

TerranearPMC Safety Share

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Week of January 28, 2019 – Fall Protection Monitors

Sometimes we may find ourselves in a bit of a predicament when it comes to complying with OSHA regulations. Such is the case when there is an assigned work activity near an unprotected leading edge on a roof and the standard method to ensure fall protection cannot be accomplished. Throughout OSHA's tenure, the residential home construction industry has been a challenge as work is generally temporary and many of the contractors and subcontractors performing work at these sites are small businesses (less than 10 employees) and therefore do not have the ability to administer S&H provisions. At the same time, roof work does not have many of the traditional fall protection systems. For instance, it is typical when performing roofing work that using personal fall arrest systems (PFAS – a full body harness with a lanyard – equipped with deceleration device) cannot be used as a proper anchor point doesn't exist. Yet workers must be protected from the obvious fall hazard.

A fall protection monitoring system is the use of a specific individual that is assigned to watch workers that are performing tasks near a leading edge and warn workers when they get too close and therefore, must retreat to a safer location. OSHA, through its Construction Standard, 29 CFR 1926, requires that employees shall be protected from falling through the use of either guardrail systems, safety net systems, personal fall arrest systems: Or, by using a combination of warning line system and guardrail system, or warning line system and safety net system, or warning line system and personal fall arrest system, or warning line system and safety monitoring system (29 CFR 1926.501(b)(10)). And as it turns out, in many cases, the only feasible method of protection is the monitoring system.

As the fall protection methods above indicate, when typical protective systems cannot be used, a combination of a warning line, guardrail systems or using a safety net and safety monitoring system must be employed. However, when a roof edge is 50-feet (15.25 m) or less in width, a safety monitoring system alone is permitted. It is important to know that a fall protection monitoring system applies to low-sloped roofs (slope less than 4 in 12). When the slope exceeds this incline, OSHA demands other protective measures.

Safety monitoring can also be applied for other types of work (besides roofing) that involve a leading edge. According to the OSHA definition, A leading edge is the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively or continuously under construction.

When using a safety monitoring system, a Fall Protection Plan is required (29 CFR 1926.502(k)). This document needs to be developed by a qualified person and is specific to the site of the leading edge work.

The person assigned to act as the fall protection monitor is a *competent person*. According to OSHA a "competent person" is defined (in 29 CFR 1926.32(f)) as "one who is capable of



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identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them." There are many OSHA standards where a competent person is assigned specific tasks to ensure the safety and health of field personnel. Such is the case for powered platforms and manlifts (29 CFR 1910, Subpart F), excavations (29 CFR 1926, Subpart P), scaffolds (29 CFR 1926, Subpart L) and Asbestos (29 CFR 1926, Subpart Z). Even though the definition of a competent person is the same in all these standards, the specific responsibilities of a competent person is geared for that specific task. Therefore, a competent person for excavations is not necessarily designated as competent with regards to asbestos abatement or inspecting scaffolds.

A designated OSHA competent person is not the same as a qualified person. A "qualified" person or engineer, as defined in 1926.32(l), might have more technical expertise, but would not necessarily have expertise in hazard recognition or the authority to correct identified hazards. Thus, a competent person, through experience and/or training is someone that is recognized by his or her organization rather than through obtaining a certificate or completing a degree or series of courses - although such education can be used as evidence that a person is indeed competent in a specific area such as excavations, asbestos abatement or fall protection.

In the case of being assigned a competent person for a fall protection monitor, the safety monitor shall be competent to recognize fall hazards. Their main responsibility is to warn an employee when it appears that an employee is unaware of a fall hazard or is acting in an unsafe manner. OSHA requirements do not include a minimum offset distance from a leading or unprotected edge from which an employee can work while being monitored by a safety monitor.

The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored and shall be close enough to communicate orally with the employee. And the safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function (similar to an attendant during a confined space entry).

Mechanical equipment shall not be used or stored in areas where safety monitoring systems are being used. In addition, no employee, other than an employee(s) that is engaged in roofing work (on low-sloped roofs) or an employee covered by a fall protection plan, shall be allowed in an area where a safety monitoring system is being used.

When personnel are working on an elevated surface with a leading-edge while being protected per a safety monitoring system, it is mandatory that such persons shall comply promptly with fall hazard warnings directed by the safety monitor. Should the safety monitor give an instruction to move away from the edge, comply and if a discussion due to a difference of opinion is needed, save it for later!

If people are good only because they fear punishment, and hope for reward, then we are a sorry lot indeed – Albert Einstein

