

April 4, 2003

Russell K. Nicolai, Board Secretary
United Union of Roofers, Waterproofers and Allied Workers
2725 SE 21st. Avenue
Portland, Oregon 97202

Dear Mr. Nicolai:

In your March 31st letter you ask about Oregon OSHA's requirements for fall protection when performing building maintenance and repair work at heights over 10 feet. You also ask if there are any exceptions to the rules when work is of short duration, such as one hour.

Building maintenance and repair work normally falls under the scope of Division 2, General Industry. OAR437-002-0125(1), located in Subdivision I, requires all employees to be protected from falls when working on unguarded surfaces more than 10 feet above lower levels or at any height above dangerous equipment. When work progresses beyond repairs to include construction or demolition, then the fall protection rules in Division 3, Subdivision M, Construction, apply. OAR437-003-1501 requires fall protection for all employees exposed to falls of 10 feet or more to lower levels except when trigger heights are reduced to 6 feet or less (when working near holes, wall openings, on established floors, mezzanines, balconies and walkways, near excavations, or above dangerous equipment).

Jobs of short duration are evaluated by OR-OSHA field staff on an individual basis. Fall protection is required when feasible. If exposure to a potential fall is greater during the installation of a fall protection system than for completion of the task without fall protection (considering such factors as time, location, available equipment, environmental conditions, and risk), then tasks of short duration may be completed without fall protection. With adequate planning and use of correct equipment, fall protection is almost always feasible, and can almost always be provided.

For further information, please contact Mike Mitchell at (503) 947-7450. You are also invited to see the OR-OSHA pages on the Internet at the above address.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources
Oregon Occupational Safety and Health Division

cc: Russell K. Nicolai
4820 SW Chestnut Place
Beaverton, Oregon 97005