



Representing Management in the Ironworker, Steel Fabricating, Erecting, and Placing Industry

Mr. William Estakhri
Lead Acting Deputy Chief for Field Enforcement
2424 Arden Way, Suite 300
Sacramento, CA 95825

December 15, 2014

Mr. Estakhri,

On behalf of the Western Steel Council, I am writing to request clarification regarding the scope of the T8 CCR 1626 (9)-(11) and T8 CCR 1504 hand rail protection standard and the application to employees of controlling contractors during the steel erection process. I have attached a photograph as well. This standard reads as follows:

T8 CCR 1626 (9)-(11)

(9) Handrails shall provide an adequate handhold.

(10) The ends of stair rails, handrails and mid-rails shall be constructed so as not to constitute a projection hazard.

(11) Handrails that will not be a permanent part of the structure being built shall have a minimum clearance of 3 inches (8 cm) between the handrail and walls, stair rails, and other objects.

T8 CCR 1504 Definitions

Handrail. A rail used to provide employees with a handhold for support.

During the steel erection process, as the stairs are erected and prior to the building being inspected for life safety and final occupancy inspection, steel aircraft cable a minimum diameter of 3/8" is used as temporary guarding and handrail. This cable is erected to ensure fall protection as well as temporary handrails, while the steel structure is being erected and completed. It is the standard practice in the industry that during the steel erection process, temporary access points be guarded for fall protection. The installation of steel cable guarding systems are only utilized for fall arrest if they meet the criteria of T8 CCR 1670 b (2) and T8 CCR 1670 B 10 (A),(B).

Question: As shown in the attached photograph, would the installation of cable guardrails in stairways and stair access points, a minimum diameter size of 3/8", violate the above referenced sections or any other section outlined in T8 CCR?

It is the industry position, that the long standing practice of installation of cable guarding in stairways, prior to the final placement of the permanent handrails and guardrails, provides safe, effective and adequate protection for workers.

I look forward to your response.

Sincerely,

Greg McClelland
Executive Director