FALL PROTECTION HANDOUT

Questions often asked

1. When is fall protection required?

A) 1915.73(d)) .When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than 5 feet above a solid surface, the edges must be guarded by adequate guardrails. Unless the nature of the work in progress or the physical conditions prohibit the use or installation of such guardrails.

B) 1915.73(e) When employees are working near the unguarded edges of decks of vessels afloat, they shall be protected by personal flotation devices, meeting the requirements of § 1915.158(a).

C) NAVSEA Standard Item 009-74

2. How close to a guarded edge can I work on a ladder before fall protection is required?

There is no provision in Subpart X (OSHA 1926) that requires fall protection for an employee while working from a portable stepladder (*or ladder*). However, if the employee will be on a surface prior to ascending or upon exiting the ladder for which fall protection is required, then fall protection would be required at such times.

If the worker cannot perform the work with both feet and one hand on the ladder, the employee will have to be protected by more than a harness and lanyard connected to a ladder safety device. The tie-off type support would have to meet the requirements of a boatswain's chair or other single point adjustable scaffold. The requirements for these devices are listed in §1926.452(o).

As a precaution, follow the requirement of fall protection when working above 5 ft or more.

3. How **do I comply with 29 CFR 1915.77 (c)?**

Follow the requirements of the standard or seek recommendation from safety management of **both**, prime and government for any challenges on meeting the standard.

4. How do I apply 1915.73 (b) & (c)?

Follow requirements except where the use of such guards is made impracticable by the work actually in progress). See above.

5. What is required for working on scaffolding over land and over water?

When employees are working near the unguarded edges of decks of vessels afloat, they shall be protected by personal flotation devices, meeting the requirements of § 1915.158(a).

For Land work apply the general industry standard 1910.28

a) What are SWRMC's expectations?

3.18.2 NAVSEA Standard Item FY16 009-74 States:

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Provide and use personal fall arrest system (PFAS), working lanyard, and climber safety device when going aloft where a climber safety rail is installed. If a climber safety rail is not installed, use a double lanyard configuration.

If questions of concerns beyond the scope of the standard, consult with your safety representative

6. What are the MSR's expectations*? See their Policy*

7. What kinds of ladders am I allowed to use and where can I use them?

Only Fiber glass, where they can have properly footing, angle and 36 "extension.

8. Does 1910 supersede 1915?

NO. 1910 is to be used when there is no standard for 1915 is available

9. Does California OSHA have additional requirements?

California OSHA does not have standards for work on vessels, however general industry standards apply when working on land. T8 CCR 1637, 3273, 3317, 3385. These are all related to fall prevention.

10. In what configurations can I use ladders (can I use an A-frame as a straight ladder)?

Ladders are to be used as stated use. No step ladders should be used as straight ladder.

11. What do I do when I can't use a ladder the way it's intended to be used because of space constraints?

Find other means of safe support such as a Jacob's ladder, or contact a qualified safety technician.

12. How high can I climb a fixed ladder without the use of a back scratcher or ball buster?

No information found in 1910, 1917, or 1926.

13. Under what conditions can I climb outside of scaffolding and guarded edges?

There is no provision for this, unless scaffold or ladder is damaged or other emergency situations.

14. **What types of PFAS is required when working from aerial lifts?**

1) See OSHA quick Card # 5452
2) https://www.osha.gov/Publications/quickcard/osha3452.pdf
3) https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=interpretations&p_id=22611

15. Are there any conditions when I have to follow 29 CFR 1926 the construction standards?

When no guidance is given, use the general industry guidelines.

16. How do I tie off when there are no hard points like on scaffolding, what do I do?
Can I ever tie off to scaffolding?

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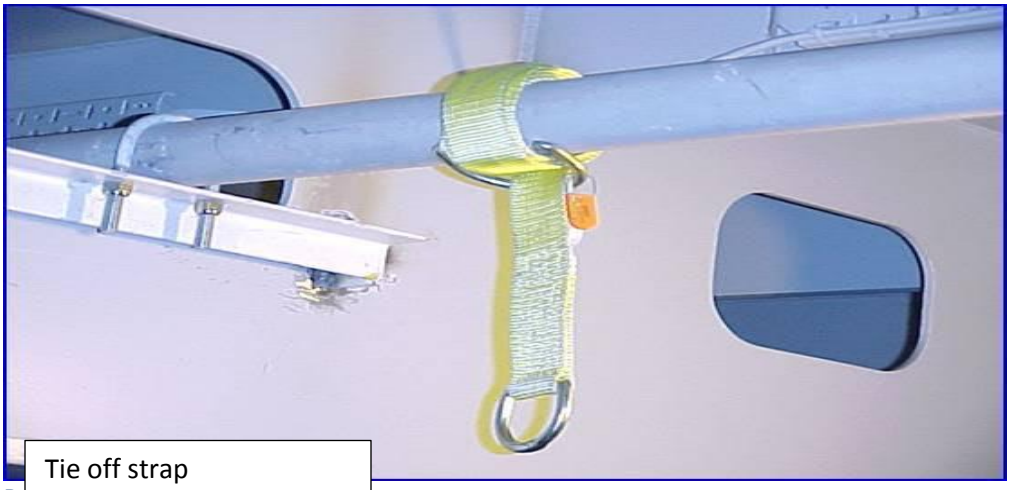
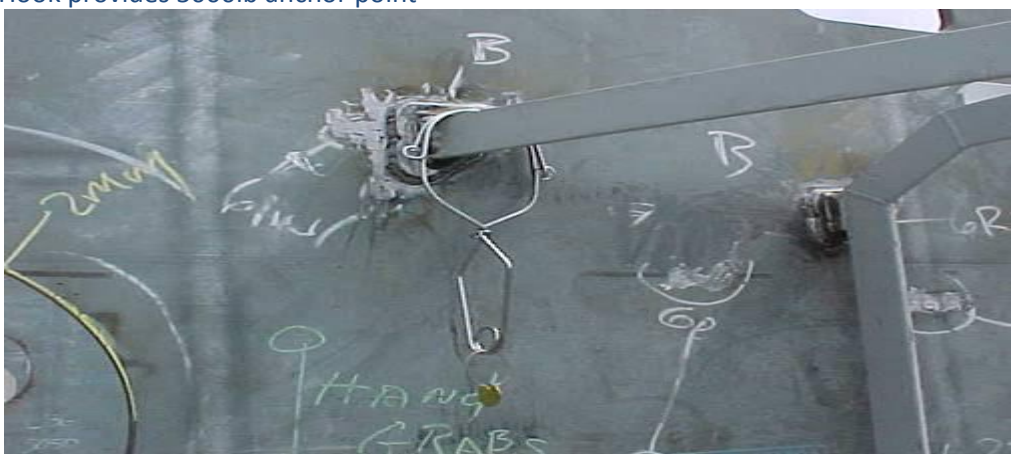
There are a number of rigging type straps available for fall protection that are designed to create a tie-off point. This must be used exclusively for fall protection and not interchanged for rigging. If you buy a rigging sling to use as a tie off point it must be used exclusively for fall protection.



Tie off strap

Beam Clamp

Hook provides 5000lb anchor point



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Must be able to support 5000 lbs.

Can I use a rigging lanyard attached to a shock absorber or instead of one?

See above

17. How do I determine a tie off point can support 5000 lbs.?

The capacity of the anchorage point is an area that if often overlooked in fall protection and one of the first things OSHA reviews during inspections/investigations.

Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds (22.2 kN) per employee attached, or shall be designed, installed, and used as follows: (i) as part of a complete personal fall arrest system which maintains a safety factor of at least two; and (ii) under the supervision of a qualified person.

Have the anchorage point calibrated.

18) **Who is responsible to provide immediate rescue in case I fall while in a harness?**

In Naval facilities, Navy personnel will. (NAVSEA 009-007, 3.1.5.1)
In shipyards, follow rescue procedures, contractor or Shipyard
Emergency Services.

18. Am I allowed to work off a ships fixed ladder?

See question #2

If scaffold is not possible, use PFAS

19. I am not comfortable wearing a snug harness can I wear it loosely?

Though there are no specific guidelines on this, please reference the NIOSH information below:

Impact of harness fit on suspension tolerance.

NIOSHTIC No. 20040657
Abstract: This study investigated the effect of body size and shape and harness fit on suspension tolerance time. Background: Fall victims may develop suspension trauma, a potentially fatal reduction of return blood flow from legs to the heart and brain, after a successfully arrested fall if they are not rescued quickly or the harness does not fit them well. Method: For this study, 20 men and 17 women with construction experience were suspended from the dorsal D-ring of a full-body fall-arrest harness. Their suspension tolerance time, physical characteristics, and harness fit levels were assessed. Results: Body characteristics (i.e., weight, stature, upper- and lower-torso depths) were associated with decreased suspension tolerance time

(ie.,http://www.cdc.gov/niosh/topics/falls/pubs.html).

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References:

1) OSHA Subpart X
2) Subpart M of 29 CFR Part 1926, General requirements for fall protection
3) OSHA 29 CFR 1915.73, 1915.158, 1915.77, 1915.159
4) The National Institute for Occupational Safety and Health (NIOSH)
5) NAVSEA Standard Item 009-74 FY 16
6) NAVSEA Standard Item 009-07 FY 16

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