

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
Research and Standards Occupational Safety Unit
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April 21, 2017

Steve Rank
Executive Director of Safety & Health
Ironworkers International
1750 New York Avenue NW
Washington, D.C. 20006

RE: Cone-and-bar barricade around floor openings

Dear Mr. Rank,

This letter is provided in response to your request that Cal/OSHA acknowledge that the cone-and-bar barricade designed and built by the District Council of Iron Workers (Ironworkers) and the Western Steel Council (WSC) can be used to warn employees about the presence of floor openings at locations where steel erection work is taking place. At such locations, the California Code of Regulations, title 8, section 1635(c)(2), requires that the floor area adjacent to a floor opening be barricaded or the floor opening be covered when not attended by steel erection personnel.

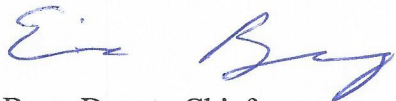
The cone-and-bar barricade observed by Cal/OSHA staff consisted of high-visibility, 27-inch high cones with attached barricade bars placed 6 or more feet away from the perimeter of a floor opening. This barricade may be placed as described to warn employees about the presence of floor openings at locations where steel erection work is taking place, assuming that all applicable regulations are met, including but not limited to the following:

1. The cone-and-bar barricade system is used only where work is in progress that requires floor openings to be uncovered. (8 CCR §1635(c))
2. The floor or working level where such work is in progress is under the exclusive control of the steel erection employer and all entrances to the working level are barricaded to prohibit entry of unauthorized personnel. (8 CCR §1635(c)(1))
3. Steel erection workers entering the area enclosed by the cone-and-bar barricade for any reason use required personal fall protection. (8 CCR §1710(m)(2))
4. The floor openings below the work where the cone-and-bar barricade is placed are covered to ensure compliance with overhead protection and fall protection requirements. (8 CCR §1635(a)(1))
5. Floor openings not required to be entered using the cone-and-bar barricade are decked over or covered, labeled, and secured as required by section 1632(b). (8 CCR §1635(c))

6. The erection floor is fully decked except for access openings to allow performance of steel erection activities. (8 CCR §1635(b)(1), §1710(l)(1))
7. After work requiring floor access openings to be uncovered is completed, and prior to allowing other trades in the work area, guarding and covers for floor openings meeting the provisions of section 1632(b) are installed. (8 CCR §1635(c)(7))
8. Employees using the cone-and-bar barricade are trained on its use and limitations. (8 CCR §1710(q), §3203)

I hope this information is helpful to you. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Eric Berg". The signature is written in a cursive style with a large, sweeping "E" and "B".

Eric Berg, Deputy Chief
Research and Standards

cc: Donald A. Zampa
Juliann Sum
Nathan Schmidt
Debra Lee