

U.S. Department of Labor
Advisory Committee on Construction Safety and Health
Fall Protection Workgroup

Ex. 8
ACCSH 1993-5

MEMORANDUM

TO: U.S. DEPARTMENT OF LABOR ADVISORY COMMITTEE ON
CONSTRUCTION SAFETY AND HEALTH

FROM: STEW BURKHAMMER AND JIM LAPPING, CO-CHAIRMEN,
FALL PROTECTION WORKGROUP

DATE: SEPTEMBER 24, 1993

RE: WORKGROUP PROPOSAL FOR FALL PROTECTION

Attached is the workgroup proposal for Subpart R which we will discuss at the ACCSH meeting on September 30, 1993. Attached to the report are comments made by other members of the workgroup, industry representatives, and OSHA recommendations.

If you have any questions, please direct them Stew Burkhammer at (301) 417-3909 or Jim Lapping at (202) 347-1461. We look forward to seeing you at the September 30, 1993 meeting.

**REPORT OF THE FALL PROTECTION WORKGROUP
OF THE
ADVISORY COMMITTEE ON CONSTRUCTION
SAFETY AND HEALTH**

On September 14, 1993, the Fall Protection Workgroup of the U.S. Department of Labor Advisory Committee on Construction Safety and Health met in an informal hearing to consider the fall protection issues that were referred to the full committee by Acting Assistant Secretary of OSHA, David Ziegler.

Members of the workgroup included Jim Lapping (Co-chairman), Building and Construction Trades Department; Mike O'Brien, National Association of Home Builders (for Kathryn Thompson); Ron Stanevich, NIOSH; Steve Cooper, International Association of Bridge, Structural and Ornamental Iron Workers; Bob Krul, United Union of Roofers, Waterproofers and Allied Workers; Eric Waterman, National Erectors' Association; Pete Chaney, Associated General Contractors. Workgroup members not present were Stew Burkhammer (Co-chairman), Bechtel Corp.; Kathryn Thompson, Kathryn Thompson Development Co.; Paul King, Pizzagalli Construction Co.

The workgroup felt that any recommendations they make to the full committee should consider previous recommendations by the Advisory Committee on Construction Safety and Health (ACCSH) to OSHA. The workgroup noted that ACCSH had considered certain aspects of fall protection in the steel erection industry at its April 1, 1987 meeting. During that meeting, ACCSH unanimously adopted the following recommendation for *steel erection* fall protection:

". . . that iron worker connectors in structural steel construction in the initial erection of the structural frame of a building be given relief from the tying off requirements of Subpart R while walking from point A to point B when connecting."

The workgroup further noted that ACCSH, at its August 4, 1987 meeting, again considered certain aspects of fall protection in the steel erection industry and recommended:

". . . that certain exceptions be granted to connectors when doing connecting work and to any other steel erection employee when walking atop the frame from point to point where the potential fall distance is less than 30 feet."

The workgroup considered these 1987 and other recommendations, including the problems that have evolved as a result of various regions taking different positions concerning fall protection violations. All non-government segments of the industry present at the meeting uniformly renounced inconsistent enforcement policies among the various OSHA regions. They stated that this was making it extremely difficult, if not almost impossible, for contractors to comply with the standards since they are never really certain what they are. They noted that this is causing chaos throughout the industry.

After discussing the matter and reviewing the material available, the workgroup invited interested parties to present testimony prior to their formulating a recommendation. Various parties, representing trade associations, contractors and labor organizations, appeared and stated their position.

The industry presenters were Jim Cole, International Association of Bridge, Structural and Ornamental Iron Workers; Chip

Pocock, Williams Industries/Steel Erectors Association of America; Jim Larson, L.R. Wilson and Sons/Steel Erectors Association of America; Aronne Goldkette, Broad, Vogt and Conant; George Miller, Mason Contractors Association of America; Sid Freedman, Precast/Prestressed Concrete Institute; Fred H. Coddling, National Association of Reinforcing Steel Contractors; Robert Herm, Pitt-Des Moines Inc.; Frank Williams, Williams Steel; William Schuzman, Steel Erectors Association of New York City; John Barnhardt, United Union of Roofers, Waterproofers and Allied Workers.

After carefully considering all of the information available to it as well as the positions presented during the hearing, the Workgroup found:

1. Over the past several years, OSHA has attempted to revise most of the major fall protection standards for the construction industry. Each of these standards has its own requirements for the heights at which fall protection is required.
2. One of these standards, Subpart R - Steel Erection, has been the object of a tremendous amount of debate, confusion, court and OSHA Review Commission decisions as well as honest and sincere disagreement over conflicts between the standard and industry practice for over 20 years.
3. The joint labor-management safety and health committee of the Iron Workers International Union and four employer associations requested Negotiated Rulemaking to revise the Steel Erection Standard - Subpart R in 1989. Their request was initially rejected by the Acting Assistant Secretary for OSHA.
4. After another request by labor and management, Negotiated Rulemaking was approved by the Secretary of Labor on July 8, 1992. However, OSHA has not implemented Negotiated Rulemaking in the last 14 months.

5. Since then, steel erector contractors have complained that they are being inundated with fall protection citations and fines by several OSHA Regional Administrators and Area Directors.
6. Many of these fines and citations are based on individual regional fall protection policies and programs implemented by the OSHA Regional Administrators as well as their individual interpretations of the OSHA standards.
7. These actions have placed steel erectors in a difficult and confusing situation because of inconsistent enforcement policies from region to region.

The workgroup discussed at length the options open to it with respect to a recommendation for an interim policy concerning steel erection. The workgroup reviewed the positions and recommendations of those who had appeared at the informal hearing on September 14, 1993. It noted that the overwhelming recommendation of those who had testified from the industry was that the sub-committee's recommendation should be in accordance with the height limitations set forth in Subpart R; namely, the 25 and 30 foot height limitations.

After careful consideration, the workgroup, in order to

1. Re-establish confidence in the OSHA system;
2. Clarify the confusion that currently exists throughout the industry, and
3. Be consistent with previous recommendations of the Advisory Committee on Construction Safety and Health on this subject,

recommends that the Advisory Committee on Construction Safety and Health adopt the following recommendations of the Fall Protection

Workgroup and recommend implementation of same on a policy basis to the Acting Assistant Secretary:

1. Negotiated Rulemaking for Subpart R be initiated immediately.
2. Nationwide uniformity and consistency in enforcement of fall protection standards.
3. That no citation shall be issued in the steel erection industry under the OSHA Act or any portion thereof or any regulation or directive promulgated under the Act for connecting activities, decking activities and employees walking to and from work stations unless the employee is not protected from a fall that would exceed two stories or 25 feet to the exterior of the structure or from a fall that would exceed two stories or 30 feet whichever is less to the interior of the structure.
4. The following are some of the normal recognized activities of employees for which citations should not be issued in accordance with #3 above:
 - a. Connectors either moving from place to place and/or connectors making the initial connection of structural steel columns, beams, braces, etc.
 - b. Bolt up personnel moving from one location to another to install bolts/fasteners.
 - c. Welders moving from one location to another to weld.
 - d. Plumb crew moving from one location to another to align the steel members.
 - e. Supervisors (foremen and pushers) moving from one location to another to supervise iron workers.
 - f. Decking crew either moving from one location to another and/or unloading, placing, aligning and installing metal decking.
 - g. Iron workers moving from one location to another to install perimeter safety cables.
 - h. Raising gang members moving from one location to another to erect structural steel.

- i. Iron workers either moving from one location to another and/or spreading, laying or picking up and removing planking for temporary flooring.
- j. Iron workers moving from one location to another to install and align grating, checker plate and other comparable flooring systems.
- k. Iron workers moving from one location to another to install perimeter angles in connection with decking and bridge work.
- l. Iron workers moving from one location to another to place, set and adjust sag rods or girts.
- m. Iron workers moving from one location to another to distribute and align bar joists.
- n. Iron workers moving from one location to another to install and weld bar joists and bridging.
- o. Iron workers moving from one location to another to install stairways.
- p. Iron workers moving from the top of a wall, shear wall or a column to another work area to install reinforcing steel.
- q. Iron workers in a detail gang moving from one location to another in connection with various operations involved in steel erection.

Respectfully submitted, Jim Lapping and Stew Burkhammer, Co-chairmen.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
National Institute for Occupational
Safety and Health - ALOSH
944 Chestnut Ridge Road
Morgantown, WV 26505-2808

September 27, 1993

Mr. Stew Burkhammer
Mr. Jim Lapping
Co-Chairmen
ACCSH Fall Protection Workgroup
Building and Construction Trades Department
American Federation of Labor
815 Sixteenth Street, N.W.
Suite 603
Washington, D.C. 20008-4189

Dear Mr. Burkhammer and Mr. Lapping:

This letter is in response to your FAX dated September 23, 1993, in reference to the document entitled "Steel Erection Industry Proposal for Fall Protection."

The information presented through the first three items listed on page five of the draft workgroup report to the Advisory Committee reflect the discussions held at the United States Department of Labor offices on September 14, 1993.

Please check to verify if Mr. Frank Williams represented Williams Steel or Williams Industries (seventh line from top of page three).

I would suggest that item two on page five be rewritten as "Nationwide uniformity and consistency of Subpart R fall protection standards be enforced."

The worker activities listed in item four on page five were not discussed in very much detail at the meeting. Some of these activities were brought to the forefront, however, others were not. After review of these activities, I am in agreement that they should be included as presented.

Page 2 - Mr. Stew Burkhammer
Mr. Jim Lapping

If you have any questions, please contact me at (304) 284-5805.

Sincerely yours,



Ronald L. Stanevich
Acting Chief
Protective Technology Branch
Division of Safety Research

KATHRYN G.
THOMPSON
DEVELOPMENT
COMPANY



MEMORANDUM

September 23, 1993

To: ✓ Mr. Jim Lapping, Co-Chair
Mr. Stew Burkhammer, Co-Chair
ACCSH Fall Protection Work Group

From: Kathryn G. Thompson

Re: Fall Protection Recommendations

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I have reviewed the materials which were sent to me as a result of the committee's work and I have the following recommendation.

Since most of the discussion relates to protection during steel erection, the fall protection for residential construction cannot comply. I suggest we incorporate the language of 1926.451 (u) (3), which is really part of the scaffolding standards. Residential builders cannot comply during truss erection since there is no stable point to attach a lifeline and the walls are not stable enough for catch platforms.

I'm sure you have it, but I'm attaching a copy of 1926.451 (u) (3) for your reference.

As far as the rest of the report is concerned, I can support it and have no particular comments other than the question of whether it's appropriate to discuss, i.e., steel erection in this particular report relating to Fall Protection Recommendations.

Very truly yours,

Kathryn G. Thompson
Kathryn G. Thompson

KGT:j
enclosure
cc: N. Mass
C. Culver
T. Hall

rungs only, the bearing area shall be at least 10 inches on each rung.

(4) Ladders used in conjunction with ladder jacks shall be so placed, fastened, held, or equipped with devices so as to prevent slipping.

(5) The wood platform planks shall be not less than 2 inches nominal in thickness. Both metal and wood platform planks shall overlap the bearing surface not less than 12 inches. The span between supports for wood shall not exceed 8 feet. Platform width shall be not less than 18 inches.

(6) Not more than two employees shall occupy any given 8 feet of any ladder jack scaffold at any one time.

(c) Window jack scaffolds. (1) Window jack scaffolds shall be used only for the purpose of working at the window opening through which the jack is placed.

(2) Window jacks shall not be used to support planks placed between one window jack and another or for other elements of scaffolding.

(3) Window jack scaffolds shall be provided with guardrails unless safety belts with lifelines are attached and provided for employee.

(4) Not more than one employee shall occupy a window jack scaffold at any one time.

(d) Roofing brackets. (1) Roofing brackets shall be constructed to fit the pitch of the roof.

(2) Brackets shall be secured in place by nailing in addition to the pointed metal projections. When it is impractical to nail brackets, rope supports shall be used. When rope supports are used, they shall consist of first-grade manila of at least ¾-inch diameter, or equivalent.

(3) A catch platform shall be installed below the working area of roofs more than 16 feet from the ground to eaves with a slope greater than 4 inches in 12 inches without a parapet. In width, the platform shall extend 2 feet beyond the protection of the eaves and shall be provided with a guardrail, midrail, and toeboard. This provision shall not apply where employees engaged in work upon such roofs are protected by a safety belt attached to a lifeline.

(v) Crawling boards or chicken ladders. (1) Crawling boards shall be not

less than 10 inches wide and 1 inch thick, having cleats 1 x 1½ inches. The cleats shall be equal in length to the width of the board and spaced at equal intervals not to exceed 24 inches. Nails shall be driven through and clinched on the underside. The crawling board shall extend from the ridge pole to the eaves when used in connection with roof construction, repair, or maintenance.

(2) A firmly fastened lifeline of at least ¾-inch diameter rope, or equivalent, shall be strung beside each crawling board for a handhold.

(3) Crawling boards shall be secured to the roof by means of adequate ridge hooks or other effective means.

(w) Float or ship scaffolds. (1) Float or ship scaffolds shall not be used to support more than three men and a few light tools, such as those needed for riveting, bolting, and welding. They shall be constructed as designed in paragraphs (w) (2) through (6) of this section unless substitute designs and materials provide equivalent strength, stability and safety.

(2) The platform shall be not less than 3 feet wide and 6 feet long, made of ¾-inch plywood, equivalent to American Plywood Association Grade B-B, Group I, Exterior, or other similar material.

(3) Under the platform, there shall be two supporting bearers made from 2 x 4-inch, or 1 x 10-inch, rough, "selected lumber," or better. They shall be free of knots or other flaws and project 6 inches beyond the platform on both sides. The ends of the platform shall extend 6 inches beyond the outer edges of the bearers. Each bearer shall be securely fastened to the platform.

(4) An edging of wood not less than ¾ x 1½ inches or equivalent shall be placed around all sides of the platform to prevent tools from rolling off.

(5) Supporting ropes shall be 1-inch diameter manila rope or equivalent, free from deterioration, chemical damage, flaws, or other imperfections. Rope connections shall be such that the platform cannot shift or slip. If two ropes are used with each float, they shall be arranged so as to provide four ends which are to be securely fastened to an overhead support. Each of



P.O. Box 3634 • Chapel Hill, North Carolina 27515

September 20, 1993

Building and Construction Trades
Department AFL/CIO
815 16th Street, N.W.
Suite 603
Washington, DC 20006

Attention: Jim Lapping
Safety Director

Re: OSHA Work Group
Advisory Committee
U.S. Dept. of Labor

Gentlemen:

We wish to take this opportunity to thank you for the courtesies extended to us on September 14, 1993, in allowing us to voice our member's opinions with regard to the enforcing of a Six (6) or Ten (10) Foot Fall Rule, as opposed to the current guidelines in Subpart R, 1926.751 OSHA Regulations. It is the consensus of our membership that until such time that Subpart R has been rewritten along with the input available from the Industry under Negotiated Rulemaking, that the current OSHA Subpart R Standard should be enforced only explicitly as it is written without cross-referencing to other areas of the Code.

Enclosed please find a copy of a statement from one (1) of our member firms, C.P. Buckner Steel Erection, Inc., also a member of the American Subcontractors Association, Specialized Carriers and Riggers Association, and the Associated General Contractors of America. Mr. Eddie Williams of C.P. Buckner Steel Erection, Inc. also requests that until



P.O. Box 3634 • Chapel Hill, North Carolina 27515

Building and Construction Trades
Department AFL/CIO
September 21, 1993
Page 2

the Subpart R of the current Code has been revised, that the current regulations be enforced only as written.

Our group would like to take this opportunity to thank your task force, as well as the OSHA Representatives, for showing enough interest through these type of meetings to encourage response from the Industries that are affected by Safety Regulations.

If you have any questions, please do not hesitate to call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jim Larson", with a long horizontal flourish extending to the right.

Jim Larson
President

JL/jeh

Enclosures

C.P. Buckner Steel Erection, Inc.

TO: Work Group Advisory Committee
U.S. Department of Labor, OSHA Division

FROM: Eddie Williams, President
C.P. Buckner Steel Erection, Inc.

DATE: September 13, 1993

RE: 10 Foot Fall Protection Rule

Dear Sir or Madam:

I understand that your committee will be discussing the possibility of establishing a 10' fall protection rule for steel erection.

I have a real problem with any decisions in regard to standards affecting steel erection being made outside of the negotiated rulemaking process.

If a 10' rule is implemented I have several questions:

1. When will the program begin?
2. Will exceptions be made for jobs already bid?
3. Is this a national program or does it just target certain areas?
4. Will a public hearing be held prior to implementation?

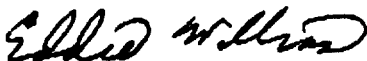
We have been following the revision of Subpart R for several years and have been very disappointed at the slow pace it has taken. We were somewhat encouraged when we heard that the negotiated rulemaking process would be used. Now it appears that an effort is being made to circumvent negotiated rulemaking.

I urge you to withdraw this item from your committee agenda and to do whatever necessary to proceed with negotiated rulemaking as soon as possible.

Thank you for your consideration to this matter.

Sincerely,

C. P. BUCKNER STEEL ERECTION, INC.



Eddie Williams
President

EW/lah





National Association of Home Builders

1201 15th Street, N.W., Washington, D.C. 20005-2800
(202) 822-0200 (800) 368-5242 Fax (202) 822-0559

August 9, 1993

Mr. Roger Clark
Director of Compliance Programs
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Dear Mr. Clark:

In an effort to enhance safety awareness in the residential construction industry, the National Association of Home Builders has launched a national safety campaign entitled, "Building America's Homes Safely" which is attempting to educate builders and construction employees about proper safety techniques and OSHA requirements. However, on behalf of the 160,000 member companies of NAHB, I wanted to raise a matter of great concern to home builders across the country regarding the enforcement of OSHA's fall protection standards.

As I'm sure you are aware, the current fall protection requirements for construction have been under revision by OSHA for almost seven years. The current fall protection requirements for high-pitched roofs (1926.451(u)(3)) require fall protection measures on roofs greater than 4-in-12 in pitch and at heights greater than 16 feet remain in effect until OSHA issues new standards. It has come to our attention, however, that regional and area OSHA offices have begun citing builders for not having fall protection at heights greater than six feet or ten feet depending on the area or region. We understand the Region 8 OSHA office is enforcing a six feet rule and the Chicago area office is enforcing a 10 feet rule. These actions are clearly in violation of the current fall protection standards, and it also makes it impossible for NAHB to educate builders about their fall protection responsibilities under OSHA. These actions also appear to violate the Administrative Procedures Act.

Recently, the Chicago area office called for a meeting with industry representatives on August 17 to detail its ten feet rule and its requirement for 100% fall protection. As has already been demonstrated to OSHA officials in your office, 100% fall protection, under the current standards, is not possible during truss erection and roof sheathing operations on wood-frame houses. We believed OSHA re-opened the fall protection rulemaking in March to address this very issue.

Letter to R. Clark
August 9, 1993
page two

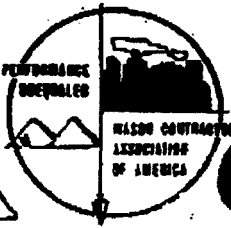
Mr. Clark, NAHB encourages its members to comply with all OSHA regulations and we have implemented an intensive national education campaign. However, these actions on the part of regional and area OSHA offices make it impossible to do any substantive education since these offices insist on ignoring current requirements. Until OSHA revises its fall protection standards, NAHB is formally calling upon the agency to suspend enforcement actions taken against builders for fall protection violations of 16 feet or less, vacate those citations issued against builders for those violations, and enforce the current 1926.451(u)(3) requirements until new standards are issued.

I look forward to receiving your response.

Sincerely,



Michael P. O'Brien
Director
Labor, Safety & Health
State & Local Government Affairs



MCAA **QuikFAX**

DATE September 16, 1993 **TIME** **TOTAL PAGES** 4

TO JIM LAPPING **FAX NUMBER**
 Director of Safety & Health/AFL-CIO 202/628-0724

FROM
 George A. Miller
 Mason Contractors Association of America

MESSAGE

Jim: Here are three of the most significant letters regarding "overhand Bricklaying". Please note: In all our discussions the RAC/LIUNA and MCAA have been involved and Negotiated Rule Making has been used.

George A. Miller

PLEASE LET US KNOW IF YOU DON'T RECEIVE ALL PAGES

MASON CONTRACTORS ASSOCIATION OF AMERICA
 1550 SPRING ROAD, OAK BROOK, IL 60621
 PHONE 708/782-6767 © FAX 708/782-6786



ATLANTA
 FEBRUARY 25 TO FEBRUARY 28, 1994
 1550 Spring Road • Suite 220 • Oak Brook, IL 60621



January 6, 1981

Dr. Eula Bingham
 Assistant Secretary
 Occupational Safety and Health
 U.S. Department of Labor
 200 Constitution Avenue, N.W.
 Washington, D.C. 20210

Dear Dr. Bingham:

Our combined organizations, the International Union of Bricklayers and Allied Craftsmen, the Laborers International Union of North America and the Mason Contractors Association of America, request an interpretation of 29 CFR Standards 1926.28, 29 CFR 1926.104, 29 CFR 1926.105, and 29 CFR 1926.500 (d)(1) as pertains to the process of overhand bricklaying. As you are aware, the Construction Advisory Committee has reviewed our request and recommended the agency's action in providing relief to the Masonry Industry from the above Standards.

Your prompt consideration in this matter will be greatly appreciated.

Sincerely,

George A. Miller, Executive Vice President
 Mason Contractors Association of America

James F. Richardson, First Vice President
 International Union of Bricklayers and
 Allied Craftsmen

Joe M. Short, Director of Education
 Laborers International Union of North America

MASON CONTRACTORS ASSOCIATION OF AMERICA

17W601 - 14th STREET - OAKBROOK TERRACE, ILLINOIS 60181 - AREA CODE 312/620-6767

U.S. Department of Labor

Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210



JAN 13 1981

Mr. George Miller
Association of Masonry Contractors
17 W 601 14th Street
Oakbrook Park, Illinois 60181

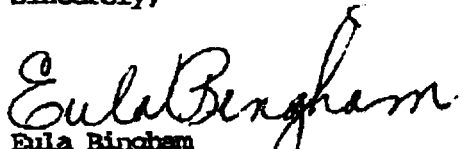
Dear Mr. Miller:

This is in response to your letter of January 6, 1981 concerning the applicability of standards 29 CFR 1926.28, 29 CFR 1926.104, 29 CFR 1926.105, and 29 CFR 1926.500(d)(1) to the process of overhand-bricklaying.

It is the interpretation of OSHA that these standards do not apply to the process of overhand-bricklaying and that, therefore, masons and mason tenders are exempt from these regulations.

The Occupational Safety and Health Administration will continue to study the problem by consulting with the Advisory Committee on Construction Safety and Health, the Mason Contractors of America, the International Union of Bricklayers and Allied Craftsmen, the International Laborers Union, and other interested parties, to determine what new regulations, if any, would be appropriate for promulgation concerning this matter.

Sincerely,


Eula Bingham
Assistant Secretary
Occupational Safety and Health



April 9, 1992

Ms. Dorothy Strunk
Acting Assistant Sec
Occupational Safety
U.S. Department of
200 Constitution Ave
Washington, D.C. 205

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Ms. Dorothy Strunk *5-2316*
 Acting Assistant Secretary
 OSHA
 U.S. Department of Labor
 200 Constitution Ave., N.W.
 Washington, DC 20210

4a. Article Number
P874212085

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
April 14, 1992

5. Signature (Addressee)
Dorothy Strunk
 6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1980 U.S. GPO: 1991-287-088

DOMESTIC RETURN RECEIPT

Dear Ms. Strunk:

On November 25, 1986, the Federal Register published 29 CFR Part 1926, Sub-Part M, "Fall Protection," which included the proposed Standards for "overhand bricklaying." Since their publication in 1986, no major comments reflecting on the integrity or effectiveness of the bricklaying sections have been made.

Since 1978, the Bricklayers and Allied Craftsmen of North America, the Laborers International Union of North America and the Mason Contractors Association of America, have fully cooperated with your office in the development of these Standards.

We are deeply concerned that the delay in implementing these Standards is adversely affecting the entire masonry industry. It would seem that adequate time for review has transpired, and positive action by OSHA is required.

MCAA has specifically made a commitment to develop an education and training program to acquaint our membership with the requirements of these Standards; thus creating a safer work place.

BAC, LIUNA and MCAA urgently request your good Offices to promptly consider these requirements in 29 CFR Part 1926, Sub-Part M and their implementation.

Sincerely,

R.C. Matthews
 Richard Matthews, President
 Mason Contractors Association
 of America

L. Gerald Carlisle
 L. Gerald Carlisle, Sec.-Treas.
 Bricklayers and Allied Craftsmen

Angelo Fosco
 Angelo Fosco, General President
 Laborers International Union of
 North America

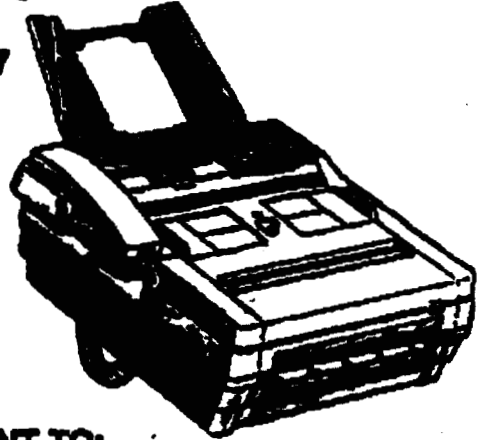
MASON CONTRACTORS ASSOCIATION OF AMERICA

1550 SPRING ROAD • SUITE 320 • OAK BROOK, IL 60521 • A/C 708/782-6767 • FAX 708/782-6786

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
DIRECTORATE OF COMPLIANCE PROGRAMS
WASHINGTON, D.C. 20210

(202) 219-8308
FAX NO: (FTS) 219-8187

FACSIMILE MESSAGE



DATE: 9/24/93

PLEASE DELIVER THE FOLLOWING DOCUMENT TO:

NAME: Mr. Brad Sant
OFFICE: _____
PHONE: 628-0724

TOTAL NUMBER OF PAGES 2 (INCLUDING THIS PAGE).

FROM: Mr. Roy Buchanan
PHONE: (202) 219-8136

DESCRIPTION OF DOCUMENT TRANSMITTED:

PLEASE CALL IMMEDIATELY IF THIS MESSAGE IS INCOMPLETE OR ILLEGIBLE.

**Request of Roy Gurnham
OSHA Directorate of Compliance Programs**

As part of developing an overall policy position on fall protection, it is suggested that the following concerns be addressed either by specific incorporation or by express omission from the coverage of any policy recommendation made by the ACCSH Subgroup on Fall Protection:

1. Scaffold (ground supported type) erection and disassembly crews.
2. Overhand bricklaying.
3. Steel erection connecting activities.
4. Transmission tower access and work aloft.
5. Eaves and gables
6. Home building (especially roof truss installation).
7. Low pitched roofs less than 16 feet.
8. Roofing materials supplier (delivering shingles to rooftop).
9. Leading edges (such as those found in the pre-cast concrete industry).
10. Other concerns not listed above.