



# OSHA NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

**DIRECTIVE NUMBER:** 00-03 (CPL 2-1) | **EFFECTIVE DATE:** February 11, 2000

**SUBJECT:** Steel Erection

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## ABSTRACT

**Purpose:** This notice describes OSHA's enforcement policy for Steel Erection in the interim period between the publication of the proposed rule and enactment of a final rule. This notice extends the policies and procedures of OSHA Notice 99-1 (CPL 2-1) for another year.

**Scope:** OSHA-wide

**References:**

1. 29 CFR Part 1926 - Safety Standards for Steel Erection; Proposed Rule (63 FR 43451)
2. OSHA Instruction .CPL 2.103, Field Inspection Reference Manual (FIRM), September 26, 1994.

**Expiration Date:** February 10, 2001.

**Cancellations:**None

**State Impact:** This notice describes a Federal Program Change for which State adoption is not required, but notification of intent is needed.

**Action Offices:** National, Regional and Area Offices

**Originating Office:** Directorate of Construction

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By and Under the Authority of  
Charles N. Jeffress  
Assistant Secretary

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- I. Purpose. This notice describes OSHA's enforcement policy for Steel Erection in the interim period between the publication of the proposed rule and enactment of a final rule. This notice extends the policies and procedures of OSHA Notice 99-1 (CPL 2-1) for another year.
- II. Scope. This notice applies OSHA-wide.
- III. Application. This notice applies to steel erection.
- IV. Effect on Previous Instructions. This notice supercedes and cancels the July 10, 1995, memorandum from Deputy Assistant Secretary James W. Stanley to the Regional Administrators.
- V. Expiration Date. This notice will terminate on February 10, 2001.
- VI. Action. Regional Administrators and Area directors shall ensure that compliance officers are familiar with the contents of this notice and that the enforcement guidelines are followed. This notice will expire after one year but may be renewed.
- VII. Federal Program Change. This notice describes a Federal Program Change for which State adoption is not required, but the States are encouraged to consider adopting the interim enforcement policy for steel erection described in this notice. However, the States shall respond via the two-way memorandum to the Regional Office as soon as the State's intent regarding the enforcement policy is known, but no later than 60 calendar days after the date of transmittal from the Directorate of Federal-State Operations.
- VIII. References.
  - A. 29 CFR Part 1926 - Safety Standards for Steel Erection; Proposed Rule (63 FR 43451).
  - B. OSHA Instruction .CPL 2.103, Field Inspection Reference Manual (FIRM), September 26, 1994.
- IX. Background. On August 13, 1998, OSHA published a proposed rule for steel erection. This notice describes OSHA's enforcement policy for steel erection in this interim period between the publication of the proposal and enactment of a final rule.

OSHA's Field Inspection Reference Manual (FIRM) states that compliance with a proposed standard, rather than with the standard in effect, would be considered a De Minimis violation provided that the employer's action clearly provides equal or greater employee protection. DeMinimis violations are not cited.

In accordance with the FIRM, the Agency establishes the following steel erection enforcement policy.

- X. Options. An employer engaged in steel erection must follow either:
- A. The current steel erection standards contained in 29 CFR 1926.750-.752 and 1926.105(a) until the promulgation of a final steel erection standard; or
  - B. The proposed steel erection standard published in the Federal Register on August 13, 1998 (63 FR 43451) with one exception. The proposed rule allows deckers (working in a controlled decking zone) to work up to 30 feet before fall protection is required. The current standard (1926.105(a)) requires deckers working in single tiered buildings to be protected from falls at 25 feet. The current 25 foot requirement will continue to be enforced.
- XI. Scope and Application of Each Option. The scope of "steel erection activities" in the current rules differs somewhat from the scope of the proposed rule.
- A. Scope and application to be followed for compliance with current rules - 1926 Subpart R and 1926.105(a) [NOTE: Paragraphs 29 CFR 1926.104, 1926.105, and 1926.107(b), (c), and (f) apply to steel erection activities.]
    - 1. *Steel erection activities*.
      - (1) Steel erection includes the following: The movement and erection of skeleton steel members (structural steel), including initial connecting, moving point-to-point, installing metal floor or roof decking, welding, bolting, and similar activities. Steel erection also includes these activities when structural steel is installed on concrete and masonry walls or supports.
      - (2) Activities that are not steel erection: Steel erection does not include the erection of steel members such as lintels, stairs, railings, curtainwalls, windows, architectural metalwork, column covers, catwalks, and similar non-skeletal items, nor does it mean the placement of reinforcing rods in concrete structures. NOTE: These steel erection activities may take place in buildings and other structures. "Buildings" includes tiered and non-tiered, single-story and multi-story buildings, warehouses, gymnasiums, stadiums, power plants, theaters, mill buildings, and similar structures. "Tiered" means the skeleton steel framework is erected in vertically stacked columns; tiered structures are not limited to multi-floored structures. "Other structures" includes bridges, viaducts, overpasses, towers, tanks, billboards, antennas, and similar structures.

2. *Application of fall protection requirements.*

a. Tiered buildings

(1) Exterior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for exterior fall hazards of less than 25 feet.

(2) Interior fall hazards of 30 feet or more on buildings which have floors or are adaptable to temporary floors are covered by 1926.750(b)(2)(i). Fall protection is not required for fall hazards of less than 30 feet. Temporary floors will generally be practicable in the construction of a typical multi-floored building.

(3) Interior fall hazards of 25 feet or more on tiered buildings which are not adaptable to temporary floors are covered by 1926.750(b)(1)(ii). Fall protection is not required for fall hazards of less than 25 feet.

b. Non-tiered buildings. Exterior and interior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for fall hazards of less than 25 feet.

c. Other structures. Exterior and interior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for fall hazards of less than 25 feet.

B. Scope and application to be followed for compliance with the Proposed Rule. The proposed rule may be used to protect employees engaged in the following activities: hoisting, connecting, welding, bolting, and rigging structural steel, steel joists and metal buildings; installing metal deck (with the exception noted in paragraph II b.) and moving point-to-point while performing these activities. In addition, when performing these structural steel activities, the following activities are also considered steel erection where they are a necessary part (i.e., they are done during and as part of the process) of the structural steel erection activities:

Rigging, hoisting, laying out, placing, connecting, guying, bracing, dismantling, burning, welding, bolting, grinding, sealing, caulking, and all related activities for construction, alteration and/or repair of materials and assemblies such as structural steel; ferrous metals and alloys; non-ferrous metals and alloys; glass; plastics and synthetic composite materials; structural metal framing and related bracing and assemblies; anchoring devices; structural cabling; cable stays;

permanent and temporary bents and towers; falsework for temporary supports of permanent steel members; architectural precast concrete, stone and other architectural materials mounted on steel frames; safety systems for steel erection; steel and metal joists; metal decking and raceway systems and accessories; metal roofing and accessories; metal siding; bridge flooring; cold formed steel framing; elevator beams; grillage; shelf racks; multi-purpose supports; crane rails and accessories; miscellaneous, architectural and ornamental metals and metal work; ladders; railings; handrails; fences and gates; gratings; trench covers; floor plates; castings; sheet metal fabrications; metal panels and panel wall systems; louvers; column covers; enclosures and pockets; stairs; perforated metals; ornamental iron work; expansion control including bridge expansion joint assemblies; slide bearings; hydraulic structures; fascias; soffit panels; penthouse enclosures; skylights; joint fillers; gaskets; sealants and seals; doors; windows; hardware, detention/security equipment and doors, windows and hardware; curtain walls/sloped glazing systems/structural glass curtain walls; translucent wall systems; conveying systems; building specialties; building equipment; machinery and plant equipment, furnishings and special construction.

NOTE: These activities may occur in a number of different types of structures, including the following:

Single and multi-story buildings; pre-engineered metal buildings; lift slab/tilt-up structures; energy exploration structures; energy production, transfer and storage structures and facilities; auditoriums; malls; amphitheatres; stadiums; power plants; mills; chemical process structures; bridges; trestles; overpasses; underpasses; viaducts; aqueducts; aerospace facilities and structures; radar and communication structures; light towers; signage; billboards; scoreboards; conveyor systems, conveyor supports and related framing; stairways; stair towers; fire escapes; draft curtains; fire containment structures; monorails; aerialways; catwalks; curtain walls; window walls; store fronts; elevator fronts; entrances; skylights; metal roofs; industrial structures; hi-bay structures; rail, marine and other transportation structures; sound barriers; water process and water containment structures; air and cable supported structures; space frames; geodesic domes; canopies; racks and rack support structures and frames; platforms; walkways; balconies; atriums; penthouses; car dumpers; stackers/reclaimers; cranes and craneways; bins; hoppers; ovens; furnaces; stacks; amusement park structures and rides; and artistic and monumental structures.

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