

Are You Ready?

Radical Changes to OSHA

Residential Fall Protection

Regulations Take Effect in June



Courtesy Miller Fall Protection

As of June 16, 2011, a new OSHA directive will radically change how most residential contractors handle fall protection on their jobs.

Before this date, OSHA's fall protection guidelines for residential construction allowed employers engaged in certain residential construction activities to use specified *alternative methods* of fall protection (i.e., slide guards or safety monitor systems) rather than the conventional fall protection requirements (guardrails, safety nets or personal fall arrest systems) detailed in the organization's residential construction fall protection standards. Since most contractors chose to use these *alternative methods*, they were not responsible for providing proof that the use of conventional fall protection was infeasible or hazardous and did not write an alternate fall protection plan to address these conditions.

OSHA's new directive, outlaws the use of alternate measures on residential projects – no matter what the circumstances – without a written, OSHA-approved fall protection plan that includes the following considerations:

- Employees working six feet or more above lower levels must use guardrails, safety nets or personal fall arrest systems that may consist of a full body harness, a deceleration device, a lanyard and an anchor point.
- The possible use of alternative measures to the extent allowed under provisions found in other fall protection regulations that address specific types of work. For example, the OSHA Safety and Health Regulations for Construction Standard #1926.501(b) (10) permits the use of warning lines and safety monitoring systems during the performance of roofing work on low-sloped roofs.
- The use of an effective fall restraint system in lieu of a personal fall arrest system rigged to prevent a worker from reaching a fall hazard and falling over the edge. A fall restraint system may consist of a full body harness or body belt connected to an anchor point at the center of a roof by a lanyard of a length that will not allow a worker to reach the edge of the roof.

If an employer demonstrates that use of conventional fall protection methods is infeasible or creates a greater hazard, it must ensure that a qualified person:

- Creates a written, site-specific, fall protection plan in compliance with OSHA Fall Protection Systems criteria and practices; and
- Documents, in that plan, the reasons why conventional fall protection systems are infeasible or why their use would create a greater hazard.

The new directive interprets *residential construction* as construction work on a structure that is:

- Used as a home/dwelling
- Built using *traditional* wood frame construction materials and methods; although the limited use of structural steel in a predominantly wood-framed home, such as a steel I-beam to help support wood framing, does not disqualify a structure from being considered residential construction.

OSHA defines *traditional* wood framing as: Wood (or equivalent cold-formed sheet metal stud), not steel or concrete; wooden floor joists and roof structures that are installed using traditional wood frame construction techniques. The exterior wall structure can also consist of wood (or equivalent cold-formed sheet metal stud) or masonry brick or block.



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