

# SAFETY MANAGEMENT SERVICES

## CONSTRUCTION SAFETY BREAKS

NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

LOCATION: \_\_\_\_\_

YOUR SAFETY CONCERNS: \_\_\_\_\_

DISCUSSION LEADER: \_\_\_\_\_

\_\_\_\_\_

## Today's Topic: Warning Lines as Fall Protection

Originally, OSHA had established specific fall protection requirement for **roofing work on low slope roofs**, in that under 29 CFR 1926.501 (b)(10) an employer may use a combination of warning lines 6 feet (and in some cases 10 feet) back from the edge in combination with monitors in place of personal fall protection equipment or guardrails.

Under 1926.501(b)(2), employers engaged in other specified work, such as **leading edge work, precast concrete erection work and residential construction**, may develop and implement a site-specific fall protection plan that uses alternative fall protection methods such as warning lines with roof monitors if they can demonstrate the infeasibility of conventional fall protection.

OSHA specifically states that the 6-foot warning line option is not available to trades whose work does not fall within the categories listed; i.e., roofing work on low sloped roofs, leading-edge work, precast concrete erection or residential construction.

## Can non-roofing trades work on a flat or low- sloped roof if they place a warning line 6' feet from the edge? The answer is No!

### How to Safely Utilize Warning Lines

In 20001, and again in 20021 and 20051, OSHA communicated that it would allow warning lines, placed 15 feet from the edge, if used in conjunction with very specific safe work practices. OSHA stated that it would only allow warning lines for non-roofing trades if ALL of the following conditions are met:

- A warning line is used 15 feet or more from the edge (or nearest edge of a hole);
- The warning line meets or exceeds the requirements in §1926.502(f)(2);

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- No work or work-related activity is to take place in the area between the warning line and the hole or edge; and
- The employer effectively implements a work rule prohibiting the employees from going past the warning line.

Restricting access to the work area between the warning line and the roof edge may pose challenges for employers. If an employer is unable to ensure no work or work activity will take place while employees are inside the 15 foot warning line, you can protect your employees with conventional fall protection equipment and dispense with the 15-foot warning line.

How often should warning line systems be inspected? Who does this inspection? Does it have to be documented?

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How high does the warning line have to be? How many stanchions are required? Can you use caution tape?

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