

**North Carolina Department of Labor  
Division of Occupational Safety and Health**

**Raleigh, North Carolina**

Field Information System

Standards Notice 71

**Subject:** 29 CFR 1910.23(c)(1) - Guarding Floor and Wall openings

**A. Discussion.**

In 1990 and again in 2003, federal OSHA proposed changes to 29 CFR subpart D (reference: 68 FR 23528 republished 5/2/03). The changes require guardrails as the primary fall protection system for all walking and working surfaces regulated under subpart D unless the use of a guardrail is not feasible. When the use of a guardrail system is not feasible, the proposed standard provides alternative fall protection measures.

STD 01-01-007, *29 CFR 1910.23, Guarding Floor and Wall Openings*, also allows the use of alternative fall protection, but does not provide the amount of detail specified in the proposed standard, and allows means of fall protection, such as safety belts and lanyards, which are no longer permitted.

On June 16, 2006, federal OSHA issued CPL 2 (06-03), to provide guidance on the alternative fall protection measures which were in the proposed subpart D. This CPL also canceled STD 01-01-007. OSHNC has incorporated the alternative fall protection measures from the CPL into this Standards Notice.

**B. Enforcement.**

In enforcing 1910.23(c)(1), OSHNC will accept the following alternative fall protection measures. Employers who comply with the following alternative measures need not use standard guardrail systems.

1. ***General requirements for use.*** Employers may establish designated areas which comply with the following provisions as an alternative to installing guardrails, where employers demonstrate that employees within the designated areas are not exposed to fall hazards. In addition, the following conditions and requirements must be met in order to use designated areas in lieu of other fall protection measures:
  - a. The work must be of a temporary nature, such as maintenance on roof top equipment.
  - b. Designated areas shall be established only on surfaces that have a slope from horizontal of 10 degrees or less.
  - c. The designated area shall consist of an area surrounded by a rope, wire or chain and supporting stanchions erected in accordance with the criteria in paragraphs (2) through (5).

2. ***Strength criteria***

- a. After being erected with the line (such as rope, wire or chain) attached, stanchions shall be capable of resisting, without tipping over, a force of at least 16 pounds (71 N) applied horizontally against the stanchion. The force shall be applied 30 inches (76 cm) above the work surface and perpendicular to the designated area perimeter, and in the direction of the unprotected side or edge;
- b. The line shall have a minimum breaking or tensile strength of 500 pounds (2.2 kN), and after being attached to the stanchions, shall be capable of supporting, without breaking, the loads applied to the stanchions as prescribed in paragraph (2)(a) of this section; and
- c. The line shall be attached at each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in adjacent sections before the stanchion tips over.

3. ***Height criteria.*** The line shall be installed in such a manner that its lowest point (including sag) is no less than 34 inches (86 cm) nor more than 39 inches (1 m) from the work surface.

4. ***Visibility criteria.*** The line forming the designated area shall be clearly visible from any unobstructed location within the designated area up to 25 feet (7.6 m) away, or at the maximum distance a worker may be positioned away from the line, whichever is less.

5. ***Location criteria.***

- a. The stanchions shall be erected as close to the work area as is permitted by the task.
- b. The perimeter of the designated area shall be erected no less than six feet (1.8 m) from the unprotected side or edge.
- c. When mechanical equipment is being used, the line shall be erected not less than six feet (1.8 m) from the unprotected side or edge which is parallel to the direction of mechanical equipment operation, and not less than 10 feet (3.1 m) from the unprotected side or edge which is perpendicular to the direction of mechanical equipment operation.
- d. Access to the designated area shall be by a clear path, formed by two lines, attached to stanchions, which meet the strength, height and visibility requirements of this paragraph.

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C. **Action.**

This SN cancels and replaces STD 01-01-007. It is effective on the date of signature and will remain in effect until the proposed walking and working surfaces (68 FR 23528 5/2/03) is published as a final rule or until canceled by the Director.

Signed on Original  
Kevin O'Barr  
Standards Officer

Signed on Original  
Allen McNeely  
Director

8/23/06  
Date of Signature