

**Herrick**

June 11, 2015

Eric Berg  
Principal Safety Engineer  
Cal/OSHA Research & Standards Occupational Safety Unit  
1515 Clay Street, Suite 1901  
Oakland, CA 94612

**RECEIVED**

**JUN 16 2015**

Division of Occupational Safety & Health  
Headquarters Office

RE: Fall Protection, Truck Unloading (1710)

Dear Mr. Berg:

I find it necessary to write you asking for what is Cal-OSHA's policy for enforcement of fall protection for unloading structural steel trucks by our Ironworkers. We are repeatedly being told by General Contractors that we fall under the 7 ½ foot rule because we are not working on the building when unloading the steel trucks. We are working with hosting equipment while unloading steel trucks so we feel that we are still working within the scope and application of 1710 Erection of Structures. What is the trigger height for fall protection when our Ironworkers are unloading steel trucks?

Thank you for looking into this and I look forward to your response.

Sincerely,  
THE HERRICK CORPORATION

  
Tom Davies  
Corporate Safety Manager