

New OSHA Requirements - Residential Fall Protection

By Kim Marie DiMatteo — DiMatteo Group



Effective 6/16/11. Enforcement 9/16/11. Earlier directives (in the late 1990's allowed the residential construction industry to by pass some of the original fall protection requirements.

Home building industry felt they could not adopt the standard as it was not feasible and created greater hazards because there was no suitable attachment or anchor points for guard rails or personal fall protection systems. Allowed use of a designated monitor to be sure workers did not get too close to the edge of a low slope roof or to use slide guard on steeper roofs, practical to use and most risky. There continued to be a high number of fall related injury's and deaths in the Residential Construction industry and many industry representatives including the National HBA pushed for and received changes in the form of standard 03-11-002 due to high number of falls in the industry and the availability of many fall protection devices not available in 1995. This change went into effect in June 2011 and enforcement has begun September 2011.

OSHA never defined what residential construction was back in 1995. New Standard defines it as meeting 2 elements. These requirements for Construction employees who are exposed to falls of 5 feet or greater. 1) Structure is used as home or dwelling and 2) Structure must be built using wood frame construction.

Requirements consist of, conventional fall protection: guardrails, safety nets or personal fall arrest systems (PFAS). Alternative fall protection measures must also meet the requirements 29 CFR 1926.502k.

Employers are still able to use alternative fall protection programs if they find that conventional fall protection is infeasibility or creates a greater hazard. If this is the case a qualified person needs to develop a site specific written fall protection plan and also document why convention fall protection options are not feasible. The current standard will now require the employer to prove that conventional fall protection is infeasible or creates a greater hazard.

So what is infeasible? Infeasible is defined in sub part M as meaning that it is impossible to perform the construction work using a convention fall protection system (guardrail system, safety net system, person fall arrest system(PFAS) or that it is technologically impossible to use any of these fall protection systems.

Per OSHA, the presumption of implementing a fall protection system is feasible has the burden of a development a fall protection plan (fpp) in lieu of other systems. Options available include, grad rails, safely nets, personal fall arrest systems, fall restraint systems and fall protection plans.

The fall protection plans must identify areas where conventional fall protection is infeasible and must classify those area's as a controlled accessed zoned(CAZ). See below:

1. Include a description of using other methods to eliminate hazards. It must use as safety monitor system in conformance with 1926.502 (h) if no other system is available.
2. Be prepared by a qualified person
3. Be site specific and in a written content
4. A copy of the written fall protection program must be on site.
5. Be administered by a competent person
6. Explanation of conventional fall protection was infeasible or would create a greater hazard.
7. Contain a method to identify employees allowed in controlled access zone (CAZ).
8. Requires a review of near-miss or accidents involving employees covered by fall protection plan.
9. Must make changes to the plan if review shows need for a change
10. Training must be certified by the employer

To obtain a full description of the new Fall Protection Requirements contact your local OSHA office.

If you're BUILDING, call us NOW!



COX COMMUNICATIONS

Save time and money - call us at ground level and get connected to our state-of-the-art network!

Ask us about our new Structured Wiring Packages!

Call Cox Communications for all your communication needs:
(860) 432-0619
www.cox.com/NewEngland

Engineering • Design

Specifications • Construction

Cox Digital Cable.
Cox High Speed Internet.
Cox Digital Telephone.