What we will discuss

- Walking-Working Surfaces definitions
- Working at heights
- Designated areas
- Boom/scissor lifts
- Training/Supervision
Despite the black and white nature of some of our rules, there are case-specific circumstances that will produce the dreaded gray area, and elicit an “it depends” from me.

My goal is to be informative on a general level, and if we need to come out and look at specifics in the future, we can certainly do that.
Walking-working surface: Any horizontal or vertical surface on or through which an employee walks, works, or gains access to a work area or workplace location.

Ladder means a device with rungs, steps, or cleats used to gain access to a different elevation.

Opening means a gap...that is at least 30 inches high and at least 18 inches wide, through which an employee can fall to a lower level.

Hole means a gap or open space in a floor, roof, horizontal walking-working surface, or similar surface that is at least 2 inches in its least dimension.
When Fall Protection is NOT Required

- When employers are inspecting, investigating, or assessing workplace conditions or work to be performed prior to the start of work or after all work has been completed.

- **This exemption does not apply** when fall protection systems or equipment...have been installed and are available for workers to use for pre-work and post-work inspections, investigations, or assessments;
When Fall Protection is Required

- The employer must ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet or more above a lower level is protected from falling by one or more of the following:
  - Guardrail systems;
  - Safety net systems; or
  - Personal fall protection systems, such as personal fall arrest, travel restraint, or positioning systems.
Holes and Hole Covers

- The employer must ensure each employee is protected from falling through any hole (including skylights) that is 4 feet or more above a lower level by one or more of the following:
  - (A) Covers;
  - (B) Guardrail systems;
  - (C) Travel restraint systems; or
  - (D) Personal fall arrest systems.

- **Covers.** The employer must ensure each cover for a hole in a walking-working surface:
  - Is capable of supporting without failure, at least twice the maximum intended load that may be imposed on the cover at any one time; and
  - Is secured to prevent accidental displacement.
1910.28(b)(13):

Work on low-slope roofs

- 1910.21(b): Definition of “Designated Area”
- 437-002-2021: Definition of “Low-slope roof”
- 1910.29(d): How to set up Designated Area

What does infrequent and temporary mean?

Infrequent means that the work is performed occasionally. Infrequent work is usually performed once a year, once a month, or as needed. Examples include annual equipment maintenance, replacing batteries monthly or quarterly, and responding to occasional equipment breakdowns.

Daily, regular, or routine tasks are not infrequent.

Temporary means that the work is brief or short. Temporary work takes less time than the time it takes to set up conventional fall protection. Temporary tasks usually take less than two hours to complete and are not complicated. These tasks can be completed in a single visit without having to climb up and down multiple times. Examples include changing a filter in a rooftop HVAC system, replacing a part on a satellite dish, and resealing the flashing around a skylight.
Ladder Safety
Let’s Talk About Ladders

- Ladders placed in locations such as passageways, doorways, or driveways where they can be displaced by other activities or traffic:
  - (i) Are secured to prevent accidental displacement; or
  - (ii) Are guarded by a temporary barricade, such as a row of traffic cones or caution tape, to keep the activities or traffic away from the ladder;
Let’s Talk About Ladders

- Ladders are used only for the purposes for which they were designed;
- Ladders are inspected before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury;
Let’s Talk About Ladders

- Portable ladders used to gain access to an upper landing surface have side rails that extend at least 3 feet above the upper landing surface.

- Ladders are not used to gain additional height from elevated surfaces such as scaffolds, truck beds, vehicle bodies, tractor scoops or boom truck buckets. (page D-22)
Scaffolds used in general industry must meet the requirements in 29 CFR part 1926, subpart L (Scaffolds).

For scissor lifts and boom lifts, the rule says:

- You **must** follow all operating and maintenance instructions and **recommendations** of the manufacturer.
Employee Training
The employer must train each employee in the proper care, inspection, storage, and use of equipment covered by this subpart before an employee uses the equipment.

- Ladders (fixed and portable, including stepladders and stepstools)
- Rolling staircases
- Dock plates

Training must be understandable. The employer must provide information and training to each employee in a manner that the employee understands.