



# Fall Protection In General Industry Spencer Hunter, MSA North American Training Instructor





# **OSHA's 2021 Top 10 Most Frequently Cited Violations**









### Walking-Working Surface:

"Means any horizontal or vertical surface on or through which an employee walks, works, or gains access to a work area or workplace location" (1910.21(b))

- □ <u>1910.21</u> Scope and Definitions
- **1910.22** General Requirements
- □ <u>1910.23</u> Ladders [General Reqs. for Temp. & Perm. Const. / Use]
- □ <u>1910.24</u> Step bolts and Manhole Steps
- □ <u>1910.25</u> Stairways
- □ <u>1910.26</u> Dockboards
- □ <u>1910.27</u> Scaffolds and Rope Descent Systems
- □ <u>1910.28</u> Duty to Have Fall Protection & Falling Object Protection
- □ <u>1910.29</u> F.P. Systems & Falling Object Protection-Criteria & Practices
- □ <u>1910.30</u> Training Requirements



1910.28(b) – Duty to Have Fall	Protection [@4'] & Falling Object Protection
Unprotected Sides & Edges	✓ Guardrail / Net / PFPS
Hoist Areas	✓ Guardrail / PFAS / Travel Restraint
Holes ( >2" in Least Dim.)	✓ Covers / Guardrails / Restraint / PFAS
Dockboards	✓ No Guardrails if Solely using Motorized Equipment
Runways & Similar Walkways	✓ Guardrails or Guardrails + PFAS or Restraint
Dangerous Equipment < 4'	✓ Guardrail / Travel Restraint
Openings ( >30" Tall & 18" Wide)	✓ Guardrail / Travel Restraint / PFAS
Vehicle Repair, Serv. & Assembly Pits.	✓ < 10' in Depth – Limit Access w/in 6'
Fixed Ladders	✓ >24'
Outdoor Advertising (Billboards)	✓ Qualified Climber until Nov. 19, 2018
Stairways	✓ Guardrails @ Platform & on Risers w/ 4+ Steps
Scaffolds & Rope Descent Systems	✓ Ensure compliance with 1926, Subpart L
Work on Low-Sloped Roofs	✓ Various Options Exist
Slaughtering Facility Platforms	✓ Guardrails or Restraint unless Infeasible



- □ <u>1910.29(c)</u>: Safety Net Systems Meet 1926 Subpart M
- □ <u>1910.29(d)</u>: Designated Areas

**1910.29(e)**: Covers

- □ <u>1910.29(f)</u>: Handrails and Stair Rail Systems
- □ <u>1910.29(g)</u>: Cages, Wells, & Platforms used w/ Fixed Ladders
- □ <u>1910.29(h)</u>: Outdoor Advertising
- □ <u>1910.29(i)</u>: Ladder Safety Systems
- <u>1910.29(j)</u>: Personal Fall Protection Systems
- □ <u>1910.29(k)</u>: Protection from Falling Objects
- □ <u>1910.29(I)</u>: Grab Handles



Before exposure to a fall hazard, employees must be trained.

- □ Must occur before May 17, 2017
- Training to be done by a "qualified person"

□ Topics:

- □ Nature of fall hazards in work area and how to recognize them;
- Procedures to follow to minimize those hazards;
- Correct procedures for installing, inspecting, operating, maintaining, & disassembling the systems the employees will use; &
- The correct use of PFPS's, including proper hook-up, anchoring, tie-off techniques, inspection, and storage as specified by MFR.
- Retraining
- Training must be understandable.



### **Prior to November 2018**

When was fall protection required?
Ladder Height > 20'

Fall Protection Methods:Cage + Well

## After November 2018

When is fall protection required now?
Potential Fall Distance > 24'

Fall Protection Methods:
 100% Connection (Twin Leg Lanyard/PFL)
 Overhead Mounted SRL
 Vertical Lifeline

How will people try to eliminate the need for fall protection on fixed ladders?



### **Is Additional Fall Protection Required?**

Additional fall protection is **not required** if the ladder is 23' tall and following three areas apply:

Platform dimensions are at least (24" X 30")
 The platform is equipped with a compliant guardrail system

Ladder is equipped with a cage and well

Additional fall protection is required if the above three areas do not apply, and your potential fall distance is >24'.



# **Portable Ladders**

Various types

# Self Supporting LadderStandard A Frame

Non-Self-Supporting Ladder
 Extension Ladder
 Single Ladder





# **Common Misuses on Portable Ladders**





# Can you see the risk?













### **Performance Duty Ratings**





#### LIGHT DUTY - BASIC DESIGNS



#### MEDIUM DUTY - LIGHTWEIGHT DESIGNS



375lb LOAD CAPACITY TYPE IAA

#### COMMERCIAL GRADE - MOST DURABLE

# Inspection



Rungs: Loose, cracked, bent, or missing	YES NO	Steps: Loose, cracked, bent, or missin	YES	
Rails: Cracked, bent, split, or frayed		Rails: Cracked, bent, split or frayed		
Labels: Missing or not readable		rail shields Labels:		
Rung Locks: Loose, bent, missing, or broken		Missing or not readable		
Hardware: Damaged, loose, or missing		Pail Shelf: Loose, bent, missing, or broken		
Shoes: Worn, broken, or missing		<b>Top:</b> Cracked, loose, or missing		
Rope / Pulley: Loose, bent, or broken		Spreader: Loose, bent, or broken		
General: Rust, corrosion, or loose		General: Rust, corrosion, or loose		
Other: Bracing rivets		Other: Bracing, shoes, or rivets		



## Self Supporting

- □ Fully open and lock spreader arms.
- If you have tools attached to your ladders remove them before adjusting or use an accessory to secure them.
- □ Be careful moving objects. (Pushing / Pulling)
- □ Do not climb on the back side of a single sided ladder.
- □ Don't stand or sit on the following areas:
  - □ Top two rungs
  - Pail Shelf



# **Non-Self-Supporting**

- Block the ladder feet against the structure and walk the ladder upward into a vertical position.
- Move the ladder into position4:1 Ratio
- Ensure the top rung extends at least 3 feet past the landing surface.
- Ensure the ladder is properly secured:Feet
  - □ Top Rungs







To complete a construction project, a worker places a portable ladder on top of a piece of equipment or on the roof of a structure that is inside a large building.

- The top of the equipment or structure is at least 10' x 10' and at least 10' above the ground. It is stable, level, and sufficiently strong to support the loads imposed by the worker, materials, and tools needed for the job.
- The worker will then do the construction task while on the ladder.

# Is fall protection required for this worker?



### **Is Fall Protection Required?**

□ While on the structure? = Yes

□ How about on the portable ladder?

Falls under Subpart X (No fall protection required)

But is there a hazard?General Duty Clause 5(a)(1)



# **Standard Interpretations - OSHA Response**



# "Section 1926.501(b)(1) states:

- Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.
- The 10' x 10' top surface of the equipment and the roof the structure that is inside the large building both meet this definition and would be considered a walking/working surface. The requirements of Subpart M would apply to a worker who is on those surfaces."

# **Standard Interpretations - OSHA Response**



"However, with respect to fall protection requirements for a worker on the ladder, §1926.500(a)(2)(vii) states:

- Subpart X (29 CFR 1926.1050 et seq.) does not require fall protection for a worker on a portable ladder. Therefore, no additional fall protection is required while the worker is on the ladder.
- □ The fact that the ladder is on either of the surfaces you describe, rather than on the ground, does not alter this conclusion."



We thank you for your participation and for allowing us to help you and keep your employees safe.





The Safety Company

TELL US WHAT YOU THINK!

Spencer Hunter spencer.hunter@msasafety.com 724-831-3921