

OSHA's Walking-Working Surfaces and Fall Protection Standard Final Rule: November 17, 2016

This rule eliminates the existing mandate to use guardrails as a primary fall protection method and allows employers to choose from accepted fall protection systems they believe will work best in a particular situation. As much as possible, OSHA aligned fall protection requirements for general industry with those for construction, easing compliance for employers who perform both types of activities.

The rule requires employers to protect workers from fall hazards along unprotected sides or edges that are at least 4 feet above a lower level. Under the final rule, employers may choose from the following fall protection options:

Guardrail System – A barrier erected along an unprotected or exposed side, edge, or other area of a walking-working surface to prevent workers from falling to a lower level.

Safety Net System – A horizontal or semi-horizontal, cantilever-style barrier that uses a netting system to stop falling workers before they make contact with a lower level or obstruction.

Personal Fall Arrest System – A system that arrests/stops a fall before the worker contacts a lower level. Consists of a body harness, anchorage, and connector, and may include a lanyard, deceleration device, lifeline, or a suitable combination. Like OSHA's construction standards, the final rule prohibits the use of body belts as part of a personal fall arrest system.

Positioning System – A system of equipment and connectors that, when used with a body harness or body belt, allows a worker to be supported on an elevated vertical surface, such as a wall or window sill, and work with both hands free.

Travel Restraint System – A combination of an anchorage, anchorage connector, lanyard (or other means of connection), and body support to eliminate the possibility of a worker going over the unprotected edge or side of a walking-working surface.

Ladder Safety System – A system attached to a fixed ladder designed to eliminate or reduce the possibility of a worker falling off the ladder. A ladder safety system usually consists of a carrier, safety sleeve, lanyard, connectors, and body harness. Cages and wells are not considered ladder safety systems.

Rope Descent Systems: The rule adds a 300-foot height limit for the use of RDS. It also requires building owners to affirm in writing that permanent building anchorages used for RDS have been tested, certified, and maintained as capable of supporting 5,000 pounds for each worker attached.

The new rule phases in a requirement for employers to have ladder safety or personal fall arrest systems for fixed ladders that extend more than 24 feet, and phases out the use of cages or wells for fall protection under the following timeline: Starting in two years, all new fixed ladders and replacement ladder/ladder sections must have a ladder safety or personal fall protection system. For existing ladders, within two years, employers must install a cage, well, ladder safety system, or personal fall arrest system on fixed ladders that do not have any fall protection. Within 20 years, all ladders extending more than 24 feet must have a ladder safety or personal fall arrest system.

The rule adds a requirement that employers ensure workers who use personal fall protection and work in other specified high hazard situations are trained, and retrained as necessary, about fall and equipment hazards, including fall protection systems.

Most of the rule will become effective 60 days after it is published in the Federal Register, but some provisions have delayed effective dates, including:

- Ensuring exposed workers are trained on fall hazards (6 months),
- Ensuring workers who use equipment covered by the final rule are trained (6 months),
- Inspecting and certifying permanent anchorages for rope descent systems (1 year),

- Installing personal fall arrest or ladder safety systems on new fixed ladders over 24 feet and on replacement ladders/ladder sections, including fixed ladders on outdoor advertising structures (2 years),
- Ensuring existing fixed ladders over 24 feet, including those on outdoor advertising structures, are equipped with a cage, well, personal fall arrest system, or ladder safety system (2 years), and
- Replacing cages and wells (used as fall protection) with ladder safety or personal fall arrest systems on all fixed ladders over 24 feet (20 years).

Questions? Contact The Redstone Group at 614-763-5034 x7007 or jwilliams@redstonegrp.com