

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

Raleigh, North Carolina

Field Information System

Operational Procedure Notice 121

Subject: Steel Erection - Interim Policy

A. Purpose.

This notice establishes North Carolina's policy for Steel Erection during the interim period before enactment of a revised Steel Erection standard, Subpart R of 29 CFR 1926, "Occupational Safety and Health Standards for the Construction Industry."

B. Scope.

This policy applies to construction activity throughout North Carolina.

C. References.

- OSHA Directive 99-1 (CPL 2-1), "Steel Erection, February 10, 1999.
- OSHA Memorandum, Deputy Assistant Secretary Stanley, "Fall Protection in Steel Erection," July 10, 1995.
- 29 CFR 1926, "North Carolina Occupational Safety and Health Standards for the Construction Industry."

D. Action.

OSHNC agencies shall continue to conduct training and outreach activities, consultative services, technical assistance, and compliance inspections in accordance with the guidance contained in this OPN.

E. Effective Dates.

OSHNC Standards Notice 12, dated March 21, 1977 is hereby rescinded. This OPN shall remain in effect beginning the date it is signed, until it is rescinded by the Director. After the Federal OSHA Subpart R is promulgated as a final rule, OSHNC will consider adopting OSHA's new standard, and will concurrently consider the utility of continuing, modifying, or discontinuing the policy established by this OPN 121.

F. Discussion.

In accordance with OSHA CPL 2.1, Section X., "Options." OSHNC opts to follow current steel erection standards contained in 29 CFR 1926.750-752, 1926.104, 105, and 107(b), (c), and (f). Policy and definitions previously established by OSHA Deputy Assistant Secretary Stanley's memorandum dated July 10, 1995 will also be retained in OSHNC's interim policy, and have been included in this OPN 121.

1. Steel Erection Activities.

- a. The term, "steel erection" includes the following: The movement and erection of skeleton steel members (structural steel), including initial connecting, moving point- to- point, installing metal floor or roof decking, welding, bolting, and similar activities. Steel erection also includes these activities when structural steel is installed on concrete and masonry walls or supports.
- b. Activities that are not steel erection: Steel erection does not include the erection of steel members such as lintels, stairs, railings, curtainwalls, windows, architectural metalwork, column covers, catwalks, and similar non skeletal items, nor does it mean the placement of reinforcing rods in concrete structures.

NOTE: These steel erection activities may take place in buildings and other structures. "Buildings" includes tiered and non-tiered, single-story and multi- story buildings, warehouses, stadiums, gymnasiums, power plants, theaters, mill buildings, and similar structures. "Tiered" means the skeletal steel framework is erected in vertically stacked columns; tiered structures are not limited to multi- floored structures. "Other structures" includes bridges, viaducts, overpasses, towers, tanks, billboards, antennas, and similar structures.

2. Application of Fall Protection Requirements.

- a. Tiered Buildings.
 - i. Exterior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for exterior fall hazards of less than 25 feet.
 - ii. Interior fall hazards of 30 feet or more on buildings which have floors or are adaptable to temporary floors are covered by 1926.750(b)(2)(i). Fall protection is not required for fall hazards of less than 30 feet. Temporary floors will generally be practicable in the construction of a typical multi- floored building.

- iii. Interior fall hazards of 25 feet or more on tiered buildings which are not adaptable to temporary floors are covered by 1926.750(b)(1)(ii). Fall protection is not required on fall hazards of less than 25 feet.
- b. Non-tiered buildings.

Exterior and interior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for fall hazards of less than 25 feet.

- c. Other structures.

Exterior and interior fall hazards of 25 feet or more are covered by 1926.105(a). Fall protection is not required for fall hazards of less than 25 feet.

Signed on Original

Jack Forshey
Safety Standards Officer

Signed on Original

Robert K. Andrews, Jr.
Director

5/11/99

Date of Signature