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Developing a Code Compliant Fall Arrest and Fall Protection for Work at Heights – Looking Ahead to include recent updates to ANSI Z359 and A92. - 2019

A white paper by Thomas Trinen, President Service One Access, Inc.

Recent code updates require all employers with personnel who work at heights, to have a fall protection plan compliant with OSHA 1910 (2017) and the new ANSI Z359.2 Standard titled “Minimum Requirements for a Comprehensive Managed Fall Protection Program”. Other Standards adopted by OSHA include ANSI A92- all require a work plan.

A thorough job hazard analysis (JHA) and implemented safe work plan not only reduces worker risk, and injuries, it also saves lives. As an employer, we make every effort to train our workers how to understand and comply with the regulations.

Essential to every fall arrest and fall protection plan are certified and properly installed and maintained anchorages and horizontal lifeline systems.

REQUIRED ACTION STEPS FOR A COMPLIANT FALL PROTECTION PLAN

1. Develop a policy and define the scope of the program.
2. Identify fall hazards through a well-developed hazard analysis of all the work area(s).
3. Determine appropriate methods of safe access to each area, include 100% tie off for fall protection and separate and independent tie offs for suspended access work (fall arrest).
4. Identify process, procedures and anchorages and PPE required to eliminate the fall hazards, namely;
 - Prevent fall hazards
 - Controlling the fall
 - Conduct education and training to ensure effective employee understanding of fall hazards and precautions.
5. Perform inspection and maintenance of fall arrest equipment. OSHA requires pre-use visual inspections, annual visual inspections, 5-year tests on fall protection and chemically bonded anchorages, and load / proof testing every ten years. These requirements are considered minimum inspection intervals. The Engineer or manufacturer may require MORE frequent inspections and testing.
6. Administer and audit the program for compliance and continuous improvement.
7. Develop, maintain and have all employees sign off on a JHA (Job Hazard Analysis), which creates the framework for the site-specific fall protection work plan for each project, or area of the building. Daily site condition review includes weather, wind, exposure and protection of the public or others potentially within the “drop zone”.

You can rely on our experience as qualified and competent persons with our knowledge of fall protection regulations, standards, equipment and systems being used at the work place. The qualified person's main responsibilities include supervising the design, selection, installation and inspection of certified anchorages and horizontal lifelines and participating in accident investigations and being a subject matter specialist to the competent person and program administrator.

It is Service One's (the employer's) responsibility to provide comprehensive training programs for all employees exposed to fall hazards, inform all authorized persons of any foreseeable fall hazards prior to exposure and provide authorized persons with fall protection equipment.

To sum everything up, a comprehensive fall protection plan must be developed to include:

1. Statement of policy
2. Results of the fall hazard survey report, including all identified fall hazards, control method for each hazard and rescue method if an active fall arrest system is to be used.
3. Delegation of ongoing responsibilities in the areas of inspection, recordkeeping, maintenance, equipment replacement, incident reporting, enforcement, accident investigation, training and changes to the plan.