



**Oregon**  
Theodore R. Kulongoski, Governor

**Department of Consumer and Business Services**  
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August 15, 1997

Revised: July 24, 2013 (based on changes to confined space standards)

Michael T. Williams  
Vertical Access Systems & Technology  
1332 Wallace Road  
Salem OR 97304

Dear Mr. Williams:

This is in response to your letter asking several questions about rescue work and confined spaces.

You asked if Oregon OSHA views fire department rescue service employees differently from other rescue employees. OAR 437-002-0146 makes no distinction between these two classes of employees – employees of the company or external rescue service employees (includes fire departments who agree to provide rescue services). *However, employers that provide fire protection services, emergency first response services, and related activities that will respond to emergency (911) calls for rescue from confined spaces must comply with Division 2, sub-division L, 437-002-0182, Oregon rules for firefighters, see confined space rescue.*

You asked if employees lowered into a vat for training or for confined space rescue need fall protection. There is no requirement in the standard for a second line if the employee is connected to lowering equipment and wearing a body harness that meets the requirements of the standard. However, all such equipment must be used according to the manufacturer's instructions. Therefore, if the tripod instructions state that a second lifeline must be used, we would expect to see one in use. Your question on rescue is not clear, but generally some form of fall protection is required when working from heights, regardless of the function performed.

You asked about ODOT employees or others needing fall protection while suspended to inspect bridges. The answer depends on how they were suspended. The use of a boatswain's chair for such work requires a second method of fall protection while certain other methods do not.

Your last question about fall protection equipment standards can only be answered depending on what type of system is in use. Varying standards require equipment to meet stated design or performance standards. These vary from standard to standard.

Sincerely,

Peggy A Munsell, Manager  
Standards & Appeals Section  
Oregon Occupational Safety & Health Division