

July 24, 2013

Mr. Steven L. Rank
Executive Director
International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers
1750 New York Avenue, NW
Washington, DC 20006

Dear Steve,

At the recent IMPACT Safety and Health meeting, you asked for an opinion from AISC concerning the shop installation of "pour stop angles." The issue at hand is contained in Question 2 of the letter from Russell B. Swanson to Mike Mathisen dated March 11, 2004. The graphic and description of the device as a "pour stop angle" in the letter are correct. We do, however, feel that the classification of this shop attachment as a "tripping hazard" is erroneous. As its name implies, the bent plate or angle is used as a "pour stop" to contain concrete or other topping to later be placed on the floor. Outboard of this device is either the edge of the building or an edge of an elevator shaft or other floor opening. All such edges are guarded either by covering or the installation of perimeter safety cable during the course of construction and at no time does a worker walk in a direction that the pour stop would be a "tripping hazard." The statement in the letter that "...the tripping hazard addressed...is created" is not accurate and in fact, this shop-installed device not only does not create a "tripping hazard" but provides a barrier similar to a toe plate installed on a perimeter safety railing to help prevent objects falling from the working floor. Taking the actual site condition one step further, the shop installation of the concrete pour stop is warranted by OSHA 1926.759 requiring protection of people below from falling objects.

Furthermore, not allowing the shop installation of these devices significantly increases the exposure to injury on the jobsite. These risks arise both from requiring field work to be performed adjacent to significant fall exposure and from the complex ergonomics of trying to position, stabilize, and connect structural members often weighing in excess of 100 pounds in a cantilever position at a worker's "foot level." Why expose workers to such risks when the device may be shop installed? The device is not a "tripping hazard" as it exists at a floor edge; shop installation helps prevent falling objects; and permitting shop installation minimizes the exposure to workers on the jobsite.

We support your request that OSHA review and rescind this ruling taking into consideration not only the device but also the purpose of the device to provide an edge barrier adjacent to openings and building perimeters.

Very truly yours,



Roger E. Ferch
President

cc: E. Dean



There's always a solution. In steel.