



International Association of

**Bridge, Structural, Ornamental and Reinforcing Iron Workers**

SUITE 400

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Affiliated with AFL-CIO



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February 3, 2017

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

RE: Clarification on the limited use of a cone and bar system during steel erection activities

Dear Mr. Berg:

I am writing on behalf of The District Council of Iron Workers of The State of California and Vicinity (Ironworkers) and the Western Steel Council (WSC) to request clarification on the limited use of a cone and bar barricade system (CBBS) during steel erection activities. Many steel erection contractor members of the WSC have performed over 4 million man-hours using this system as a means to protect Ironworkers from fall hazards.

The use of this system has proven superior to the use conventional planking and plywood as means to provide guarding around temporary floor and roof openings where steel erection activities occur. The Ironworker and the WSC are requesting the Division issue a compliance advice letter regarding how the Division interprets Title 8 as it applies to the use of a CBBS. Members of our organization and the WSC have met with the Division and reviewed a Power Point training program for the use of a CBBS provided by the Ironworkers and the WSC. We also arranged for your staff to visit a steel erection project to observe the use of the CBBS in the field.

We would appreciate clarification from Cal/OSHA that the CBBS would provide protection from fall hazards if the following conditions apply.

- The floor or working level where work is in progress is under the exclusive control of the steel erection employer and the entry is barricaded.
- The CBBS is erected 6 or more feet from the perimeter of the uncovered floor opening.
- Steel erection workers entering the area enclosed by the CBBS for any reason are using personal fall protection.
- The floor openings above and below the work activity protected by the CBBS are covered to ensure compliance with overhead protection and fall protection requirements.

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- Floor openings not required to be entered using the CBBS are decked over or covered, labeled and secured as required by section 1635(b).
- The CBBS is not be used on the derrick or erection floor where solid decking or planking is required except in connection with access openings that exist to allow performance of steel erection activities.
- After work requiring floor access openings to be uncovered is completed, and prior to allowing other trades in the work area, the guarding and/or covers for floor openings meets the provisions of Section 1632(b).
- Employees using the CBBS are trained on its use and limitations.

It is our belief that the use of a CBBS will help protect Ironworkers from fall hazards that historically, have resulted in disabling injuries and fatalities.

I look forward to your response. Please contact me if you have any questions.

Sincerely,

Steven L. Rank  
Executive Director of Safety and Health  
Iron Workers International Union

C: Ronald Piksa, General Secretary, Ironworkers International Union  
Donald Zampa, President, California District Council of Iron Workers  
Greg McClelland, Western Steel Council