A REAL-WORLD VIEW: IMPLEMENTING NEW OSHA FALL PROTECTION REGULATIONS

PPSA Health & Safety Conference – June 2018

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AGENDA

- Background/context
- Overview of new federal regulations
  - Roof edge/designated area
  - Assessments
  - Anchorages
  - Design changes (ladders, stairs, guardrail, etc.)
  - Program/policy changes
- Next steps: action plan
HOW DID WE GET HERE?
HISTORY

Originated 1971

Updates
- 1990
- 2003
- 2010

2016 Published
UNDERSTAND REQUIREMENTS

Two “types” of hazards

Duty to have fall protection 1910.28

Systems criteria 1910.29(b)
GRANDFATHERED CHANGES?

Unless otherwise specified, changes are not grandfathered.
HOW HAVE YOU REVIEWED THE NEW REGULATIONS?
ROOF EDGE/DESIGNATED AREA
SAFE DISTANCE TO AN EDGE

- Less than 6 feet from roof edge
- 6-15 feet from roof edge
- 15 feet or more from roof edge
ROOF EDGE (INFREQUENT & TEMP.)

0 to 6 Ft. = Conventional Fall Protection
6 - 15 ft. = Designated Area Warning Line
15 ft. or more = Administrative Control
ROOF EDGE

- Temporary
  - “Brief” - Performed in less time than set up of fall protection
  - “Simple” – No significant equipment, personnel or resources
  - “Short-term” – Doesn’t require multiple days/shifts

- Infrequent
  - Only on occasion
  - Not routine part of job
ROOF EDGE (FREQUENT)

0 to 15 Ft. = Conventional Fall Protection

15 ft. or more = Designated Area or Conventional Fall Protection
NEW! ASSESSMENT REQUIREMENT

- 1910.132(d) requires workplace assessment
  > Didn’t previously apply to fall protection….NOW IT DOES!

- OSHA intent is for proactive hazard identification

- No implementation or grandfather clause
  > Required on January 17, 2017
UNDERSTAND REQUIREMENTS

Survey

Select PPE

Communicate

Ensure proper fit
GREAT DATA = GREAT DECISIONS

32% of risk in top 1% of hazards

77% of risk in top 10% of hazards
SAMPLE RESULTS

Stairs
- 55% non-compliant

Ladders
- 72% non-compliant

Platforms
- 62% non-compliant

Roofs
- 100% non-compliant
<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>NONE</th>
<th>MINOR</th>
<th>QP EVAL</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stair</td>
<td>73</td>
<td>160</td>
<td>8</td>
<td>241</td>
</tr>
<tr>
<td>Ladder</td>
<td>104</td>
<td>182</td>
<td>28</td>
<td>314</td>
</tr>
<tr>
<td>Platform</td>
<td>124</td>
<td>338</td>
<td>68</td>
<td>532</td>
</tr>
<tr>
<td>Roof</td>
<td>6</td>
<td>14</td>
<td>12</td>
<td>32</td>
</tr>
<tr>
<td>Total</td>
<td>307</td>
<td>694</td>
<td>116</td>
<td>1,119</td>
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</tbody>
</table>
ANCHORAGES
 Osama’s 1910.27(b)(1)(i)

> ...before any rope descent system is used...building owner has identified, tested, certified, and maintained each anchorage

> Certification of anchorages – November 20, 2017
Does not explicitly require 100% field testing of the anchorages post installation

> Testing to 5,000 pounds could damage anchor or structure

> Depends on documentation for design and installation
ANCHORAGE CASE STUDY

- Existing systems lack documentation
  - When records are available
    - Straightforward: certification = documentation
  - When records are “lost”
    - More challenging with documentation lacking
      - Load testing
      - Other investigative effort required
DESIGN CHANGES
### Stairs details

<table>
<thead>
<tr>
<th>Item</th>
<th>Old Rule</th>
<th>New Rule</th>
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<tbody>
<tr>
<td>Overhead clearance</td>
<td>84 inches</td>
<td>80 inches</td>
</tr>
<tr>
<td>Handrail height</td>
<td>30-34 inches</td>
<td>30-38 inches</td>
</tr>
<tr>
<td>Stair rail</td>
<td>N/A</td>
<td>42 inches</td>
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</table>
REQUIRED STAIR DESIGN CHANGES?

- Installed after 1/17/17
  - 42” stair rail required
    - Plus handrail on open sides
  - Handrail must be 30-38”
- No retrofit requirement as long as it meets the minimum
Ladder safety systems required on fixed ladders greater than 24 feet

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Jan 2017</td>
<td>Replaced or modified</td>
</tr>
<tr>
<td>Nov 2018</td>
<td>New ladders</td>
</tr>
<tr>
<td>Nov 2036</td>
<td>Retrofit</td>
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</table>
IMPACT TO GUARDRAILS?

- Parapet option excluded
- Previous grandfather clause – 36 inches – excluded
RULES FOR SELF-CLOSING GATES?

- Self-closing gates equipped with a toprail and midrail
- Chains not included for ladder openings
UPDATE POLICIES & PROGRAM
Company policy

- OSHA 1910 Subparts D&I
- ANSI Z359.1 standard
WHAT NEEDS TO CHANGE?

- Awareness training vs. authorized person training
GAP ANALYSIS

Current State

Desired/Required State

ACTION PLAN
On a scale of 1-5, how much does this impact your organization?
ACTIONS TO TAKE
3 factors to consider when planning implementation

> Who is your team?
  
  • Does that involve a third party specialist?

> What are your priorities?

> What happens now vs. later?
NEW DOCUMENTATION REQUIREMENTS

- Training
- Assessment
- RDS anchorage certification
WHERE DO I START?

1. Read Regulatory Text (pages 82981 to 83006)

2. Plan communication and training for staff

3. Read Preamble (Recommended sections in handout)

4. Learn more on this topic
   (Resources in handout)
AUDIENCE QUESTION

What ideas do you have to address the new regulations?
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