

99-05: Container Top Fall Protection Requirements and Exemptions



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Container Top Fall Protection Requirements and Exemptions

INFORMATION

"29 CFR 1918.85 (j) Fall Protection. (1) Containers being handled by container gantry cranes. (i) After July 26, 1999, where a container gantry crane is being used to handle containers, the employer shall ensure that no employee is on top of a container. Exception: An Employee may be on top of a container only to perform a necessary function that cannot be eliminated by the use of positive container securing devices.6 (Footnote 6: Examples of work that may not be eliminated by positive container securing devices and guides, that may require employees to work on top of containers include, but are not limited to: installing or removing bridge clamps; hooking up or detaching over-height containers; or freeing a jammed semi-automatic twist lock.)

(ii) After July 26, 1999, the employer shall ensure that positive container securing devices such as semiautomatic twist locks or above deck cell guides are used wherever container gantry cranes are used to hoist containers.

(iii) The employer is to ensure that each employee on top of a container is protected from fall hazards by a fall protection system meeting the requirements of Paragraph (k) of this section."

The OSHA Rules above outline the requirements for cargo operation after July 26, 1999 when containers are lifted by container gantry cranes. PMA has sent letters to ship owners advising them of these requirements in order that semi automatic twist locks or above deck cell guides may be employed before the deadline.

Even with the Semi-Automatic Twist Locks or above deck cell guides, there will still be some allowable exceptions for properly protected employees to work on top of containers.

Bridge clamp installation/ removal. The intent of the regulations is to minimize container top work through the use of engineering solutions where inter-box connectors can be placed into the container on the pier. Devices like bridge clamps, and bridge stackers which go between two or more containers cannot be installed on the pier and therefore become exception situations for their installation and removal.

Top Down Unlashing: As boxes are stacked higher and higher on deck the feasibility of using a SATL unlocking pole from the deck diminishes. OSHA has been petitioned to accept top down unlocking of containers 5 high and above from the top down as safer than trying to control a longer pole. (Currently there are no 5 high unlocking poles.)

Securing and unlashing of overheight or unusually shaped cargo. Cargo of this sort has to be manually secured and hooked up. Container gantry cranes may still be used to lift this cargo, but the rigging has to be done manually.

Below deck container securing. These rules also apply to container top work below decks. Some vessels that carry break bulk as well as containers below decks may not have cell guides. Some vessels with 40-foot cell guides may wish to stow 2-20 foot containers in these slots below deck. While there are "single stackers" or "safety stackers" that may be placed into the containers on the dock, some of the below deck securing equipment must be placed or attached from on top of the container. Double stacking clamps "double stackers" will

have to be placed between two containers manually. Tension-compression devices or transverse securing arms that secure container blocks to the ships bulkheads will have to be installed manually as well.

Cargo Securing Manual. In general, all vessels must have an approved Intergovernmental Maritime Organization (IMO) approved cargo securing manual. If questions arise as to how containers or cargo is to be stowed aboard a particular ship, this manual should be consulted for reference.

Fall Protection. If employees are sent on tops of containers, then they must be provided with fall protection if they will be exposed to an unguarded edge. (An unguarded edge is defined as being within three feet of the edge of a work surface where the vertical distance to the next horizontal level is more than 8 feet, or if two work surfaces are level but there is a gap of more than one foot in between, then an unguarded edge exists)

ACTION

Employers and employees should be aware of the requirements and exemptions for container top work that go into effect after July 26, 1999.

Employers and employees are reminded of the fall protection requirements that must be employed if employees are sent on top of the containers.