

Developing Fall Safety Programs for Branch 2 & 3 Operations

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I was pleased when PCOC President Robert (Bob) Howell asked me to develop a fall protection compliance program for Branch 2 and 3 operations during his presidency. I had been gathering resources in anticipation of one day developing such a program, and Bob's request was exactly what was needed to bring this project to the top of my long-term "to-do" list.

My first step in this project is to review what resources PCOC has already developed and passed along to our membership. The broadest perspective we have given on this topic was in the Fall 2003 *Voice of PCOC* Magazine wherein we published an article titled "Fall Protection Affects All Branches of Structural Pest Control."

In last year's article we pointed out that falls constitute the largest cause of injuries to structural pest control employees. Classified under the heading "Slips and trips," fortunately most of these falls are not from elevated surfaces. At the most basic level employers are to address the hazard of employees slipping, tripping and otherwise falling from ground-level surfaces. OSHA reports "*slips, trips, and falls constitute the majority of general industry accidents. They cause 15% of all accidental deaths, and are second only to motor vehicles as a cause of fatalities.*"

So where do we start with developing a fall safety program? All employers should have all of their safety training programs organized under their Written Injury and Illness Prevention Program (IIPP) pursuant to section 3203 of the California Worker Health & Safety Code. As part of your IIPP, employers are to identify all potential hazards to their employees and train their employees on the hazards and how to prevent injuries from these hazards.

One of the first questions asked is "When are my employees exposed to a fall hazard?" With few exceptions, any time a workspace has a potential of a fall of 30 inches or more, section §3210 of the Department of Industrial Relations rules (Cal-OSHA) requires either guardrails, or another method of fall protection. Based on section §3210 you can then consider any potential of a fall of 30 inches or more to be a risk, which must be addressed by your company.

So at what height do you need to begin to worry about fall protection? As we described last fall, the general industry safety order §3210 has detailed rules for guardrails or other fall protection when employees are exposed to heights of 30 inches or more.

During the coming membership year we will be taking the tools and resources we currently have and expanding and organizing them in a fashion to comply with the state and federal edicts, as we understand them.

We will have to include the recommendations made to the General Pest industry as a result of a death in 1997 (*Fatality Assessment and Control Evaluation Program Report # 97-MA-038-01 Pest Control Technician Dies in 100 Foot Fall from Roof in Massachusetts*). There was a similar report issued in California making recommendations to the Fumigation industry after a fumigator was killed falling off a roof

(Fatality Assessment and Control Evaluation Program Report # 98CA002 Fumigator falls off roof during tenting).

To quote the report on the pest control technician death: *“The victim was a 25-year-old male pest control technician. He was employed by the company for approximately seven months and was at the jobsite for less than an hour at the time of the incident. He had formal training in college in integrated pest management prior to joining the company.”* The technician was performing his regular maintenance service for a 9-story apartment building. The laundry room and a penthouse apartment were on the roof, and there was a fenced-in walkway between the units. The technician and a building maintenance person went to the roof so the technician could treat for spiders around the “whirlybird vents” on the roof. The technician noticed spiders under the eaves of one of the penthouses, and proceeded to spray the eaves walking along the edge of the penthouse. *“He apparently did not realize that the roof edge was at the end of the penthouse and he walked off the edge of the roof. He fell 9 stories and landed approximately 14 feet from the base of the building.”*

As a result of this death there were two recommendations made to the structural pest control industry, and one to building owners:

Recommendation #1: Employers should develop and implement a site-specific health and safety plan for each site under contract.

Recommendation #2: Employers should employ alternative controls for fall hazards when personal fall arrest systems are not required or appropriate.

Recommendation #3: Building owners should consider the installation of guardrails at the perimeter of flat roofs wherever possible.

While the first recommendation of developing and implementing a site-specific health and safety plan for each site under contract seems onerous, it is actually the requirement and purpose for California’s Written Injury and Illness Prevention Program (SB 198).

One of the most common height risks Branch 2 and 3 techs are exposed to is working on ladders. As such PCOC has provided members with resources for ladder safety for many years. Your PCOC Best Practices Manual contains a section on Ladder Safety, which was published in 1994. Through the Peacock Group, all PCOC members may access a number of ladder safety meetings, and those who are insured through the PCOC Insurance Program (www.pcocinsurance.com) can access 19 ladder and fall safety meetings. A review of Peacock Group safety meetings published in the PCOC NewsBriefs will also reveal many ladder safety meetings. (An archive of PCOC NewsBriefs from 1999 to the present may be found online at www.pcoc.org.)

The final product should be ready in spring of 2005, and will be a gathering of various resources and tools to aid in your implementing a comprehensive fall protection program as part of your IIPP. This package will likely be posted to the PCOC.org website as well as being available for sale via CD. This will include articles, suggested Best Management Practices company policies, new hire training, and ongoing training. We will include copies of applicable codes and regulations, as well as compliance aids and documents put together by various public agencies. Please don’t wait for this document to be released to implement a fall protection program as part of your IIPP. Rather, take advantage of the resources already made available to you.

This article has been general in nature. It did not attempt to list all or even most issues relating to working from heights. Safety premises, products, operations, employees, and

other persons are your primary responsibility and the opinions expressed in this article do not relieve you of this responsibility. To assist you in furthering your fall protection programs we suggest you read all of the applicable Cal-OSHA statutes and regulations located at the Department of Industrial Relations (DIR), Department of Occupational Health & Safety (DOHS) website: www.dir.ca.gov.