



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (Oregon OSHA)

350 Winter Street NE

PO Box 14480

Salem, OR 97309-0405

Phone: 503-378-3272

Toll Free: 1-800-922-2689

Fax: 503-947-7461

osha.oregon.gov

Issued: August 16, 2002

Revised: October 2, 2018

Michael Williams
Vertical Access Systems & Technology, Inc.
2428 Whetstone NW
Salem, Oregon 97304

This letter was revised to update Oregon OSHA's response based on a rulemaking revision in this matter.

Question 1: At what distance from the edge does Oregon OSHA feel that a person may walk to do tasks and not be tied off?

Answer 1: There is no specific distance from an unprotected edge that is adequate to preclude the use of fall protection. Fall protection is required for employees in general industry who are exposed to falls of 4 feet or more on walking/working surfaces and 10 feet or more on vehicles and rolling stock. Fall protection is required for employees performing construction activities who are exposed to falls of 6 feet or more on walking/working surfaces, except on scaffolding where fall protection is required at 10 feet or more. All employees working above or adjacent to dangerous equipment must be protected from falling at any height.

NOTE: The new Walking-Working Surfaces: Designated areas [[1910.28\(b\)\(13\)](#)] allows general industry employers with work being performed on a 2/12 or less pitch roof to use designated areas (distances of 6 feet to 15 feet or more from a fall hazard), without using fall arrest or fall restraint, under certain conditions. Refer to the rule for specifics.

The employer must evaluate each walking/working surface to first determine if a fall hazard exists, and then decide which fall-protection system to use if employees are going to be exposed to a fall hazard. When determining if employees will be exposed to a fall hazard, there are a variety of factors that must be considered, including distance from the unprotected edge. There are many factors that could affect that distance. Is the walking/working surface sloped, uneven, slippery, or are there tripping hazards? Are there weather conditions such as wind, ice, snow, or rain? Does the work involve activities that could cause a worker to lose their balance, such as pulling, pushing or carrying material? Could the worker stumble and fall over the edge? The distance from the edge must be such that employees will not be exposed to the fall hazard. If this cannot be achieved, then one or more fall-protection systems must be provided, installed, and implemented according to the criteria in [1926.502](#), [437-003-0502](#), [437-003-1502](#), and [437-003-2502](#).

The only exception for the use of fall protection in general industry and during construction activities is when employees are making an inspection, investigation, or assessing workplace conditions prior to the actual start of work or after all work has been completed. This exception does not apply in general industry if fall-protection anchors are already installed and are available for workers to use for pre-work and post-work inspections, investigations, or assessments.

Question 2: Is a person required to stay tied off while moving rigging, including rigger beams, counter weights, fall-protection lines, and wire ropes, from one location to another on a roof?

Answer 2: Yes. If the person is still exposed to a fall hazard, then he/she must stay tied off. If life lines present challenges to moving material and equipment, then the employer should consider another form of fall protection or implement a different design of the present system.

Question 3: Does a worker need to be protected from falling when exposed to falls of 10 feet or more from more than one direction?

Answer 3: Yes. When fall protection is required as discussed in answer 1, the fall-protection system used must protect the worker from falls to lower levels or dangerous equipment in all directions of exposure.

Question 4: Is fall protection required for both unguarded edges when working at or near a corner of a roof with a potential fall distance of 10 feet or more?

Answer 4: Yes. See answer 1 above.

Question 5: When using multiple anchor points, are workers allowed to disconnect their life lines from one anchor and move to the next one without being connected, or are they required to use multiple life lines that allow continuous protection?

Answer 5: If workers are exposed to a fall while moving to the next anchor, then fall protection is required where feasible. If it is feasible to provide fall protection 100 percent of the time by using a Y-lanyard (double tie off lanyard) to connect to the next anchor before disconnecting from the previous anchor, then it's required.

Question 6: On roofs that do not have any anchorage points near the center, are employees allowed to install fall protection, including attaching to anchor points located along the edge of the roof or on parapets that are only 24 to 30 inches high, without being tied off?

Answer 6: Oregon OSHA acknowledges that there may be times during the installation of fall protection when it may be infeasible to be protected against a fall for a brief period. Such a time could be when installing an anchor point located near a roof's edge. However, the employer must consider using another fall-protection system to install an anchorage point in such a location, or install the anchor point from a ladder. If it is feasible to provide fall protection 100 percent of the time when installing anchors or transitioning from one anchor to another, then it's required.

Question 7: Is a worker allowed to lift rigging over the edge of the roof and located it 10 to 15 feet back from the edge while protected by either an arrest or restraint system, and then disconnect the life line, move to the next anchorage point (also 10 to 15 feet from the edge of the roof), and reconnect?

Answer 7: This process would be allowed if the worker is not exposed to a fall hazard as explained in answers 1 and 5 above.

Question 8: When an employee accesses a roof through a hatch or doorway near the edge, is fall protection required, or is that employee allowed to immediately move to the center of the roof without it?

Answer 8: If no fall protection is provided, such as a railing on the unprotected roof edge at the point of access, then the employee is allowed to access the roof the first time, and exit the roof the last time, without fall protection. If multiple trips on and off the roof are made, then you must install a fall-protection system that protects the employee when in the fall hazard area next to the hatch.

Question 9: Is fall protection required for employees, such as window cleaners and glaziers, who need to perform tasks of short duration, such as cleaning or caulking windows, on balconies or other inadequately protected surfaces?

Answer 9: Fall protection is required whenever feasible. If exposure to a potential fall is greater during the installation of a fall-protection system than for completion of the task without fall protection (considering such factors as time, location, available equipment, environmental conditions, and risk), then tasks of short duration may be completed without fall protection. With adequate planning and the use of the correct equipment, fall protection can almost always be provided. See Fall Protection rules ([general industry](#)) and ([construction](#)) for more specifics.

Question 10: Is there some distance that Oregon OSHA feels is appropriate that a worker can stay back from the edge on a roof that does not have appropriate guardrails and accomplish his work?

Answer 10: See the answer to the first question.

Sincerely,

Trena VanDeHey, Standards & Technical Resources Manager
Oregon Occupational Safety & Health Division

History: SI 2002-1 Revised 1/18/2017 and 10-2-2018