



Standard/Regulation Information

OSHA Electric Power Generation, Transmission and Distribution; Electrical Protective Equipment

Fall Protection Requirements

Updated March 13, 2015

On April 11, 2014, OSHA published new, updated rules and regulations for electrical power generation, transmission and distribution. These new rules cover both construction (Subpart V) and general industry (1910.269).

The overall effective date of 1910.269 and Subpart V is July 10, 2014*. The compliance deadline for most of the specific fall protection rules and regulations is April 1, 2015*.

OSHA estimates that the new rules will prevent at least an additional 118 workplace injuries and 20 fatalities annually. The previous rules were out-of-date and inconsistent, dating back to the 1970's. Efforts have been underway since 2005 to update these regulations.

Who is affected?

Under 1910.269 (General Industry), those affected include workers who operate or maintain electric power generation, transmission or distribution lines or equipment.

Under Subpart V (Construction Industry), those affected include workers who perform construction work on electric power transmission or distribution lines or equipment (construction includes the erection of new lines and equipment and alteration or conversion or improvement of existing lines and equipment).

OSHA 1910.269 and Subpart V (1926.954)

There are two main fall protection related rules that are new or revised.

Qualified employee - must use fall protection when climbing or changing location on poles, towers or similar structures, unless the employer can demonstrate that climbing or changing location with fall protection is infeasible or creates a greater hazard than climbing or changing location without it. The changes for qualified employees are effective April 1, 2015*.

Note: It will be the employer's responsibility to show OSHA why fall protection cannot be used if the employer elects to not use fall protection. Previous rules stated that fall protection equipment was not required to be used by qualified employees who are climbing or changing locations.

Arc flash – Personal fall arrest equipment must be capable of passing a drop test after exposure to an electric arc if the workers using fall arrest equipment are exposed to flames or electric arc hazards. The OSHA electric arc / heat energy level of 40+/- 5 cal/cm², is the same as the ASTM F887 arc flash requirement. Therefore if the at height worker is exposed to flame or arc flash hazards, the use of arc flash fall arrest equipment is required. Arc flash compliant fall arrest equipment (harnesses, lanyards and self retracting lanyards, ASTM F887 reference) will meet the new OSHA regulation.



Other notable fall protection related rules include the following:

For most applications, the new rules require one of the following types of fall protection:

- Fall arrest (Personal Fall Arrest System- arrest an employee in a fall)
- Restraint (a system that prevents the user from falling any distance)
- Work positioning (a system rigged to allow an employee to be supported on an elevated vertical surface and work with both hands free)(2 ft. free fall limit)
- Other fall protection (example: guardrails) meeting OSHA General industry or Construction industry standards

Fall protection equipment shall in general meet the requirements of Subpart M (1926.500 - .503)

Work positioning systems must be rigged so that workers can free fall no more than 2 ft.

Anchorage for work positioning equipment shall be capable of supporting at least twice the potential impact load of an employee's fall, or 3,000 lbs., whichever is greater.

Wood pole fall restriction devices (WPFRD's) meeting the ASTM F887 standard are deemed to meet the anchorage strength requirement when used in accordance with manufacturer's instructions. Note: ASTM F887 does not require WPFRD's (example: the Cynch-Lok product) to be arc flash rated.

Employees in elevated locations more than 4 ft. above the ground shall use some type of fall protection.

Aerial lift fall protection is required. Acceptable forms of protection include fall arrest systems and fall restraint systems. A full body harness is required.

Full body harnesses are required for a fall arrest system. Body Belts are allowed to be used for restraint systems and work positioning systems.

States with their own safety and health programs must have standards that are at least as effective as Federal standards.

Employers shall provide rescue equipment to ensure the prompt and safe rescue of employees from enclosed spaces.

Summary: Major fall protection points in OSHA's new rule for Electric Power Generation:

Qualified climber exemptions for fall protection use are changing. Most applications will require the use of fall protection. Previous rules did not require fall protection to be used by qualified employees when climbing or changing positions.

If employees working at height can be exposed to heat or arc flash potential, arc flash rated fall arrest products shall be used. Compliance to the arc flash portion of ASTM F887 for harnesses and lanyards would establish compliance to OSHA.

Please review the entire OSHA regulations for complete details and requirements that apply to your applications. This document is intended as a Capital Safety summary only.

*On February 18, 2015, OSHA issued a memorandum addressing new effective dates for portions of the revised standard. Two areas specific to fall protection are delayed, as follows:



Aerial Lifts – Line clearance and tree trimming work covered within this standard.

- Until March 31, 2015 no citations will be issued provided employer ensures that each employee uses a body belt and lanyard.
- From March 31 to December 31, 2015 no citations will be issued provided that the employer is testing the use of fall restraint systems in the type of bucket at issue, and provided that each employee uses a body belt and lanyard attached to the boom of the aerial lift.

Qualified Climber

- OSHA has delayed the original effective date of April 1, 2015 for Qualified Climbers to use fall protection when climbing or changing position on poles, towers, or similar structures.
- Beginning on June 1, Qualified Climbers must use fall protection when climbing or changing position on poles, towers, or similar structures unless employer can show that climbing or changing location with fall protection is infeasible or creates a greater hazard than climbing or changing location without it.