



# Safety Bulletin

*Provided as a service of MCAA's Safety Excellence Initiative*

**Subject:** OSHA's Revised Walking-Working Surfaces Provision for Low-Slope Roofs

## Introduction

In the past, mechanical service technicians were required to have fall prevention or protection systems in place while servicing HVAC equipment on flat roofs, regardless of how far they were working from the roof's edge. The revised rule now allows workers to perform their tasks without fall prevention or protection systems, but only under specified conditions.

## Key Dates

January 17, 2017 – The rule becomes effective

## 15 Foot Rule

Under specified conditions workers performing tasks on low slope-roofs are permitted to work without fall prevention or protection systems when working 15 feet or more from the roof's edge.

### *Specified Conditions:*

- *There are no other fall hazards, such as skylights or roof hatches;*
- *The work to be performed is infrequent and temporary; and*
- *The employer implements and enforces a work rule prohibiting affected workers from going within 15 feet of the roof's edge without an adequate fall prevention or protection system in place.*

For additional information about this topic or to learn more about MCAA's Safety Excellence Initiative, contact Pete Chaney at 301-869-5800 or [pchaney@mcaa.org](mailto:pchaney@mcaa.org).



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## **Summary of 29 CFR 1910.28 – Duty to Have Fall Protection – (b) (13) Work on Low-Slope Roofs**

### **Definitions**

**Low-Slope Roof** means a roof that has a slope less than or equal to a ratio of 4 in 12 (vertical to horizontal).

**Designated Area** means a distinct portion of a walking-working surface delineated by a warning line in which employees may perform work without additional fall protection.

### **Less Than 6 Feet from the Roof Edge**

- When work is performed less than 6 feet from the roof edge affected workers must be protected by a guardrail system, safety net system, travel restraint system, or personal fall arrest system.

### **Between 6 Feet and 15 Feet from the Roof Edge**

- When work is performed at least 6 feet, but less than 15 feet from the roof edge affected workers must be protected by a guardrail system, safety net system, travel restraint system, or personal fall arrest system, **or** a designated area if the work is both temporary and infrequent.

### **15 Feet or More from the Roof Edge**

- When work is performed 15 feet or more from the roof edge affected workers must be protected by a guardrail system, safety net system, travel restraint system, or personal fall arrest system, **or** a designated area if the work is both temporary and infrequent. **-OR-**
- Fall prevention/protection is not required if the work is both temporary and infrequent, and the employer implements and enforces a work rule prohibiting affected workers from going within 15 feet of the roof's edge without an adequate fall prevention or protection system in place.

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