

August 16, 2002

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

Dear Mr. Williams:

This letter is in response to the ten questions about fall protection that you recently sent to us:

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

Answer: There is no specific distance from an unprotected edge that has been identified as adequate to preclude the use of fall protection. Both OAR437-003-1501 (general fall protection for construction) and OAR437-002-0125 (fall protection for general industry) require employees who are exposed to falls of 10 feet or more, or are above dangerous equipment, to be protected from falling. The employer must evaluate each walking/working surface to determine first if a fall hazard exists, and then decide which fall protection system to use, if employees are going to be exposed to the fall hazard. When determining if employees will be exposed to the fall hazard, there are a variety of factors that must be considered, one of which is distance from the unprotected edge. There are many factors that could affect that distance. Is the walking/working surface sloped, uneven or slippery, or are there tripping hazards? Are there wind or other weather conditions such as 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.

Question: Would a person be required to stay tied off while moving or carrying rigging, including rigger beams, counter weights, fall protection lines, wire ropes, from one location to another on a roof?

Answer: Yes, if the person is still exposed to the fall hazard. If life lines present challenges to moving material and equipment, then you should consider another form of fall protection, or implement a different design of the present system.

Michael Williams,
August 1, 2002
Page 2

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

Answer: Yes. Fall protection is required for **all** exposure to falls.

Question: 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: Yes. Fall protection is required for **all** exposure to falls.

Question: 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: 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% of the time, it's required.

Question: 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: Oregon OSHA acknowledges that there may be times during the installation of a fall protection system when it may be infeasible to be protected against a fall. Such a time could be when attaching to anchor points located near a roof's edge. However, if it is feasible to provide fall protection 100% of the time, it's required. The employer must consider using another fall protection system to install the anchorage points for the fall arrest system. Quite often there is something located back from the edge of a roof, such as HVAC equipment or the access hatch framework that will provide a temporary anchor for a fall restraint system.

Question: 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: This process would be allowed if the worker is not exposed to a fall hazard as outlined in the first and fifth question.

Michael Williams,
August 1, 2002
Page 3

Question: 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: 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 hazardous area next to the hatch.

Question: 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: 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.

Question: 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: See the answer to the first question.

Should you have further questions, please contact Mike Mitchell at 800-922-2689. You are also invited to see the OR-OSHA pages on the Internet at the above address.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources
Oregon Occupational Safety and Health Division