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From: Marilyn K. Schuster, Policy manager

Subject: Steel Erection, protection for workers working in locations covered by one or more floors exposed to overhead lifting operations.

Following is a question raised by Michael Cunningham, Safety Director for York and Curtis Inc: “During steel erection, what procedures should be followed to ensure adequate protection for workers (usually in trades other than steel erection) working in locations covered by one or more floors, exposed to overhead lifting operations (including steel)?”

For the answer I reviewed a number of resources. One such source being the language in the standard at http://www.cbs.state.or.us/external/osh/pdfs/rules/division_3/div3r.pdf which states the following in 1926.759(b):

(b) Protection from falling objects other than materials being hoisted. The controlling contractor shall bar other construction processes below steel erection unless overhead protection for the employees below is provided.

This rule was written to make it clear that it is allowable to work under steel erection (including hoisting) as long as there are protective covers for the employees below. It is an expected and allowable practice that workers will be under the steel erection going on above once there is a suitable cover over them. 1926.759(b) was to ensure that workers who are below steel erection activities are protected from falling objects other than hoisted materials. Generally, it is understood that form setters, nelson stud installers, concrete finishers, electricians, plumbers, carpenters, and others will be on the decked floors below getting ready to pour as the erection progresses.

In addition, 1926.754(b)(3) requires trades to be separated by decking or netting every other floor which serves as fall protection and debris protection (when nets are lined with smaller mesh). The falling objects the workers are to be protected from include nuts, bolts, wrenches, snapped bolt ends, and other miscellaneous items that are inherent to erection work.



Working under loads is also addressed in the Steel Erection standard at 1926.753(d)(1) as follows:

(d) Working under loads.

(1) Routes for suspended loads shall be pre-planned to ensure that no employee is required to work directly below a suspended load except for:

(i) Employees engaged in the initial connection of the steel; or

(ii) Employees necessary for the hooking or unhooking of the load.

(2) When working under suspended loads, the following criteria shall be met:

(i) Materials being hoisted shall be rigged to prevent unintentional displacement;

(ii) Hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping out of the hook; and

(iii) All loads shall be rigged by a qualified rigger

To imply that the concrete deck would protect from a free-falling beam or other hoisted object is erroneous and that hazard is better addressed by the proper rigging and hoisting practices addressed in subdivision CC.

In the case of loads being lifted or suspended loads, the crane standard at 1926.1425 has requirements for keeping clear of the load.

In summary, given that the standards are inter-related, more than one rule may be applicable.