



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

350 Winter Street NE, Room 430

P.O. Box 14480

Salem, OR 97309-0405

Phone: (503) 378-3272

Toll Free: 1-800-922-2689

Fax: (503) 947-7461

www.orosha.org

August 15, 1997
Revised June 26, 2009

Michael T. Williams
Vertical Access Systems & Technology
1332 Wallace Road
Salem OR 97304

Dear Mr. Williams:

This is in response to your letter asking several questions about rescue work and confined spaces.

You asked if OR-OSHA views fire department rescue service employees differently from other rescue employees. OAR 437-002-1910.146 makes no distinction between these two classes of employees: employees of the company or designated rescue service employees. *However, employers that provide fire protection services, emergency first response services, and related activities that will respond to emergency (911) calls for rescue from confined spaces must comply with Division 2, Sub-division L, specifically 437-002-0182(36) Confined Space Rescue.*

You asked if employees lowered into a vat for training or for confined space rescue need fall protection. There is no requirement in the standard for a second line if the employee is connected to lowering equipment and wearing a body harness that meets the requirements of the standard. However, all such equipment must be used according to the manufacturer's instructions. Therefore, if the tripod instructions state that a second lifeline must be used, we would expect to see one in use. Your question on rescue is not clear, but generally some form of fall protection is required when working from heights, regardless of the function performed.

You asked about ODOT employees or others needing fall protection while suspended to inspect bridges. The answer depends on how they were suspended. The use of a boatswain's chair for such work requires a second method of fall protection while certain other methods do not.

Your last question about fall protection equipment standards can only be answered depending on what type of system is in use. Varying standards require equipment to meet stated design or performance standards. These vary from standard to standard.

Sincerely,

Peggy A Munsell, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division