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GET YOUR FALL
PROTECTION PLAN UP TO
OSHA REQUIREMENTS

Fall Protection

Does your fall prevention plan meet current industry standards or OSHA requirements?

Fall protection can be confusing:

- There are different standards between industry and construction
- The presence of "Proposed Rules"
- Letters of Interpretation that modify the Rules are difficult to locate
- Consensus standards are frequently changing

The ever-changing rules and regulations can make it difficult to determine if your fall prevention plan meets current industry standards or OSHA requirements.

FALL PROTECTION CONSIDERATIONS

1. 29 CFR 1910 and 29 CFR 1926 are not interchangeable

Part 1910 covers general industry and includes Operations and Maintenance activities. Part 1926 covers construction and includes modifications to your facility. There are significant differences in these Rules including different heights at which fall protection is required, different height requirements on stair guards, and different requirements for fall protection on roofs.

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2. Safe edge distance

For the Construction Industry

A 1996 Letter of Interpretation to Part 1926 (construction) allows a De Minimis violation for an unprotected edge if employees working 50 to 100 feet away from an unprotected edge have been properly trained. De Minimis violations are not included in citations. For work performed less than 50 feet away from an unprotected edge a warning line no less than 15 feet from the edge is also a De Minimis violation if constructed in accordance with 1926.502(f)(2) and the employer implements a work rule prohibiting work beyond the warning line. There are some specific exemptions noted in CFR 1926.502 for certain activities which include leading edge type work.

For General Industry

According to Part 1910 of OSHA, an unprotected edge with a risk of falling 4 feet or more must be protected with a guardrail, safety net, or fall protection system. OSHA allows work in a "designated area" conforming to rule 29 CFR 1910.28(b)(13). This rule requires that work is of a temporary nature, the designated area is surrounded by a warning line conforming to the height and strength requirements, the perimeter is no less than 6 feet from an unprotected edge, and the roof has a slope of 4:12 or less.

3. Fall restraint is an acceptable means of fall protection

Fall restraint using a tether or other acceptable means is allowed. Note that "fall restraint" is not "fall positioning" or "fall arrest." Fall restraint is achieved through the use of a restraint system, which does not allow a worker to reach an unprotected edge or other fall hazard. Fall restraint in the construction industry is allowed by Letter of Interpretation. This Letter of Interpretation requires that the anchorage point for fall restraint systems be capable of supporting 3,000 lbs. or twice the maximum expected force. According to CFR 1910.140(c)(14), a fall restraint line must be capable of supporting 5,000 lbs.

4. Being connected to a fall arrest system does not necessarily make you safe

Fall distances and loads imposed on the anchor during a fall are often grossly underestimated. Shock absorbing lanyards typically require a distance between the D-ring attachment and closest obstruction of 17-18 feet. Fall distances when using self-retracting lanyards can vary by model. These distances are valid only if the fall protection system is being used correctly and the anchorage point is attached at or above D-ring height, or about five feet above the elevated walking working surface. In addition, loads imposed on the anchorage point during a fall are often underestimated. If attached to a horizontal lifeline without energy absorbers, the force on anchorage points can easily reach over 15,000 pounds during a fall.

FALL PROTECTION SERVICES

Shive-Hattery's team of engineers meet the requirements of OSHA's "qualified person" by degree, experience and training in fall protection. We can help you navigate through the rules and regulations and develop a fall prevention plan that meets current industry standards and OSHA requirements.

- Design or specification of complete Fall Protection Systems, including flexible horizontal lifeline systems, rigid horizontal lifeline systems and single anchorage connectors.
- On-site condition evaluation of existing systems and recertification.
- Design of guardrail systems, hole protection (cover or guarding)
- Design of stair and ladder systems —

