

Warning Line Misconceptions

Scenario: Multiple trades are working on a roof to include roofers, HVAC and masons. A warning line has been established by the roofer at 6 feet back from the edge and everyone is using that as their fall protection system. TOSHA shows up on site to perform an inspection. Is everyone in compliance? The answer is NO!

Over the years, the application of warning line systems for fall protection has been misapplied by many. The only places that warning line systems are even referenced in the Subpart M Fall Protection standard is in conjunction with “Roofing work on low slope roofs” or in OSHA’s sample fall protection plan.

Roofing work is defined as “the hoisting, storage, application, and removal of roofing materials and equipment, including related insulation, sheet metal, and vapor barrier work, but not including the construction of the roof deck”.

However, there was an interpretation generated by OSHA in 2002 and re-confirmed in 2005 that provides some additional guidance for employees other than roofers performing work on low slope roofs.

The interpretation allows for the use of a warning line when certain conditions are met to include the following:

1. A warning line is used **15 ft.** or more from the edge (or nearest edge of a hole);
 2. The warning line meets or exceeds the requirements in 1926.502(f)(2);
 3. No work or work-related activity is to take place in the area between the warning line and hole or edge; and
 4. The employer effectively implements a work rule prohibiting the employees from going past the warning line.
- (cont. page 2)*

DID YOU KNOW?

The OSHA standard 1926.302(e) for powder actuated tools requires that only employees who have been trained in the operation of the particular tool in use shall be allowed to operate a powder-actuated tool. It is expected that employees have specific training on each brand of tool in use. Trainers representing each manufacturer issue cards to employees to show proof of training.

Suggestion: Call your local manufacturer’s representative or your local AGC Safety Director to set up this required training if needed.

A powder- actuated tool safety talk will be posted on our website for your use! www.tnagc.org



INSIDE THIS ISSUE

- 1 Warning Line Misconceptions
Did You Know?
- 2 Self- Assessment: Rigging Inspection and Documentation
NASA Awards
Electrical DVD
- 3 PBG Builders, Inc. Wins AGC Award
Employee Rights Notice Posting
Nail Gun Safety Guidance Document
- 4 **AGC’s NEW TRAINING TRACKER PROGRAM**
Go to www.tnagc.org to download reference documents associated with these articles.

Note that OSHA does state that they may still cite a de-minimis violation of the guardrail criteria which is considered an administrative violation and does not carry monetary fines.

Go to OSHA's interpretation on this subject to find out more at www.tnagc.org – safety resources.



This Issue's Self-Assessment: RIGGING INSPECTION AND DOCUMENTATION

With the new crane standard in effect, there is a new emphasis on all things related to cranes and rigging. This assessment will review basic inspection and documentation requirements related to various types of rigging equipment. OSHA's rigging requirements are addressed in 29 CFR 1926 Subpart H.

Is all rigging equipment inspected by a competent person prior to use on each shift and all defective equipment removed from service?

Alloy Steel Chains

Do all chains have affixed identification stating size, grade, rated capacity and the manufacturer?
Do you have documented inspection records that show that chains have been inspected at a minimum of annually?

OSHA recently revised its regulation regarding the marking of wire rope slings.

Wire Rope

OSHA recently revised its 1926.251 regulation regarding the marking of wire rope slings. ***It now mandates that all wire rope slings be permanently affixed with legible identification markings stating size, rated capacity for the types of hitches used and the angle upon which it is based, and the number of legs if more than one.*** Refer to 1926.251(c)(16).

Have all your wire rope slings been tagged?

Note: You can take wire rope slings and other rigging equipment back to the manufacturer to be re-tested and tagged.

Synthetic Webbing (nylon, polyester and polypropylene)

Are all synthetic web slings marked or coded to show name of the manufacturer, rated capacity for the type of hitch and type of material?

Shackles

Do all your shackles have rated capacities indicated on the shackle?

AGC NASA AWARDS

The AGC of America's National AGC Safety Awards Program is an annual awards program that is entirely based on your injury statistics. It is a simple, one page form that requires you to take totals off your OSHA 300A Summary. To be eligible to receive a certificate of recognition you must have participated for 3 years in a row and either have a zero incident rate or a rate 25% less than your division. So, if you haven't submitted in the past – get started this year! The submission deadline is **Wednesday, February 1st**. If you need a tabulation form, contact your local safety director or go to our website at www.tnagc.org.

New Addition to AGC Libraries

Electrical Safety for the Construction Worker - DVD

Description: This product enables field-level employees to recognize and promote safe electrical practices in and around the construction site. It addresses site-specific hazards and controls and provides real-world solutions. (20 minutes)



Remember we have a full library of safety videos in each office that are available for you to check out!

ALSO NOTE: WE HAVE JUST UPGRADED SEVERAL OF OUR MOST POPULAR VHS TAPES TO DVD!

**PBG BUILDERS, INC. OF
GOODLETTSVILLE WINS 2011 AGC OF
TENNESSEE CONSTRUCTION SAFETY
EXCELLENCE AWARD**

In a continuing effort to encourage members to excel at meeting and exceeding the safety standards for the construction industry, the Associated General Contractors of Tennessee recently conducted its Thirteenth Annual Construction Safety Excellence Awards.

Construction Safety Excellence Award candidates had to meet stringent pre-qualification requirements to participate. Candidates were then independently judged on their corporate commitment to safety; overall safety program elements; level of employee involvement and the company's effectiveness in promoting safety to include uniqueness and creativity.

AGC of Tennessee would like to congratulate PBG Builders, Inc. of Goodlettsville and wish them the best in their continued success in safety.

The company will now go on to compete nationally at the 2012 Associated General Contractors of America Construction Safety Excellence Awards. AGC of America will present awards to the winning firms at it's 93rd national convention to be held in Honolulu, Hawaii in March 2012.

New Employee Rights Notice Posting

As of January 31, 2012, most private sector employers are required to post a notice advising employees of their rights under the National Labor Relations Act. The notice should be posted in a conspicuous place, where other notifications of workplace rights and employer rules and policies are posted.

Go to www.nlr.gov/poster to download the notice.

**DON'T FORGET TO POST YOUR OSHA 300A
SUMMARY FORM ON YOUR
JOBSITES FROM
FEBRUARY 1ST -APRIL 30!**

***** NEW *****

Nail Gun Safety

A Guide for Construction Contractors

"Nail gun injuries are responsible for approximately 37,000 emergency room visits annually. In some cases, workers have died from their injuries," said Assistant Secretary of Labor for Occupational Safety and Health Dr. David Michaels. "This document will help construction employers make necessary changes to improve nail gun safety and protect their workers from preventable injuries and death."

This new OSHA/NIOSH guidance document can be downloaded from our website at www.tnagc.org.



YOUR AGC IN TENNESSEE SAFETY STAFF

EAST TN
Tom Hutto
O(423) 265-1111 C(423)593-2230
tom@agcctn.org

KNOXVILLE
Kim Enoch
O(865) 525-2166 C(865) 806-6191
tnsafetyknox@comcast.net

MIDDLE TN
Thomas Reed
O(615)244-6344 C(615)400-5208
tireed@tnagc.org

TRI-CITIES
Jim Rhinehardt
O(423)323-1339 C(423)612-2157
jimr@tricitiestnagc.org

WEST TN
Nick Nanney
O (901)762-0026 C(901)481-0126
nickn@agcwt.ntemail.net



AGC Tennessee Training Tracker

Is the task of maintaining accurate, up to date training records for your employees a challenge for your company? In our experience, it is!

In an effort to better serve AGC members, CompTrust AGC.....**Tennessee** has recognized this challenge and is providing a state-of-the art solution!

Contractors across the state of Tennessee depend on CompTrust and AGC to meet their training needs. With five safety directors on staff across the state, access to quality, professional safety training is one of the many benefits of membership offered AGC members across the state. Training is not, however, limited to safety training and the options vary by area. Many other forms of training are offered by the various offices across the state to include AGC Supervisory Training Programs and many others tailored to the members' needs.

Our new AGC Tennessee Training Tracker is a comprehensive training tracking program and records management system. This program offers many advanced benefits to include:

Compliance Management

- Maintenance of training records in one, easy to access central location (database)
- Access to documentation of training to include training rosters, copies of certificates, tests, etc. via uploaded pdf documents
- Scheduling assistance provided by a reporting application that provides reminders on upcoming training renewal dates
- Complete records' management as program participant data entered by AGC will instantly merge with any individual member's data when entered

Cost Savings and Efficiencies

- Input of AGC provided safety training will be performed by AGC staff
- Quick access to records when needed to meet pre-qualification or contractual requirements
- Organized tracking procedures prevent unnecessary re-training due to lost training records and time saved due to searching through hard copy files
- Efficient, easy to use training data entry

Pricing:

- ***FREE FOR COMPTRUST PARTICIPANTS***
- \$100 initial setup fee and administrator
- Minimum annual fee for companies with 50 employees or less: \$125
- Annual fee for employers with over 50 employees: \$2.50/employee
- Contact your local safety director for more information.