



Clark County Department of Building & Fire Prevention

Building Division – Inspection Services

Field Inspection Guideline

SUBJECT:	Roof Sheathing Inspections	FIG-B-010
Effective Date:	July 30, 2001	Revised: June 05, 2014
		Approved By: BAT
Code Chapter:	Code of Federal Regulations, Part 1926 Construction Industry, Section 1926.1053 – Ladders: TG-70-2008	Page 1 of 3

Field Application:

To accomplish safe roof sheathing inspections, the Clark County Department of Building and Fire Prevention requires that the ladder used for roof access be supplied by the contractor and secured in an OSHA approved manner, as required under the Code of Federal Regulations, Part 1926 Construction Industry, Section 1926.1053 Ladders.

Clark County will continue to do roof sheathing inspections on the roof for slopes of 5 units vertical in 12 units horizontal, or less. For roof slopes greater than 5 units vertical in 12 units horizontal, special inspection of the roof sheathing will be required by a Clark County approved special inspector working with a listed quality assurance agency.

Roof inspections will be completed by the approved OSHA recommended “Roof Monitoring System” incorporating a spotter from the building department, the contractor, or the homeowner. There shall also be a leading edge line at no closer than (six feet) 6’ from the roof edge. Both systems shall be in place before the inspection is completed

Attachment: Ladder Safety Guidelines for Accessing Roofs

Revision History:

Reference#	Title	Effective Date	Revised	Reviewed
DB002	Roof Sheathing Inspections	July 30, 2001		
DB002	Roof Sheathing Inspections		March 26, 2004	
FIG-B-010	Roof Sheathing Inspections			October 22, 2008
FIG-B-010	Roof Sheathing Inspections		July 15, 2009	
FIG-B-010	Roof Sheathing Inspections			May 30, 2013
FIG-B-010	Roof Sheathing Inspections		June 05, 2014	



Standard Interpretations - Table of Contents

Standard Number: 1926.500(a); 1926.501(b)(10); 1926.502(f)(2)

OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at http://www.osha.gov.

March 12, 2004

Mr. Randy Stahl
Safety Manager
Korellis Roofing, Inc.
1333 169th Street
Hammond, IN 46324-2008

Re: Is fall protection required during small roofing repairs that take minimal time to complete?

Dear Mr. Stahl:

This is in response to your letter dated December 16, 2003, to the Occupational Safety and Health Administration (OSHA). We have paraphrased your question as follows:

Question 1: Scenario: We do roofing inspections in order to identify where repairs are needed on pre-existing roofing systems. Often the repairs needed are small in scale and worker exposure to a fall hazard is minimal in terms of time. The fall hazard exposure time for the installation and removal of fall protection systems from the roof exceeds the exposure time for completing these roofing repair jobs.

In this circumstance, in non-residential roofing work, is fall protection required by 29 CFR Part 1926 Subpart M?

Answer

First, Part 1926 Subpart M does not require fall protection for those conducting the initial inspection of the roof to determine what work needs to be done. Section 1926.500(a) states:

This subpart sets forth requirements and criteria for fall protection in construction workplaces covered under 29 CFR Part 1926. Exception: The provisions of this subpart do not apply when employees are making an inspection, investigation, or assessment of workplace conditions prior to the actual start of construction work or after all construction work has been completed. [Emphasis added.]

With regard to fall protection requirements applicable to the construction work itself, §1926.501(b)(10) (low slope roofs) requires conventional fall protection, a combination of a monitoring system and warning line, or on roofs of 50 feet or less in width, a monitoring system alone (i.e., without a warning line) be used. Under the standard, the requirement for fall protection for this work does not depend on the duration of the fall hazard exposure.

In contrast, the Agency found in the rulemaking that the short duration of hazard exposure was part of the basis for creating the exception for the inspection-only activity. But another basis for the exception was the concept that in inspections before and after the work is done, there is no on-going construction work to divert the inspector's attention from the fall hazard. Once there is construction activity, the risk goes up by virtue of that diversion of attention. Consequently, in the preamble to the rule, OSHA stated that the exception does not apply if the inspection activity takes place at the same time the construction work is on-going:

[I]f inspections are made while construction operations are underway, all employees who are exposed to fall hazards while performing inspections must be protected as required by Subpart M.1

Therefore, apart from inspections, the Agency in the rulemaking rejected short duration of the exposure as an exception to the fall protection requirement for construction work.

Note, though, that the use of warning lines without a monitor is acceptable where the warning lines are at least 15 feet back from the edge and all of the following are met:

- (1) A warning line is used 15 feet or more from the edge (or nearest edge of a hole);
(2) The warning line meets or exceeds the requirements in §1926.502(f)(2);
(3) No work or work-related activity is to take place in the area between the warning line and the hole or edge; and
(4) The employer effectively implements a work rule prohibiting the employees from going past the warning line.2

If you need additional information, please contact us by fax (202-693-1689) at: U.S. Department of Labor, OSHA, Office of Construction Standards and Guidance. You can also contact us by mail at U.S. Department of Labor, OSHA, Office of Construction Standards and Guidance, Room N3468, 200 Constitution Avenue, N.W., Washington, D.C. 20210, although there will be a delay in our receiving correspondence by mail.

Sincerely,

Russell B. Swanson, Director
Directorate of Construction

1August 9, 1994, Federal Register on page 40675. [back to text]

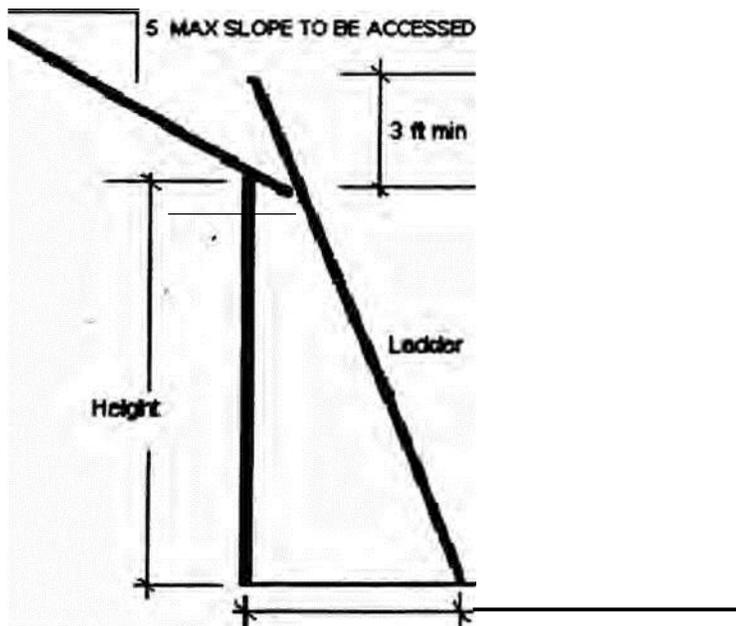
2See our May 12, 2000, letter to Mr. Barry Cole (copy enclosed). [back to text]

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LADDER SAFETY GUIDELINES FOR ACCESSING ROOFS

- Ladders shall be placed so that each rail is on level and firm footing and so that the ladder is rigid, stable and secure.
- Ladders shall be used at such an angle that the horizontal distance from the foot of the ladder to the structure the ladder rests against is one quarter (1/4) of the height of the ladder.
- Ladders shall rise to a height of at least 3 feet above the roof landing where you will access the roof.
- Ladders shall be secured at the top to the building. (not held in place by someone)
- Access can be thru the sheathing as long as all the same requirements are met.
- Only one person at a time on a ladder.
- Always face the ladder when ascending or descending it.
- Permanent ladders attached to the building (ship ladders) have their own requirements and will be on the plans.

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1 ft from well for every 4 ft in height

NOTE: Roof access will be by ladder secured in an OSHA approved manner ONLY.