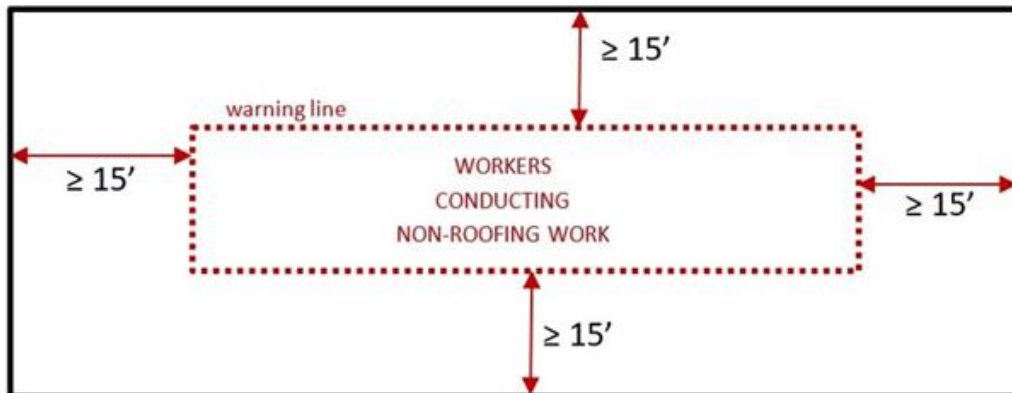
## Warning line systems

Warning line systems are a form of administrative control and are considered the last reliable means of providing fall protection to employees.

Warning line systems consist of a barrier (rope, wire, tape, or chain) erected on a walking or working surface to warn employees that they are approaching an unprotected fall hazard.

Warning lines may only be used on low-slope roofs or surfaces.

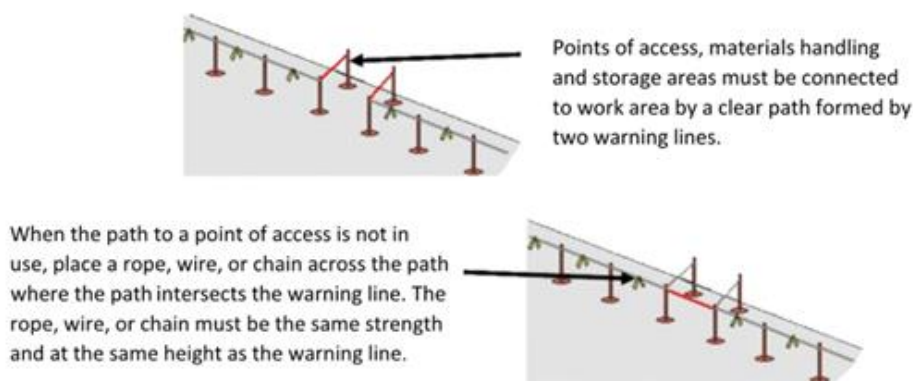
Below is a diagram of a warning line system for non-roofing, non-construction work.



If employees engage in rooftop work that is not rooftop utility maintenance, warning lines must be used.

A warning line system must:

- Be erected around all unprotected sides of a roof or elevated walking or working surface
- Have rope, wire, or chain with a minimum tensile strength of 500 pounds, or highly visible caution tape that is at least 3 inches wide, 3 mils thick, and has a tensile strength of at least 200 pounds
- Have the line flagged at 6-foot intervals with highly visible materials, unless the line in use is high-visibility tape
- Be supported so that the lowest dip in the line is not less than 36 or more than 45 inches from the surface
- Have stanchions that can resist a horizontal force of at least 16 pounds, and are perpendicular to the lifeline they are supporting
- Have points of access for employees to access the work area and handle materials delineated by two warning lines set no more than 6 feet apart, and that can be enclosed at their intersection with the work area when not in use, as illustrated below



Employees who will have any part of their body on the unprotected side of a warning line system must use a personal fall restraint system.

### **Inspection of fall protection equipment**

All components of a wearable fall protection system, as well as any anchors used by those systems, require inspection. The following are fall protection items commonly used at the PUD:

#### Anchors (affixed)

Affixed anchors must be inspected upon placement into service and annually thereafter. The majority of permanently affixed anchors at the PUD are designed for confined space entry retrieval and fall protection, or are affixed to the tops of water reservoirs.

Anchor inspections shall be tracked and completed in a GIS-based asset management system. Anchors affixed to the tops of water reservoirs shall be inspected by PUD staff during the annual health inspections.

A competent person should inspect affixed anchors and any attachments to ensure that they are free of defects, deformities, and damage. Any anchors found to be damaged shall be tagged out of service and not used. Inspecting employees must notify their supervisor or the safety manager if they discover an anchor that is not safe to use, or if they question the safety of continuing to use

an anchor they have inspected. Anchor components that are involved in a fall event must be removed from service and replaced

#### Anchors (temporary)

Temporary anchors are typically limited to beam straps and similar items.

Before each use, the user must inspect the anchor for damage to the webbing, straps, and buckles. Special attention should be paid to frayed edges, broken fibers, pulled stitches, burns, and any other damage.

Anchor straps and similar devices must be inspected once a year by a competent PUD employee or the safety manager.

Anchor components involved in a fall event must be removed from service and replaced

#### Harnesses

Before each use, the user must inspect the harness for damage to the webbing, straps, and buckles. Special attention should be paid to frayed edges, broken fibers, pulled stitches, burns, and any other damage.

D-rings should be checked for distortion, cracks, breaks, and rough or sharp edges.

The fall arrest indicators on the back of the D-ring pad should be checked for signs of activation. The harness has most likely been compromised if the indicator is broken or stretched between any of the arrows.

#### Lanyards

Before each use, lanyards must be inspected by the user. The user should start by inspecting the lanyard's webbing to ensure it is free of frayed edges, broken fibers, pulled stitches, or other damage.

The snap hook should be carefully inspected to make sure it is free of distortion, cracks, corrosion, or pitting. Thimbles must be firmly seated in the eye of the splice and be free of deformities and damage.

#### Self-retracting lifelines (SRLs)

Before each use, the user must inspect the unit's housing for loose fasteners and for bent, cracked, distorted, worn, malfunctioning, or damaged parts.

The lifeline retraction should be tested by slowly pulling a few feet of line out and checking whether it retracts properly. The lifeline must be checked for signs of damage.

The braking mechanism should be tested by gently pulling a few feet of line out, then suddenly jerking on it. The line should brake against the hard jerk without any slippage. Once tension is released, the unit should gently retract the lifeline back into the housing.

All hardware, such as swivels, snap hooks, and other parts, should be inspected. Any SRL with a red indicator in the swivel eye of the SRL indicates the unit has been involved in an arrested fall.

### Vertical lifeline ropes

Vertical lifeline ropes that are used with rope grab fall restraint systems must be inspected by the user before use.

Inspect the rope by slowly rotating it from one end to the other and look for fuzzy, worn, broken, or cut fibers. Carefully look for significant decreases in the rope's diameter.

The snap hook should be carefully inspected to make sure it is free of distortion, cracks, corrosion, or pitting. Thimbles must be firmly seated in the eye of the splice and be free of deformities and damage.

### **Fall protection work plans**

All work sites that are 10 feet or more above the surface below will have a written, site-specific fall protection work plan prepared. Such plans must be communicated to assigned employees and posted at the work site before employees begin work.

A standardized site-specific fall protection work plan has been provided as Appendix (A). This plan is intended for the majority of the elevated PUD work areas that are 10 feet or more above the level below. An example of where employees can use the plan template includes the tops of water reservoirs.

If PUD employees will work at a height of 10 feet or more above the surface below, and the template plan does not adequately address the site's hazards, the work must not begin until the hazards are addressed in a customized, site-specific fall protection work plan. PUD employees and supervisors who encounter situations requiring a custom site-specific plan must consult with the safety manager before proceeding with the work.

### **Portable ladders**

While ladders can help provide temporary access, falls from ladders are a leading cause of workplace death and injuries.

The PUD requires extension ladders and stepladders to be used to reach anything out of vertical reach above an employee's head and to access any work area 4 feet or more below the walking or working surface. Further, all temporary ladders should be used for access, and situations requiring working from ladders should be eliminated whenever possible. When situations arise requiring employees to work from ladders, alternatives such as providing a way for employees to reach the work from the walking or working surface or using scaffolds and mobile elevating work platforms (boom or scissor lifts) should be used instead. If working from ladders is expected, employees must first consult the safety manager.

The following are common types of portable ladders used at the PUD.

Extension (example below)



Stepladder, including stepstool (examples below)



Platform (examples below)



Orchard (example below)

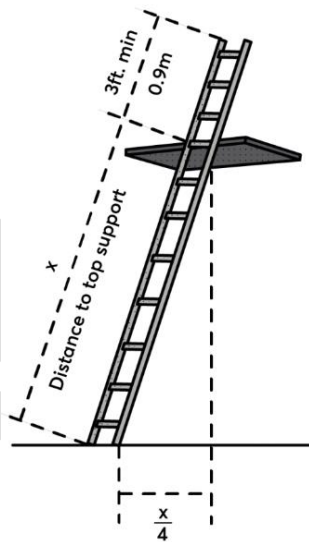


Ladders must be appropriate for the intended purpose. Select the best ladder for the job. Unless designed to do so, a closed foldable stepladder should not be rested against a surface and used like an extension ladder. Orchard ladders must be used only for outdoor landscape maintenance work and never as a stepladder.

Extension, step, platform, and orchard ladders must be constructed with fiberglass frames. Wood- or metal-framed ladders shall not be used without the safety manager's approval.

Make sure the ladder is placed on a firm, level surface. Do not place a ladder on any part of a vehicle, mobile equipment, or dunnage. Ladders may be set on top of plywood or other durable mud sills if the ground is soft. Mud sills must be fixed in place so they do not move. Ladder bottoms should be secured by anchoring or by an employee on the ground holding them in place to prevent the ladder from shifting.

Extension ladders must be set up with a 4:1 height-to-base ratio from the vertical surface or wall, with at least 3 feet of the ladder (usually the top three rungs) above the landing or working surface. The top of the ladder should be tied off whenever possible to prevent it from being displaced.



All ladders should be kept clear of all overhead obstructions. A general rule is that ladders must be at least 10 feet away from all power lines. Ladders should be at least 48 inches from any overhead object to allow the ladder user to pass safely beneath it.

Ladder working load ratings must be strictly observed and adhered to. The actual working load is the weight of the user, PPE, tools, equipment, and material used or carried on the ladder. The PUD shall procure ladders with a weight rating at least one rating higher than the anticipated working load. All portable ladders must be ANSI-rated to be authorized for purchase and use.

ANSI Rating	Load Capacity*	Use
Type I	250lbs	Construction and Industrial – Heavy Duty
Type IA	300lbs	Construction and Industrial – Extra Heavy Duty
Type IAA	375lbs	Construction and Industrial – Extra Heavy Duty
Type II	225lbs	Tradespeople and Farm
Type III	200lbs	Household – Light Duty

When using a portable ladder:

- Employees must use both hands and both feet when climbing.
- Do not carry anything when ascending or descending a ladder. Instead, use a tool belt, a backpack, a pouch, or another method to keep your hands free. Raise and lower objects, tools, and materials with a handline or a hoist.
- Keep the area around the top and bottom of the ladder clear.
- Do not use the last step or the top cap as a step (except with purpose-built stepstools).
- Do not use the top four rungs of an extension ladder as steps.
- Secure all portable ladders in position using anchorages or the assistance of another employee.
- Make sure extension ladders are set up with a 4:1 height-to-base ratio.
- Wear shoes with non-slip soles that are clean of mud, oil, and grease.
- Use purpose-built ladder levelers or self-leveling feet attached to the ladder when it is set on loose soil or a soft base.
- Maintain three points of contact with the ladder at all times, whether climbing the ladder or working from it.
- Face the ladder and keep your trunk between the side rails of the ladder. Never overreach to perform work from a ladder.

Stepstools are to be treated much like other portable ladders. They are often ideal for offices, storage areas, and office environments. Stepstools have the same rating capacities as other portable ladders. Stepstools must not exceed 32 inches in height, must have tread widths of at least 10.5 inches, and must have steps spaced not less than 8 inches nor more than 12 inches apart. All ladders must be inspected by the user before use and periodically. Ladders must be checked for:

- Missing hardware, treads, or other components
- Proper spreader bar function
- Damage to braces
- Stability when fully opened
- Contamination, such as oil or grease
- Cracks, breaks, holes, or splits in the siderails, steps, rungs, or other components
- End caps on ladder feet

Damaged ladders must be taken out of service immediately and not used under any circumstances. Damaged ladders should be appropriately disposed of in the PUD yard's refuse containers. To prevent further use, the damaged ladder should be cut vertically along its length to render it unusable or otherwise destroyed.

Ladders that are displaced, involved in a fall, or are subject to other incidents that could cause damage must be inspected before further use.

### **Fixed ladders**

Fixed ladders are used at the PUD to access roofs, the tops of water reservoirs, the interiors of in-ground utility vaults, and for other related purposes.

Fixed ladders that are installed after 2006 must comply with ANSI A14.3, 2002 edition, American National Standard for Ladders-Fixed Safety Requirements.

Ladder cages have been a part of utility fixed ladder systems for decades. Ladder cages do not provide adequate fall protection on their own. Case studies have shown that ladder cages make high-angle rescues of injured workers very difficult for rescuers. Also, ladder cages have been shown to cause injuries to ladder users protected by ladder safety systems, who would otherwise have been uninjured had the ladder cage not been present. State and federal rules regarding fixed ladder cages were adopted in 2017.

Existing fixed ladders taller than 24 feet must have a ladder safety system installed before November 2036.

New fixed ladders taller than 24 feet must have a ladder safety system installed at the time of construction.

Existing fixed ladders with a cage must have the cage removed when a ladder safety system is installed.

Fixed ladder cages must comply with WAC 296-876-600 until they are phased out of use in 2036. If a ladder cage is found not to comply with the regulation, it shall be removed rather than altered.

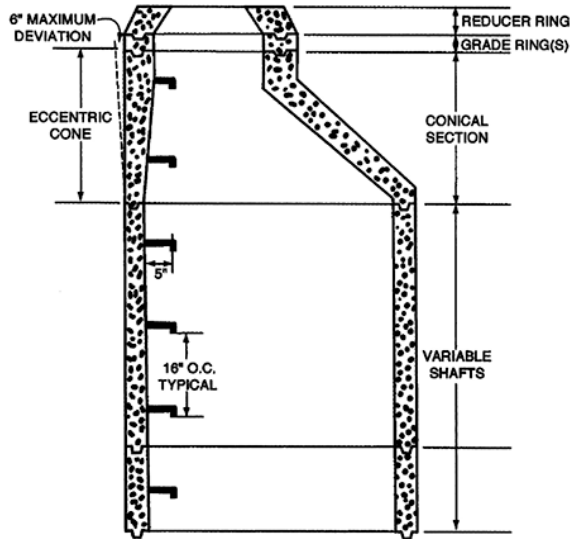
Landing and resting platforms on fixed ladders are not required to be installed so long as the bottom of the ladder either has a lockable closing that covers the bottom 6 feet of the ladder, or the fixed ladder is installed so that the bottom is elevated off the ground at least 6 feet, to prevent unauthorized access.

Fixed ladders on water reservoirs and any attached safety equipment must be inspected annually during annual health inspections.

### **Utility hole access**

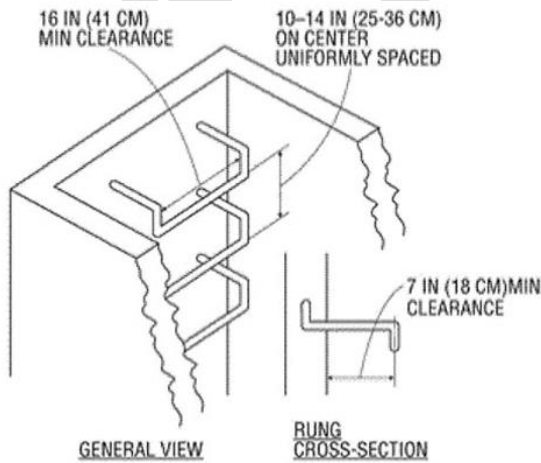
Utility hole accesses to PUD facilities should be limited and phased out wherever possible because of the difficulty in ensuring safe entry and effective rescue. Instead, single and twin-panel vault openings should be installed.

Utility hole steps are regulated by fixed ladder safety requirements and by WAC 296-876-90010.



**Rung ladder access**

An individual rung ladder is a type of fixed ladder consisting of individual steps or rungs mounted directly into a structure. This category of ladder does not include utility hole accesses and is regulated by WAC 296-876-60030.



## Scaffolds

Scaffolds are temporary elevated platforms that support employees or materials.

A typical rolling scaffold is shown below.



Scaffolds used at the PUD shall be supported scaffolds. Scaffolds can consist of one or more platforms supported by rigid means such as outrigger beams, brackets, poles, legs, uprights, posts, or frames. Mobile scaffolds are supported scaffolds that are on casters or wheels.

All scaffolding must be fully planked with planks secured so they cannot move.

Scaffolds that are 10 feet or more in height must have standard guardrails, mid-rails, and toe boards (or netting). If guardrails cannot be provided or installed, then employees must use a personal fall arrest system with an overhead anchoring point.

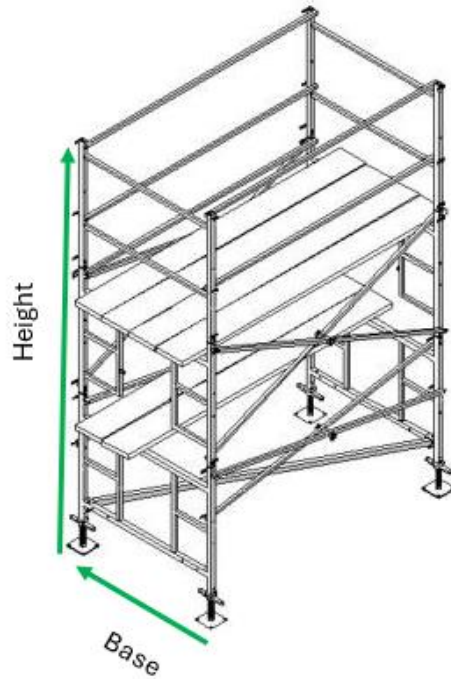
Work from scaffold platforms that are 10 feet or more above the level on which the scaffold rests requires a site-specific fall protection work plan.

Guardrails must not be used as a fall protection anchor point unless the manufacturer of the scaffold system specifies otherwise.

Scaffolds must not be moved horizontally while employees are on them, unless the scaffold is designed to be moved safely.

Employees must not work on scaffolds outside during storms, high winds, or when working surfaces are covered in ice.

Unanchored scaffolding shall not have a height-to-base ratio greater than 4:1. For most prefabricated scaffolding, this means the scaffold cannot have more than 3 supported platform levels without anchors to prevent tipping.



To prevent movement, scaffolding with a height-to-base ratio greater than 4:1 must be secured to a structure at intervals not exceeding 30 feet horizontally and 20 feet vertically.

Walls and structures supporting exterior scaffolding must be capable of supporting the weight of the scaffolding and 4 times its maximum intended load.

Fabricated frame scaffolds must be designed by a professional engineer licensed in Washington state. Engineered scaffolds must meet the requirements of WAC 296-874-400.

### **Mobile elevated work platforms**

PUD employees must comply with requirements in WAC 296-869 and ANSI A92 when operating owned or leased mobile elevating work platform (MEWP) equipment. MEWPs include:

- Scissor lifts and vertical personnel lifts, where the elevating platform cannot move beyond the base of the unit
- Aerial lifts, and boom, telescoping, and articulating lifts, where the platform can move beyond the base of the unit

Only PUD employees who are trained in the type of MEWP they are to use are considered competent and are authorized to use an MEWP.

MEWPs must be inspected by the user before use.

Work performed from an MEWP platform 10 feet or more above the surface under the platform requires a site-specific fall protection work plan.

PUD employees must only use scissor or boom lifts with a work platform fully enclosed by a standard guardrail system.

In addition to installed guardrails, personal fall restraint is always required for employees using boom lifts.

Typically, personal fall restraint is not required when using a scissor lift if the guardrails are in place. However, if the manufacturer's instructions or unit decals indicate that users must wear a fall restraint, PUD employees must use appropriate fall restraint systems.

Fall restraint lanyards used in scissor lifts and boom lifts must be anchored to purpose-built anchorage points provided and approved by the lift's manufacturer. Only one employee can anchor to the lift's anchor points at a time, unless more than one anchor is provided. Anchoring to the lift's guardrails is prohibited.

Transfer from the work platform of a scissor or boom lift to another work surface is not allowed unless the lift is designed explicitly for such transfers and the employee is protected by a fall protection system during the transfer.

Guardrails on scissor or boom lifts must not be used to support equipment, materials, or personnel.

Scissor and personnel lifts must be lowered to their base position before traveling the lift horizontally or moving the lift to another work area.

Lift users must use a spotter person on the ground to assist the lift operator if vehicular or pedestrian traffic is present in the area where the lift is being used.

## **Training**

### Fall protection

All PUD employees must be oriented and trained to the fall hazards they are expected to encounter while performing their work.

Administrative and office employees may require training to become aware of and reduce slip, trip, and fall hazards in their work areas.

Employees who may be exposed to heights greater than 10 feet require training that covers the following topics:

- The nature of fall hazards in the work area
- When fall protection is required
- What type of fall protection is required
- The correct use of fall protection equipment
- Limitations of fall protection equipment
- Proper care, maintenance, useful life, and removal of service of fall protection equipment

Fall protection training does not need to be repeated. However, it should be repeated if new fall hazards are discovered and systems to protect employees are adopted for use.

### Ladders

All PUD employees who are expected to use ladders (including stepstools) must be trained before using them.

Employees who need to use ladders require training that covers the following topics:

- The recognition of ladder use hazards and the processes to minimize those hazards
- The proper construction, use, placement, and care in handling ladders
- The maximum intended load capacities of the ladders that are used
- The applicable requirements in WAC 296-876-600

Ladder safety training does not need to be repeated. However, training should be repeated if a new ladder use arises or a new type of ladder is adopted.

### Scaffolds

All PUD employees who are expected to use scaffolds must be trained in their use.

Employees who need to use scaffolds require training that covers the following topics:

- Hazards in the area where the scaffold will be used
- The procedures for erecting, disassembling, moving, using, inspecting, and maintaining the scaffold being used
- The design criteria, maximum intended load capacity, and intended use of the scaffold
- The design limitations and procedures to ensure scaffolds remain safe while being used
- Any other requirements of WAC 296-874-200 that apply

Scaffold safety training does not need to be repeated. However, training should be repeated if a new type of scaffold is adopted or a new situation arises that requires its use.

### Mobile elevated work platforms

All PUD employees who are expected to use MEWPs must be trained before using them.

Employees who need to use MEWPs require model or type-specific training that covers the following topics:

- The manufacturer's operating and maintenance instructions
- The ability to know and use all user controls on the MEWP
- The intended use of the MEWP
- The hazards in the area where the MEWP will be used
- How to properly set up the MEWP for safe use
- Traveling the lift and driving it safely
- Elevating, lowering, articulating, and booming the platform
- Working safely from the platform
- What to do when malfunctions or unsafe conditions occur

### **Recordkeeping**

All training documents must be kept for at least 7 years.

Site-specific fall protection work plans must be retained for as long as the fall hazard (or facility) exists, or for a minimum of 6 years, whichever is longer.

Fall protection anchorage inspection, pull test data, and other relevant documents must be kept for the life of the anchor.

All other documents pertaining to the fall protection, ladder safety, scaffold safety, and MEWP safety program must be kept for a minimum of 6 years.

Former Title/Policy #:	N/A
Effective Date:	
Revision Date:	
General Manager Signature:	Date:

DRAFT



## Site-specific fall protection work plan

For low-slope elevated surfaces (water reservoirs, catwalks, etc.) over 10 feet high

WAC 296-880-10020: A written fall protection work plan is required when employees are exposed to fall hazards of 10 feet or more. This plan must be available on the job site for affected employees to use and for inspection.

Work Site Name	Date
Site Address	

All affected employees must understand this plan before beginning work. This plan is valid only for one shift per day.

### Discussion

This plan shall apply only to elevated work sites with low-slope surfaces. Low-sloped surfaces are defined as 4:12, or 4 feet of rise for every 12 feet of run or less.

For work on a steep-sloped surface greater than 4:12, employees must consult the safety manager to develop a site-specific fall protection work plan tailored to the site's specific hazards.

Hazards at the PUD's low-sloped elevated surface sites include open-sided floors and working surfaces, the use of a mobile lift to access the work area, and transitions between fall protection systems.

### Key definitions

Fall restraint – the method used to prevent falls by keeping employees from approaching the edge of a walking or working surface. Examples include the use of guardrails or the use of a rope grab system to prevent the employee from approaching the unprotected edge of an elevated work area.

Fall arrest- the methods and materials used to stop and/or soften the impending impact of an employee who has fallen. Examples include the use of a fall restraint harness, a lanyard, and an anchoring system while working over the edge of an elevated work area.

Work on low-sloped work surfaces must be conducted using **fall restraint**. At no time, except when accessing a water reservoir using a fixed ladder system, shall **fall arrest** be used.

The methods of fall protection can include any of the following, check all that apply:

<input type="checkbox"/>	Guardrail system (low-slope only)	<input type="checkbox"/>	Personal fall restraint system
<input type="checkbox"/>	Warning line System (low-slope only)	<input type="checkbox"/>	Vertical lifelines and rope grab
<input type="checkbox"/>	Horizontal lifelines		

All employees and visitors to the work site must wear a hard hat while on the ground within 50 feet of the elevated work area during active work. Employees above must maintain positive control of all materials and ensure they do not fall.

Revised January 2026

Employees will erect fall protection before work begins. The use of a powered lift or boom trucks to lift materials to the elevated surface may be done with a person standing on the elevated surface to receive materials from behind installed guardrails, or while anchored to a personal fall restraint system.

A site-specific diagram of the work area and fall protection must be attached to this plan.

Employees shall store all work equipment and materials as far from the elevated surface's edge as possible. Equipment being used must always be under an employee's positive control. Employees must never intentionally drop or throw tools or other items onto or towards others on elevated surfaces, into powered lifts, or onto the ground. Always walk or use hand lines to move materials, equipment, and other objects to others.

If unsure how to proceed safely, stop all work and contact your supervisor and the safety manager before proceeding.

**Emergency Procedures**

If an employee is injured on the site, stop all work immediately and contact 911. Take all actions possible to prevent further injury first. Once it appears that the injured employee's situation has been addressed, contact your supervisor and the safety manager immediately.

If an employee is trapped/suspended above ground in distress, contact 911 immediately. Notify the 911 dispatcher of the employee's suspension above the ground. If it is possible to safely reach the injured employee with equipment already on-site, such as a powered lift or boom, this can be attempted while awaiting emergency responders to arrive.

Employees who received fall protection training on the above site-specific fall protection work plan:

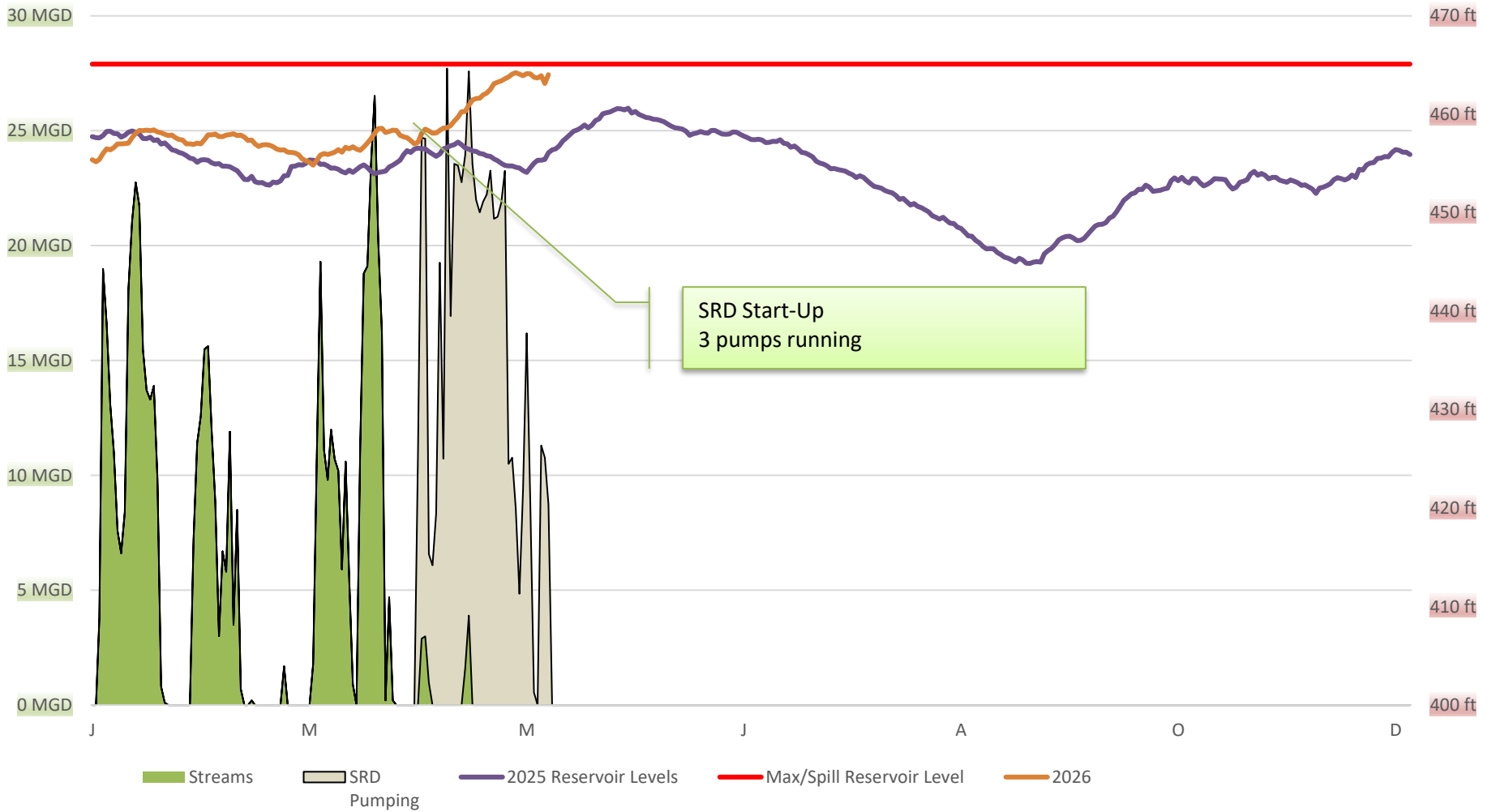
Printed Name	Signature	Date

**Site-specific diagram**

Revised January 2026

# 2026 Judy Reservoir Inflows & Elevation

April 30 Elevation:	463.92 (ft)
May 07 Elevation:	464.04 (ft)
Change in Elevation:	0.12 (+ 1.4 Inches)
Spillway Elevation:	465.10
Stream Inflow YTD:	306.39 MG
Skagit River YTD:	587.21 MG



### 5-YEAR JUDY RESERVOIR ELEVATIONS

