



TOSHA INSTRUCTION

TENNESSEE DEPARTMENT OF LABOR & WORKFORCE DEVELOPMENT
DIVISION OF OCCUPATIONAL SAFETY & HEALTH

DIRECTIVE NUMBER: CPL-TN 04-00-004
(CPL-TN 2.504 with changes)

EFFECTIVE DATE: September 24, 1999

SUBJECT: Local Emphasis Program - Fall Protection

TO: TOSHA Personnel

FROM: Robert B. Cooper, Chief, Standards & Procedures

THRU: John D. Winkler, Administrator

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DATE: September 24, 1999

1. PURPOSE: This instruction establishes a Local Emphasis Program (LEP) for Fall Protection. This LEP is established to reduce employee reduce employee injuries and eliminate deaths from falls in both construction and general industry.
2. DOCUMENTS REFERENCED:
 1. TOSHA Field Operations Manual (FOM), Tennessee Occupational Safety and Health Plan - Part V, (March 29, 1996).
 2. OSHA Standards for the Construction Industry (29 CFR 1926.500, .451, .750 and .1051).
 3. OSHA Standards for General Industry (29 CFR 1910.22-.30).
 4. OSHA IMIS Manual
3. BACKGROUND: In Tennessee, falls are the leading cause of worker fatalities. The agency has determined that an increased TOSHA presence at worksites where the potential for falls is present is warranted. TOSHA recognizes that accidents involving falls are generally complex events frequently involving a variety of factors.

Consequently, the standards for fall protection deal with both the human and equipment-related issues in protection workers from fall hazards. For example, employers and employees need to do the following:

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- * Where protection is required, select fall protection systems appropriate for given situations.
- * Use proper construction and installation of safety systems.
- * Supervise employees properly.
- * Use safe work procedures.
- * Train workers in the proper selection, use and maintenance of fall protection systems.

The standard covers most construction workers except those inspecting, investigating or assessing workplace conditions prior to the actual start of work or after all work has been completed.

Construction employers must protect their employees from fall hazards and falling objects whenever an affected employee is 6 feet or more above a lower level. Fall protection generally can be provided through the use of guardrail systems, safety net systems, personal fall arrest systems, positioning device systems, warning line systems and safety monitoring systems.

General Industry employers must protect their employees from fall hazards when the employee is more than four (4) feet above a lower level. Fall protection can generally be provided through the use of guardrail systems and personal fall arrest systems.

D. PROCEDURES.

1. Provide a training program for TOSHA compliance and consultation personnel to make them aware of fall hazards and the appropriate standards which apply to different situations. This training would include specific training on the SEP.
2. Provide a training program for industry to help industry understand the significance of the hazards associated with fall hazards, the proper application of protective systems available and the TOSHA standards which cover various fall situations. These would be given in several areas of the state.
3. Provide a 15 minute fall protection presentation at each seminar that TOSHA presents to industry. A self contained Power Point presentation would be developed to assist the presenter.
4. Require Compliance Officers to address fall hazards on each inspection. When a possible violation is observed but is not able to be cited, the situation will be addressed with the company representative and noted in the inspection narrative.

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Examples would be violations without employee exposure, i.e. roofing work on a site not yet started, erecting steel below 25 feet, etc. In addition, the CO will provide information to aid the employer in the elimination or control of the fall.

5. Develop an intervention procedure to address fall hazards observed outside the traditional inspection arena. These procedures include the following:
 - a. When a serious fall hazard is observed outside a traditional inspection the CO will be authorized to initiate an inspection. If it is feasible, the CO will contact the Area Office Supervisor prior to making the inspection. If this is not practical, the CO shall make the inspection and then contact the Area Office Supervisor as soon as possible.
 - b. The inspection shall be conducted in the same manner as any other inspection (Opening, Closing Conference, etc.). Violations shall be documented and citations will be issued for any violations of TOSHA standards.
 - c. The scope of the inspection conducted under this Special Emphasis Program shall be limited to the fall hazards observed.

E. Recording in IMIS. The following guidelines shall be applied when recording inspections conducted under this LEP or other inspections where fall protection hazards are found:

1. Current instructions for completing the appropriate inspection classification boxes (Items 24 and 25) on the Inspection Report, TOSHA-1 Form, as found in the IMIS Manual shall be followed for inspections under this LEP.
 - a. The TOSHA-1 for any inspection under this LEP shall be recorded under A Local Emphasis Program@ (Item 25c). Record "FALLS" in the space in item 25c. (Note: Entry is made in ALL CAPS).
 - b. The TOSHA-1 for any programmed inspection scheduled under this LEP shall be marked "planned" (Item 24h) and "Local Emphasis Program" (Item 25c). Record "FALLS" in the space in item 25c.
 - c. The TOSHA-1 for any unprogrammed inspection where fall protection hazards are found shall be marked as unprogrammed (Item 24a thru g). In addition it shall be marked "Local Emphasis Program" (Item 25c). Record "FALLS" in the space in Item 25c.

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2. Nonformal complaints, other government agency referrals and report from the public, reporting potential hazards related to fall hazards shall be recorded on a TOSHA-7, Notice of Alleged Safety or Health Hazards, or an OSHA-90, Referral Report, if appropriate, in accordance with current IMIS instructions. They shall be recorded as unprogrammed inspections under the LEP.

F. Evaluation.

1. Compliance and Consultation data will be evaluated monthly.
2. An evaluation report will be completed monthly by the Operations Manager. This report will be provided to the Administrator, Assistant Administrator and Managers.
3. An annual evaluation will be performed in August 2000 to evaluate the LEP for its effectiveness, impact on the workplace and its continuation in FY2001.

G. ACTION. Managers and Supervisors shall insure that the procedures set forth in this instruction for the TOSHA LEP on Fall Protection are followed during interventions where fall exposures are observed.

H. EFFECTIVE/EXPIRATION DATES: This instruction is effective October 1, 1999 and shall remain in effect until cancelled or superseded.

APPENDIX A

Tennessee Occupational Safety & Health Administration (TOSHA)
SPECIAL EMPHASIS PROGRAM
FOR
FALL PROTECTION

The Tennessee Occupational Safety and Health Administration (TOSHA) has instituted a Special Emphasis Program to better identify actual and potential fall hazards and provide for the control or elimination of these hazards. Falls are the leading cause of fatal injury and occur in all types of employment. This program is established to focus attention on fall hazards statewide in order to prevent fall related injuries and fatalities.

Each year in the United States fall account for more than 200 fatalities and over 100,000 injuries. These occur in all areas of employment and almost all occupations. In Tennessee falls have been the leading cause of work related death for the past several years. The following table shows the statistics for 1997-1999:

Year	Fatalities
1997	7
1998	10
1999*	6

*as of July 1, 1999

In general, fall hazards must be addressed when the fall hazard is greater than 4 feet in an industrial setting or 6 feet in a construction setting. Fall hazards which occur in an industrial setting are often less obvious than those which occur on a construction site. In an industrial workplace fall hazards can occur from storage areas above offices and on mezzanines, cat walks, floor holes and manholes, scaffolds, certain types of material handling equipment, elevated work platforms and even employees climbing onto equipment to perform a repair or make an adjustment. These hazards can be controlled with the use of guardrails, covers, personal fall arrest equipment and employee training.

Fall hazards are present during almost all phases of construction. These hazards often occur during excavation, steel erection, concrete forming and pouring, work from scaffolding and roofing.

The majority of fatalities which occur on construction projects are from falls and falls are a significant source of serious injury. Almost all trades are exposed to fall hazard at some

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point during the performance of their work, and the fall hazard must be identified and protection provided. Fall protection can be provided with the use of guardrail systems, personal fall arrest equipment (body harness, lanyard, etc.), controlled access areas, nets and employee awareness training.

TOSHA is committed to helping employees and employers identify fall hazards and select the necessary protection to control or eliminate the hazard. This Special Emphasis Program will help TOSHA meet this goal.

For more information and publications on fall protection contact your local Tennessee OSHA office listed below or telephone 1-800-249-8510.

Chattanooga	(423)634-6424	Knoxville	(423)594-6180
Jackson	(901)423-5641	Memphis	(901)543-7259
Kingsport	(423)224-2042	Nashville	(615)741-3161