

Changes to Consider for the EIS
Origin: Fall Protection Draft dated 7-30-09

Increased Requirements	Reason/Comments
Body belts	This option has been eliminated as a component of a fall restraint system and positioning device system.
WAC 296-155-24509(2)(a)(i) When employees are using stilts that places their center of gravity above the protection of the standard guardrail system, the height of the toprail or equivalent member must be increased (or additional railings may be added) an amount equal to the height of the stilts while maintaining the strength specifications of the guardrail system and ensuring there are no openings in the standard guardrail system greater than 19 inches wide between rails.	<p>In current standard, this is a note under WAC 296-155-505(7)(a); which states:</p> <p><i>Note: When employers are using stilts, the top edge height of the top rail, or equivalent member, shall be increased an amount equal to the height of the stilts.</i></p> <p>Change: Because the note reads like a requirement, it is now a requirement with language that clarifies what the abatement issues are for eliminating or reducing employee risk of exposure to this fall hazard while working on stilts. The language specifically addresses increasing height of top rail or adding additional railing</p> <p>Fall protection methods are limited for persons working on stilts because the department does not want the employer to implement a fall protection system in which an employee on stilts can trip over the lifeline.</p>
WAC 296-155-24509(6) Fall protection during form and rebar work. When exposed to a fall height of 4 feet or more, employees placing or tying reinforcing steel on a vertical face are required to be protected by personal fall arrest systems, safety net systems, or positioning device systems.	Change: Fall protection for form and rebar work now starts at 4 feet not 6 feet.
WAC 296-155-24509(9) Hazardous slopes. Employees exposed to falls of 4 feet or more while working on a hazardous slope shall use personal fall arrest systems or positioning device systems.	Fall protection while working on a hazardous slope now starts at 4 feet not 6 feet.
WAC 296-155-24513(3)(a) A catch platform shall be installed within 4 vertical feet of the work area.	Catch platforms must now be installed within 4 vertical feet of the work area and not 10'.
WAC 296-155-24519(1) Self-rescue devices. Self-rescue devices are not a fall protection system. Self-rescue devices used to self-rescue after a fall shall meet the following requirements. <ul style="list-style-type: none"> (a) Use self-rescue devices according to the manufacturer's instructions. (b) Self-rescue devices must be addressed by the fall protection work plan. 	New option for rescue. The department is not requiring the use of self rescue device systems; however, employers who use self rescue device systems must comply with this section.