



# CONN-OSHA QUARTERLY

June 2013

## Fall Protection Safety for Residential Construction

By: Dave Boutin, CSP

After 40 years, most business owners know about OSHA. Unfortunately, that does not mean business owners know all the rules that apply to them and their work. This frequently applies to smaller companies that do not have resources to hire a health and safety officer. Many residential construction contractors fit in this category. The unfortunate reality is residential contractors are learning about safety the expensive way, through fines and penalties. Other employers who experience employee injuries and deaths find out lawsuits are even more costly. Save yourself a lot of time and money by learning about **and using** fall protection.

First, let's understand why we need fall protection. Fall protection is the leading cause of death in Construction, causing approximately 3 times the number of deaths as the next highest cause. Of those fall related deaths, approximately one third occur in residential construction. This high rate of fatalities and disabling injuries in residential construction led to the release of "Interim Fall Protec-

tion Guidelines for Residential Construction" in 1995. In the more than 15 years since, a wide variety of methods and equipment have evolved, making residential fall protection feasible. The new "Compliance Guidance for Residential Construction" was released in 2010. Implementation dates were extended several times, but **Residential Fall Protection requirements became effective March 15, 2013.** Residential construction employers now have the same fall protection obligations as other types of construction.



(Continued on page 3)

## Connecticut Welcomes OSHSPA

CONN-OSHA is hosting the Occupational Safety and Health State Plan Association (OSHSPA) Conference June 10-12, 2013 at the Mystic Hilton.

OSHSPA is the Occupational Safety and Health State Plan Association ([www.oshspa.org](http://www.oshspa.org)), an organization of 27 states and territories that have OSHA-approved state plans. OSHSPA is the link between the state plans, federal OSHA, and Congress. OSHSPA representatives meet three times a year to exchange information and address shared concerns; they also appear before congressional committees and other hearings to report on workplace safety and health matters.

The Occupational Safety and Health Act of 1970 gives states and territories the right to develop their own workplace safety and health plans and to enforce safety and health rules within their jurisdictions. Federal OSHA approves and monitors state plans and funds up to 50 percent of their operating costs. State plans must be as effective as federal OSHA in enforcing safe and health-

ful working conditions.

State plans affect the safety and health of more than 57 million workers. In addition to their enforcement role, state plans help employers make safer workplaces with free consultative services, education, and technical assistance.



### Protecting public-sector employees

The Federal Occupational Safety and Health Act of 1970 does not cover public-sector employees. However, states with state plans give equal protection to public- and private-sector employees. This is a significant benefit to public employees because some of the most hazardous occupations — firefighting, emergency response, corrections, law enforcement, publicly funded health care facilities, and transportation — are in the public sector.

## Test Your OSHA Recordkeeping Knowledge

When paying a friendly visit, an OSHA compliance officer will start by looking over your OSHA Recordkeeping Forms. These forms measure your establishment's safety and health record. Failure to keep these records accurate and up-to-date can lead to fines. There are 3 OSHA Recordkeeping Forms:

- 300 Log of Work-Related Injuries and Illnesses
- 300A Summary of Work-Related Injuries and Illnesses
- 301 Injury and Illness Incident Report

You may download the forms in Excel or PDF format at [www.osha.gov/recordkeeping/RKforms.html](http://www.osha.gov/recordkeeping/RKforms.html)

The information on the OSHA 300A Summary Form is used to calculate your Days Away Restricted Transferred (DART) rate. This rate provides the number of cases with days away, job transfer, or restriction per 100 full-time employees. If your DART rate is higher than the national DART rate for private industry, you may be subject to an inspection.

### 1. When do I post the OSHA records?

- a. February 1<sup>st</sup> through December 31<sup>st</sup>
- b. February 1<sup>st</sup> through April 30<sup>th</sup>
- c. February 1<sup>st</sup> through February 2<sup>nd</sup>

### 2. Which form(s) do I post?

- a. OSHA 300A Summary
- b. OSHA 300 Log
- c. Both A & B

The OSHA 300A Summary must be completed and posted, where employees may easily see it, from February 1<sup>st</sup> through April 30<sup>th</sup> (Question #1: Answer b). Do not post the 300 Log (Question #2: Answer a).

When a government representative requests to see your OSHA records, you have 4 business hours to provide them. You are required to keep these records for five years, updating the OSHA 300 Log as necessary. Upon employee request, you have until the end of the next business day to provide copies of the OSHA Forms 300 Log, 300A Summary, and his or her individual OSHA 301 Incident Report.

### 3. If an employee visits a walk-in clinic, you must automatically add a case to the Log.

- a. True
- b. False

### 4. If a case has 1 day away from work and 3 days of job restriction, you should check:

- a. Column H: Cases with Days Away from Work
- b. Column I: Cases with Job Transfer/ Restriction
- c. Both a & b

An incident is not automatically recordable because an employee is seen at a walk-in clinic or by a doctor. The diagnosis and treatment determine if the case is recordable (Question #3: Answer b).

For every case on your log, check one and only one box in Column G through Column J. All cases with Days Away from Work should be recorded in Column H (Question #4: Answer a). Cases with *only* job transfer or restriction should be recorded in Column I.

### 5. A person is injured in December 2012 and is out 2 days in January 2013. Do you:

- a. Record the case on 2012's log and the number of days on the 2013 log.
- b. Record both the case and number of days on the 2012 log.
- c. Record both the case and number of days on the 2013 log.

### 6. An employee clocks in at 8:15 a.m. and is injured at 8:30 a.m. He goes home for the rest of the day and stays home the next day to recover. Do you:

- a. Record the case in Column H: Days Away from Work Case with 1 day away.
- b. Record the case in Column H: Days Away from Work Case with 2 days away.
- c. This is getting complicated...I'll consult my Magic 8 Ball.

If a case has days away from work that continue into the next year, record the case and the number of days in the year the injury or illness occurred (Question #5: Answer b). Remember to count calendar days and start counting the day after the incident (Question #6: Answer a). If an individual case has a large amount of lost time, you may stop counting at 180 days.

There are many OSHA recordkeeping rules not mentioned in this article. If you would like more information, please call 860-263-6941 or e-mail [CONNOSHASTATS@ct.gov](mailto:CONNOSHASTATS@ct.gov) to request information packets. Upcoming recordkeeping workshops are listed on page 4.

Connecticut Department of Labor - OSHA  
38 Wolcott Hill Road  
Wethersfield, CT 06109

To receive the *Quarterly* electronically, contact [gregory.grayson@dol.gov](mailto:gregory.grayson@dol.gov). In the subject line type "*subscribe*" and provide your e-mail address. You may also reach us by phone at (860) 263-6900 or visit our website at [www.ctdol.state.ct.us/osha/osha.htm](http://www.ctdol.state.ct.us/osha/osha.htm)

## Residential Fall Protection (cont. from page 1)

Frequent citations for residential contractors include:

- Fall protection not used when working 6 feet or more above a lower level.
- Improper use of warning lines
- Improper use of safety monitor

Keep in mind falls can be the result of other unsafe conditions. Falls may occur because a ladder is used incorrectly or an employee receives an electrical shock. Contractors cited for fall protection violations may be cited for these hazards as well.

There are many simple things you can do to protect your workers:

**Preplan.** Create a Job Hazard Assessment (JHA) for Fall Hazards and review before each work activity. Identify options for eliminating or controlling each anticipated hazard before the project begins. Assure fall protection equipment is available from the first day. Update JHA as necessary to address new job activities, hazards, equipment and/or methods. Communicate expectations to contractors.

**Train.** Provide safety training for your employees and supervisors. OSHA 10-hour Construction training is an excellent course to learn basic safety requirements and all 10-hour Construction courses include a section about fall protection. Employees who work at heights should also be given specific training about inspection, installation, and proper use of the fall protections systems they use.

**Implement.** Establish and communicate fall protection requirements for activities that expose employees and contractors to fall hazards. Verify that methods of fall protection used by employees and contractors are effective for the type of hazard. Make sure workers know fall protection is a requirement, not an option.

**Intervene.** Observe for employees and contractors who don't use proper fall protection. Immediately stop unsafe work practices. Reinstruct personnel regarding fall protection requirements and expectations when violations are observed.

Free assistance is available to help you identify and correct safety hazards through the CONN-OSHA consultation program. Contact CONN-OSHA at 860-263-6900 to find out what you need before you start your next job. You can ask questions, request literature, or schedule your free on-site consultation. All consultation services are free and confidential. Information and printed materials are also available through the CONN-OSHA

[www.ctdol.state.ct.us/osha/osha.htm](http://www.ctdol.state.ct.us/osha/osha.htm)

and OSHA [www.osha.gov](http://www.osha.gov) websites.

Link to the "Compliance Guidance for Residential Construction"

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=DIRECTIVES&p\\_id=4755](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=4755)



### Fall Protection Tips

- Identify all potential tripping and fall hazards before work starts. 
- Look for fall hazards such as unprotected floor openings/edges, shafts, skylights, stairwells, and roof openings/edges. 
- Inspect fall protection equipment for defects before use. 
- Select, wear, and use fall protection equipment appropriate for the task. 
- Secure and stabilize all ladders before climbing them. 
- Never stand on the top rung/step of a ladder. 
- Use handrails when you go up or down stairs. 
- Practice good housekeeping. Keep cords, welding leads and air hoses out of walkways or adjacent work areas. 

For more complete information:  
 Occupational Safety and Health Administration  
U.S. Department of Labor  
[www.osha.gov](http://www.osha.gov) (800) 321-OSHA

OSHA 3231-18F05

## Fatality & Casualty Reporting

**State & Town:** CONN-OSHA (860) 263-6946 (local) or 1-866-241-4060 (toll-free)  
**Private Employers:** Report to Federal OSHA at 1-800-321-OSHA(6742)

## *Hazard Corner...*

Did you know that falls are the leading cause of fatalities in construction? Thirty-four percent of all fatalities were caused by falls in 2008 and 2009. In 2010 there were 264 fall fatalities (255 falls to lower level) out of 774 total fatalities in construction. These numbers don't even represent the serious injuries that occur each year from falls from above. These falls are preventable!

Please remember, if you are working at a height of 6 feet or more in construction, guardrails, safety nets or personal fall arrest systems are required. For general industry, working at a height of 4 feet or greater triggers similar requirements. In addition, if you are working above dangerous machines or equipment, employers must provide guardrails and toe boards to prevent workers from falling.

OSHA currently is running a fall protection campaign in order to bring awareness and assistance to this deadly issue. OSHA notes three simple steps to preventing falls.

- **PLAN:** Plan ahead to get the job done safely
- **PROVIDE:** Provide the right equipment
- **TRAIN:** Train everyone to use the equipment safely

For anyone looking for information on preventing falls, please go to [OSHA.gov](http://OSHA.gov). There you can find education materials and resources, training and media resources.



## *Connecticut-OSHA ~ Training Update...*

**Workplace Violence** *June 27, 2013, from 10:00 a.m. to noon* This workshop provides some tools to help manage, defuse and prevent workplace violence.

**GHS Hazard Communication** *June 28 (this session is full) and September 10, 2013, from 10:00 a.m. to noon* The Hazard Communication Standard (HCS) is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The major changes in 29 CFR 1910.1200; Hazard classification, Pictograms and Safety Data Sheets will be addressed in this session.

**OSHA Recordkeeping** *July 9, 2013, from 8:30 a.m. to noon* At this workshop, you will learn how to fill out the OSHA 300 Log of Work-Related Injuries and Illnesses accurately and correctly.

**Material Handling & Ergonomics** *July 10, 2013, from 10:00 a.m. to noon* Confronted with making ergonomic improvements to an existing manufacturing process or office environment but have run out of ideas? This session will help attendees develop a process for recognizing and quantifying risks, creating cost-effective solutions, and documenting the effectiveness of the results.

**Safe Driving – Get There Safely EVERY Time** *July 24, 2013, from 10:00 a.m. to noon* Work-related vehicle crashes are the leading cause of occupational fatalities. The goal of this session is to increase awareness of the need for, and the benefits of, safe driving.

**Breakfast Roundtable** This discussion group meets the third Tuesday of every month from 8:15 am to 9:45 am. Pre-registration is required. To be placed on the e-mail distribution list, contact John Able at [able.john@dol.gov](mailto:able.john@dol.gov)

Classes are free and held at 200 Folly Brook Boulevard, Wethersfield, CT in Conference Room A. To register, contact Catherine Zinsser at [zinsser.catherine@dol.gov](mailto:zinsser.catherine@dol.gov). Pre-registration is required. A Photo I.D. is also required to allow entry into a public building. For more training information, visit the CONN-OSHA web site [www.ctdol.state.ct.us/osha/osha.htm](http://www.ctdol.state.ct.us/osha/osha.htm)