

from experience

environmental, health & safety edition

Rooftop Fall Protection: If Your Building Has a Roof, Read This Now

Working on rooftops is, by its very nature, risk-laden. Every day, maintenance personnel, construction workers, roofers, and others step out from safety to do their jobs. And every year, there are over 200,000 injuries and deaths from falls. The Walking and Working Surfaces Standard, enacted in January 2017 by the U.S. Occupational Safety & Hazard Administration (OSHA 1910.21 and .28) and set into law later that year, was enacted with the aim of reducing injuries and fatalities, putting rules and regulations in plain language less subject to misinterpretation. Yet even though these rules have been active now for more than 18 months, many companies may not be in compliance. For buildings with low-sloped roofs, OSHA's new standard calls out three distinct edge distances with fall protection requirements:

1. **<6 feet.** For distances less than 6 feet from an edge, protection must include either a guardrail system, safety net system, travel restraint system, or personal fall arrest system.
2. **6 to <15 feet.** For distances of 6 to <15 feet from an edge, protection must include either one of those listed in point #1 above, or the employer may use a designated area with an OSHA specified warning line when performing work that is both infrequent and temporary.
 - a. Warning lines must be actual barriers (e.g., ropes, wires, tape or chains) designed to alert employees to the fact that they are approaching an unprotected edge or side, and have their own set of guidelines that must be followed. Warning lines must have a minimum breaking strength of 200 pounds, a low point between 34 and 39 inches above the walking-working surface, clear visibility from a distance of 25 feet and from all areas of the designated area, and more. (Section 1910.29(d)(2) and (3) contains additional guidelines regarding warning lines).
 - b. Infrequent work is defined as tasks that occur on occasion and are not a routine part of the job. Temporary work is that which is brief, or short term or that which is performed in less time than is needed to set up fall protection.
3. **≥15 feet.** For distances of 15 feet or more from an edge, protection must include any form of protection listed in #1 or #2 above, or the employer may implement and enforce work rules prohibiting employees from going within 15 feet of the roof edge without the use of fall protection.

When evaluating the needs of your spaces, note that one size does not fit all when it comes to fall protection: Every roof has unique characteristics (e.g., HVAC systems, cooling towers) which may require different types of protection. Fall protection may include permanently mounted, low-profile post anchors, roof perimeter guards, portable guardrail systems, safety nets, travel restraint (tether) line systems, etc. In addition, you may want to consider using a "qualified" person (as defined by 29 CFR 1910. 21(b)), particularly when tie-off anchors are needed, to evaluate and provide solutions for your low-sloped roof. To learn more about the Walking & Working Surfaces Standard, [visit the OSHA website](#), or contact Hixson.

experience in brief

As the annual July 1 reporting deadline approaches for the USEPA SARA 313 Toxic Release Inventory (TRI) for chemicals, keep in mind the possible need to report for the following Food Industry Chemicals: Ammonia, Chlorine, Nitric Acid, Sodium Nitrate, other Nitrate compounds. All of these contribute directly or indirectly towards releases that may need to be reported.

continuing education

Hixson associates regularly participate in continuing professional education events across the country. To learn more about the events listed below, e-mail Hixson at: info@hixson-inc.com

Manufacturer's Education Council, "Sustainability & EHS Symposium"
Sharonville, OH
March, 2019

Ohio Safety Congress
Columbus, OH
March 2019

AERMOD - Air Emission Modeling Training
New York, NY
April 2019

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