

Standard/Regulation Information

OSHA Walking-Working Surfaces and Personal Protective Equipment (Fall Protection Systems) Proposed Rule

On May 24, 2010, a proposed fall protection standard for walking and working surfaces was published in the Federal Register. Comments on the proposed rulemaking will be accepted until August 23, 2010. This important fall protection proposal, if enacted, would update the current General Industry regulations that have been in effect for over 30 years. The existing inconsistencies between OSHA Construction and General Industry standards create problems in the field when people try to develop appropriate work practices. The goal of this proposed standard will be to more closely align General Industry standards with Construction and Shipyard standards. OSHA is also looking to update the standard based on products that incorporate new technology.

Current Walking-Working Surfaces Standards

Most of the current Walking-Working Surfaces standards were created in 1970. Since then, several attempts to update the standards have occurred, but for various reasons the attempts were not successful. Prior to the current proposal, the last one was in 1990. The current standards for Walking-Working Surfaces are within subpart D, and include sections 1910.21 thru 1910.30.

Who is affected by the new standard?

The new standard will apply to employees engaged in general industry related activities of the 1910 series of standards. This includes activities covered in the existing sections 1910.21 thru 1910.30 (subpart D), and affects the following: 1910.66 thru 1910.68 (subpart F, Powered Platforms), 1910.132, (subpart I, PPE), 1910.178, .179 (subpart N, Material Handling and Storage), .and 1910.261, .262, .265, .268 and .269 (subpart R, Special Industries).

The new proposed standard does not relate to construction work (this is covered in the 1926 series standards, for example Subpart M 1926.500 series).

Overview of Proposed Fall Protection Requirements

The proposed standard covers several areas related to fall protection. The major fall protection points include:

Major points of proposed Walking-Working Surfaces Standard, Fall Protection Related:

Rolling Stock/ Commercial Vehicles- OSHA is requesting comments on this topic. No specific requirements for rolling stock and motor vehicles are included in the current proposal. If sufficient comments are received, a separate proposal will be issued. Rolling stock includes railcars and locomotives. The General Industry standard, if applied, would cover the non-railroad operations (example: loading and unloading by non-railroad employees on non-railroad property).

Stacked Materials- OSHA is requesting comments on this topic as well. Stacked materials include steel and concrete.

New Appendix- Section added for testing and test procedures. This outlines test criteria for various systems.

Qualified Climber- Current exemptions allow qualified climbers to climb fixed ladders, under certain conditions, without fall protection. The proposal would only exempt the billboard industry (and electric power generation, transmission, or distribution work which is covered in other standards). All other ladder climbing activities would fall under the standard fall protection requirements of the proposed standard. Qualified climbers must have completed a training or apprenticeship program.

Building Anchorages- Under the proposed rule, buildings must have separate anchorages for personal fall arrest systems and for rope descent systems. This would include anchorages for window cleaning work as well as other suspended rope descent system work.

Technological Advances in Fall Protection- OSHA is looking for comments on the latest new fall protection technologies.

Scaffolds- OSHA is proposing to remove most general industry scaffold standards in 1910.28 and 1910.29, and proposes compliance with the construction industry scaffold standards (1926 subpart L).

Rope Descent Systems (RDS)- This is an addition to the scaffold portion. Use of RDS is limited to 300 ft. Other requirements include: use in accordance with mfg requirements, train users of RDS, inspect each day, use independent lifelines and provide prompt rescue. A "sound" anchorage point is required for the RDS.

New Section on Duty to have Fall Protection- Details employer obligations for fall protection. Indicates when fall protection is required, including unprotected sides and edges, hoist areas, holes, wall openings, service pits, fixed ladders, stairways and scaffolds (including rope descent systems). The threshold is 4 ft. as it was in the past. Employers now have multiple choices on how to protect employees working in these settings, including using covers, nets, guardrails, travel restraint systems and fall arrest systems. Specific language is in the proposal allowing outdoor advertising (billboards) climbing to allow a qualified climber to climb up to 50 ft. ladders (65 ft. from grade) without fall protection. They would be required to use an 18 inch positioning lanyard in order to rest hands free. Above 50 (or above 65 ft. from grade) the climber must use a ladder safety system for the entire climb distance. Once the climber reaches the working position, they are required to connect to a fall protection system.

Fixed Ladders - A form of fall protection is required at 24 ft. and above. Ladder safety systems are an acceptable protection method. Current standard calls out a 20 ft. threshold.

Training - Employer must provide training for each employee who uses personal fall protection equipment (including rope descent systems). Training must be done by a qualified person. Training should include: the nature of fall hazards in work area; correct procedures for erecting, maintaining, disassembly and inspection of fall protection system; use, operation and limitation of equipment, including proper hook up, anchoring and tie off. Retraining is required if there is reason to believe the employee does not understand or have skill to perform procedures to minimize hazards.

Fall Protection Systems- Key requirements are the same as in construction, including: full body harness required for fall arrest; 1800 lb. maximum arresting force and 3.5 ft. deceleration distance; anchorage requirements of 5,000 lbs. or provide safety factor of at least 2 under qualified person supervision; locking type snap hooks required; horizontal lifeline systems must be designed, installed and used under the supervision of a qualified person, and provide a safety factor of at least two.

Positioning Systems- Includes conventional fall protection positioning systems, window cleaner's systems and linesman's belts.

Summary

This proposed standard, if approved, will help update General Industry fall protection standards and make it more consistent with Construction Industry standards. In the past, only section 1910.66 (which applied to powered platform work) addressed fall protection system specifics for General Industry.

The key accomplishments of the proposal are:

- 1) Updates Standards- Proposal reflects current industry practices and national consensus standards.
- 2) Consistent Standards- Make General Industry standards more consistent with Construction standards.
- 3) Safety- Estimates are that the proposed standard would prevent 20 annual fatalities and more than 3,500 injuries.
- 4) Ladder Climbing- Proposal would require previously exempt climbers to use fall protection while climbing ladders.