

CBS Corporate Safety and Environmental Affairs

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Walking - Working Surfaces

OSHA has published a completely revised and reformatted Subpart D: Walking-Working Surfaces rule. Compared to the existing rule, many new provisions have been added. It also changes 10 other OSHA rules and features highly prescriptive requirements. It goes into effect on January 17, 2017, but does include phase in dates for a few requirements.

The rule applies to far more than just working at heights. The declared purpose is to reduce the incidence of slips, trips and falls everywhere employees work (offices, production facilities, outdoors, elevated work locations, etc.). The scope of what is covered is very broad and includes but is not limited to housekeeping (including combustible dust), floors, walkways, walls, parking lots, stairways, ladders, catwalks, ramps, docks, platforms, scaffolds, roofs and fall protection systems (fall arrest, fall restraint, work positioning and designated areas).

Hitting just the high points, here are several of the more prominent and challenging provisions:

- Location-specific written hazard assessments identifying walking-working surface hazards and their respective controls
- Documented scheduled and ad hoc inspections of buildings, sites, ladders and step bolts
- Ladder, stairway, and guardrail conformance to the specified dimensions and physical criteria (including replacement of safety chains with guardrails in most applications)
- Certain work practice adoption, such as maintaining three points of contact when ascending and descending ladders (no hand carrying) and setting wheel chocks whenever a dockboard is used
- Self-closing gate installation on fixed ladders and retrofitting fixed ladders 24 feet or greater with safety climb systems
- Roof fall protection measures based on 6 feet, 15 feet, and greater than 15 feet boundaries from unprotected roof edges and frequency of access (all roof access will now require a fall protection control)
- Building owner testing and written certification of anchorages to contractors using them for rope descent systems and mobile platforms (typically involves window washing)
- Fall arrest and fall restraint solutions meeting a combination of performance and prescriptive constraints and specifications
- Employee training by a qualified person on the hazards they are subject to encountering and the respective relevant control measures

Detailed information on the Walking-Working Surfaces rule is found in the preamble: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-18/pdf/2016-24557.pdf>

We will incorporate the Walking –Working Surfaces rule into our EHS Audit and will be providing more information as it becomes available.

We plan on holding a webinar during the week of February 6th. Invitations will be forthcoming.

Progress Updates

- **Belfor & Foster Fuels**
Meetings between individual locations and Belfor and Foster Fuels kicked off at Broadcast Center in New York at the end of December.
- **E-learning**
We have worked out the logistics for our ENG e-course and have begun working with our e-learning vendor.
- **Personal Protective Equipment**
Things are moving forward with the hostile environment personal protective equipment deployment at our news bureaus, including the adoption of a respirator quantitative fit testing protocol.
- **Gensuite**
We are finalizing plans for the limited initial deployment of Gensuite to owned and operated television stations.