

Professional Aviation Safety Specialists

Occupational Safety and Health Bulletin

Fall Protection



Fall Hazard Survey

August 2016

Workplace Fall Hazard Survey

The pictures below show a case of the one-size-fits-all, or "cookie cutter," approach to fall protection. The problem with this approach is that it ignores site, structure and environment specific issues.



A few years ago the agency decided that they needed to provide fall protection for these, mostly triangular, glide slope towers found on airports having an instrument landing system. The agency's approach was to count up the number of towers, order a bunch of ladder safety systems, and create a "project" for running around to install them. After all, "If there's a tower with a ladder, or something similar to it, we need to slap a ladder safety system on it."

Problems with the one-size-fits-all approach:

1. Not all towers have the same dimensions. In *this* case, an average sized specialist must climb to the top of the structure, unhook from the ladder safety system, transfer to the inside of the tower, then climb back down to the work platform to work on the antenna. Why? Because the ladder obstructs the openings on the side of the tower where a person could transition from the outside to the inside of the structure.
2. There is no method of providing adequate fall protection while the specialist makes the transition over the top of the tower.

The agency has wasted a great deal of money, which they constantly claim they are critically short of, created an enormous impediment to specialists performing their work in an efficient manner, while arguably making the fall hazards worse than if they had done nothing at all.

Most ATO climbers can describe a situation that they have encountered, or are currently subject to, where the cookie-cutter approach to prescribing fall protection fails to effectively protect them from a fall hazard. It is no small wonder that the whole topic of fall protection is a very sore subject for many specialists who simply want to get the job done in an expedient manner.

These situations should never occur. They occur because the agency systematically fails to take the first step in effectively prescribing fall protection methods: completing a fall hazard survey of the workplace.

The American national standard setting requirements for fall protection programs is standard ANSI/ASSE Z359.2-2007 Minimum Requirements for a Comprehensive Managed Fall Protection Program. You can, and should, obtain your copy, when signed into the agency intranet, through the FAA's IHS subscription service at:

<https://ksn2.faa.gov/ajw/es4/nes/res/ihsaccess.aspx>.

A fall hazard survey can be thought of as a specific type of job hazard analysis that is required by OSHA before prescribing any type of personal protective equipment. A fall hazard survey report will document a comprehensive fall hazard survey.

The fall hazard survey report should include, while not limited to:

- An enumeration of all fall hazards through 100% of the path of travel while performing all predictable maintenance tasks; not simply scheduled recurring preventative maintenance.
- One or more methods identified for elimination or control of each hazard.
- Drawings showing the location of hazards and distances to obstructions within the fall path of each location.
- Environmental factors that may affect the installation, use, inspection, maintenance, and dismantling of any fall protection system. These could include extreme heat or cold, radial ice, snow, proximity to weapons firing ranges, hunting areas, unstable/uneven walking surface, etc.
- Descriptions of all hazards should include:
 - o Reason for the exposure;
 - o Severity of the fall (injury or death);
 - o Frequency of the task;
 - o Duration of the task;
 - o Obstructions in the fall path;
 - o Existing fall protection systems/equipment;
 - o Access to the task/structure;

- o Environmental conditions (current and predictable)
- o Risks to, or caused by, other workers in the area;
- o etc.

Please don't continually endure senseless work methods prescribed in the name of "safety," or wait for someone to get hurt, to take action to rectify the situation.

Frustration and disgust lead to indifference. Indifference leads to inaction. Inaction leads to injury and death.

Action:

Unfortunately, each ATO Service Area administers the fall protection program in its own manner. Ask the appropriate workplace supervisor for a copy of the fall hazard report for each workplace where there is any type of fall hazard. The presence of equipment on a roof, or equipment located on a platform at the top of a tower, are obvious examples of where a complete workplace fall hazard survey should have been conducted and documented in a workplace fall hazard report. ***Please take action*** if a fall hazard report is not provided within two working days, or if what's provided is inadequate.

Note: A completed checklist from Appendix I of JO 3900.63 is ***not*** an adequate fall hazard survey report.

The absence of a complete fall hazard survey, prepared by a fall protection Competent or Qualified Person, as described above is a breach of the collective bargaining agreement. You are strongly encouraged to file a grievance if a fall hazard report is not available for any workplace that has any type of fall hazard. Standard language is provided as an attachment and as an editable document at www.passmember.org.

Contact your PASS Regional Vice President, PASS Regional or National Safety Representative if you need assistance in preparing, or are uncomfortable with filing, a grievance, or are uncertain about a workplace situation.

GRIEVANCE RECORD		<i>FOR FAA USE ONLY</i>	
AGGRIEVED			
1A. EMPLOYEE'S NAME PASS <i>{Representative's Name}</i> <i>{SSC NAME}</i> SSC Representative	1B. FACILITY <i>{XYZ}</i> <i>{FAC}</i> <i>{SSC NAME}</i>	1C. LOCATION <i>{City}</i> <i>{State}</i>	
2. ARTICLE/SECTION VIOLATED Article 54, Section 1	3. INCIDENT DATE <i>{Today's Date}</i> Continuous and Ongoing	4. NAME OF UNION REPRESENTATIVE <i>{Representative's Name}</i>	
5. INFORMAL GRIEVANCE OFFICIAL	6. INFORMAL DECISION DATE	7. ORAL PRESENTATION REQUESTED ☐ YES ☐ NO	
8. DESCRIPTION This grievance is filed in accordance with Article 5, Section 1b of the CBA. This grievance is filed on behalf of all bargaining unit employees who are, or are reasonably likely to, be assigned duties requiring them to perform work at heights at the <i>{XYZ}</i> <i>{FAC}</i>. A comprehensive fall hazard survey report documenting the findings of a comprehensive fall hazard survey of the <i>{XYZ}</i> <i>{FAC}</i> as described in ANSI/ASSE Z359.2-2007 Section 4, is not available. <i>{Not required - but helpful: Any amplifying information describing the need for a survey. E.g. presence of equipment on a roof; presence of towers, poles or masts that must be climbed; hatches in a platform, floor, or roof; requirement to work from a man-lift or bucket truck, etc}</i>			
9. CORRECTIVE ACTION DESIRED 1. Record and communicate the fall hazard on a Notice of Unsafe or Unhealthful Working Conditions per 29 CFR 1960. 2. Administer the control and abatement of the hazard per 29 CFR 1960. 3. Post an ANSI Z535.2-2011 compliant warning sign at <i>{XYZ}</i> <i>{FAC}</i> prohibiting any work aloft until a workplace fall hazard survey report is published and fall protection procedures based on that report are established. 4. Perform a fall hazard survey of the workplace as described in ANSI/ASSE Z359.2-2007 Section 4.2. 5. Establish site specific fall protection procedures described in ANSI/ASSE Z359.2-2007 Section 4.3. 6. Any other remedy deemed appropriate by an appropriate authority.			
SUBMISSION		RECEIPT ACKNOWLEDGED	
10. EMPLOYEE'S SIGNATURE	11. DATE	12. MANAGEMENT OFFICIAL'S SIGNATURE	13. DATE
DISPOSITION			
14. DESCRIPTION			
FAA Form 3770-2 (3-78)			

