

Changes to OSHA's Slip and Fall Prevention Regulation



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WEBINAR HOST: Jack Fearing, CPEA



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United States Patent

Lapeyre

Lapeyre Stair began its history of innovation in 1982 with the introduction of the space-saving, Alternating Tread safety stair.

Since then, Lapeyre Stair has continued to innovate and improve standards for industrial and commercial metal stair systems.

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Today's Speaker



**Jack Fearing, CPEA
Managing Partner
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Presentation Outline

- Definitions & Statistics
- Walking-Working Surfaces FAQs
- Fall Protection Systems
- Ladder Safety
- Loading Dock Safety
- Roof Access Points
- Other Key Issues
- Walking-Working Surfaces LOIs
- Challenges / Q&A

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Scope

Covers all W-WS in **general industry** workplaces:

- Floors
- Roofs
- Stairways
- Aisles & walkways
- Ladders
- Dock boards
- Platforms
- Equipment
- Other surfaces



Applicability

Applies to approximately 7 million **General Industry (1910)** workplaces. These include:

- Manufacturing
- Warehousing
- Utilities
- Oil & Gas extraction
- Retailers
- Offices



If construction and transportation employers are:

- Engaged in general industry activities
 - Maintenance
 - Repair

Note: NAICS = North American Industry Classification System

Definitions

When there is too little friction or traction between your feet (footwear) and the walking or working surface, and you lose your balance.



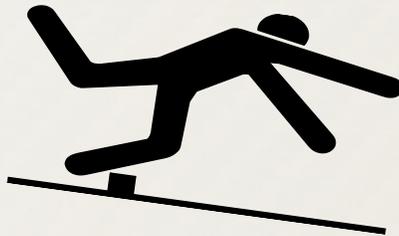
Slip

When you are too far off your center of balance.



Trip

When your foot (or lower leg) hits an object and your upper body continues moving, throwing you off balance.



Falls

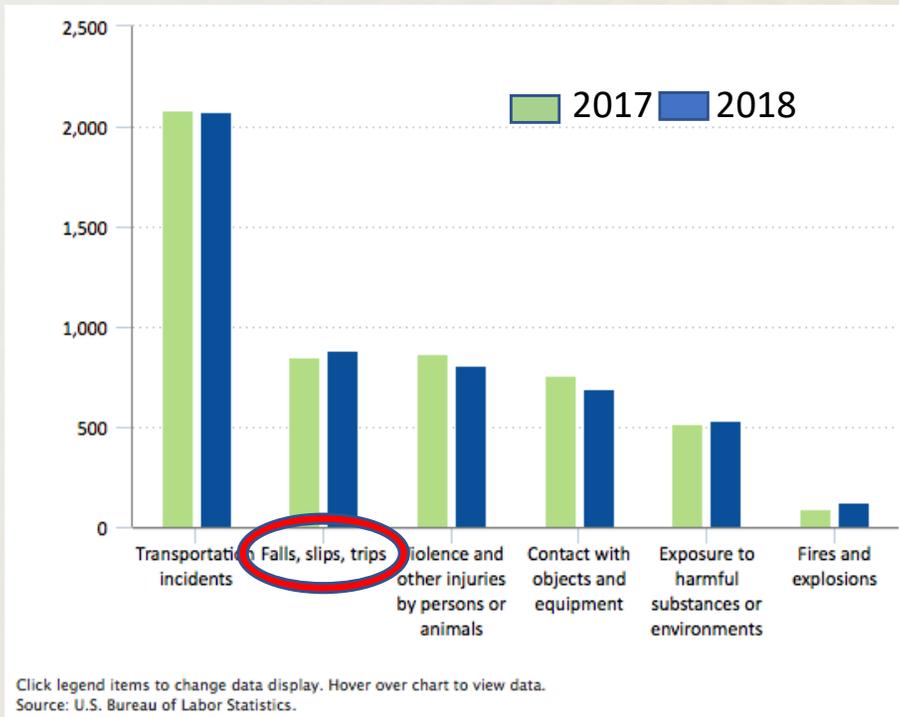
When you step down unexpectedly to a lower surface (**Misstep**) and lose your balance, e.g., stepping off a curb.



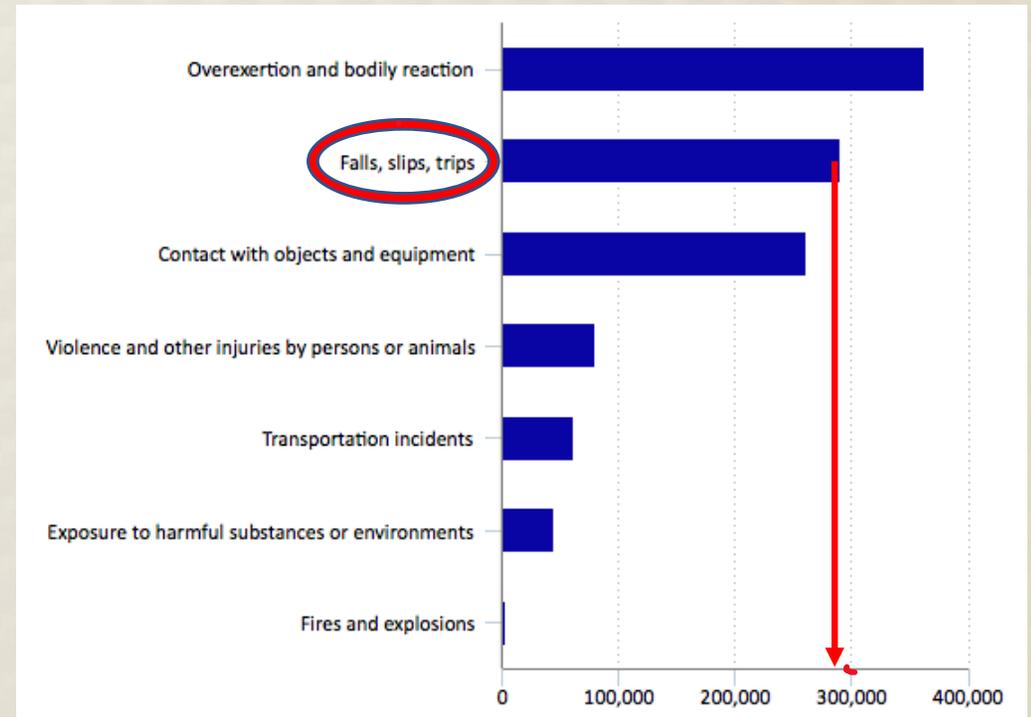
STF Friction: The resistance encountered when an object (foot) is moved in contact with another (ground). Friction is necessary in order to walk without slipping.

Slip, Trip & Fall Statistics

Fatal work-related injuries, 2017 & 2018



2018 Nonfatal work-related injuries involving days away from work



Total work-related fatalities in 2018 = 5,250

Slip, Trip & Fall Statistics

Types:

- On the same level >137,000*
 - Floors
 - Walkways
 - Moving industrial vehicles
 - Other surfaces
- To lower level >48,000*
 - Stairs or steps
 - Docks
 - Ladders
 - Roofs
 - Nonmoving vehicles



Note: These include \$B in Workers' Compensation costs*

OSHA Walking-Working FAQs

- What is the OSHA Walking-Working Surfaces standard?
- What is included in the standard?
- Who needs to comply?
- What are the requirements for affected employers?
- What do employees need to be trained on?

Subpart D: Walking-Working Surfaces

Revised (maintains some existing and Introduced new) W-WS requirements include:

- General
- Definitions
- Ladders
 - Portable
 - Fixed
 - Mobile stands/platforms
- Stairs
- Scaffolding
- Dock boards



The Hierarchy of Fall Protection



Fall Protection Systems

Fall Protection Options include:

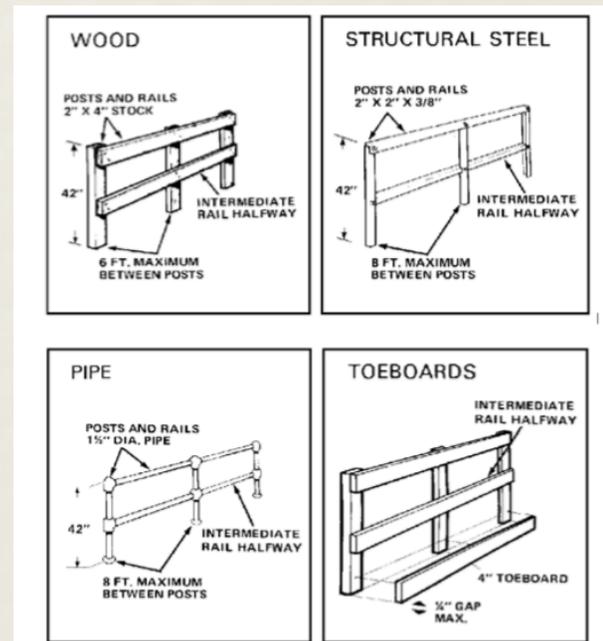
- Guardrails
- Covers
- Handrail & stair rail systems
- Ladder safety systems
- Safety net systems
- Rope descent systems
- Designated areas
- Personal fall protection



Guardrail System

Guardrail includes a top rail, a mid-rail and a toe-board. The top rail is **42** (+/- 3") inches high, and the mid-rail is approximately halfway from the surface to the top rail.

Toe-boards must be at least **4** inches high and distance from floor not over $\frac{1}{4}$ ".



Types of Ladders

Types of ladders covered include:

- Portable
 - Extension
 - Step
- Stepstools
- Mobile ladder stands
- Mobile ladder platforms
- Fixed



Ladder Use & Inspections

When going up and down ladders, you must make sure employees:



- Face the ladder
- Use at least one hand to firmly grasp the ladder, (aka “Three Points of Contact”)
- Not carry any object or load that could cause them to lose balance and fall.

All Ladders, portable, mobile and fixed, must be inspected:

- Before initial use on each shift
- As necessary during use
- After use



Fixed Ladders

All fixed ladder platform openings must be equipped with an offset passage or a self-closing gate that:

- Swings away from the hole, and
- Includes a top rail and mid-rail
- Safety chains & swing gates **are not** allowed



Fixed Ladders

Fixed ladders 24 feet or more above a lower level must be equipped with:

- Cage*
- Well*
- Personal fall arrest system, or
- Ladder safety system



Cages and wells will no longer be allowed as a means of fall protection on and after November 18, 2018*

Note: ALL fixed ladders (24 feet or more) must be retrofitted with a personal fall arrest system **by November 19, 2036.**

Ladder Fall Protection

Required fall protection:

- Portable
 - None
- Mobile ladder stands
 - Handrails – 4 – 10 feet
 - Handrails, guardrails, and/or toe boards – above 10 feet
- Mobile ladder platforms
 - Handrails – 4 – 10 feet
 - Guardrails with toe boards – above 10 feet
- Fixed
 - PFAS
 - Ladder safety system
 - Self-closing gate



Loading Dock Safety

Hazards:

- Wet, oily, or broken floor surfaces
- Unguarded dock edges
- Unsecured dock plates
- Unchocked trailer wheels
- Carbon monoxide exhaust
- Handling large, heavy, awkward loads
- Powered industrial vehicles
- Trailer separation
- Noise

Dock Boards



Dock Plates



Loading Dock Safety

Dock boards 4 feet or more above a lower level put into service **after** January 17, 2017 must have:

- Run-off protection
- Guards, or
- Curbs

Note: Except where there is no run-off hazard



When using a dock board 4 feet or more above a lower level it must have:

- Handrail, or
- Guardrail system (safety chains are not allowed)



Note: When a dock board is in place, measures must be used (e.g., chocks) to prevent movement of affected vehicles.

Loading Dock Safety

OSHA Training e-Tool



UNITED STATES
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The Workplace

- Physical Conditions
- Pedestrian Traffic
- Ramps and Grades
- Loading Docks**
- Narrow Aisles
- Elevators
- Enclosed Areas

Understanding the Workplace: Loading Docks

Loading docks can be dangerous places for forklifts. Falls from a loading dock in a forklift can be fatal.

- [Loading Docks](#)

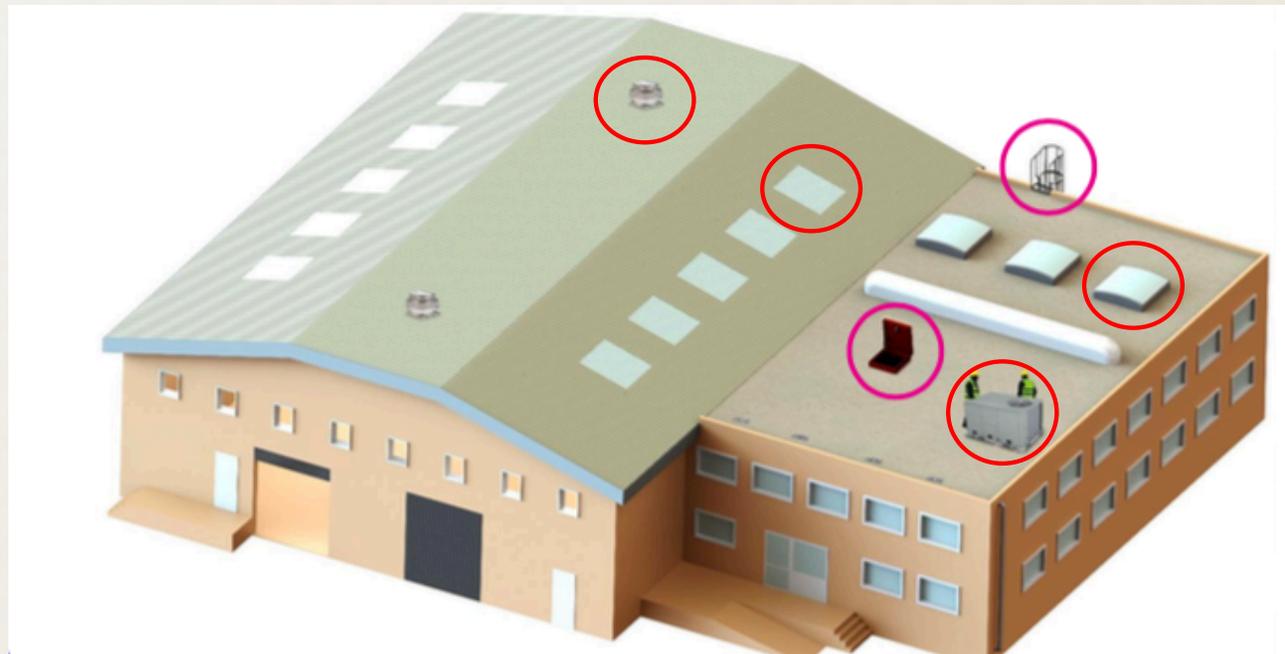
For information on entering truck trailers and railroad cars, see [Truck Trailers and Railroad Cars](#).



Figure 1. Always look in the direction of travel. Be careful at the edges of the loading docks.

Rooftop Access Hazards

- Access Points
- Rooftop Openings
- Unprotected Edges



Access Points

Each employee is protected from falling into a ladderway floor hole or ladderway platform hole by a guardrail system and toeboard erected on all exposed sides, except at the entrance to the hole, where a **self-closing gate or an offset must be used.**



Ladderway Platform



Ladderway Floor Hole

Rooftop Openings

Employees must be protected from falling through any hole (including skylights) that is 4 feet (1.2 m) or more above a lower level by one or more of the following:

- Covers
- Guardrail System
- Travel Restraint System
- Personal Fall Arrest System (PFAS)



Guardrail System



Cover

Unprotected Edges

- When work is performed **15 feet or more from the roof edge.**
- When work is performed **at least 6 feet but less than 15 feet from the roof edge.**
- When work is performed **less than 6 feet from the roof edge.**



Designated Area

- A designated area can only be used on low-slope roofs when the work is:
 - Temporary – 6'-15' from the roof's edge
 - Permanent – 15' or more from roof's edge ONLY

Note: Conventional fall protection must be used for less than 6'

- A designated area must be delineated with a warning line that consists of rope, wire, tape or chain that is:
 - As close to the work area as possible
 - Has a minimum breaking strength of 200 lbs.
 - 34-39" it's lowest point
 - Clearly visible from 25 feet away

Note: A monitor is not allowed



Other Key Issues

- Personal Protective Equipment

- PFAS



- Hazard Assessments

		Likelihood				
		1 Near Impossible	2 Unlikely	3 Possible Chance	4 Likely	5 Almost Certain
Potential Severity	1 Insignificant	1	2	3	4	5
	2 Minor Injuries	2	4	6	8	10
	3 Notable Injuries	3	6	9	12	15
	4 Major Injuries	4	8	12	16	20
	5 Debilitating injury/death	5	10	15	20	25

- Inspections & Corrective Actions



- Training

- Qualified Person v. Competent Person

OSHA Walking-Working LOIs

- NATE Response - FINAL
- Gate Strength of Snaphooks & Carabiners
- Enforcement Guidance for RDS Anchorages

Before any rope descent system (RDS) is used, the building owner must inform the employer, in writing that the building owner has identified, tested, certified, and maintained each anchorage so it is capable of supporting at least 5,000 pounds, in any direction, for each employee attached.



Critical Compliance Dates

Subpart D Section	Compliance Date
§ 1910.30 (a)(b): Deadline on which employers must train employees on fall & equipment hazards.	May 17, 2017
§ 1910.27 (b)(1): Certification of anchorages.	November 20, 2017
§ 1910.28(b)(9)(i)(A): Deadline by which employers must equip existing fixed ladders with a cage, well, ladder safety system, or personal fall arrest system.	November 19, 2018
§ 1910.28(b)(9)(i)(B): Deadline by which employers must begin equipping new fixed ladders with a ladder safety system or personal fall arrest system.	November 19, 2018
§ 1910.28(b)(9)(i)(D): Deadline by which all fixed ladders must be equipped with a ladder safety system or personal fall arrest system.	November 18, 2036

Challenges to Compliance

- Risk Assessments
- Employee Training
- Inspections & Corrective Actions
- Proper Equipment
- Documentation





Thank You for Your Participation

Jack Fearing, CPEA

Managing Partner

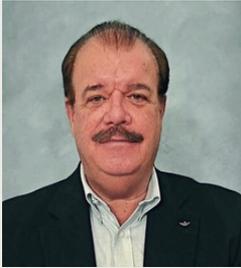
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About the Speaker



Jack a Certified Professional Environmental Auditor (CPEA) and the Managing Partner for Fearing International Group LLC, a Veteran-owned Small Business (VOSB) global occupational and aviation safety consulting firm in Flemington, NJ.

Jack has more than 35 years of experience in occupational safety and health management and DOD aviation safety. He is a professional member of the New Jersey chapter of the American Society of Safety Professionals (ASSP) and was the Chapter Safety Professional of the Year (SPY) in 2019.

Jack has extensive hands-on experience in developing OSHA compliance programs, employee and management training and coordinating with state and Federal regulatory agencies in both union and non-union environments. Jack is a graduate of the University of Massachusetts (BS in Biology) and Boston University (M.Ed in Environmental Science). He is a retired US Army Lt Colonel and served as a utility helicopter pilot and Aviation Safety Officer in a Combat Aviation Brigade on active duty.

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