

NORTH CAROLINA DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH DIVISION
RALEIGH, NORTH CAROLINA
JULY 29, 1975

Standards Notice - 23

TO: All OSHA Consultants, Supervisors, Safety Officers, and Industrial Hygienists

SUBJECT: Guarding of Open-Sided Flat Roofs

a. Standard

1926.500(d) (1) Every open-sided floor or platform six feet or more above adjacent floor or ground level shall be guarded by a standard railing, or the equivalent, as specified in paragraph (f) (1) of this section, on all open sides, except where there is entrance to a ramp, stairway, or fixed ladder. The railing shall be provided with a standard toeboard wherever, beneath the open sides, persons can pass, or there is moving machinery, or there is equipment with which falling materials could create a hazard.

b. Discussion

There has been much discussion regarding the application of 29 CCFR 1926.500 (d) (1) to open-sided flat roofs. A recent court ruling lends support to the opinion that the quoted standard is not specific enough to apply in cases where employees working on flat roofs are exposed to the hazard of falling.

c. Interpretation

Citations will be issued for a violation of 29 CFR 1926.28 (a) (requiring safety belts) when employees are found exposed to the open sides of flat roofs over six feet from adjacent floor or ground level. Citations will be issued only if protection in the form of a railing (standard railing or its equivalent) as specified under 29 CFR 1926.500 (f) (1) is not provided.

Michael R. Peeler
OSHA Standards Engineer

R.P. Boylston
OSHA Director

MRP:vj