106 Addressing Unexpected Fall Protection Needs

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Thursday, March 29, 3:45 to 4:45 p.m.
ADDRESSING UNEXPECTED FALL PROTECTION NEEDS

OHIO SAFETY CONGRESS 2012: SESSION 106

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No protection is not an option

Giving out harnesses and lanyards is not enough
  > The use of PPE is simply not intuitive

A risk assessment is the best way to minimize delays/downtime
LEARNING OBJECTIVES

- Describe potential scenarios that may require unexpected fall protection solutions
- Summarize possible solutions for unforeseen fall protection issues
- Analyze your organization’s capability to account for unpredicted fall protection needs
- Provide a way ahead in addressing this issue at your facility now …and for something six months from now
AGENDA

- Regulatory requirements
- Summary of options
- Use of PPE
- Closing
Fall hazard survey report (Z359.2 §4)

“Prior to preparing fall protection procedures, a fall hazard survey shall be performed for every workplace activity where authorized persons are exposed to a fall hazard.”
Section 6.7. Job Task.

Every job task shall be surveyed to identify potential fall hazards and appropriate protection provided.
Proposed 29 CFR 1910 Subpart I (General Industry)

> Existing 29 CFR 1910.132(d)(1)

> The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE).
WHAT IS CONSIDERED A HAZARD?

- § 1910.28 Duty to have fall protection
- § 1910.29 Fall protection systems criteria and practices
- Hazard surveys required under 1910.132 and the categories of falls listed under subpart D
VPP

Worksite analysis

Safety Program Core Elements

- Hazard Identification and Assessment
  - What is the employer's basic obligation?
  - The employer must systematically identify and assess hazards to which employees are exposed and assess compliance with the General Duty Clause and OSHA standards.

Injury and Illness Prevention Program (I2P2)
AGENDA

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GENERAL CONSIDERATIONS

- Difference between emergency and urgent business need
- 20-foot principal
- Difference between a JSA and an assessment
How you ask the question means a lot:

> Not, can you provide a compliant fall protection system in this area?

> Which option do you want to select in protecting the workers?

  • In general, five basic options
OPTION #1: DO NOTHING
OPTION #2: PORTABLE GUARDRAIL
OPTION #3: SCAFFOLDING
OPTION #4: LIFTS
OPTION #4: LIFTS
OPTION #5: PPE

- Rope access
- Industrial fall protection
Regulatory requirements

Summary of options

Use of PPE
  > Do’s/Don’ts
  > Process
  > Examples

Closing
Do’s

> For AP training, address hazards and equipment they use

> Prepare generic use and rescue procedures for different system “types”

> Conduct anchorage survey
Don’ts:

> Allow competent person to identify an anchorage without any guidance from a professional engineer or qualified person

> Just give a worker a harness and lanyard (or dual-legged SRL units)
PROCESS TO BUILD YOUR ACTIVE SYSTEM

NOT

• Training
• Equipment
• Anchorage

- Procedure

But,

• Anchorage
• Equipment
• Procedure
• Training
PPE WITHIN A FACILITY

- Overhead steel
- Reinforced concrete floors or steel deck for restraints
- Large process/manufacturing equipment

Challenges
- Type of structure
- Obstructions – floor and above
- Clearances and swing fall
PPE ON A HORIZONTAL SURFACE
MILER EDGE WITH SRL

Photo from Bacou-Dalloz
BALLASTED ANCHORAGE
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FOR MORE INFORMATION

- Blog
  > LJBfallprotectionblog.com

- Recorded webinars
  > Slideshare.net/kmesser

- YouTube channel
  > Youtube.com/LJBinc
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