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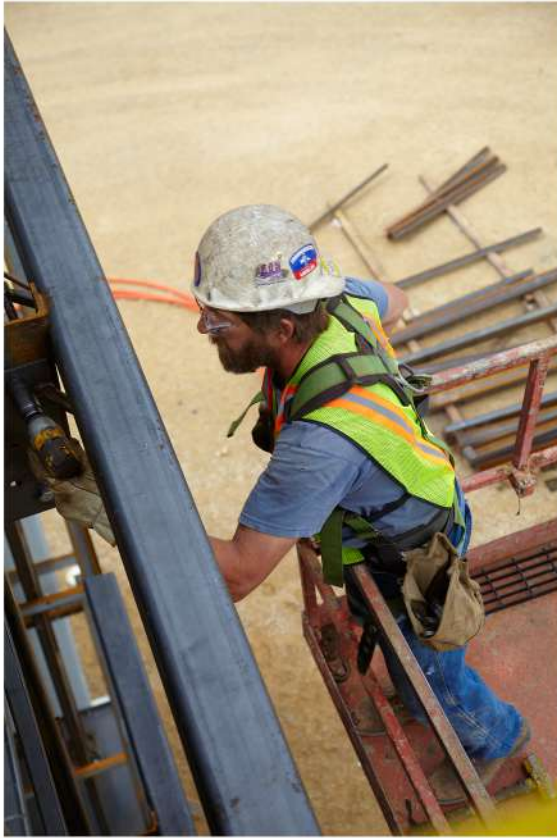


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# Understanding the Final Rule to Update General Industry Walking-Working Surfaces and Fall Protection Standards



Falls from heights and on the same levels or working surfaces are among the leading causes of serious work-related injuries and deaths. OSHA has issued a final rule on Walking-Working Surfaces and Personal Fall Protection Systems to better protect workers in general industry from these hazards.

OSHA estimates the changes to these standards will **prevent 29 fatalities and 5,842 lost-workday injuries** each year. This article describes some of the notable changes of this final rule to help you understand how they may affect your business.

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# Acceptable Fall Protection

OSHA defines fall protection as “any equipment, device, or system that prevents a worker from falling from an elevation or mitigates the effect of such a fall”. Under the final rule, employers may choose from the following fall protection options:

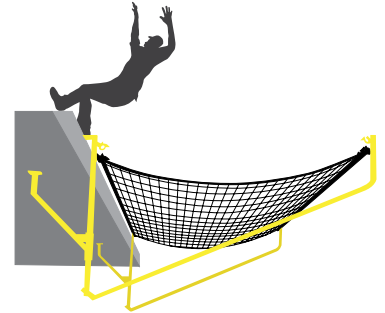


## Guardrails

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 Systems

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.



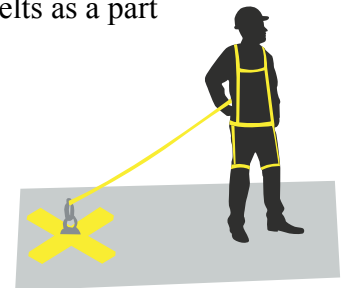
## Personal Fall Arrest Systems

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. OSHA strictly prohibits the use of body belts as a part of a personal fall arrest system.



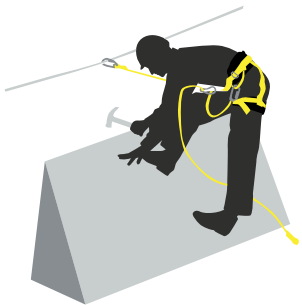
## Travel Restraint Systems

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.



## Work Positioning Systems

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.



## Ladder Safety Systems

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



**Note:** In some cases non-conventional fall protection such as warning lines, controlled access zones and safety monitoring systems can be used. However, these must be accompanied by a written fall protection program highlighting the reasons why conventional fall protection is unsafe or infeasible in the specific application.



# Final Rule: Notable Changes

The final rule updates and revises the outdated general industry Walking-Working Surfaces and Personal Protective Equipment standards on slip, trip, and fall hazards. These changes cover a wide variety of general industry firms from warehousing to window washing. Here are some of the notable changes to the rule that will affect most industries. Check out [www.osha.gov](http://www.osha.gov) to find the full regulatory text and a full list of changes made by this rule.

## Ladders

In general, ladders must be capable of supporting their maximum intended load, while mobile ladder stands and platforms must be capable of supporting four times their maximum intended load. Ladders must also be inspected before and after each use to identify any defects that could cause an injury.

### *Fixed Ladders*

A ladder that is permanently attached to a structure, building or piece of equipment is known as a fixed ladder. These include individual-rung ladders, but not ship stairs, step bolts or manhole steps.

The new rule phases in a requirement for all employers to have ladder safety systems or personal fall arrest systems for all fixed ladders that extend over 24 feet. It also phases out the use of cages or wells for fall protection. In order to allow time for employers to comply with this new rule, the following timelines will be put into place regarding fixed ladders:

- **In two years**, all *new or replacement* fixed ladders or ladder sections must be equipped with a ladder safety or personal fall arrest system.
- **In two years**, for *existing ladders* that do not have any fall protection equipment employers must install a cage, well, ladder safety or personal fall arrest system.
- **Within 20 years**, all ladders extending more than 24 feet must have a ladder safety or personal fall arrest system as cages and wells will no longer be considered acceptable fall protection equipment.



### *Portable Ladders*

Under the revisions of the final rule regarding portable ladders OSHA requires that employers must ensure that:

- Rungs and steps are slip resistant
- Ladders used on slippery surfaces are secured and stabilized
- Ladders are not moved, shifted, or extended while a worker is on them
- Top steps and caps of stepladders are not used as steps
- Ladders are not fastened together to provide added length unless designed for such use
- Ladders are not placed on boxes, barrels, or other unstable bases to obtain added height

## Rope Descent Systems

A Rope Descent System (RDS) consists of a roof anchorage, support rope, descent device, carabiners or shackles, and a chair or seatboard. These systems are widely used to perform elevated work such as window washing.

The new rule includes updated regulations for the use of RDS to better protect the workers using this equipment. The changes to the rule include:

- RDS can no longer be used for heights greater than 300 feet above grade unless the employer demonstrates that it is not feasible to access such heights by any other means or that those means pose a greater hazard than using an RDS.
- Before any RDS is used, the building owner must inform the employer in writing that each anchorage has been inspected and certified that it is capable of supporting at least 5000 lbs in each direction for every employee attached.
- After the first certification, an annual inspection is required and a re-certification by a competent person must be performed at least every 10 years.
- No employee can be allowed to use an RDS until the seatboards or chairs have been tested with a live load of at least 300 lbs.



## Scaffolding

All scaffolding used in general industry must be in compliance with the scaffolding standard 29 CFR Part 1926, Subpart L which currently applies in all construction applications. This standard covers the required elements of compliant scaffolding as well as other important topics such as proper use and required training.

## Connection Equipment

Employers must make sure the fall protection equipment provided to their employees has been tested and deemed safe for their use. All parts of fall arrest, work positioning and travel restraint systems must be inspected before and after every use to be sure the safety of the equipment has not been compromised.

Under the new rule, OSHA now requires all D-rings, snaphooks and carabiners be proof tested to a minimum tensile load of 3,600 lbs without cracking, breaking, or incurring permanent deformation. The previous strength requirements for this type of equipment were much lower and were not consistent with ANSI requirements.



## Falling Objects

The new rule also includes requirements for protecting employees in general industry from falling objects. When employees are exposed to falling object hazards the employer must ensure that each employee is provided with and wears compliant head protection. They must also implement one or more of the following:

- Erect toeboards, screens, or guardrails to prevent objects from falling to a lower level
- Erect canopy structures
- Barricade the area into which objects fall and prohibit workers from entering that area

## Outdoor Advertising/Billboards

With the new rule, OSHA will also be phasing out the use of a “qualified climber” for the outdoor advertising industry. Today OSHA recognizes a qualified climber as a person that has been deemed physically capable and properly trained to perform duties that involve climbing without fall protection. In most cases, once a climber reaches their desired height a fall protection system must be in place.

*As of November 19, 2018* all workers climbing fixed ladders over 24 feet will be required to use a ladder safety or personal fall arrest system and qualified climbers will be prohibited.



## Low-Sloped Roofs

The new rule also clarifies the fall protection requirements for work on flat or low-sloped roofs. This provision will especially apply to roofing and HVAC contractors performing work at these heights. OSHA now defines the type of fall protection required based on how close employees are working to the edge of the roof.

### *When work is performed less than 6 feet from the roof edge*

- The employer must ensure each employee is protected from falling by a guardrail, safety net system or fall arrest/restraint system.

### *When work is performed at least 6 feet but less than 15 feet from the roof edge*

- The employer must ensure each employee is protected from falling by a guardrail, safety net, or fall arrest/restraint system
- The employer may also use a designated area when performing work that is both infrequent and temporary. In this case, workers must not be permitted to work outside the designated area.

### *When work is performed 15 feet or more from the roof edge*

- The employer must ensure each employee is protected from falling by a guardrail, safety net, fall arrest/restraint system or a designated area. The employer is not required to provide fall protection if the work is both infrequent and temporary.
- A rule prohibiting employees from going within 15 feet of the roof edge without fall protection must be implemented and enforced.



### Training

Training must be provided to all employees who use fall protection systems or are exposed to fall hazards. This training must be given by a competent person before the employees are exposed to any fall hazards.

Training must be conducted in a manner that is understood by all employees. Employers must make sure employees are trained in at least the following topics:

- The nature of fall hazards and how to recognize them
- The procedures to be followed to minimize those hazards
- The correct procedures for installing, inspecting, operating, maintaining, and disassembling the fall protection systems the employee uses
- The correct use of fall protection systems and equipment including, but not limited to, proper hook-up, anchoring, and tie-off techniques
- The methods of equipment inspection, maintenance and storage of the equipment as specified by the manufacturer

To comply with the final rule, all employees must be trained *on or before May 17, 2017*

### Retraining

Situations requiring retraining of employees include, but are not limited to:

- When changes in the workplace render previous training obsolete or inadequate
- When changes in the types of fall protection systems or equipment to be used render previous training obsolete or inadequate
- When inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee no longer has the requisite understanding or skill necessary to use equipment to perform the job safely



## In Conclusion

This rule change brings many benefits to both employers and their employees. Employers have more flexible options for selecting fall protection and employees will be better protected in their line of work. Keep in mind that while most of the changes are effective within 60 days of the original publishing date, November 18, 2016, some provisions have delayed timelines for compliance.

To see the full regulatory text, the OSHA fact sheet, or frequently asked questions about these changes visit <https://www.osha.gov/walking-working-surfaces/index.html>.



### *Let Fastenal Help*

If you would like help making sure your current fall protection program meets these requirements or are looking for new equipment to comply with the changes please reach out to our Safety Specialist team by emailing [safetyquestions@fastenal.com](mailto:safetyquestions@fastenal.com).

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<https://www.osha.gov/walking-working-surfaces/index.html>