

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH*Headquarters Office*

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*Juliann Sum, Chief*

March 8, 2016

Steven L. Rank
Executive Director of Safety and Health
Iron Workers International Union
srank@iwintl.org

Re: Title 8 sections 1669, 1670, and 1710 – Fall Protection for Unloading Structural Steel from Trucks at Steel Construction Job Sites.

Dear Mr. Rank:

This letter amends a previous response from the Division of Occupational Safety and Health (Cal/OSHA) regarding the fall protection requirement for ironworkers unloading structural steel from trucks with hoisting equipment. The content and conclusions of this letter are based only on the facts described below and responsive only to the initial requester. They may not be construed as a statement of general Cal/OSHA policy or general interpretation of the regulations referenced in this letter.

Applicable Regulations:

On February 24, 2016, I wrote to you in response to your letter of September 2, 2015 regarding fall protection requirements for ironworkers during structural steel unloading operations at structural steel erection job sites. My letter discussed requirements in Title 8 sections 1669 and 1670, found in the Construction Safety Orders, Article 24 - Fall Protection.

Upon further analysis, we have determined that Title 8 section 1710 applies to the unloading of structural steel from trucks with hoisting equipment, instead of section 1670. The scope and application of section 1710 include the following:

Construction Safety Orders
Article 29. Erection and Construction
§1710. Structural Steel Erection.

(a) Scope and application.

(1) This section sets forth requirements to protect employees from the hazards associated with steel erection activities involved in the construction, alteration, and/or repair of single and multi-story buildings, bridges, and other structures where steel erection occurs. The requirements of this section apply to employers engaged in steel erection unless otherwise specified.

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(2) Steel erection activities include hoisting, connecting, welding, bolting, and rigging structural steel, steel joists and metal buildings; installing metal deck, siding systems, miscellaneous metals, ornamental iron and similar materials; and moving from point-to-point to perform these activities.

Section 1710 is applicable because its scope and application include rigging operations, and the unloading of structural steel from trucks is primarily a rigging operation.

Amended Response

Title 8 subsection 1710(m)(2) requires fall protection as follows:

Construction Safety Orders
Article 29. Erection and Construction
§ 1710. Structural Steel Erection.

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(m) Working and Traveling on the Skeleton Steel of Multistory Buildings or Structures.

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(2) Work Other Than Connecting.
When performing any other work at a work point, iron workers shall be provided with and use personal fall protection as described in Article 24 where the fall distance is greater than 15 feet.

Thus, while unloading structural steel from trucks, ironworkers must be protected from falls when the fall distance is greater than 15 feet. (Note: Despite its heading, subsection 1710(m) is not restricted to work on the skeleton steel of multistory buildings or structures.)

In addition, the ironworkers must be qualified riggers capable of safely performing the rigging operations and must be provided training about the job hazards including, but not limited to falls, being struck by steel and entanglement in the rigging, slings and crane load lines. The employer's Injury and Illness Prevention Program must also address rigging, steel handling, and fall hazards.

We hope this provides you with information you need. If you have any further questions regarding this or related safety concerns, please contact me at 925-270-9791 or eberg@dir.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Berg". The signature is written in a cursive style with a large, sweeping initial "E".

Eric Berg

Deputy Chief, Research and Standards