SAUDI ARABIAN OIL COMPANY (Saudi Aramco) G. I. Number **Approved** 8.001 **GENERAL INSTRUCTION MANUAL** ISSUE DATE REPLACES ISSUING ORG. LOSS PREVENTION DEPARTMENT 06/28/04 09/15/2003 APPROVAL PAGE NO. **SUBJECT** SAFETY REQUIREMENTS FOR SCAFFOLDS

HJK

1 OF 15

### **CONTENTS:**

- 1.0 **PURPOSE**
- 2.0 **DEFINITIONS & ACRONYMS**
- 3.0 **GENERAL PROVISIONS**
- 4.0 SCAFFOLD PLAN PREPARATION AND REVIEW
- 5.0 SCAFFOLD ERECTION
- 6.0 INITIAL INSPECTION AND TAGGING
- **ALTERATIONS** 7.0
- 8.0 PERIODIC INSPECTIONS
- 9.0 **DISMANTLING**
- 10.0 RESPONSIBILITIES
- 11.0 **CERTIFICATION**

#### 1.0 **PURPOSE**

This General Instruction (GI) provides the minimum administrative requirements for the safe design, erection, supervision, inspection, use, alteration, and dismantling of stationary and mobile scaffolds with fixed platform heights at all onshore and offshore Saudi Aramco facilities and project sites. This GI applies to scaffolds erected either by contractors or by Saudi Aramco departments in support of construction, operations, or maintenance activities.

#### 2.0 **DEFINITIONS**

- 2.1 **Bracket** (Tank Builder's) Scaffold – a scaffold supported by bracket straps welded to the tank or vessel wall. Upright brackets are hooked to the straps.
- 2.2 **Fabricated Tubular Frame Scaffold** – a scaffold consisting of a platform(s) supported on fabricated end frames with integral posts.
- 2.3 Guardrails – toprails and midrails erected to prevent workers from falling off an elevated work area.
- 2.4 **Lanyard** - a flexible line with a positive means to lock end connections closed (i.e., locking type snap hooks or carabineers with a self-closing, self-locking keeper) that is used to secure the wearer of a full body harness to a lifeline or a point of anchorage.
  - **Shock-absorbing Lanyard** a specially designed lanyard with a built-in shock absorber that elongates during a fall, so that fall arresting forces are significantly reduced when compared to a traditional web or rope lanyard.
- 2.5 **Mobile Scaffold** – a rigid scaffold assembly supported by casters and manually moved horizontally.

| * CHANGE | ** ADDITION | NEW INSTRUCTION $\square$ | COMPLETE REVISION $\square$ |
|----------|-------------|---------------------------|-----------------------------|
|          |             |                           |                             |

| SAUDI ARABIAI                    | N OIL COMPANY (Saudi Aramco)      | G. I. Number           | Approved               |
|----------------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL 8.001 |                                   | 01                     |                        |
| ISSUING ORG.                     | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                          | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>2 OF 15    |
|                                  |                                   |                        |                        |

- 2.6 **Personal Fall Arrest System** a system used to arrest an individual's fall. It consists of a substantial anchorage, full body harness, and lanyard, and may include a deceleration device, lifeline, or suitable combinations of these.
- 2.7 **Platform** an elevated work area composed of one or more platform units and a guardrail system.
- 2.8 **Platform Unit** an individual wood plank, fabricated plank, fabricated deck, or fabricated platform.
- 2.9 **Point of access** the stepping-on point for all ladders, stairs, etc. used to gain initial access to a scaffold. Upper ladders within a scaffold are not considered a point of access.
- 2.10 **Proponent** any Saudi Aramco organization (or its authorized representative) that has been assigned to occupy and/or operate in any community or plant (industrial and non-industrial) facility or building. For capital projects under construction within an existing facility, the Proponent shall be the owner of that facility. For grassroots capital projects under construction, the Proponent shall be the organization responsible for executing the project.
- 2.11 **Qualified Structural Engineer** an engineer working for the Specialized Scaffolding Contractor who has a college degree in civil/structural engineering and who is knowledgeable, experienced, and working in the field of engineering analysis and design of scaffolds.
- \* 2.12 **Scaffold** a temporary structure (base-supported or underhung) used for supporting workmen and/or materials at any height.
  - 2.13 **Scaffold Craftsmen (Scaffolders)** employees of the Scaffold Erector who work under the direct supervision of a Scaffold Supervisor and who erect, alter, or dismantle scaffolds. Scaffold craftsmen shall be trained and qualified to perform scaffolding work, but are *not* certified by Saudi Aramco.
  - 2.14 **Scaffold Erector** the *organization* responsible for the proper design, erection, alteration, and dismantling of the scaffold. May be either a Saudi Aramco maintenance organization or an outside contractor.
  - 2.15 **Scaffold Field Inspection Checklists** checklists with minimum requirements for field inspection of various types of scaffolds (see the Loss Prevention Intranet website). The various Scaffold Field Inspection Checklists and their applicability are:
    - "Base-Supported, Non-Movable Scaffold Field Inspection Checklist" (Saudi Aramco Form 9614). To be used for field inspection of fixed scaffolds supported at their base.
    - "Mobile Scaffold Field Inspection Checklist" (Saudi Aramco Form 9615). To be used for field inspection of mobile scaffolds.
    - "Underhung Scaffold Field Inspection Checklist" (Saudi Aramco Form 9616).

| SAUDI ARABIA   | N OIL COMPANY (Saudi Aramco)   | G. I. Number                    | Approved                         |
|----------------|--|---------------------------------|----------------------------------|
| <b>GENERAL</b> | INSTRUCTION MANUAL   | 8.0                             | )01                              |
| ISSUING ORG.   | LOSS PREVENTION DEPARTMENT   | ISSUE DATE<br>06/28/04          | REPLACES<br>09/15/2003           |
| SUBJECT        | SAFETY REQUIREMENTS FOR SCAFFOLDS  | APPROVAL<br>HJK                 | PAGE NO.<br>3 OF 15              |
|                | To be used for field inspection of underhung (suspended) scaff   | olds.                           |                                  |
|                | • "Bracket Scaffold Field Inspection Checklist" (Saudi Aramco la To be used for field inspection of bracket (tank builder's) scaff   |                                 |                                  |
| *              | • "Scaffold Field Inspection Checklist" in the <i>Saudi Aramco Blu</i> by the Scaffold Erector and should be used in lieu of the above Supervisors and Inspectors who are <i>certified</i> by Saudi Aramco   | checklists by                   | -                                |
| * 2.16         | <b>Scaffold Inspector</b> – a Saudi Aramco or contractor employee we experience, and capability of performing scaffold inspection tasks be hazards, verifying compliance with applicable standards, and record All Scaffold Inspectors shall be certified by Saudi Aramco (see section   | by identifying ing inspection   | scaffold                         |
| 2.17           | <b>Scaffold Plan</b> – a scaffold design/layout package sufficient to erect a scaffold plan submitted for review by Saudi Aramco shall include discaffold material specifications and sizes, manufacturer's technical fittings, etc. (including structural calculations required for Special requested for other scaffolds).   | rawings, desig<br>data for coup | gn loads,<br>olers and           |
| 2.18           | <b>Scaffold Plan Completeness Checklist</b> – a checklist (Saudi Ara verifying completeness of information shown on a scaffold plan (se Intranet website).   |                                 | ,                                |
| * 2.19         | <b>Scaffold Supervisor</b> – a full-time employee of the Scaffold Erector supervisor of craftsmen erecting, altering, or dismantling scaffolds in is responsible, and who has the authority, training, and experience needirect scaffolding work and verify compliance with applicable st Supervisors shall be certified by Saudi Aramco (see section 11.0).   | the area for vessary to com     | which he npetently               |
| * 2.20         | <b>Scaffold Tag</b> – a standard Saudi Aramco holder with inserts (restricted Saudi Aramco facilities and project sites) for clearly showing whe meets Saudi Aramco's requirements. The Proponent shall provide Scaffold Erector, unless specified otherwise in the contract (in who Erector shall purchase authentic scaffold tags only from the Saudi supplier). Scaffold tags are color coded as follows: | ther or not a scaffold tag      | scaffold<br>s to the<br>Scaffold |
|                | • <b>Red Scaffold Tag</b> – indicates that the scaffold has not been in  | nspected or is                  | not safe                         |

and is safe for use at the time of inspection. A green scaffold tag is valid for a maximum of two weeks. Only authentic Saudi Aramco approved green scaffold tag inserts (SAP Material Number 1000123290) are to be used as green scaffold tags.

for use (by anyone other than scaffold craftsmen). The red scaffold tag is also a holder into which either green or yellow scaffold tag inserts are to be placed, as applicable. Only authentic Saudi Aramco approved red scaffold tag holders (SAP

Green Scaffold Tag – indicates that the scaffold is complete, has been inspected,

\* CHANGE \*\* ADDITION NEW INSTRUCTION  $\square$  COMPLETE REVISION  $\square$ 

Material Number 1000123277) are to be used as red scaffold tags.

| SAUDI ARABIA               | N OIL COMPANY (Saudi Aramco)      | G. I. Number           | Approved               |
|----------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL |                                   | 8.001                  |                        |
| ISSUING ORG.               | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                    | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>4 OF 15    |

- Yellow Scaffold Tag indicates the scaffold has been inspected and may be used only by workers wearing a properly anchored personal fall arrest system, including full body harness and lanyard. A yellow scaffold tag is required whenever all guardrails or planks cannot physically be installed (i.e., due to interferences) or must be temporarily removed. A yellow scaffold tag does not permit intentional erection of an incomplete scaffold. A yellow scaffold tag is valid for a maximum of two weeks. Only authentic Saudi Aramco approved yellow scaffold tag inserts (SAP Material Number 1000123293) are to be used as yellow scaffold tags.
- 2.21 **Scaffold User's Safety Checklist** a checklist to assist users of a scaffold and Work Permit Issuers/Receivers in performing a pre-use safety inspection. This checklist is on the reverse side of the green and yellow scaffold tags.
- \* 2.22 **Special Scaffold** a structural engineering review of the scaffold plan, by Saudi Aramco Consulting Services Department (CSD), is required for the following special scaffolds:
  - Any scaffold over 38 meters (125 feet) tall
  - A tube and coupler scaffold which exceeds the maximum limits in Section 9.11 of the Saudi Aramco *Scaffold Safety Handbook*
  - Any scaffold cantilevered (extended outward) by more than 3 meters (10 feet)
  - Any scaffold (except tank bracket scaffolds) with a total platform area over 30 square meters (320 sq. ft.) that is supported by or hung from an existing structure (e.g., building, roof, pipe rack, offshore platform) or is within 3 meters (10 feet) of any other scaffold supported by or hung from the same structure.
  - Any scaffold supporting loads greater than 240 kg/sq.m. (50 psf), including piping, equipment, masonry, new or existing structures, or loads other than workers and their materials
  - Any scaffold supported by or hung from one or more outrigger beams
  - Any scaffold supported by or hung from wind girders or roofs of floating roof tanks.
- \* 2.23 **Specialized Scaffolding Contractor** a contractor Scaffold Erector (organization) that specializes in and regularly performs all phases of scaffold design and erection. For the purposes of this GI, a Specialized Scaffolding Contractor may be either an independent scaffolding company or the scaffold division/unit of a local company and shall be approved by Saudi Aramco. Scaffold design and erection shall be the sole business of a Specialized Scaffolding Contractor (company or division/unit). Contractors currently on the Saudi Aramco General Bid Slate (GBS) for Scaffolding Services are approved Specialized Scaffolding Contractors. Other contractors (non-GBS) interested in being considered for approval as a Specialized Scaffolding Contractor shall submit their completed Non-GBS Qualification Questionnaire (available on the Loss Prevention Intranet website) *through their Proponent* to the Manager, Loss Prevention Department, for review by the Specialized Scaffolding Contractor Evaluation Team (SSCET). This review takes at least 3 months.

| SAUDI ARABIA               | N OIL COMPANY (Saudi Aramco)      | G. I. Number           | Approved               |
|----------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL |                                   |                        | 01                     |
| ISSUING ORG.               | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                    | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>5 OF 15    |

- 2.24 **Structural Alteration** any change in the framing configuration of the structural elements (used to carry load or for stability) of an existing scaffold.
- 2.25 **System Scaffold** a scaffold consisting of posts (standards) with fixed connection points that accept runners (ledgers), bearers (transoms) and braces that can be interconnected at predetermined levels.
- 2.26 **Tube and Coupler Scaffold** a scaffold constructed of: steel tubing that serves as posts (standards), runners (ledgers), bearers (transoms), braces, and ties; a base supporting the posts; and specially designed scaffold couplers that serve to connect the various members.

#### \* 2.27 **ACRONYMS**

3.0

ALPD Area Loss Prevention Division
 CSD Consulting Services Department
 CSM Construction Safety Manual

• GBS General Bid Slate for Scaffolding Services

• GES General Engineering Services (design consultant)

LPD Loss Prevention Department
 PMT Project Management Team
 PPE Personal Protective Equipment

• SSCET Specialized Scaffolding Contractor Evaluation Team

SSH Scaffold Safety HandbookT&CD Training & Career Development

# GENERAL PROVISIONS

- 3.1 All scaffold work shall meet the requirements of this General Instruction, the Saudi Aramco *Scaffold Safety Handbook* (SSH), and the Saudi Aramco *Construction Safety Manual* (CSM). Chapter II, Section 9 of the CSM is available as the separately bound SSH. The SSH governs and shall be used instead of older versions of the CSM scaffold Chapter II, Section 9 (dated 1993 or before).
- All scaffolds shall be built in accordance with the work process/decision flowchart in Supplement 8.001-1, including formal scaffold plan review, inspection, tagging, etc. However, non-mobile, base-supported scaffolds less than 1.8 meters (6 feet) tall do not need to be in accordance with Supplement 8.001-1, unless located near the edge of an elevated structure with a protected or un-protected fall potential of more than 1.8 meters (6 feet).
  - 3.3 Effective July 1, 2003, Special Scaffolds and scaffolds over 12.2 meters (40 feet) tall shall only be designed, erected, altered, inspected, and dismantled by a Saudi Aramco approved Specialized Scaffolding Contractor. However, Saudi Aramco maintenance organizations that specialize in offshore work are permitted to design, erect, alter, and dismantle scaffolds over 12.2 meters (40 feet) tall and Special Scaffolds on remote offshore platforms for their own use only.

| SAUDI ARABIA | N OIL COMPANY (Saudi Aramco)      | G. I. Number           | Approved               |
|--------------|-----------------------------------|------------------------|------------------------|
| GENERAL      | INSTRUCTION MANUAL                | 8.001                  |                        |
| ISSUING ORG. | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT      | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>6 OF 15    |

- 3.4 If an approved Specialized Scaffolding Contractor is *not* on the General Bid Slate for Scaffolding Services (Non-GBS), they are only permitted (within Saudi Aramco) to design, erect, and alter scaffolds *for their own use* (not for hire), using their own personnel and materials.
- 3.5 For scaffolds equal to or less than 12.2 meters (40 feet) tall, the Proponent shall decide whether to use a Saudi Aramco maintenance group or an outside contractor, giving due consideration to their in-house capabilities and the complexity of the required scaffold(s).

### 4.0 SCAFFOLD PLAN PREPARATION AND REVIEW

- 4.1 A scaffold plan, which meets all SSH requirements, shall be prepared by the Specialized Scaffolding Contractor for all scaffolds over 12.2 meters (40 feet) in height, for all Special Scaffolds, or for any other scaffold as requested by Loss Prevention.
- 4.2 The Specialized Scaffolding Contractor shall ensure that every scaffold plan is complete and in accordance with the "Scaffold Plan Completeness Checklist." The Specialized Scaffolding Contractor shall complete and attach this checklist to every scaffold plan, prior to submitting the scaffold plan to the Proponent for review.
- 4.3 The Specialized Scaffolding Contractor shall ensure that the scaffold plan for any Special Scaffold is checked and the design verified and signed by a Qualified Structural Engineer, prior to submitting the scaffold plan to the Proponent for review. For scaffolds requiring a scaffold plan and supported by an existing structure, the Qualified Structural Engineer shall compute or verify scaffold support reactions (including wind). These support reactions shall be submitted to the Proponent for use in confirming the adequacy of the existing structure to support the scaffold loads.
- \* 4.4 For contracts signed after the issue date of this GI, the Specialized Scaffolding Contractor shall utilize an independent Saudi Aramco approved General Engineering Services (GES) design consultant, or the structural engineering group of the project's Lump Sum Turnkey (LSTK) contractor, to prepare or review and approve the structural calculations and scaffold plan for any scaffold categorized as a Special Scaffold. This engineering shall be performed by qualified structural engineer(s) prior to submittal of the scaffold plan to Saudi Aramco for approval and shall be in accordance with the design criteria in SSH Addendum #2.
  - 4.5 The Proponent shall review every scaffold plan for completeness and verify that the scaffold meets job functionality, access, and clearance requirements, prior to submitting the scaffold plan for review by the Loss Prevention Department (LPD). For scaffolds requiring a scaffold plan and supported by an existing structure, the Proponent's designated engineering organization is responsible for confirming the adequacy of the existing structure to support

#### SAUDI ARABIAN OIL COMPANY (Saudi Aramco) G. I. Number Approved 8.001 **GENERAL INSTRUCTION MANUAL** ISSUE DATE REPLACES ISSUING ORG. LOSS PREVENTION DEPARTMENT 06/28/04 09/15/2003 APPROVAL PAGE NO. **SUBJECT** SAFETY REQUIREMENTS FOR SCAFFOLDS HJK 7 OF 15

the scaffold loads (including wind loads) and for ensuring that all necessary precautions (i.e., shoring) are taken.

- 4.6 The Proponent shall submit the scaffold plan (if required per paragraph 4.1) to the local Area Loss Prevention Division (ALPD) office for review at least two weeks prior to erection (four weeks for Special Scaffolds). This lead time is necessary to allow adequate time for scaffold plan transit, review, rework, and acceptance.
- 4.7 The ALPD shall review every scaffold plan for conformance to *Scaffold Safety Handbook* (SSH) requirements. If all needed information accompanies the scaffold plan (per "Scaffold Plan Completeness Checklist") and no rework is required, review and acceptance will be completed within one week after receipt of the scaffold plan. If rework is required, ALPD shall work with the Proponent to ensure that the Specialized Scaffolding Contractor satisfactorily corrects noted deficiencies. A copy of the revised scaffold plan shall be sent to the same ALPD office for verification that their comments were satisfactorily addressed.
- 4.8 For Special Scaffolds, the Proponent shall submit another scaffold plan (after ALPD review and rework) to Consulting Services Department (CSD) Civil Engineering Unit. CSD shall perform a structural engineering review of the scaffold plan for Special Scaffolds. However, CSD will not review, and will return for rework, any scaffold plan that is incomplete and/or not legibly prepared in accordance with the "Scaffold Plan Completeness Checklist." If all needed information accompanies the scaffold plan and no rework is required, review and acceptance will be completed within two weeks after receipt of the scaffold plan. If rework is required, CSD shall work with the Proponent to ensure that the Specialized Scaffolding Contractor satisfactorily corrects noted deficiencies. A copy of the revised scaffold plan shall be sent to CSD for verification that their comments were satisfactorily addressed.
- 4.9 A copy of the final, accepted scaffold plan shall be sent by the Proponent to the ALPD.
- 4.10 The Proponent should file the final, accepted scaffold plan for use as a model scaffold plan for similar jobs in the future.

# 5.0 SCAFFOLD ERECTION

- 5.1 Prior to scaffold erection, the Proponent representative (i.e., Work Permit Issuer) and Scaffold Supervisor shall survey the job site and take measures to mitigate potential hazards, such as: debris, overhead power lines, electrical cables, excavations, roads, etc. For scaffolds requiring a scaffold plan, the Work Permit Issuer shall verify that a scaffold plan was prepared (and reviewed by Loss Prevention) before issuing a Work Permit for scaffold erection.
- 5.2 Scaffold materials shall be inspected before, during, and after erection by the Scaffold Supervisor to ensure that they meet all SSH requirements, are in good condition, and are

| SAUDI ARABIA               | G. I. Number                      | Approved               |                        |
|----------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL |                                   | 8.001                  |                        |
| ISSUING ORG.               | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                    | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>8 OF 15    |

free of defects. Any scaffold component that is damaged, weakened, or does not meet the applicable codes and standards shall be marked with bright fluorescent orange paint and immediately removed from Saudi Aramco property. This material shall be destroyed to ensure that it is not re-used on any Saudi Aramco facility or project site.

- 5.3 Any scaffold, for which a scaffold plan was prepared, shall be erected in accordance with the final, accepted scaffold plan for that scaffold. Any required deviations from the accepted scaffold plan shall be first reviewed by the ALPD and, in the case of a Special Scaffold, by CSD.
- 5.4 All scaffolds shall be erected, altered, and dismantled only under the direction of an on-site Scaffold Supervisor employed by the Scaffold Erector. The Scaffold Supervisor shall have full supervisory authority over his scaffold craftsmen, be present at the job site during their work, and provide effective supervision of all scaffolding work under his responsibility. He shall not just show up at the end of the job to sign the scaffold tag. Only trained and experienced scaffold craftsmen shall be used for erecting, altering, and dismantling scaffolds.
- 5.5 The Scaffold Supervisor shall ensure that Personal Protective Equipment (PPE), including personal fall arrest systems, is used by his scaffold craftsmen in accordance with SSH and CSM requirements during scaffold erection, alteration, and dismantling. Each scaffold craftsman shall continuously wear a full body harness with a shock-absorbing lanyard while erecting, altering, or dismantling a scaffold. If it is possible to do so, each scaffold craftsman shall properly anchor his lanyard whenever he is not protected by a guardrail system and could fall more than 1.8 meters (6 feet). The lanyard shall be anchored to the scaffold only if a stronger anchorage is not available.
- 5.6 All scaffolds shall be continuously tagged with a Saudi Aramco red, green, or yellow scaffold tag, as applicable. During the entire time that a scaffold is being erected, altered, repaired, or dismantled, a red ("Do Not Use") scaffold tag shall be continuously attached to the scaffold at each point of access. Only the Scaffold Supervisor or Scaffold Inspector is authorized to remove a red scaffold tag. Red scaffold tags (empty holders) shall be attached to the scaffold by placing a scaffold tube through the hole in the holder during scaffold erection. Red scaffold tags (empty holders) shall not be tied to the scaffold using wire, string, etc.

## 6.0 INITIAL INSPECTION AND TAGGING

Any scaffold tagged with a red scaffold tag shall not be used, except by scaffold craftsmen for the purpose of erecting, dismantling, altering, or correcting scaffold deficiencies. Any unauthorized person using a scaffold with a red scaffold tag, and their supervision, will be subject to disciplinary action.

| SAUDI ARABIA               | N OIL COMPANY (Saudi Aramco)   | G. I. Number           | Approved               |
|----------------------------|--|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL |  | 8.001                  |                        |
| ISSUING ORG.               | LOSS PREVENTION DEPARTMENT   | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                    | SAFETY REQUIREMENTS FOR SCAFFOLDS  | APPROVAL<br>HJK        | PAGE NO.<br>9 OF 15    |
| * 6.2                      | The Scaffold Supervisor who is responsible for the scaffold shall scaffold at the job site as soon as possible after completion by his |                        | -                      |

- the Scaffold Supervisor who is responsible for the scaffold shall personally inspect the scaffold at the job site as soon as possible after completion by his craftsmen, and before workers other than scaffold craftsmen may use the scaffold. The Scaffold Supervisor shall complete and sign the applicable "Scaffold Field Inspection Checklist" during this field inspection.
- All green ("Passed Inspection") or yellow ("Full Body Harness Required") scaffold tags shall be signed by a certified Scaffold Supervisor. He shall sign in the "Scaffold Supervisor" section (not the "Scaffold Inspector" section) of the scaffold tag(s) immediately after he inspects the scaffold and determines that it is complete and safe for use in accordance with Saudi Aramco requirements. For a scaffold equal to or less than 6 meters (20 feet) tall, which is not a Special Scaffold, only the certified Scaffold Supervisor is required to sign the scaffold tag(s) and he shall write the "Date of Next Inspection" on the tag(s). The next inspection date shall *not* be more than two weeks after the date when he completed his present inspection. For a scaffold equal to or less than 6 meters (20 feet) tall that is not a Special Scaffold, the Supervisor shall insert his signed green or yellow tag into the previously installed holder. However, for scaffolds over 6 meters (20 feet) tall and Special Scaffolds, the Supervisor shall give his signed tag(s) to a certified Scaffold Inspector.
- Scaffolds over 6 meters (20 feet) tall and Special Scaffolds shall *also* be inspected by a certified Scaffold Inspector (who is not the Supervisor for that scaffold). The Inspector shall personally complete his inspection at the job site as soon as possible *after* the Scaffold Supervisor completes his inspection. Both the Scaffold Supervisor and Inspector shall complete and sign separate "Scaffold Field Inspection Checklists." After the Inspector determines that the scaffold is complete and safe for use in accordance with Saudi Aramco requirements, he shall also sign the same green or yellow scaffold tag(s) that were previously signed by the Scaffold Supervisor. The Inspector shall only sign scaffold tag(s) in the "Scaffold Inspector" section (not in the "Scaffold Supervisor" section). The Inspector shall write the "Date of Next Inspection" on the green or yellow scaffold tag(s). The next inspection date shall *not* be more than two weeks after the date when he completed his present inspection. For scaffolds over 6 meters (20 feet) tall and Special Scaffolds, the Inspector shall insert the green or yellow scaffold tag, signed by *both* himself and the Scaffold Supervisor, into the previously installed holder.
  - 6.5 After each field inspection, the Scaffold Supervisor (and Inspector, if required per paragraph 6.4) shall give his signed "Scaffold Field Inspection Checklist" to either the Work Permit Issuer's unit or the Saudi Aramco project site office (as applicable), who will keep it on file until the scaffold has been dismantled.
  - 6.6 Both the Scaffold Supervisor and the Scaffold Inspector shall each have completed their inspection and signed the appropriate scaffold tag(s) before any scaffold over 6 meters (20 feet) tall, or any Special Scaffold, may be tagged with anything other than red scaffold tag(s), or used by anyone other than scaffold craftsmen.

| SAUDI ARABIA                     | N OIL COMPANY (Saudi Aramco)      | G. I. Number           | Approved               |
|----------------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL 8.001 |                                   | 001                    |                        |
| ISSUING ORG.                     | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                          | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>10 OF 15   |

- 6.7 For any scaffold with platform(s) which physically cannot be completely erected (i.e., interference with equipment or structure prevents installation of all guardrails or planks), yellow scaffold tag(s) (instead of green scaffold tags) shall be signed by the Scaffold Supervisor (and Inspector if required per paragraph 6.4) and securely affixed to the scaffold, in a clearly visible location at each point of access. In no case shall a scaffold that is missing members required for structural stability (i.e., bearers, runners, posts, or braces) be tagged with yellow or green scaffold tag(s). Use of a yellow scaffold tag does not permit intentional erection of incomplete scaffolds.
- 6.8 Only the Scaffold Supervisor (and Inspector, if required per paragraph 6.4) is authorized to sign or affix green or yellow scaffold tag(s). The Scaffold Supervisor (and Inspector) shall not sign scaffold tag(s) for any scaffold he considers to be unsafe or incorrect. The Scaffold Supervisor (and Inspector) are not accountable if others alter, without their knowledge, a scaffold with a scaffold tag they previously signed.
- 6.9 Each green or yellow scaffold tag (insert) shall be securely and completely inserted into the red scaffold tag (holder) such that it hides the red "Do Not Use" warning message. The front face of the green or yellow scaffold tags (with signatures) shall be clearly visible at all times. Only permanent ink pens (Saudi Aramco SAP Material Number 1000123296) are to be used to write on and sign green and yellow scaffold tags. All green and yellow scaffold tags shall have a maximum validity of two weeks.
- 6.10 Red, green, and yellow scaffold tags shall not be removed or re-used elsewhere prior to dismantling the scaffold to which they are attached. Anyone who makes an unauthorized removal or alteration of a scaffold tag shall be subject to disciplinary action.

# 7.0 ALTERATIONS

- 7.1 Only scaffold craftsmen, under the direct supervision of a Scaffold Supervisor employed by the Scaffold Erector who originally erected the scaffold, are permitted to alter or repair any part of an existing scaffold, including guardrails, planks, and ladders.
- 7.2 The altered scaffold shall be re-inspected by a Scaffold Supervisor (and Scaffold Inspector, if required per paragraph 6.4) after each alteration. If the scaffold is safe for use, newly signed green or yellow scaffold tags (as applicable) shall be securely attached to the scaffold prior to re-use.
- 7.3 Neither the Scaffold Supervisor, nor any other employee of the Scaffold Erector, is authorized to make any scaffold alteration which in their opinion is unsafe.

SAUDI ARABIAN OIL COMPANY (Saudi Aramco)

GENERAL INSTRUCTION MANUAL

ISSUING ORG. LOSS PREVENTION DEPARTMENT

G. I. Number Approved

8.001

ISSUE DATE REPLACES
06/28/04 09/15/2003

APPROVAL

HJK

PAGE NO.

11 OF 15

### 8.0 PERIODIC INSPECTIONS

SAFETY REQUIREMENTS FOR SCAFFOLDS

**SUBJECT** 

- 8.1 At least every two weeks, each scaffold shall be re-inspected by a Scaffold Supervisor employed by the Scaffold Erector who erected the scaffold (and a Scaffold Inspector, if required per paragraph 6.4). This bi-weekly inspection is to determine if the scaffold has been improperly altered and is still safe for use. The Scaffold Supervisor (and Scaffold Inspector, if required per paragraph 6.4) shall sign and attach green or yellow scaffold tag(s), valid for not more than two weeks, to the scaffold if it is still safe for use. If a scaffold has been improperly altered or is unsafe, the Scaffold Supervisor shall ensure it is tagged with a red scaffold tag. Alternatively, he may immediately correct the deficiencies and sign and attach another green or yellow scaffold tag(s) as applicable.
- 8.2 Prior to the first use on each shift, the immediate supervisor of the workers who will be using the scaffold (usually the Work Permit Receiver), and the Work Permit Issuer (or his designated representative if a joint site inspection is required per GI 2.100, "Work Permit System"), shall perform a pre-use inspection of the scaffold. This pre-use inspection is to ensure that the scaffold has not been improperly altered, that no major safety defects are present, and that green or yellow scaffold tag(s) are in place and still valid (date of next inspection has not passed). The "Scaffold User's Safety Checklist," on the reverse side of the green or yellow scaffold tag, should be used to assist in this pre-use inspection.
- 8.3 If at any time (such as during the pre-use inspection) it is determined that a scaffold is unsafe or that the green or yellow scaffold tags are no longer valid (date of next inspection has passed), the green or yellow scaffold tag(s) shall be removed and the scaffold tagged with red ("Do Not Use") scaffold tag(s). Whenever this is done, the person who removed the green or yellow scaffold tag(s) shall immediately notify the Proponent and/or Work Permit Issuer so that the Work Permit may be promptly withdrawn and corrective action initiated. All work requiring use of the scaffold shall stop until corrective action is taken.
- 8.4 The Work Permit Issuer shall not issue a Work Permit for anyone (other than scaffold craftsmen) to work on any scaffold that: (1) is determined to be unsafe during the pre-use inspection, (2) does not have a green or yellow scaffold tag, (3) has a red scaffold tag, or (4) has a green or yellow scaffold tag for which the date of next inspection has passed (in this case the green or yellow tag shall be removed). If the scaffold has a valid yellow scaffold tag, the Work Permit Issuer shall note on the Work Permit that use of a personal fall arrest system, including properly anchored full body harness, is required at all times by anyone working on the scaffold.

### 9.0 DISMANTLING

9.1 Immediately after completion of the scaffold's intended use, and upon verification that no other workers need to use the scaffold, the Proponent shall ensure that all green or yellow scaffold tags are removed from the scaffold and that a red ("Do Not Use") scaffold tag is

| SAUDI A | RABIAI  | N OIL COMPANY (Saudi Aramco)   | G. I. Number           | Approved                         |
|---------|---|--|------------------------|----------------------------------|
| GENE    | RAL   | INSTRUCTION MANUAL   | 8.0                    | 01                               |
| ISSUING | GORG.   | LOSS PREVENTION DEPARTMENT   | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003           |
| SUBJECT | Τ   | SAFETY REQUIREMENTS FOR SCAFFOLDS  | APPROVAL<br>HJK        | PAGE NO.<br>12 OF 15             |
|         | 0.2   | securely affixed at each point of access. The Proponent shall in Scaffold Erector that the scaffold is ready to be dismantled.   | ·                      | otify the                        |
|         | 9.2   | The Scaffold Erector shall dismantle the scaffold as soon as possible the Proponent that the scaffold is ready to be dismantled.   | _                      | ·                                |
|         | 9.3 The Scaffold Supervisor shall ensure that dismantling of scaffolds is planned, orderly, and performed level by level from top to bottom. Scaffold components, tools, and fittings shall be lowered to the ground in an orderly manner by rope, etc. and not thrown down. The Scaffold Supervisor shall also ensure that scaffold materials are returned and properly stacked at their designated storage location immediately after the scaffold is dismantled. |  |                        | ngs shall<br>wn. The<br>properly |
| 10.0    | RES   | PONSIBILITIES  |                        |                                  |
|         | 10.1  | Consulting Services Department (CSD) – responsible for conducting structural engineering reviews of scaffold plans, including design calculations, for all Special Scaffolds. Such reviews do not relieve the Specialized Scaffolding Contractor of responsibility for ensuring the structural integrity and adequacy of a scaffold. CSD will also provide a representative to the Specialized Scaffolding Contractor Evaluation Team (SSCET).         |                        |                                  |
|         | 10.2  | Training and Career Development (T&CD) Organization – responsible for providin scaffold training courses for Saudi Aramco employees (T&CD does not provide trainin courses for contractor employees). T&CD is also responsible for administering Saud Aramco Certified Scaffold Supervisor and Certified Scaffold Inspector certification test and issuing certification cards to Saudi Aramco employees and contractor employees where pass the test. |                        |                                  |
|         | 10.3 Loss Prevention Department (LPD) – through its area offices, is responsible for conduction a review of scaffold plans (whenever required per paragraph 4.1) for completeness (per the "Scaffold Plan Completeness Checklist") and for conformance to SSH safety requirement LPD will also conduct random compliance inspections of scaffolds and lead the Specialize Scaffolding Contractor Evaluation Team (SSCET).   |  |                        | (per the rements.                |
|         | 10.4  | Proponent responsibilities include:  |                        |                                  |
|         |   | 10.4.1 Ensuring that all requirements in this General Instruction including notifying the Scaffold Erector when the scaffold is a and ensuring that it is tagged with red scaffold tag(s) after it is  | ready to be dis        | smantled                         |
|         |   | 10.4.2 Establishing a work process for storing and issuing scaffold ta   | ng holders, ins        | erts, and                        |

10.4.3 Communicating in writing to Work Permit Issuers, and to the Scaffold Erector, the

names and badge numbers of individuals who are authorized to give direction for

pens to Scaffold Erectors.

#### SAUDI ARABIAN OIL COMPANY (Saudi Aramco) G. I. Number Approved 8.001 **GENERAL INSTRUCTION MANUAL** ISSUE DATE REPLACES ISSUING ORG. LOSS PREVENTION DEPARTMENT 06/28/04 09/15/2003 APPROVAL PAGE NO. **SUBJECT** SAFETY REQUIREMENTS FOR SCAFFOLDS HJK 13 OF 15

scaffold alteration or modification. All directions given to the Scaffold Erector for any scaffold alteration or modification shall state clearly what work access is required, and not specifically how the scaffold is to be altered or modified.

- 10.4.4 Confirming the structural adequacy of any existing structure used to support a scaffold and its intended load, and ensuring that all necessary precautions (i.e., shoring) are taken.
- 10.4.5 For Special Scaffolds and scaffolds over 12.2 meters (40 feet) tall:
  - 10.4.5.1 Designating a single-point-of-contact for all communications during scaffold design, plan review, erection, and inspection.
  - 10.4.5.2 Ensuring that the Specialized Scaffolding Contractor has all required layout and design information needed to prepare a complete and correct scaffold plan.

This information includes:

- type and duration of work to be done on the scaffold,
- maximum number of workers and additional loads to be on each platform level at any one time,
- required access points/elevations,
- maximum number of simultaneous working and planked platforms,
- location of potential interferences (e.g., piping, equipment) and areas to remain free of obstruction (e.g., exits, roadways),
- unusual or heavy loads, etc.
- 10.4.5.3 Checking and verifying that the scaffold plan is complete (using the "Scaffold Plan Completeness Checklist") prior to submitting for review to LPD, and in the case of Special Scaffolds, to LPD followed by CSD.
- 10.4.5.4 Checking and verifying that the scaffold plan meets job functionality, access, and clearance requirements.
- 10.4.5.5 A Proponent that submits a request for approval of a Specialized Scaffolding Contractor shall assign a representative to the SSCET. This Proponent representative will only participate in the SSCET review of the completed Qualification Questionnaire for that specific contractor.
- 10.5 Scaffold Erector (including Specialized Scaffolding Contractor) responsible for providing qualified and properly trained scaffold craftsmen and supervision to perform all phases of scaffold work, including planning, design, engineering, erection, alteration, dismantling, supervision, and inspection. The Scaffold Erector is responsible for implementing a system to manage and perform bi-weekly inspections of their scaffolds. The Scaffold Erector is responsible for the safety and structural adequacy of scaffolds erected or altered by their employees.

| SAUDI ARABIA               | G. I. Number                      | Approved               |                        |
|----------------------------|-----------------------------------|------------------------|------------------------|
| GENERAL INSTRUCTION MANUAL |                                   | 8.001                  |                        |
| ISSUING ORG.               | LOSS PREVENTION DEPARTMENT        | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |
| SUBJECT                    | SAFETY REQUIREMENTS FOR SCAFFOLDS | APPROVAL<br>HJK        | PAGE NO.<br>14 OF 15   |

- 10.6 Scaffold Inspector responsible for independently verifying scaffold safety and conformance to the requirements of this General Instruction, the Saudi Aramco *Construction Safety Manual (Scaffold Safety Handbook)* and the accepted scaffold plan, by field inspection, acceptance, and co-signing scaffold tag(s) for all new or altered Special Scaffolds and scaffolds over 6 meters (20 feet) tall. All Scaffold Inspectors shall be fluent in written and verbal English.
- 10.7 Scaffold Supervisor responsible for ensuring that scaffold erection, alteration, and dismantling is done safely, in accordance with the accepted scaffold plan, the requirements of this General Instruction and the Saudi Aramco *Construction Safety Manual (Scaffold Safety Handbook)*. The Scaffold Supervisor is responsible for the appropriate use and placement of scaffold tag(s) on all new or altered scaffolds. All Scaffold Supervisors shall be experienced in scaffold erection and fluent in written and verbal English.

### 11.0 CERTIFICATION

- 11.1 Effective July 1, 2003, only Scaffold Supervisors holding a valid Saudi Aramco Certified Scaffold Supervisor I, Certified Scaffold Supervisor II-T, or Certified Scaffold Supervisor II-S pocket card are permitted to supervise scaffold erection, alteration, or dismantling, and to inspect scaffolds at Saudi Aramco facilities and project sites.
- \* 11.2 Effective July 1, 2003, only Scaffold Inspectors holding a valid Saudi Aramco Certified Scaffold Inspector pocket card are permitted to inspect scaffolds, including Special Scaffolds, at Saudi Aramco facilities and project sites. Anyone certified as only a Scaffold Inspector is NOT permitted to supervise scaffold erection, alteration, or dismantling at Saudi Aramco facilities and project sites.
  - 11.3 The supervision and inspection authority of each certification is as follows:
    - **Certified Scaffold Supervisor I** can supervise, inspect, and sign scaffold tags for *all* scaffolds, including Special Scaffolds. At least five (5) years of scaffold erection experience is required before seeking certification as a Certified Scaffold Supervisor I.
    - Certified Scaffold Supervisor II-T can supervise, inspect, and sign scaffold tags for *only* tube and coupler scaffolds less than 12.2 meters (40 feet) tall, excluding Special Scaffolds. At least three (3) years of scaffold erection experience is required before seeking certification as a Certified Scaffold Supervisor II-T.
    - Certified Scaffold Supervisor II-S can supervise, inspect, and sign scaffold tags for *only* system scaffolds or fabricated tubular frame scaffolds (including tubular braces and tie-ins) less than 12.2 meters (40 feet) tall, excluding Special Scaffolds. At least three (3) years of scaffold erection experience is required before seeking certification as a Certified Scaffold Supervisor II-S.

| SAUDI ARABIAN OIL COMPANY (Saudi Aramco)  G. I. Number Approved |  |                        |                        |  |  |
|---|--|------------------------|------------------------|--|--|
| <b>GENERAL</b>  | INSTRUCTION MANUAL   | 8.0                    | 01                     |  |  |
| ISSUING ORG.  | LOSS PREVENTION DEPARTMENT   | ISSUE DATE<br>06/28/04 | REPLACES<br>09/15/2003 |  |  |
| SUBJECT   | SAFETY REQUIREMENTS FOR SCAFFOLDS  | APPROVAL<br>HJK        | PAGE NO.<br>15 OF 15   |  |  |
|   | • <b>Certified Scaffold Inspector</b> – can inspect and sign scaffold including Special Scaffolds.   | tags for all se        | caffolds,              |  |  |
| * 11.4  | * 11.4 T&CD, or an outside testing agency approved by LPD and T&CD, will administer Saudi Aramco scaffold supervisor and inspector certification tests to Saudi Aramco and contractor employees. Upon successful completion of the Saudi Aramco Certified Scaffold Supervisor or Certified Scaffold Inspector test, a pocket card will be signed and issued by T&CD, or an approved testing agency, to the individual confirming him as either a Saudi Aramco Certified Scaffold Supervisor I, II-T, or II-S, or a Certified Scaffold Inspector, as applicable. Multiple certifications for a single individual are permitted (e.g., a Scaffold Inspector may also be certified as a Scaffold Supervisor – however, per paragraph 6.4, he shall not sign the same scaffold tag in both positions). |                        |                        |  |  |
| 11.5  | Every Certified Scaffold Supervisor I, II-T, or II-S and Certified Schave his valid Saudi Aramco certification pocket card (bearing his nathis possession at all times while at the job site.  |                        |                        |  |  |
| 11.6  | All organizations shall maintain records of their Certified Scaffold Sup<br>Scaffold Inspectors. Certifications expire three (3) years after the da<br>Certified Scaffold Supervisors and Inspectors shall be re-tested and re-<br>years.  | te of issue. The       | nerefore,              |  |  |
| Approved by:  |  |                        |                        |  |  |
| Manager<br>Loss Prevention                                      | on Department  |                        |                        |  |  |
| Concurred by:   |  |                        |                        |  |  |
| Manager<br>Consulting Se  | rvices Department  |                        |                        |  |  |
|   |  |                        |                        |  |  |

NEW INSTRUCTION  $\square$  COMPLETE REVISION  $\square$ 

\* CHANGE \*\* ADDITION

GENERAL INSTUCTION NO. SAUDI ARABIAN OIL COMPANY (Saudi Aramco) 8.001 **GENERAL INSTRUCTION MANUAL ISSUE DATE** REPLACES ISSUING ORG. LOSS PREVENTION DEPARTMENT 06/28/04 09/15/2003 **APPROVAL** PAGE NO. **SUBJECT** SUPPLEMENT 8.001-1: SCAFFOLD WORKFLOW PROCESS HJK 1 OF 1 **Proponent Determine Scaffold Access Needs** Over 12.2 m (40 ft) or "Special"? Yes Specialized Scaffold Erector Prepare Scaffold Plan Proponent Review Plan (use "Plan Completeness Checklist") Specialized Scaffold Erector roponent Revise and Re-submit Accept Scaffold Plan through Plan? Proponent Yes LPD Review Scaffold Plan No (use "Scaffold Plan Review Checklist") LPD "Special Accept No Scaffold"? Plan? Yes No Specialized Scaffold Erector CSD Revise and Re-submit CSD Review Scaffold Plan Accept Scaffold Plan through Plan? Proponent to CSD Release For Construction & Send Final Plan to LPD Yes **Erect Scaffold** Scaffold Erector do Alteration or Repair No Scaffold Supervisor and Over 6 m Scaffold Inspector do Field )ver 12.2 m (20 ft) or Inspection (use "Scaffold No (40 ft) or 'Special"? Yes Field Inspection Checklist") 'Special''? No Scaffold Supervisor does Structural Field Inspection (use Pass? Yes 'Scaffold Field Inspection Alteration? Checklist") Yes No Tag & Release For Use Work Permit Receiver and

> Issuer Pre-Use Inspection & Area LPD Random Inspection

> > NEW INSTRUCTION □

\* CHANGE

\*\* ADDITION

Pass?

Continue to Use

COMPLETE REVISION □

SAUDI ARABIAN OIL COMPANY (Saudi Aramco)

# **GENERAL INSTRUCTION MANUAL**

ISSUING ORG. LOSS PREVENTION DEPARTMENT

SUBJECT SUPPLEMENT 8.001-2: SCAFFOLD RESPONSIBILITY MATRIX

1 OF 1

HJK

| Scaffold Height                                    | Scaffold<br>Plan (SP)<br>Required<br>? | SP To Be<br>Reviewed<br>By<br>Proponent<br>And LP<br>Area<br>Office? | SP To Be<br>Reviewed<br>By CSD? | Scaffold To<br>Be Erected<br>By:         | Scaffold<br>Field<br>Inspection<br>Checklist<br>Completed<br>By: | Scaffold<br>Tag(s)<br>Signed By:      |
|--|--|--|---------------------------------|--|--|---------------------------------------|
| 0 – 6m<br>(0 - 20 ft.)                             | No                                     | No   | No                              | Qualified<br>Scaffold<br>Erector         | Scaffold<br>Supervisor<br>Only **                                | Scaffold<br>Supervisor<br>Only **     |
| 6 - 12.2m<br>(20 – 40 ft.)                         | No                                     | No   | No                              | Qualified<br>Scaffold<br>Erector         | Scaffold<br>Supervisor<br>& Inspector                            | Scaffold<br>Supervisor<br>& Inspector |
| 12.2 - 38m<br>(40 – 125 ft.)                       | Yes                                    | Yes  | No                              | Specialized<br>Scaffolding<br>Contractor | Scaffold<br>Supervisor<br>& Inspector                            | Scaffold<br>Supervisor<br>& Inspector |
| Special Scaffold*,<br>including > 38m<br>(125 ft.) | Yes                                    | Yes  | Yes                             | Specialized<br>Scaffolding<br>Contractor | Scaffold<br>Supervisor<br>& Inspector                            | Scaffold<br>Supervisor<br>& Inspector |

<sup>\*</sup> Note: Special Scaffolds also include those cantilevered by more than 3m (10 ft.) and those with a total platform area of more than 30 sq. meters (320 sq. ft.) that are supported by or hung from an existing structure or are within 3 meters (10 ft.) of any other scaffold supported by or hung from the same structure.

<sup>\*\*</sup> Unless scaffold is below 1.8m (6 ft.) tall and tagging is not required per paragraph 3.2.