

MBAA Safety Toolbox Talk



Walking-Working Surfaces

Overview

Slips, trips, and falls together are the leading cause for incidents within the general industry. They account for 15% of all accidental deaths (2nd leading behind motor vehicles) and are one of the most frequently-reported injuries, making up 25% of reported claims per year. Falls alone account for more than 17% of all disabling occupational injuries. The OSHA standard 1910 subpart D is the Walking-Working Surfaces standard and it discusses ways to prevent these incidents from occurring. These methods include requirements for ladders, fall protection, stairways, scaffolds, rope descent systems, and falling object protection.

OSHA's Walking Working Surfaces Standard

General requirements of this standard state that it is the responsibility of the employer to inspect, maintain, and repair walking-working surfaces for the safety of the employees. Employers should also ensure that these surfaces can support the intended load, have safe means of access and egress, and are clean, dry, and free of hazards. Typical hazards that interfere with safe walking-working surfaces include sharp and protruding objects, loose boards, corrosion, leaks, spills, snow, and ice. For wet processes, the employer should provide platforms, mats, or other dry standing places to prevent employees from slipping.

New Requirements for Ladders

OSHA regulations will start to phase out cages around fixed ladders. OSHA now requires fixed ladders installed **on or after November 19, 2018, of 24 feet or more** to be equipped with a personal fall arrest system or a ladder safety system. Additionally, ladders installed before November 19, 2018, must be retrofitted with a personal fall arrest system or ladder safety system **before November 19, 2036.**

Duty to Provide Fall Protection

Fall protection is required to be provided by employers to protect employees from fall and falling object hazards. All fall protection must meet the criteria in OSHA 1910.29 which discusses guardrail, safety net, handrail, stair rail, and cage requirements. One of the most important methods of fall protection are guardrails. The top edge height on guardrails must be 42 inches, plus or minus 3 inches, above the walking-working surface and must be capable of withstanding a force of at least 200 pounds of applied downward or outward force. Other methods of preventing falls includes ladder safety systems, personal fall arrest systems, and hole covers.

Where is Fall Protection Required

Fall protection is required for any walking-working surfaces with an unprotected side or edge that is 4 feet or more above lower level. Some areas where fall protection would be required include:

- Hoist holes that are 4 feet or more above lower level
- Runways or similar surfaces 4 feet or higher
- Openings less than 39 inches above walking-working surfaces
- Dock board areas 4 feet or higher
- Fixed ladders that are 24 feet or higher
- Stairways with an unprotected edge
- Roof work that is performed less than 6 feet from the roof edge

Preventing Falling Objects

The new standard also addresses dropped object protection. Dropped objects account for more than 50,000 OSHA recordable injuries every year in the United States. It is the responsibility of the employer to provide protection against dropped objects for employees. Methods to control the risk of dropped objects include: guardrails, toe boards, safety

nets, covers, canopies, and barricading areas below. Other options to reduce the risk include tethered tools, gripped gloves, and close-lid containers and toolboxes.

Training Requirements

Employers must provide training, by a qualified person, for each employee on fall and equipment hazards in the workplace. Fall training should discuss the nature of fall hazards and how to recognize them, procedures to minimize those hazards, correct use of personal fall protection systems and equipment, and correct procedures for installing, inspecting, operating, maintaining, and disassembling the personal fall protection systems that they use. Equipment hazard training must include the proper care, inspection, storage, and use of equipment prior to use. Retraining must be conducted if the employer has reason to believe the employee does not have the required understanding and skill. Retraining is also required if there are changes in the workplace that render previous training inadequate or if there are changes in types of fall protection or equipment.

LEARN MORE!

<https://www.osha.gov/Publications/OSHA3903.pdf>

FOR MORE INFORMATION ON BREWERY SAFETY, PLEASE VISIT THE MBAA BREWERY SAFETY WEBSITE AT:
<http://www.mbaa.com/brewresources/brewsafety>