



US Army Corps
of Engineers®

LIFELINE

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ISSUE 1



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Welcome to the LifeLine fall protection newsletter. The purpose of the newsletter is to communicate fall protection issues to the field, providing information, updates on standards, product safety information, and other fall protection issues.

LifeLine is a publication of the USACE Fall Protection Working Group.

WG Sharepoint site –
<https://cops.usace.army.mil/sites/S/FP/default.aspx>

Editor's Comments

The editor would like to thank the outgoing Fall Protection Working Group Chair, Ms. Ellen Stewart, who will be retiring from USACE HQ January 2015. Without her support, the Working Group would not exist. She has been a tireless champion in the improvement of fall protection standards for the Corps and Industry.



Ellen B. Stewart

The USACE National Fall Protection Working Group (WG) provides technical guidance to the field in support of occupational standards and governing regulations with respect to fall protection requirements.

The WG maintains Sections 21 and 24 of the US Army Corps of Engineers (USACE) Safety and Health Requirements Manual (EM 385-1-1), as well as applicable portions of all other sections as related to falls, fall protection programs and personal protective equipment. The WG members serve as technical advisors and resources to the field. Guidance will be in accordance with EM 385-1-1, OSHA Regulations, National Consensus Standards and any other applicable requirements or standards.

When a fall-from-height related accident occurs which triggers a formal Board of Investigation (BOI), a representative of this WG will serve as a Technical Advisor to the BOI. Routine periodicals will be provided to the field detailing fall protection issues and summarizing lessons-learned.

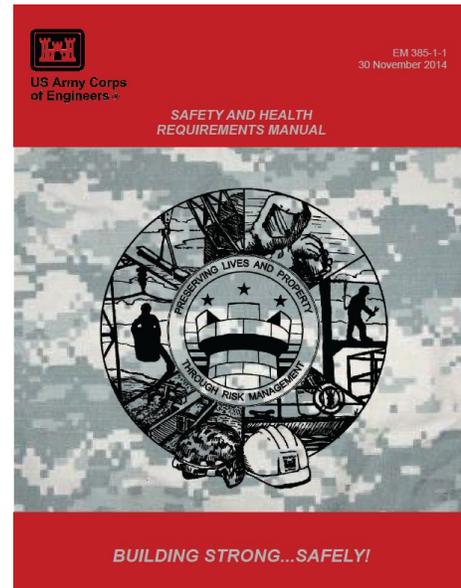
NEW FALL PROTECTION REQUIREMENTS

The new EM 385-1-1 Sections 21 and 24 have new fall protection and safe access requirements.

* Publication of EM 385-1-1 anticipated in January 2015

Highlights include:

1. Training requirements, to include refresher training.
2. Work Platforms.
3. Updated fall restraint requirements for Self-propelled Elevating Work Platforms (Scissor Lifts).
4. Roofing work requirements for maintenance activities.
5. Flowchart for work over water requirements.
6. Rope Access work moved from Appendix P to Section 24. This section has been refined.
7. Ladderway openings to incorporate OSHA requirements.
8. Requirement to maintain 3 points of contact on a ladder.
9. Equipping harnesses with trauma straps.



WHAT IS A COMPETENT PERSON FOR FALL PROTECTION?

Minimum training

Section 21.C.04 of the new EM 385-1-1 will state that 18 months from the effective date of the manual, Competent Person (CP) training shall be a MINIMUM of 24 hours, with a combination of formal and practical applications. All training shall be documented and conducted by a Competent Person trainer IAW ANSI Z359.2.

Why the change?

Under the current requirements, no specific length of training is established for a person being trained to be a CP. An individual can simply take a 2 hour on-line course and be qualified as a CP. Falls from heights are the greatest hazard on construction sites and also pose a significant hazard in our own facilities. A CP is responsible

for managing a fall protection program and a 2 hour, or even an 8 hour course cannot provide the knowledge and skills needed.

This new training requirement has been coordinated with industry, and they feel that the Corps is taking a step in the right direction by increasing the level of CP training.



WHERE CAN ONE GET 24 HOURS OF COMPETENT PERSON TRAINING?

The Fall Protection Working Group has contacted major fall protection training firms and they either already provide training that meets the new requirement or are modifying their training to meet the enhanced training. If you have a local training source, recommend you inform them of the new training requirement.

National sources of training that are offering a 24 hour CP course include:

Miller. Cristy Kluck at 855-565-6722

<https://www.millerfallprotection.com/>

DBI Sala/Capitol Safety – Brooke Ortega at 651-388-8282 ext. 6386 www.capitalsafety.com

LJB Fall Protection - 866-552-3536

<http://www.libinc.com/>

Gravitec - 800-755-8455 <http://www.gravitec.com/>



Q & A s

Q. Lifespan of fall arrest gear?

A. Prior to 2012, the ANSI A10.32 standard stated that fall protection gear would be replaced every 5 years. The 2012 version of the standard changed replacement determination based on:

1. Damage or excessive wear.
2. Manufacturer requirements.
3. Exposed to a fall arrest.

In addition, some manufacturers of fall arrest gear will specifically state lifespan, often using 5 years from the date that the equipment was placed in service.



Q. When can I work on a roof with no fall protection?

A. Section 21 of the new EM 385-1-1 has the following added. These requirements are based on OSHA guidance:

1. During construction activities, fall protection is required for employees exposed to fall hazards while conducting inspection, investigation or assessment work.
2. Prior to start of construction or after construction work is complete, fall protection **is required** when conducting inspection, investigation or assessment

work **within 6 ft.** from an unprotected edge of a roof. An AHA shall be developed by a Competent Person for Fall Protection.

3. Prior to start of construction or after construction work is complete, fall protection **may not be required** when conducting inspection, investigation or assessment work **more than 6 ft. away** from an unprotected edge of a roof. An AHA shall be developed by a Competent Person for Fall Protection.
4. During maintenance evolutions (i.e. inspecting or maintaining HVAC or other equipment on roofs) fall protection is required when conducting inspection and investigation work.

TRAINING REQUIREMENTS NEW EM 385-1-1



The new EM 385-1-1 fall protection training requirements for USACE and contractor employees will be updated to align with the ANSI Z359 Fall Protection Code. These changes are significant and include minimum hours of training and refresher training.

Note—refresher training only applies to USACE employees.

Fall Protection training requirements. Refresher training requirements only apply to USACE employees.

POSITION TITLE	TYPE OF TRAINING (Reference ANSI/ASSE Z359.2)	LENGTH AND REFRESHER (all training shall be documented)
Fall Protection Program Manager	- Working knowledge of current fall protection regulations, requirements, standards, equipment and systems.	- 1 hour of initial and refresher annually covering fall protection and rescue. Can be informational meetings or training sessions.
Qualified Person (QP) for Fall Protection	Trained by a QP Trainer in proper inspection, assembly and use of fall protection equipment and systems that they encounter in their work as a QP.	- By Professional training, qualification, or certification - 1 hour annual refresher. Can be informational meetings or training sessions.
Competent Person (CP) for Fall Protection	- Trained by a Competent Person or Qualified Person for Fall Protection trainer.	- Initial 24 hours of a combination of formal and practical, documented. - 2 hours of annual refresher. Can be informational meetings or training sessions, or a combination there -of.
End User	- Trained by Competent Person for Fall Protection who is qualified in delivering fall protection training.	- 2-8 hours or as appropriate initial training - 1 hour annual refresher.
Authorized Rescuer	- Trained by a Competent Rescuer	- 2-8 hours or as appropriate - 1 hour annual refresher
Competent Rescuer	- Trained by a Competent Rescue Trainer	- 2-8 hours or as appropriate - 1 hour annual refresher
Supervisors of End Users and other applicable employees	- FP awareness training - Familiarization with SOPs - Local program requirements - Proper inspection and record keeping - Proper anchoring and tie-off techniques	<i>Local Training plan/briefing, and/or instruction, SOP or Web Based Training</i>

RESOURCES

Share Point

The Fall Protection working group has developed resources and these can be found at this link to the Fall Protection Share Point site at:

<https://cops.usace.army.mil/sites/S/FP/default.aspx>

Resources include:

- Product info.
- Guidance
- Equipment recalls and safety info.

Project Fall Protection Plans

Section 21 of EM 385-1-1 requires every Government facility to have a written Fall Protection Program if they have personnel working at heights. The program shall include:

- Identification of duties and responsibilities.
- Description of project or tasks performed.

How to find the ANSI Z359 Fall Protection Code.

The Corps has a subscription to many consensus standards. From a USACE computer, follow these steps for access:

1. <http://www.wbdg.org/>
2. Click on the DoD logo in the right hand column.
3. Click the pull-down menu under the Corps logo and select Non-Government Standards.
4. Select the Army button

and click the Login to IHS button.

5. Click the IHS Standards Expert.
6. Under the Search column you can now enter your search terms. Example - enter "Z359" in the Document Number window this will take you to the ANSI/ASSE Fall Protection Code standards. From here you can view, print, or download the standards.

- Training requirements
- Anticipated hazards and fall protection and control.
- Rescue plans and procedures.
- Design of anchorages/ fall arrest and horizontal lifeline systems.

Developing a project fall protection plan

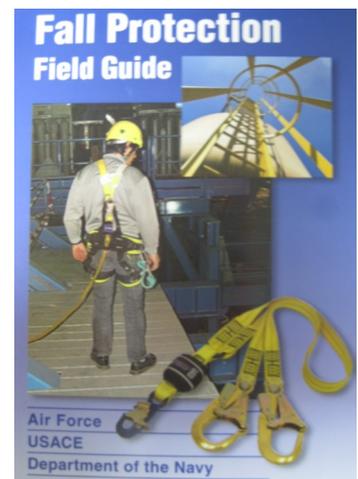
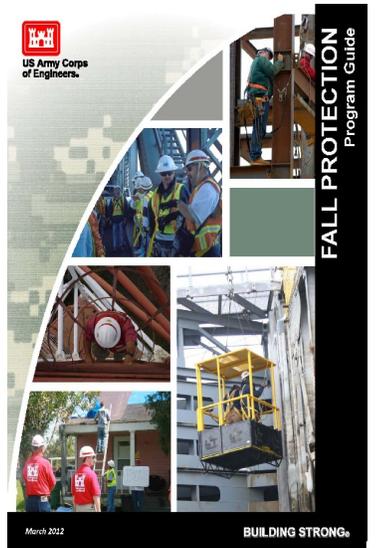
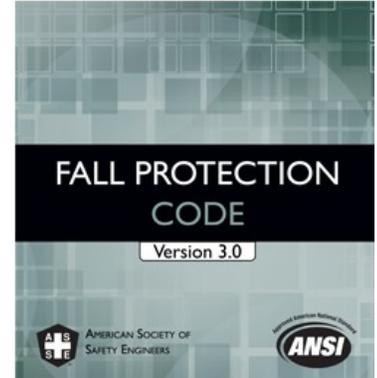
To aid you, the Working Group has developed a Guide that can be used as a template, located at this link—
<https://cops.usace.army.mil/sites/S/FP/FP%20Guide/Forms/AllItems.aspx?InitialTabId=Ribbon%2EDocument&VisibilityContext=WSSTabPersistence>

Field Guide

The Navy developed a Fall Protection Field Guide that has a variety of fall protection related information for use by personnel in the field. Information includes:

- Federal and DoD fall protection standards
- Equipment types, uses, and training requirements
- Hazard evaluation and other tools.

The guide can be found on the Fall Protection Share Point site under the Documents column. Pocket-sized printed copies are forthcoming.



LADDER OPENINGS

The new Section 24 of EM 385-1-1 has been updated for ladder openings.

24.B.02 states: "Every ladderway, floor opening or platform shall be guarded by a standard railing with standard toe-board (when exposure exists to falling materials), on all exposed sides (except at entrance to opening). The passage through the railing shall be provided with either a guardrail or shall be offset so that a person cannot walk directly into the opening. The guarding shall meet the strength requirements of Section 21.F.01. Swing gates are preferred over chain gates."

Ladder openings not meeting this requirement pose a significant fall hazard to employees. There are numerous manufacturers of swing gates for retro-fitting existing ladder openings. Chains meeting the guard rail strength requirements are acceptable, but not as effective as a swing gate due to the issues such as the effort required to connect/re-connect chains and limiting the sag in the chains.



SCISSOR LIFT ANCHORAGES

Change 2 of the 2008 version of EM 385-1-1, Section 21.J.02, states: "Scissor lifts shall be equipped with standard guardrails. In addition to the guardrail provided, the scissor lift shall be equipped with anchorages meeting the ANSI Z359 Fall Protection Code. A restraint system shall be used in addition to guardrails. Lanyards used with the restraint system shall be sufficiently short to prohibit workers from climbing out of, or being ejected from the platform. Scissor lifts equipped with anchorages that do not meet ANSI Z359 may be used until 15 October 2011, at which time they must be either equipped with such anchorages or removed from service".

The new EM 385-1-1 states :

- Scissor lifts without anchorages are prohibited.
- Lanyards with built-in shock absorbers are acceptable if sufficiently short.
- The use of a self-retracting device (SRD) is prohibited unless permitted by the SRD manufacturer and used in accordance with manufacturer's instructions.

> *Why the change to allow SRDs? OSHA already allows it as do some scissor lift manufacturers. Industry asked the Corps to allow this. SRDs are NOT allowed for use in aerial work platforms though.*



WHAT IF THE SCISSOR LIFT DOES NOT HAVE ANCHORAGES?

The three main manufacturers of scissor lifts were contacted by the Fall Protection Working Group and all have solutions for scissor lifts not currently equipped with anchorages. There are other brands or scissor lifts that were not contacted and we recommend that if you have another brand of lift, the manufacturer be contacted directly for specific guidance.

Genie—Genie states that all of their scissor lifts have been equipped over the years with a mid-rail that meets the OSHA anchorage requirement. It is important that the decal stating such be in the scissor lift platform and the manufacturers' manual be present with the equipment.

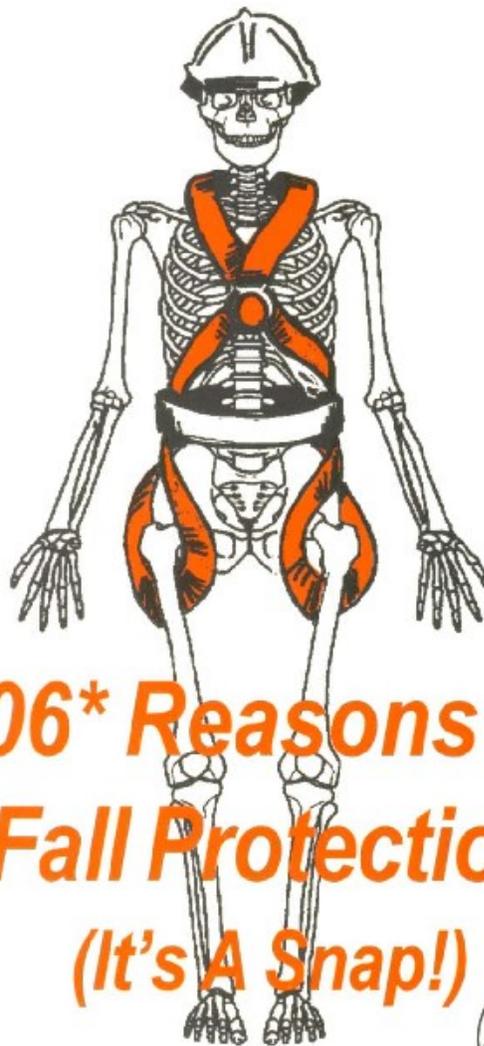
Skyjack—D-ring kits can be procured from them to meet the ANSI Z359 anchorage standard. Skyjack scissor lifts offered anchorages as an option starting in 1998 and started installing them as standard equipment in 2005.

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JLG - They can be contacted for a detailed procedure for welding in a floor mounted anchorage.

FALL PROTECTION



***206* Reasons for
Fall Protection
(It's A Snap!)***



U.S. DEPARTMENT OF LABOR

*BONES IN THE HUMAN BODY

OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION