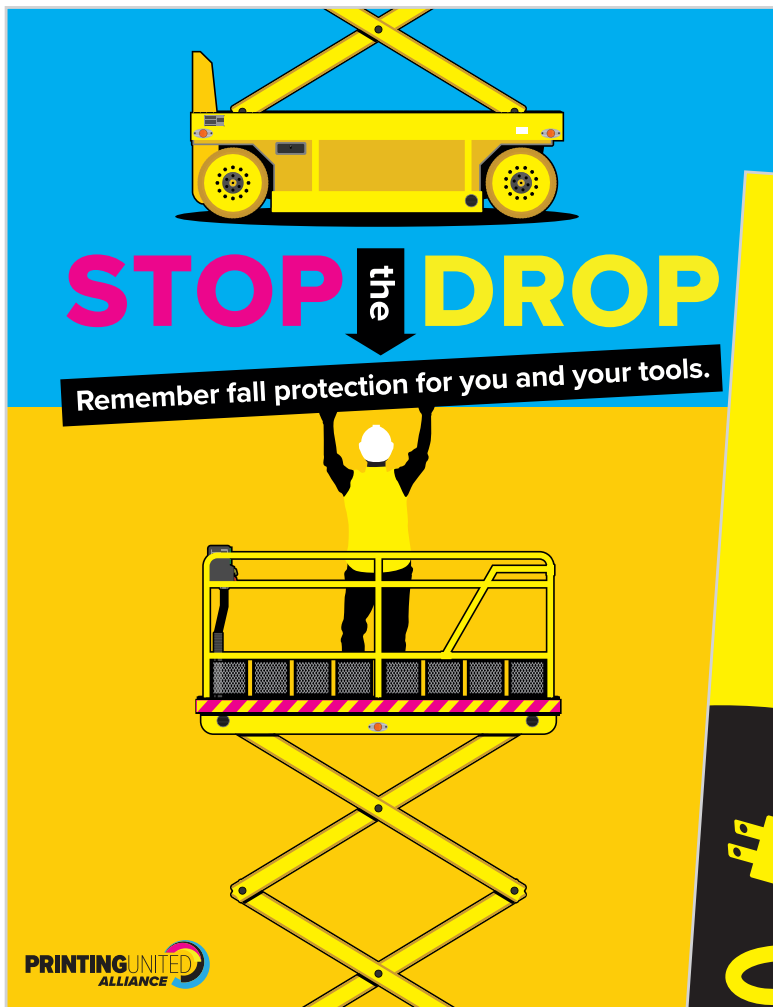


OSHA Updates

Walking-Working Surfaces Rule

Compliance with these new standards is imperative to prevent injuries from slips, trips and falls and to ensure cost-efficient worker protection.



Overview

After two decades of starts and stops, the U.S. Occupational Safety & Health Administration (OSHA) updated its rule addressing walking-working surfaces in January 2017. The reissued rule, which took effect January 17, 2017, is extensive and addresses every area where an employee is required to walk, stand and work. The covered areas include all ground-level surfaces, elevated surfaces, parking lots, sidewalks, steps, ladders, loading docks and roofs.

The goal of the regulation is to prevent slips, trips and falls in the workplace. It addresses common actions such as housekeeping as well as fall protection requirements for employees who are more than 4 feet above a work surface. One key change is that it allows more flexibility in the choice of fall protection systems, when they are necessary.

From a printing operation's perspective, many of the provisions in the rule apply. The rule it contains the following sections:

- Scope and definitions
- General requirements
- Ladders
- Step bolts and manhole steps
- Stairways
- Dockboards
- Scaffolds and rope descent systems
- Duty to have fall protection and falling object protection
- Fall protection systems and falling object protection – criteria and practices
- Training requirements
- Personal fall protection systems

Many of the rule changes were made to revise the existing requirements, update others and add training and inspection requirements that were not previously required.

Periodic Inspections of Walking and Working Surfaces

The most significant change is a new requirement for employers to inspect walking-working surfaces “regularly and as necessary” to ensure that they are maintained in a safe condition. “Regularly and as necessary” is not defined, but a best practice would suggest inspections should occur about once a month, at a minimum. There may be instances where inspections should occur more frequently, such as during the winter season, to ensure that sidewalks, entrance ways, parking lots and loading docks are free from snow and ice hazards. The employer must define the frequency based on the working surface hazards.

If hazardous conditions are found on a walking-working surface, they must be corrected or repaired before use. If this cannot occur immediately, the hazardous condition must be guarded. A qualified person must either perform or supervise the correction or repair if it involves the structural integrity of the surface. It is also important to understand that the requirements of the rule include outdoor surfaces, such as sidewalks, steps and parking lots year-round.

OSHA did not require that the inspections be documented, but it is a best practice to do so.

PRINTING United Alliance's Walking-Working Surface Checklist is a tool for conducting and documenting your facility's inspections. It is also recommended that your facility maintain all supporting documentation when corrective actions are taken to show that the workplace is being inspected regularly and identified problems are being corrected.

Ladders

The ladder requirements cover all fixed and portable ladders in the workplace, except when those that are integral parts of a machine or equipment, such as a printing press. Ladders are broadly defined and include what are traditionally considered portable steps.

OSHA's final rule states that all ladders must be inspected before initial use during each work shift. OSHA does not specify what to inspect, but it is important to confirm that the ladder is in a safe condition and that it functions properly. PRINTING United Alliance is providing a "Ladder Per Use Checklist" as a tool that employees can use to conduct the pre-use inspection.

OSHA does not require documenting ladder inspections, but doing so is a best practice. A system for recording inspections could be as simple as posting a copy of the PRINTING United Alliance checklist at each ladder storage location as a reminder for employees.

PRINTING United Alliance's Ladder Use Compliance Checklist outlines the majority of the elements under the ladder regulations. This documentation covers compliance requirements for covered ladders. This checklist provides an organized, easy-to-read document to ensure your facility complies with OSHA's regulations for all ladders. It is recommended that you use this document as an informational guide for overall compliance with the standard. PRINTING United Alliance's "Ladder Per Use Checklist" should be used for your inspections.

Fall Protection

Fall protection, according to OSHA, is any equipment, device, or system that prevents a worker from falling from an elevated surface or from coming in contact with a lower level if a fall occurs. Fall protection is required for any elevated work surface that is 4 feet or more above the next adjacent surface. These include hoist areas, holes, loading docks, openings, stairways, runways and similar walkways, and equipment such as press platforms. In addition, there are specific requirements for when employees access roof areas that address the roof hatch, fixed ladders, and the times when fall protection is and is not required.

To provide as many options as possible, the rule does not dictate the specific fall protection system, instead allowing employers to choose the one that best fits the activity — guardrails, safety nets, travel restraints or personal fall protection. OSHA has dictated that body belts are not allowed as part of a personal fall arrest system, which is a change in personal fall protection

Training

The final rule requires that each employee who uses personal fall protection systems is trained by a qualified person in a manner that the employee understands. PRINTING United Alliance's Walking Working Surfaces Training Checklist can serve as a best practice tool and assist you with training your employees to be safe. The purpose of this checklist is to provide your company with a general awareness of the federal regulatory subjects and basic training requirements associated with the OSHA walking-working surfaces standards. This checklist should be used to assess whether the necessary categories (as determined by the standard) have been covered during employee training. Employees must have awareness and understanding of all of the subjects presented in this checklist.

Conclusion

OSHA's new walking-working surfaces rule is very broad and impacts every location where an employee will work. It incorporates several updates and new requirements to provide the necessary guidance to eliminate hazards in the workplace. Compliance with these new standards is imperative to prevent injuries from slips, trips and falls and to ensure cost-efficient worker protection. For more information contact PRINTING United Alliance's Government Affairs department with any questions: govtaffairs@printing.org or 888-385-3588.

Protecting workers is a number-one priority for the printing industry. Safety agencies continue to expand site-specific targeted inspection programs to include companies with 20 employees — it pays to be aware of what you need to do to implement a safety and health program. Take advantage of PRINTING United Alliance’s services to integrate safety into your workplace and update your safety and health programs!

Whether you are looking for information on OSHA violations or how to develop a lockout/tagout program, PRINTING United Alliance can help. For more information or if you have specific questions, please contact PRINTING United Alliance’s Government Affairs Department at govtaffairs@printing.org.