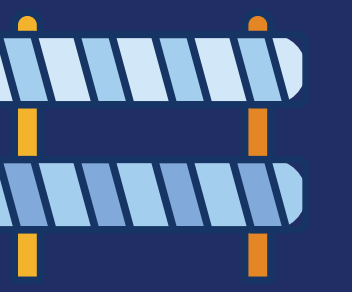


# OSHA Requirements for Mechanical Service and Construction Work on Low-Slope Roofs



## Fall Prevention

Prevent workers from falling by use of fall restraint systems, or guardrail systems.

## Designated Area

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

## Fall Protection

Protect workers from severe injury if they do fall by use of fall arrest systems.

## Low-Slope Roof

A roof that has a slope less than or equal to a ratio of 4 in 12 (vertical to horizontal).

## Warning Lines

Ropes, wires, or chains surrounding a work area and must be at least 6 feet from all sides.

## SERVICE (1910 Standards)

### Less Than 6 Feet from Roof Edge

Workers must be protected by a guardrail system, travel restraint system, or personal fall arrest system.

### 6-15 Feet from Roof Edge

Workers must be protected by a guardrail system, travel restraint system, or personal fall arrest system, or a designated area if the work is **both temporary and infrequent**.

### 15+ Feet from Roof Edge

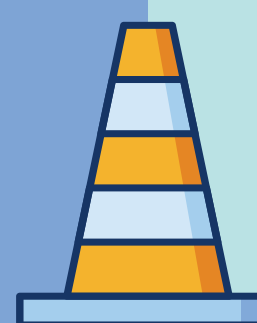
Workers must be protected by a guardrail system, travel restraint system, personal fall arrest system, or a designated area if the work is **both temporary & infrequent**.

## 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 fifteen feet of the roof's edge without an adequate fall prevention or protection system in place.

## OSHA's Position

Mechanical service work does not meet the definition of "temporary and infrequent" if the task takes longer than it would to install or set up fall protection & the task is performed more than once a month, once a year, or when needed. MCAA is working to establish a reasonable interpretation of the standard.



## CONSTRUCTION (1926 Standards)

### All Distances from Roof Edge

Workers must be protected by fall prevention/protection when working six feet or more above a lower level.

### Warning Lines: Less than 15 Feet from Roof Edge

Not permitted as a substitute for conventional fall protection for mechanical construction.

### Warning Lines: 15+ Feet from Roof Edge

OSHA would consider the violation of its guardrail criteria to be de minimis if:

- The warning line meets or exceeds the requirements in the standard (Subpart M)
- No work or work-related activity is to take place in the area between the warning line and the edge
- The employer effectively implements a safe work rule prohibiting the employees from going past the warning line

## OSHA's Position

There is no safe distance where a worker can work on a low-slope roof without fall prevention or fall protection when working six feet or more above a lower level with the exception of 15+ feet warning line example above.