

New Walking-Working Surfaces and PPE (Fall Protection) Rule



Every Step You Take, Every Move You Make

American Society of Safety Professionals
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My Background

- Mary Bauer

- 34 years w/ OSHA
- 20 years as a Compliance Officer
- 14 years as a CAS
- IH/ Safety
- CIH: Certified Industrial Hygienist
- CSP: Certified Safety Professional
- 1000 + Inspections

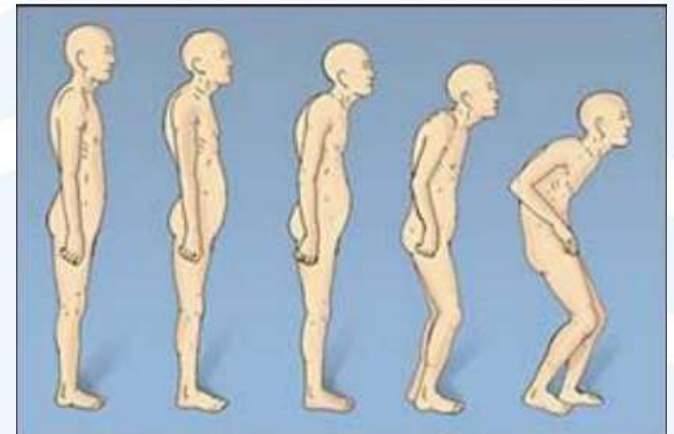


Logistics



Agenda

- Blow-by-Blow of the New Standard
- Solutions or Alternatives to Comply
 - Hierarchy of Controls
 - Time Management
 - Investing Wisely
 - Aging Workforce
 - OSHA Penalty Structure
- Resources
- Questions and Answers



Common Place

- When was the last time you fell?
- Know someone killed or disabled from fall?
- Required time off work?
- Lingering aches/pains?
- Do you know “how” to fall?
- It’s all about the sudden stop!
- Do you “practice” falling?



“Every Step You Take, Every Move You Make”

Police/Sting - 1983

- What is 1:1,000,000 chances?



- 10,000 steps per day
- 100 days
- 3.65 times per year



“Hi, I’ve reached my daily steps target, can you come and pick me up?”

Purpose of the New Rule

- To update the outdated subpart D standard, incorporating new technology and industry practices
- Vertical Standards “meet the requirements of Subpart D”. Paper Mills, Sawmills, etc.
- To increase consistency with OSHA’s construction standards (CFR 1926 subparts L, M, and X)
- To add new provisions to subpart I that set forth criteria requirements for personal fall protection equipment

Benefits

- According to BLS data, slips, trips, and falls are a leading cause of workplace fatalities and injuries in general industry
 - Same Level
 - Ladders
 - Platforms
- OSHA estimates the new rule will prevent 29 fatalities and 5,842 injuries annually
- Net benefits - \$309.5 million/year
(Monetized benefits – annual costs)

Who is Affected?

- OSHA estimates 6.9 million general industry establishments employing 112.3 million workers will be affected



New Penalty Levels-Federal OSHA

Adjusted Jan., **2019 Rates = + \$300**

Type of Violation	New Maximum*
Serious and Other-Than-Serious Posting Requirements	\$13,260 per violation
Willful or Repeated	\$132,598 per violation
Failure to Abate	\$13,260 per day beyond the abatement date

*Maximum penalties will be readjusted annually for inflation.

Who is NOT Covered: Agricultural Operations

- Although OSHA believes that walking-working surfaces hazards, particularly fall hazards, are present in **agricultural operations**, the Agency did not propose to cover agricultural operations and did not gather and analyze the type of information necessary to support including agricultural operations in the final rule. In addition, because the proposed rule did not cover agricultural operations, the public, and in particular agricultural stakeholders, did not have an opportunity to comment on any protective measures OSHA might require.

What are Agricultural Operations?

- Although the final rule does not define agricultural operations, in the past OSHA has said they include:
- Activities involved in growing and harvesting (including field sorting) of crops, plants, vines, fruit and nut trees, ornamental plants, egg production, and raising livestock, poultry, fish and livestock products (e.g., feed for livestock on the farm); and
- Preparation of the ground, sowing, watering and feeding of plants, weeding, spraying, harvesting, raising livestock, and all activity necessary for these activities .
- In addition, activities integrally related to these core agricultural activities (e.g., **delivery of feed to chickens**) also are considered agricultural operations. Determining whether an activity is a core agricultural operation is made on a case-by-case basis based on the nature and character of the specific activity.

What conditions exist on the farms that are your customers?????

Organization of Subpart D

§1910.21 – Scope, Application
and Definitions

§1910.22 – General
Requirements

§1910.23 – Ladders

§1910.24 – Stepbolts and
Manhole Steps

§1910.25 – Stairways

§1910.26 – Dockboards

§1910.27 – Scaffolds and
Rope Descent Systems

§1910.28 – Duty to Have Fall
Protection

§1910.29 – Fall Protection
Systems Criteria and
Practices

§1910.30 – Training
Requirements

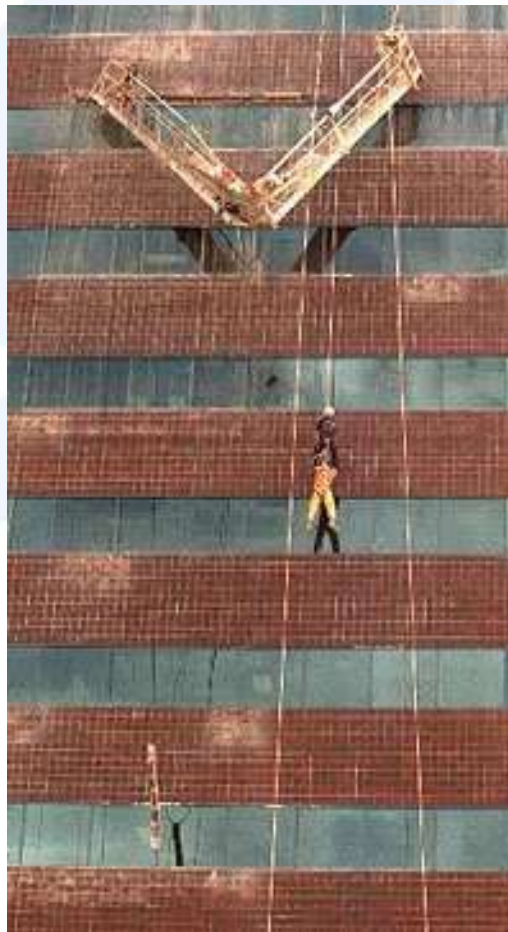
Hierarchy of Controls for Falls



Personal Fall Protection



Travel Restraint



Personal Fall Arrest



Work Positioning

§1910.21 Scope and Definitions

§1910.21 – Scope and definitions

- This subpart applies to all general industry workplaces.
- It covers all walking-working surfaces unless specifically excluded by an individual section of this subpart.
- Consolidates definitions into one section
- Adds new definitions to provide clarity

Fall Protection for Rolling Stock

Example of what is Excluded



No incidents of falls off trailers

Decided they needed to install overhead fall protection to ensure safety when sweeping hopper trailers

Install cost of ~\$25K

Since installation 2 years ago, we have had 2 near falls where the system arrested the fall. Estimated cost savings of \$200,000 in workman's comp/insurance

Priceless = Human Cost for the family, friends and co-workers

Rolling Stock was not covered under this new standard but can be cited under the General Duty Clause – (5)(a)(1).

Automatic Hatch Covers

Eliminates Accessing top of truck – Eliminates Dust Exposure
Some maintenance required....



Pivotal Edge Automatic Hatches

§1910.22 General Requirements

§1910.22 – General Requirements

- Maintains housekeeping provisions
 - All places of employment, passageways, storerooms, service rooms, and walking-working surfaces are kept in a clean, orderly, and sanitary condition.
 - Subjective to the Compliance Officer



Housekeeping Hazard?



§1910.22 General Requirements

§1910.22 – General Requirements

- Walking-working surfaces must be designed to meet their maximum intended load
- Must **KNOW** the Load Rating for floors
- Mezzanines....
- Storage above Offices...

§1910.22 General Requirements

§1910.22 – General Requirements

(3) Walking-working surfaces are maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice.



Slip Resistant Floors-Shoes?

- Did NOT get addressed in the Revision
- March 21, 2003 Letter of Interpretation
 - Co-efficient of Friction (COF) non-mandatory in the Notice of PROPOSED Rulemaking
- What is your biggest risk?
 - Flooring
 - Shoes



§1910.22

§1910.22 – General Requirements

(c) Access and egress. The employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces.

Watch for Employee “Short Cuts”ducking under or climbing over equipment. Setting up ladders to gain access to another surface or MACHINES.

Aisle Marking

1910.22(c)

- *Access and egress.* The employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces.



OSHA Preamble - One way employers can meet the performance language is by appropriately marking passageways and permanent aisles as a means of identifying safe access and egress.

§1910.22 General Requirements

§1910.22 – General Requirements

(1) Walking-working surfaces are inspected, regularly and as necessary, and maintained in a safe condition;

Snow Storm? Flooding?

Who can maintain if they can't be exposed to the hazard?

§1910.22 General Requirements

§1910.22 – General Requirements

- (3) When any correction or repair involves the structural integrity of the walking-working surface, a qualified person performs or supervises the correction or repair.
- **Qualified** describes a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work, or the project.

§1910.23 Ladders

§1910.23 – Ladders.

- Consolidates and simplifies rules into general requirements, portable ladders, fixed ladders, and mobile ladder stands
- Requires inspection before use



Fixed Ladders



Portable
Ladders and Step Stools

Definitions

Stepstool:

1910.21(b)

- A self-supporting, portable ladder that has flat steps and side rails.
- For purposes of the final rule, stepstool includes only those ladders that have a fixed height, do not have a pail shelf, and do not exceed 32 inches (81 cm) in overall height to the top cap, although side rails may extend above the top cap.
- A stepstool is designed so an employee can climb and stand on all of the steps and the top cap.



§1910.23

§1910.23 – Ladders.

- This section covers all ladders, **except** when the ladder is:
- (2) Designed into or is an integral part of machines or equipment.



1910.23 – Ladders



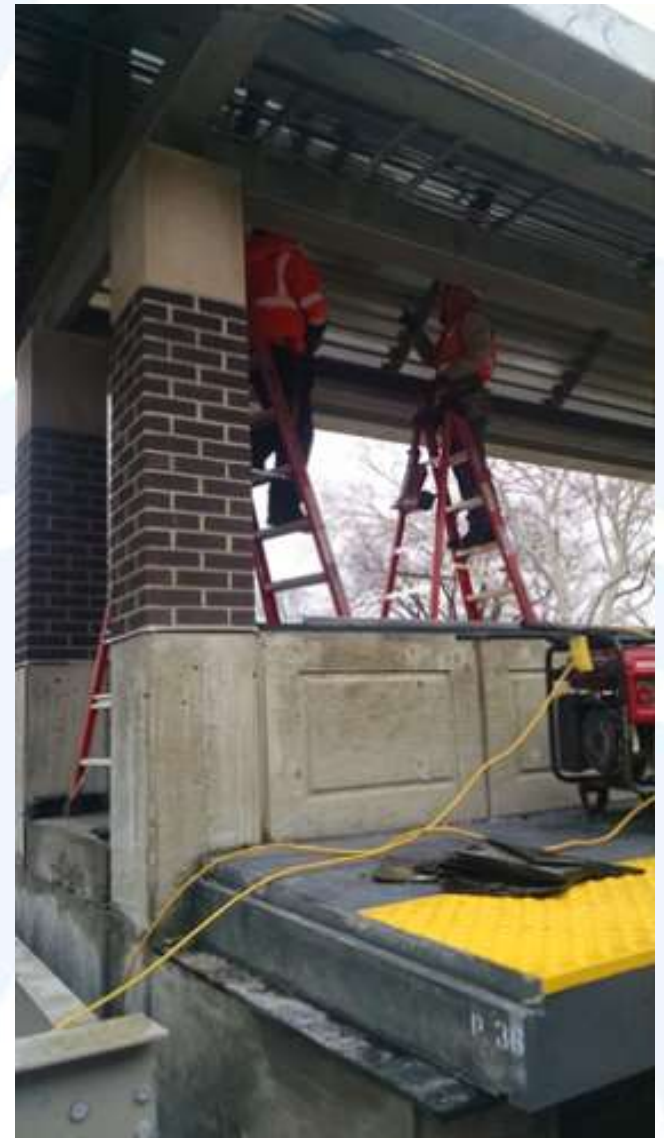
§1910.23(b) Ladders

- (8) Ladders are used only for the **purposes** for which they were designed;
- (9) Ladders are **inspected** before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury;
- (10) Any ladder with structural or other defects is **immediately tagged** “Dangerous: Do Not Use” or with similar language in accordance with §1910.145 and removed from service until repaired in accordance with §1910.22(d), or replaced;
- (11) Each employee **faces the ladder** when climbing up or down it;
- (12) Each employee uses at **least one hand** to grasp the ladder when climbing up and down it; and
- (13) **No employee carries any object or load that could cause the employee to lose balance** and fall while climbing up or down the ladder.
- **Portable:** (3) Ladders are not loaded beyond the **maximum intended load**;
- **Note to paragraph (c)(3):** The maximum intended load, as defined in §1910.21(b), includes the total load (weight and force) of the employee and all tools, equipment, and materials being carried.

Ladders

1910.23(b)(8)

- Ladders are used only for the purposes for which they were designed;



§1910.23(b)(9) Ladder Inspections

Get the Ladder Safety App



Learn more:

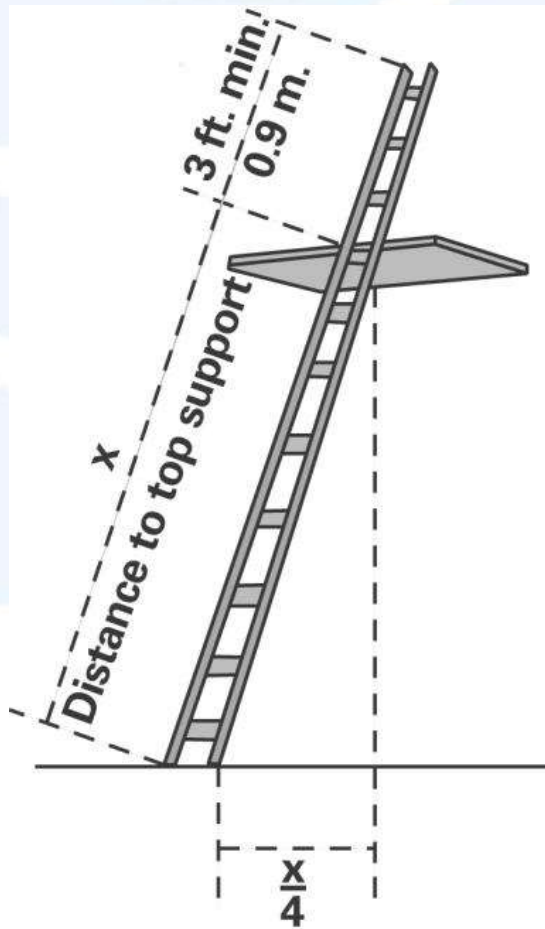
www.cdc.gov/niosh/topics/falls

Stickers and Coatings

- 1910.23(b)(5): Wooden ladders are not coated with any material that may obscure structural defects.
- Do you need stickers?
 - Not required in standard.
 - https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=19130



Portable Ladder Section



- Secured from displacement and stabilized.
- Barricaded from traffic
- No use of cap and top step
- Extend 3' above level
- 1:4 ratio for angle
- Not resting on boxes, barrels, etc.

Secured and Access Protected



Safe Access: Ladder/Platform?

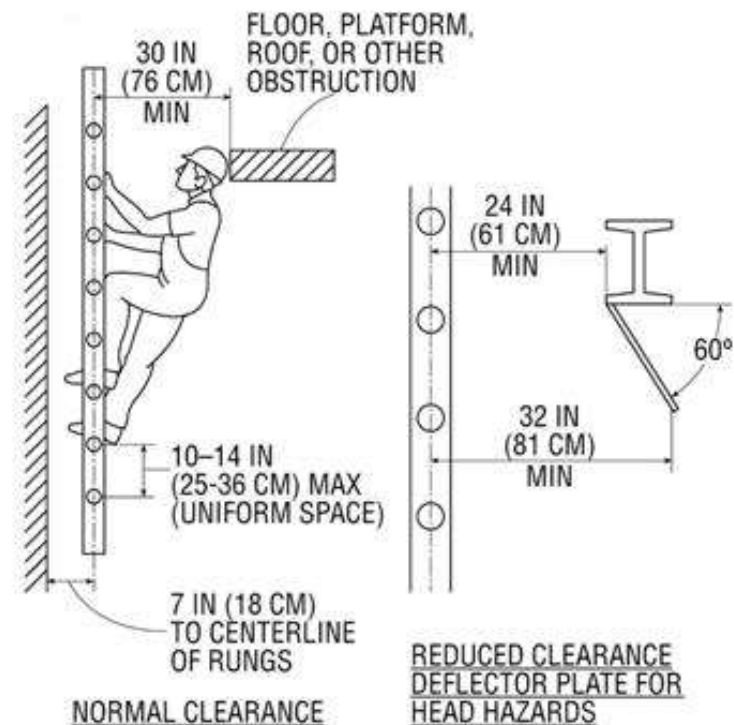


Extension Ladders only if approved



Fixed Ladders

- Extend 42" above landing
- Hatch covers specifications
- 7" between rung and wall

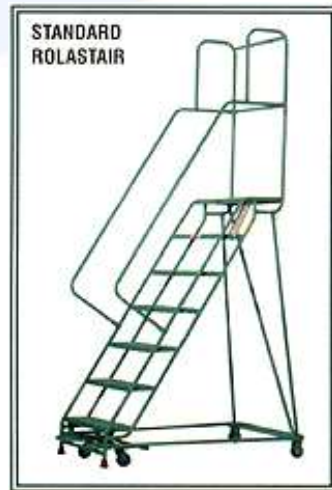




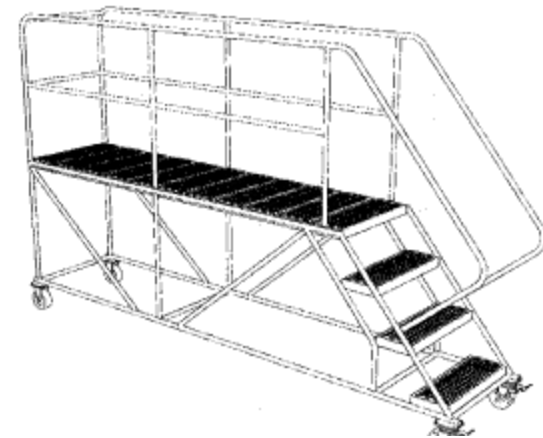
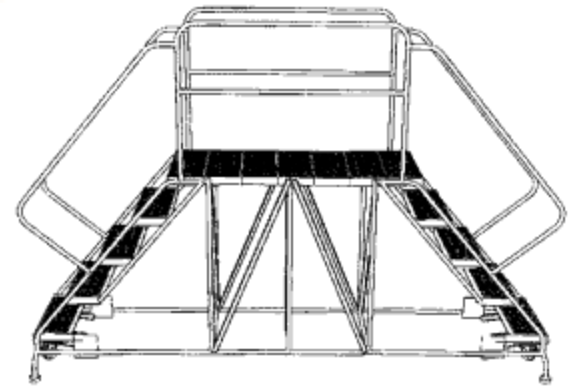
JUL 8 2004

§1910.23 Mobile Ladder Stands

- Updates and makes rule consistent with current national consensus standards
 - 4 X the intended load
 - Brakes on wheels/casters
 - Not moved w/ employee on it



Mobile Ladder Stand



Mobile Ladder Stand Platform

Ladder Extensions

(5) For through ladders, the steps or rungs are omitted from the extensions, and the side rails are flared to provide not less than 24 inches (61cm) and not more than 30 inches (76 cm) of clearance. When a ladder safety system is provided, the maximum clearance between side rails of the extension must not exceed 36 inches (91 cm);



Through Ladder



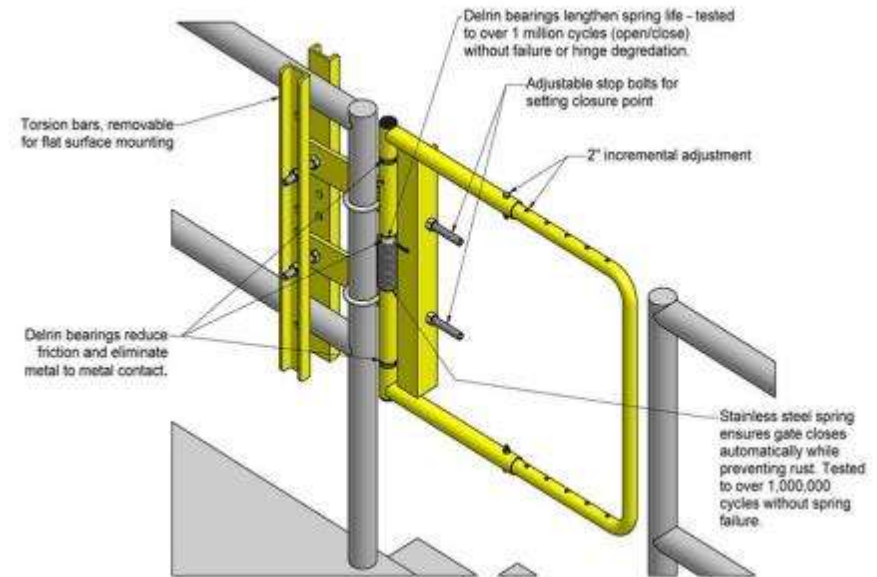
1910.23(a)(2): Ladderway Openings

- **1910.23(a)(2):**
- Every ladderway floor opening or platform shall be guarded by a standard railing with standard toeboard on all exposed sides (except at entrance to opening), with the passage through the railing either provided with a **swinging gate** or so offset that a person cannot walk directly into the opening.
- *What are the requirements for self-closing gates?*
- OSHA 1910.29 (b)(13) says that when guardrail systems are used around holes that serve as points of access (such as ladderways), the opening must have the following characteristics:
 - Has a **self-closing gate** that slides or swings away from the hole, and is equipped with a top rail and midrail or equivalent intermediate member that meets the requirements
 - As an alternative, you can **offset** the ladder opening to prevent an employee from walking or falling into the hole

Swing Gates – No Chains!



Chain to “Guard” Access is no longer Acceptable.



Inspection/Maintenance item to ensure the gate remains “self” closing.

Ladderway/Hatchway



Guarded Manhole/Vault



§1910.24

§1910.24 – Stepbolts and manhole steps



- Moves stepbolt criteria from OSHA's Telecommunication Standard to Walking-Working Surfaces
- Makes design, inspection, and maintenance requirements consistent with national consensus standards
- Grandfathered if prior to Jan. 17, 2017



Step bolts on pole

Manhole Steps

1910.24(a)(1)

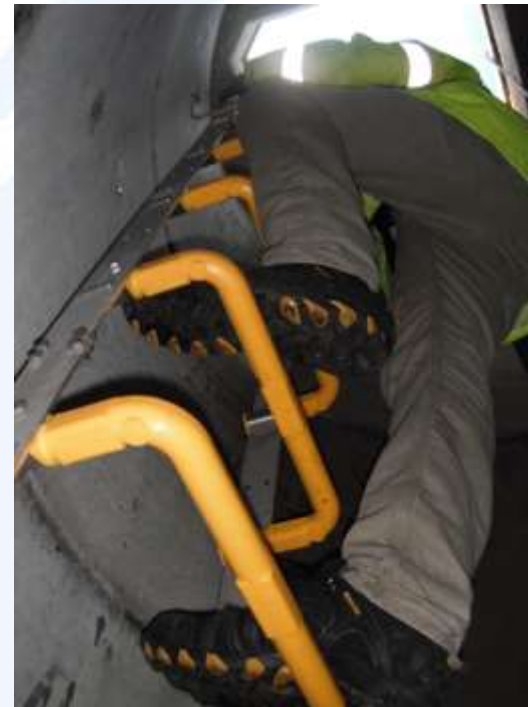
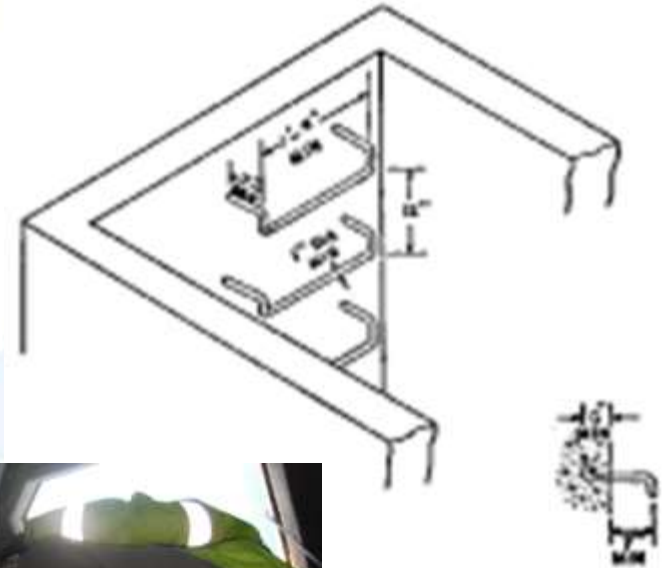
- The employer must ensure that each manhole step is capable of supporting its maximum intended load.
- The employer must ensure that each manhole step is inspected at the start of the work shift and maintained in accordance with §1910.22.



§1910.24

§1910.24 – Stepbolts and manhole steps

Condition of Concrete?
Broken Rung?





§1910.25 Stairways

§1910.25 – Stairways

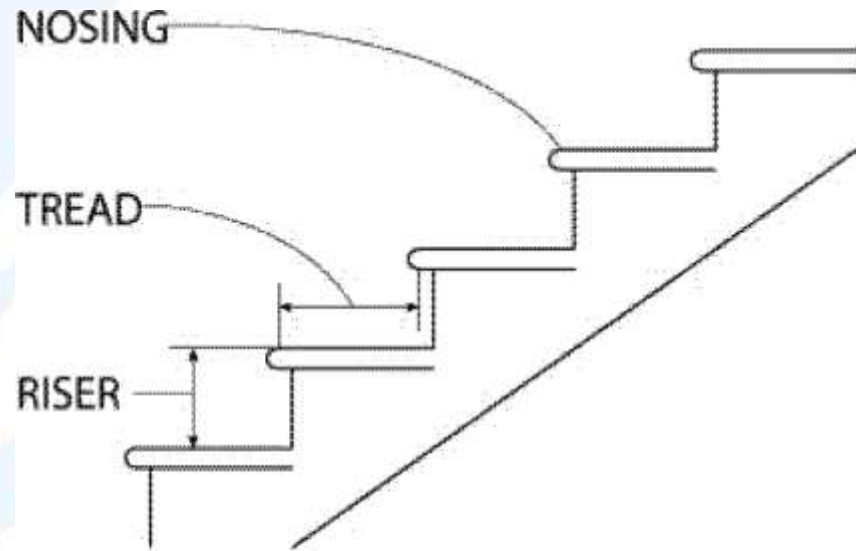
- Adds design and use criteria for spiral stairs, ship stairs, and alternating tread-type stairs
- Updates design criteria for stairs and landings, consistent with national consensus standards
- Grandfathering in: Before or After January 17, 2017

§1910.25 Stairways

Using ANSI terms and measurement in the new standard. Standard stairs are now 30-50 degrees.

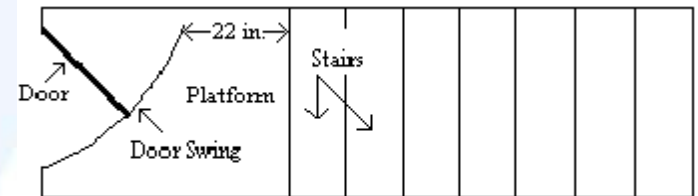
Table D-1-- Stairway Rise and Tread Dimensions

Angle to horizontal	Rise (in inches)	Tread run (in inches)
30 deg. 35'	6 1/2	11
32 deg. 08'	6 3/4	10 3/4
33 deg. 41'	7	10 1/2
35 deg. 16'	7 1/4	10 1/4
36 deg. 52'	7 1/2	10
38 deg. 29'	7 3/4	9 3/4
40 deg. 08'	8	9 1/2
41 deg. 44'	8 1/4	9 1/4
43 deg. 22'	8 1/2	9
45 deg. 00'	8 3/4	8 3/4
46 deg. 38'	9	8 1/2
48 deg. 16'	9 1/4	8 1/4
49 deg. 54'	9 1/2	8



MINIMUM TREAD WIDTH 22 IN (56 CM)
MINIMUM TREAD DEPTH 9.5 IN (24 CM)
MAXIMUM RISER HEIGHT 9.5 IN (24 CM)

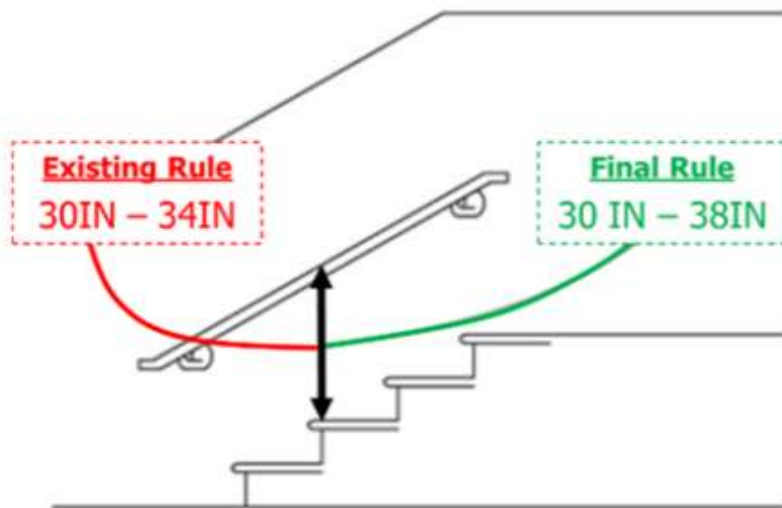
Prior to January 17, 2017



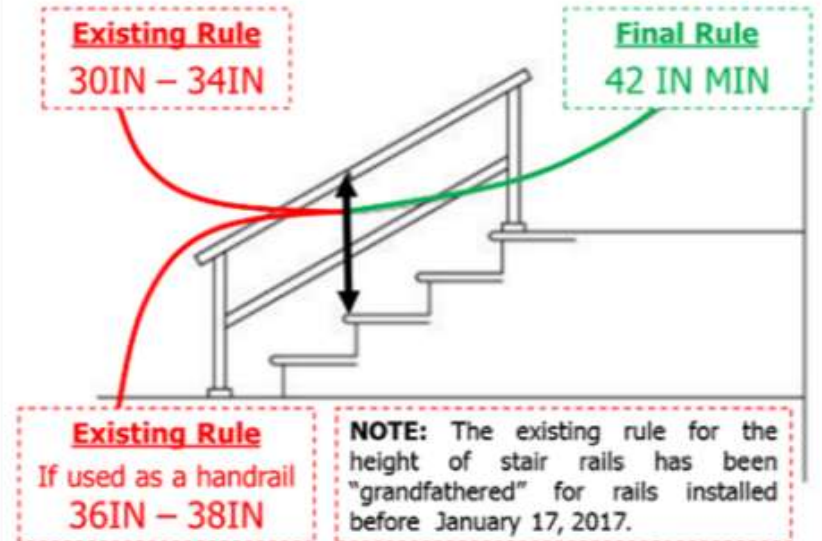
After January 17, 2017

Railing for Stairway

Handrail Height



Stair Rail Height



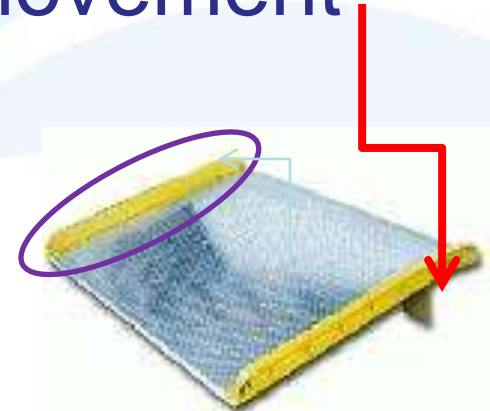
3rd Rail



§1910.26

§1910.26 – Dockboards

- Updates requirements for dockboards
- Adds design and construction requirements to prevent equipment from going **over the dockboard edge**
- Positioning/Anchor to prevent movement
- Chocks for Vehicle
- Training (1910.30)



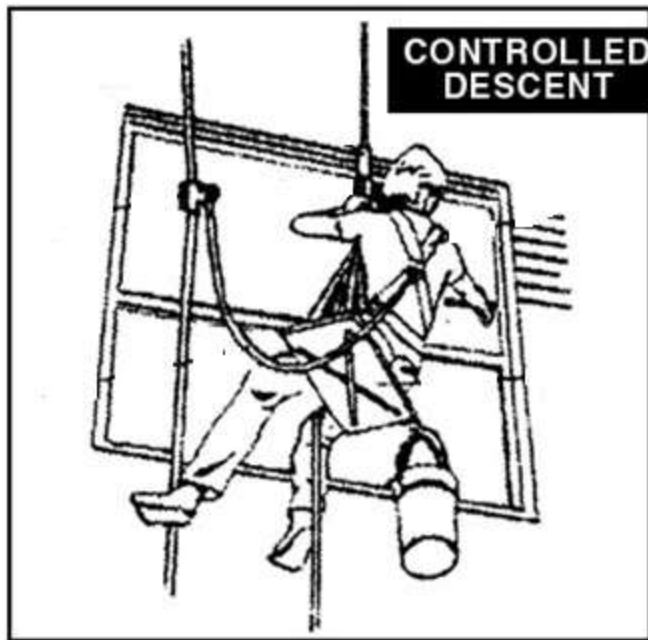
§1910.27

§1910.27 – Scaffolds and Rope Descent Systems (RDS)

- Requires that employers using **scaffolds follow the construction standard**
 - 10' is the distance when fall protection is required (guardrail)
- Adds provision allowing use of RDS, which codifies a 1991 OSHA memo allowing RDS
- Requires certification of anchorages starting 1 year after final rule published – date was extended
- Requires RDS have separate fall arrest system

Rope Descent Systems

ROPE DESCENT SYSTEM (RDS)



Grain Bins?

§1910.28 Duty to Provide Fall Protection

§1910.28 – Duty to have fall protection and falling object protection

- Consolidates general industry fall protection requirements into one section
- Makes requirements and format consistent with construction standard
- Incorporates new technology that is consistent with national consensus standards
- Gives employers flexibility to use the system that works best to protect workers in their situation

§1910.28 Duty to Provide Fall Protection

- (b) Protection from fall hazards--(1) Unprotected sides and edges. (i) Except as provided elsewhere in this section, the employer must ensure that each employee on a walking-working surface with an unprotected side or edge that is **4 feet** (1.2 m) or more above a lower level is protected from falling by one or more of the following:
 - (A) Guardrail systems;
 - (B) Safety net systems; or
 - (C) Personal fall protection systems, such as personal fall arrest, travel restraint, or positioning systems.

Best Practices: Dock Opening



Loading Dock for Flat Bed

What do you do when the truck is not in the dock space?
Eliminated truck needing to drive on flat bed to load!!!



§1910.28(b)(2): Hoisting Areas

§1910.28(b)(2): Hoisting Areas



Mezzanines



§1910.28(b)(3): Floor Holes

§1910.28(b)(3): Floor Holes

Hole means a gap or open space in a floor, roof, horizontal walking-working surface, or similar surface that is at least 2 inches (5 cm) in its least dimension.



§1910.28(b)(3): Floor Holes

(ii) Each employee is protected from tripping into or stepping into or through any hole that is **less than 4 feet** (1.2 m) above a lower level by covers or guardrail systems.

Stepping or tripping into hazard.



Areas Around Catwalks



1910.28 Duty for Fall Protection > 4'

- 1910.28(b)(4): Dockboard**
- 1910.28(b)(5): Runway, Ramps**
- 1910.28(b)(6): Dangerous Equipment (Vat)**
- 1910.28(b)(7): Openings**
- 1910.28(b)(8): Repair Pits, Service Pits
< 10' in depth**
- 1910.28(b)(9): Fixed Ladders (>24')**
See Implementation Dates
- 1910.28(b)(10): Billboards**
- 1910.28(b)(11): Stairway Openings**

Protection for Vats/ Dangerous Operations



Protection for Vats/ Dangerous Operations



Cat walks/Conveyor Crossovers



Repair, Service or Assembly Pits

- Allowed if the Pit is:
- Less than 10' Deep
 - Limited Access within 6' (Training -1910.30)
 - Warning Line at 6' or Floor Marking from edge to 6' or combo
 - Warning Sign "Open Pit"



**Best Practice:
Standard Guard
Rails OR
Floor Opening
Cover or Grates**

Repair or Service Pit



Repair or Service Pits



Proper Guard Rail?
Proper Warning Line?

1910.28 Duty for Fall Protection > 4'

**1910.28(b)(12): Scaffolds and Rope
Descent systems**

See Construction Standard

**1910.28(b)(13): Work on Low-Sloped
Roof**

**1910.28(b)(14): Slaughtering Facility
Platforms**

1910.28(b)(15): Any Other Platform

1910.28(d) Designated Area for Work Both Infrequent and Temporary

Designated Area: a distinct portion of a walking/working surface delineated by a warning line in which employees may perform work without additional fall protection.

A designated area must be surrounded by a rope, wire or chain and supporting stanchions.



1910.28 Designated Area for Work Both Infrequent and Temporary

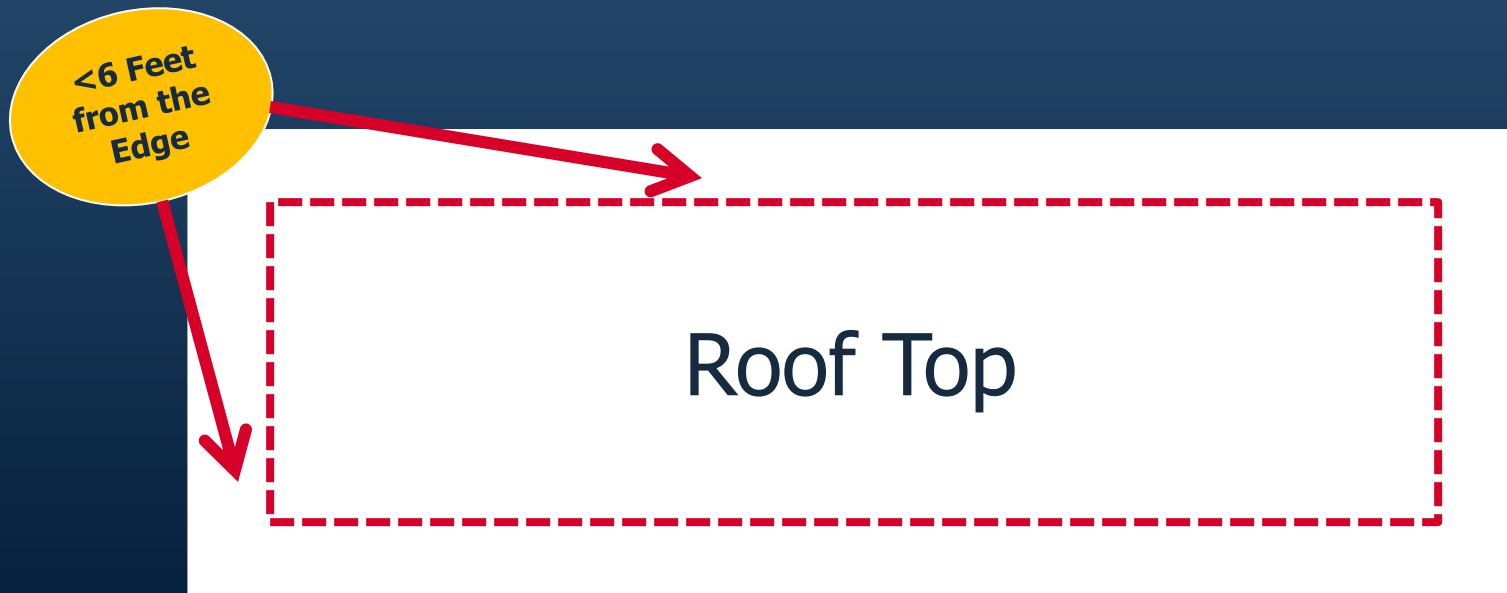
- **Infrequent:** The task or job is performed only on occasion, when needed (e.g., equipment breakdown), on an occasional basis, or at sporadic or irregular intervals. Annual maintenance or servicing of equipment, monthly or quarterly replacement of batteries or HVAC filters, and responding to equipment outage or breakdown. Infrequent jobs also do not include those that workers perform as a primary or routine part of their job or repeatedly at various locations during a workshift. A task may be considered infrequent when it is performed once a month, once a year, or when needed.

1910.28 Designated Area for Work Both Infrequent and Temporary

- **Temporary:** No specific time limit on what constitutes a temporary task. Short duration tasks generally are those that take less than '1-2 hours' to complete." Examples of such tasks include "changing a filter in a roof-top HVAC system, replacing a part on a satellite dish, caulking or resealing the flashing around a skylight, or sweeping a chimney."

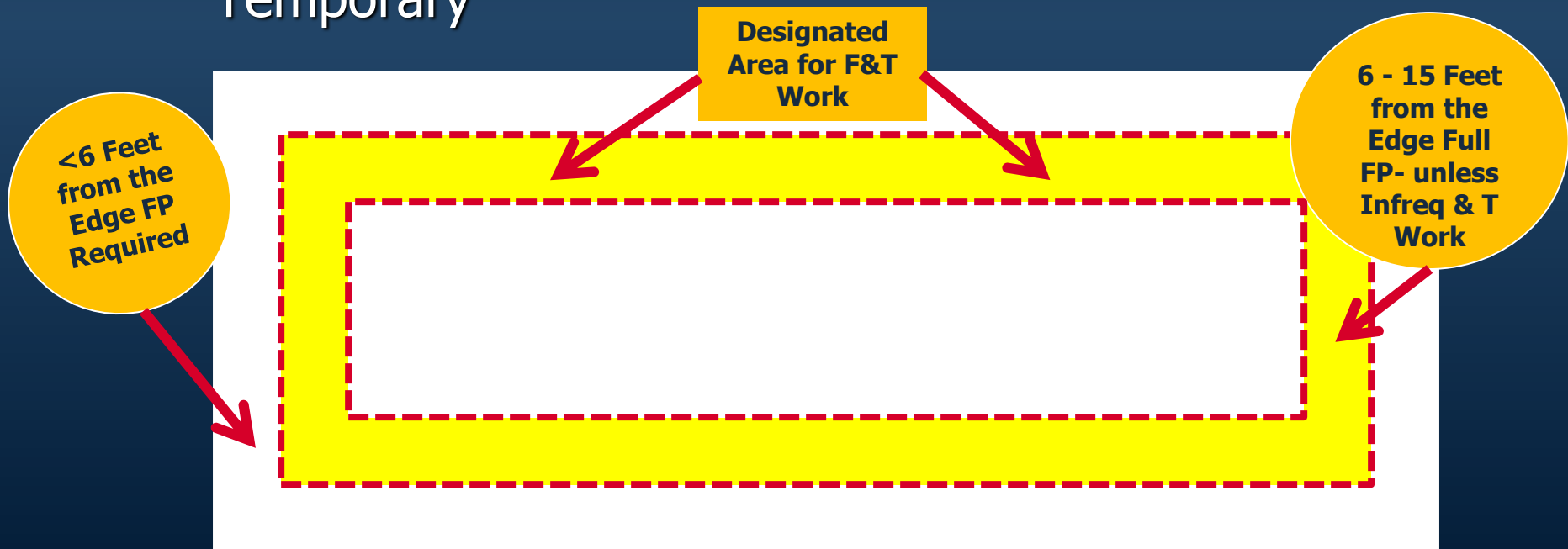
1910.28 Duty to have fall protection

- Roof Edge Protection (Flat/Low Slope)
 - Fall Protection is required when work is performed <6 feet from the edge.



1910.28 Duty to have Fall Protection

- Work performed 6-15 feet from the Edge:
 - Protect workers: Guardrails, Safety Net System, Travel Restraint System, Personal Fall Arrest System.
 - May use a Designated Area for Work Infrequent and Temporary



1910.28 Duty to have Fall Protection

If the work is not temporary or infrequent, the employer may use a designated area if the work is more than 15 feet from the roof edge.

<6 Feet
from the
Edge

6 - 15 Feet
from the
Edge

Designated Area



1910.28 Duty to have Fall Protection

If the work IS temporary and infrequent, the employer may implement and enforce a work rule if the work is more than 15 feet from the roof edge.

<15 Feet from the Edge

15 Feet from the Edge

Work Rule: Implemented and Enforced > 15' if Infreq/Temp

Roof Line: Best Practices

- Assess Your High Potential Risk areas
 - Piping
 - Equipment
 - Access Points
 - Existing Protection
- Add to Existing Parapet
- Free Standing –Non Roof Penetrating Options



Perimeter Guardrails or Specific Location Anchors



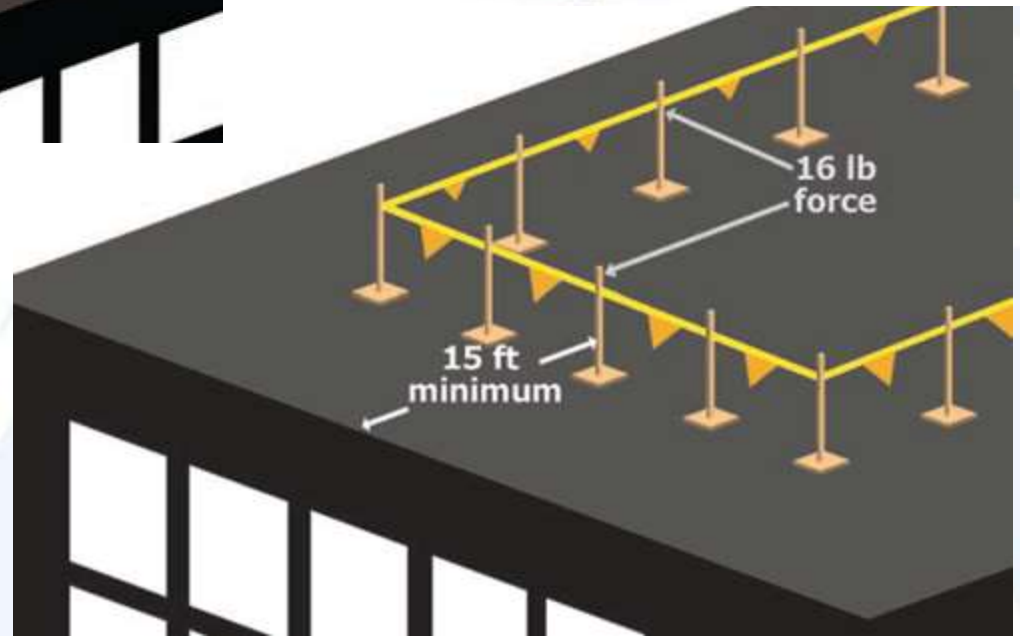
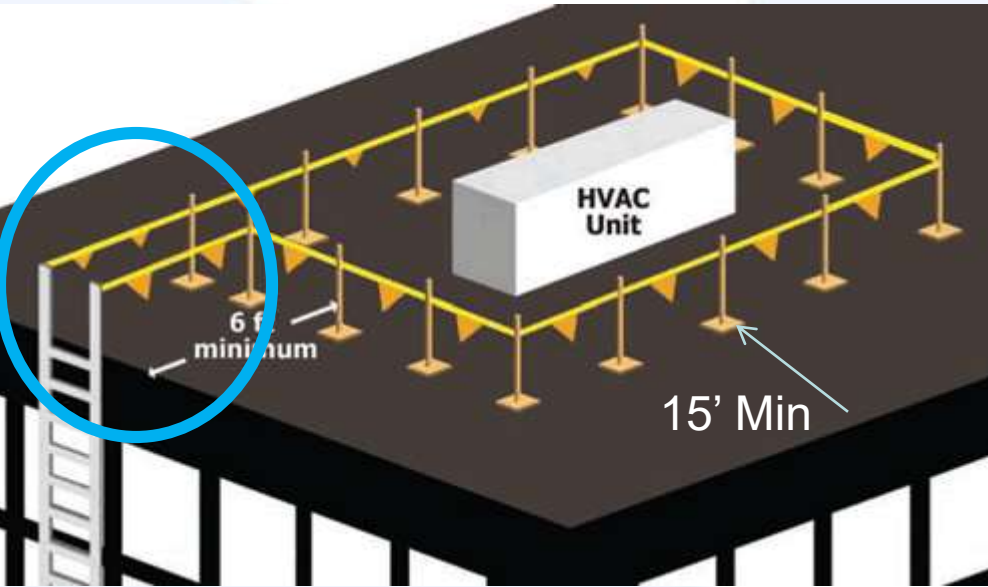
1910.28(b)(13): Work on Low-Sloped Roofs

- ***Within 6 feet*** of edge: Full Fall Protection
- **Between 6-15 feet:** Full Fall Protection **unless** the “infrequent and temporary” clause as long as a designated area is used.
- *Designated area means a distinct portion of a walking-working surface delineated by a warning line in which employees may perform work without additional fall protection. (See 1910.29(d) for specific requirements)*

1910.28(b)(13): Work on Low-Sloped Roofs

- (iii) When work is performed **15 feet (4.6 m) or more** from the roof edge, the employer must:
- (A) Protect each employee from falling by a guardrail system, safety net system, travel restraint system, or personal fall arrest system or a ***designated area***. The employer is not required to provide any fall protection, provided the work is both infrequent and temporary; and
- (B) Implement and enforce a work rule prohibiting employees from going within 15 feet (4.6 m) of the roof edge without using fall protection in accordance with paragraphs (b)(13)(i) and (ii) of this section.

1910.28(b)(13): Work on Low-Sloped Roofs



Need Fall Protection for the 6' Access area and transition to the ladder.

Roofs

- The final rule divides work on low-slope roofs into three (3) zones:
- Work performed LESS THAN 6 feet from the roof edge;
- Work performed 6 feet to less than 15 feet from the roof edge; and,
- Work performed 15 feet or MORE from the roof edge.
- Each zone has its own set of requirements



Work on low-slope roofs

1910.28(b)(13)(i)

- When work is performed less than 6 feet (1.6 m) from the roof edge, the employer must ensure each employee is protected from falling by a guardrail system, safety net system, travel restraint system, or personal fall arrest system.



Low Sloped Roofs

1910.28(b)(13)(ii)

- When work is performed at least 6 feet (1.6 m) but less than 15 feet (4.6 m) from the roof edge, the employer must ensure each employee is protected from falling by using a guardrail system, safety net system, travel restraint system, or personal fall arrest system.



Designated Areas

1910.29(d)(2)

- The employer must ensure each warning line:
- (i) Has a minimum breaking strength of 200 pounds (0.89 kN);
- (ii) Is installed so its lowest point, including sag, is not less than 34 inches (86 cm) and not more than 39 inches (99 cm) above the walking-working surface;
- (iii) Is supported in such a manner that pulling on one section of the line will not result in slack being taken up in adjacent sections causing the line to fall below the limits specified in paragraph (d)(2)(ii) of this section;



Construction Style Warning Line



1910.28(b)(9)(i): Implementation Dates

1910.28(b)(9)(i)	(9) Fixed ladders (that extend more than 24 feet (7.3 m) above a lower level). (i) For fixed ladders that extend more than 24 feet (7.3 m) above a lower level, the employer must ensure:	1/17/2017
1910.28(b)(9)(i)(A)	(A) Existing fixed ladders. Each fixed ladder installed before November 19, 2018 is equipped with a personal fall arrest system, ladder safety system, cage, or well;	1/17/2017
1910.28(b)(9)(i)(B)	(B) New fixed ladders. Each fixed ladder installed on and after November 19, 2018, is equipped with a personal fall arrest system or a ladder safety system;	11/19/2018
1910.28(b)(9)(i)(C)	(C) Replacement. When a fixed ladder, cage, or well, or any portion of a section thereof, is replaced, a personal fall arrest system or ladder safety system is installed in at least that section of the fixed ladder, cage, or well where the replacement is located; and	1/17/2017
1910.28(b)(9)(i)(D)	(D) Final deadline. On and after November 18, 2036, all fixed ladders are equipped with a personal fall arrest system or a ladder safety system.	11/18/2036

1910.28(c) Falling Object Protection

- (c) Protection from falling objects. When an employee is exposed to falling objects, the employer must ensure that each employee wears **head protection** that meets the requirements of subpart I of this part. In addition, the employer must protect employees from falling objects by implementing one or more of the following:
 - (1) Erecting **toeboards, screens**, or guardrail systems to prevent objects from falling to a lower level;
 - (2) Erecting **canopy structures** and keeping potential falling objects far enough from an edge, hole, or opening to prevent them from falling to a lower level; or
 - (3) **Barricading** the area into which objects could fall, prohibiting employees from entering the barricaded area, and keeping objects far enough from an edge or opening to prevent them from falling to a lower level.

1910.28(c) Falling Object Protection



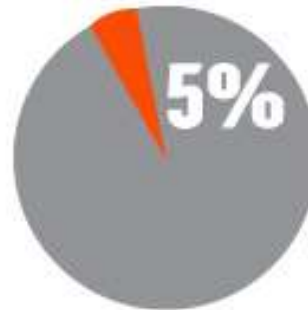
IN THE U.S. IN 2015 THERE WERE
519 FATALITIES
FROM BEING STRUCK BY AN OBJECT OR EQUIPMENT
[503 IN 2014]



247 WERE CAUSED BY
A FALLING OBJECT [243 IN 2014]



REPRESENTS 48%
OF ALL STRUCK BY
FATALITIES



REPRESENTS 5%
OF ALL WORKPLACE
FATALITIES

*BUREAU OF LABOR STATISTICS

1910.28(c) Falling Object Protection

TOOL TETHER SHORT FORM GUIDE



STEP 1 - DETERMINE TOOL TETHER TYPE BASED ON TOOL WEIGHT & HOW TOOL WILL BE USED.



A - Attached to Person



B - Attached to Structure



C - Retractable



D - Wrist

Tools Under 2 lbs

- A - **Personal:** For single tool use; moves with you
- B - **Personal with Anchor Strap:** For single tool use; attached to a structure
- C - **Retractable:** Low profile, ideal for multiple tether use
- D - **Wrist:** For short drop lengths, low profile

Tools 2 lbs - 15 lbs

- A - **Personal:** Single tool use; moves with you
- B - **Personal with Anchor Strap:** For single tool use; attached to a structure
- B - **Anchor Tether:** Attached to a structure; provides 10 foot working radius

Tools up to 25 lbs

- B - **Personal with Anchor Strap:** For single tool use; attached to a structure
- B - **Anchored Tether:** Attached to a structure; provides 10 foot working radius

IMPORTANT

When tethering any tool to a person or structure, always check with a qualified safety professional regarding shock loads to, the body, fall-protection devices, or structure anchor points.

STEP 2 - DETERMINE TOOL ATTACHMENT.

Single Tool

When you don't need to easily remove a lanyard from a tool, affixed lanyard system is acceptable.



Multiple Tools

When it's necessary to easily change-out tools from a tool tether, a Side Release Lanyard system or Carabiner clip are the best options.



STEP 3 - CHOOSE TOOL ATTACHMENT POINT FOR LANYARD OR CARABINER.



A - Tool has Lanyard Loop

Lanyard to tool's Lanyard Loop.



B - Tool has Large Ends

Tool must have ends large enough that will allow a lanyard to be looped and cinched securely without slipping off.



C - Tool has Small End(s)

Tool doesn't have large enough ends (looped lanyard would slide off) Attach a ring using a Band-It for lanyard or carabiner.



D - Tool Modification

Tool doesn't have large enough end; lanyard or Band-It might slide off... Tool must be modified.

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§1910.29

§1910.29 – Fall protection systems criteria

Specifies design and installation requirements of each fall protection system available to employers including:

- Guardrails
- Stair rails -
 - Grandfathering
- Designated areas
- Safety nets
- Covers
 - 2 X intended load
 - Secured
- Cages and wells
- Ladder safety systems
- Toeboards

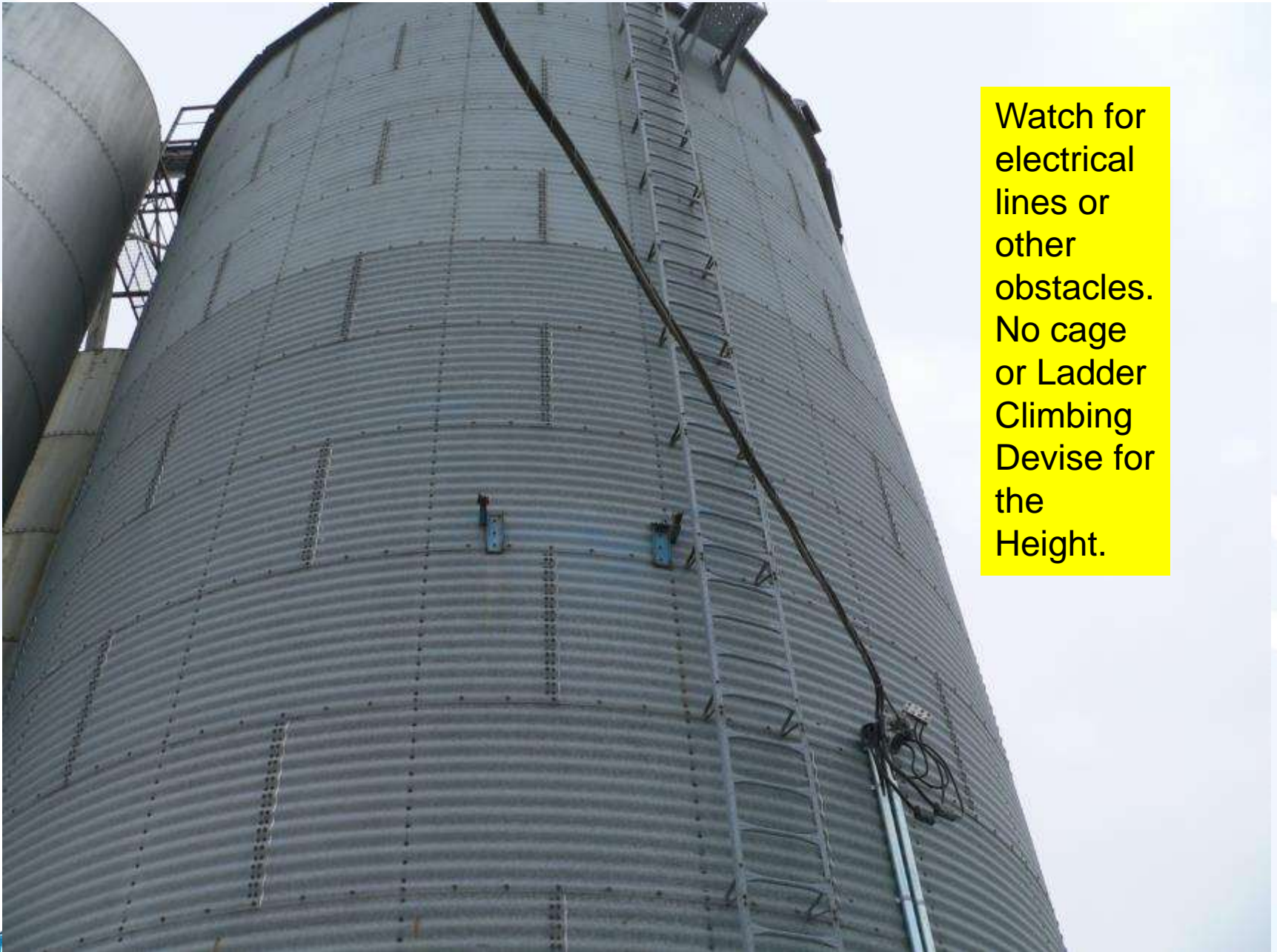
Ladder Safety System





Ladder Safety System in Use





Watch for electrical lines or other obstacles. No cage or Ladder Climbing Devise for the Height.





Top of old
ladder

X



Alternative to Ladders? Stairs

\$3,000 to
\$20,000
for stairs
vs. ladder

Huge
discussion
on “3rd
handrail”
especially
in AgriBus
Grain Bins



§1910.30



§1910.30 – Training: *May 17, 2017*

- Adds training and retraining requirements addressing fall hazards and equipment hazards for *those wearing personal fall protection systems* –
- Dockboard handling, Rope Descent and designated area set-up training (roof work) too.
- Retraining when Situation changes or reason to believe workers don't understand
- Requires employers make training understandable to workers

§1910.140

§1910.140 – Personal Protective Equipment (Personal Fall Protection Systems)

- Adds definitions for personal fall protection systems
- Adds new section on system and use criteria for:
 - Personal fall protection equipment (e.g., lanyards, ropes, D-rings, harnesses)
 - Personal fall arrest systems
 - Travel restraint systems
 - Work positioning systems



PFPS: Competent Person

- Competent person means a person who is capable of **identifying existing and predictable hazards** in any personal fall protection system or any component of it, as well as in their application and uses with related equipment, and who has **authorization** to take prompt, corrective action to eliminate the identified hazards.

Major Changes

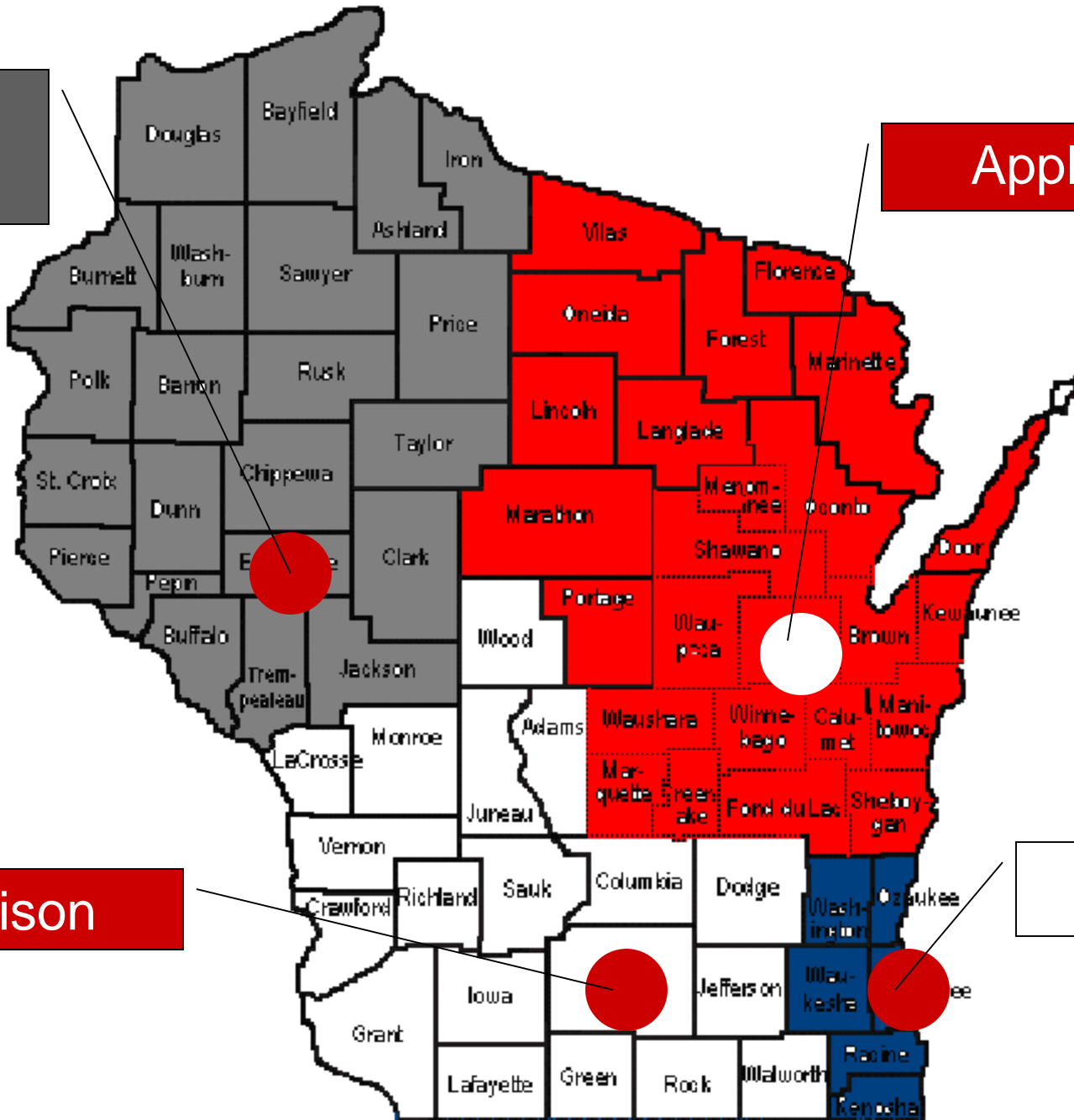
- Fall Protection Flexibility
- Updated Scaffold Requirements
- Phase-in of ladder safety systems or personal fall arrest systems on fixed ladders
- Phase-out of “qualified climbers” on outdoor advertising structures
- Rope descent systems
- Adds requirements for personal fall protection equipment (final §1910.140)
- Adds training requirements

Main Effective Dates

- Rule overall: January 17, 2017
- Training: 6 months after publication May 17, 2017
- Building anchorages for RDS: 1 year after publication – **Extended?**
- Fixed ladder fall protection: 2 years after publication
- Installation of ladder safety system or personal fall arrest system on fixed ladders: 20 years after publication – **Nov. 17, 2036**

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Compliance Assistance Resources

- OSHA's new webpage on subparts D&I:
www.osha.gov/walking-working-surfaces/index.html
- Fact Sheets
<https://www.osha.gov/Publications/OSHA3903.pdf>
<https://safety.grainger.com/people/are-your-ladders-code>
- FAQs
<https://www.osha.gov/walking-working-surfaces/faq.html>
- Publications
<https://www.osha.gov/Publications/OSHA3625.pdf>



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for every employer's workplace training needs





**Bear in mind
that working
from
elevations
requires fall
protection**

Understand? Questions? Confused?

