

Letters

Fall Protection for Holes

I read the October issue Q&A entitled "Are Guardrails Needed if Workers Wear Harnesses?" The provided answer needs to be supplemented with additional OSHA requirements for holes that have fall heights of less than 6 feet. Specifically, 29 CFR 1926.501(b)(4)(ii) requires all holes regardless of depth to be protected such that employees cannot trip or stumble into them. A personal fall arrest system (PFAS) does not meet OSHA's requirements for such holes. In such cases, holes must be either covered or guarded. If the question involved a deck with a fall exposure of less than 6 feet, a PFAS is not permitted and the hole must be either guarded or covered.

OSHA clarified this in an 11/17/98 letter of interpretation regarding an elevator pit, as follows:

The fall protection standard, at 29 CFR 1926.500(b), defines a hole as "a gap or void 2 inches ... or more in its least dimension, in a floor, roof, or other walking/working surface." The standard has two requirements with respect to holes. First, 1926.501(b)(4)(i) requires that employees be protected from falling through holes more than 6 feet by fall arrest systems, guardrails, or covers. So, if a hole is more than 6 feet deep, one of these protection systems must be used.

Second, 1926.501(b)(4)(ii) requires that employees be protected from tripping or stepping into holes by placing covers over them. This provision does not specify a minimum depth for the requirement to apply.

The first issue is whether the pit is a "hole." The pit you describe is located in and surrounded by a floor, roof, or other walking/working surface of a significantly larger dimension than the pit. This pit would be considered a hole under the standard. Since the fall distance is less than 6 feet, the applicable requirement is 1926.501(b)(4)(ii), which requires a cover to protect against the tripping/stepping-into hazard. Alternatively, a guardrail could be used to prevent employee exposure to this hazard.

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The following excerpts were taken from comments posted on jlconline.com in response to the indicated articles.

Word to the Wise

"Replace the Deck Framing or Just Re-Skin?" Q&A, 7/13

When underneath the deck framing, I also check the nails used in any existing hangers. You'd be surprised how many times the original hangers — or hold-down hardware — were attached with roofing nails, since they obviously "fit" and were readily available. — *WJParker*

Cringe-Worthy Solution?

"Hot-Water Systems," Letters, 5/13

Reading this letter literally made me cringe. The problem isn't that Mr. Landes' design won't work — it will work very well. The problem is that the energy to keep the water moving in his recirculation loop has to come from somewhere, and it will come from the water heater. While this solution may well save water, it will waste a significant amount of energy. Hot water will constantly be leaving the water heater, and cooler water will be returning, to be reheated. The demand-controlled recirculation approach promoted by Gary Klein is a far better solution, as the water in the pipes is only hot when it needs to be. — *Eric Woodhouse*

Preserving Original Framing

"Don't Cut Historic Timbers," Letters, 3/13

I too am a historic restoration contractor. I agree with what Scott Killian said [about not cutting original framing members]. We deal with this quite a lot in our work converting old barns into homes. We typically restore the original timber frame and then enclose this with a new shell. In the case of an older purlin roof we typically frame a new roof system over the old roof. We can frame this so that there is no load on the older roof and the new framing does all the work. This new framework then houses insulation and ventilation, and the original framework is kept in place. It also allows us to shore up older weak framing and fasten it to the new framing. The only drawback is that the location of the fascia and soffit is higher on the building. — *John Sheridan*

KEEP 'EM COMING!

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