
Supervisors' Q&A: Tying off on Scissor Lifts in Virginia

The Question *We've always been told that Scissor Lift equipment is a form of mobile scaffold and as long as there are guardrails in place we don't have to use a Personal Fall Arrest System (PFAS) or tie off.*

Now we are being told we have to tie off. Why?

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Applicable Standards & Codes 29CFR 1926.452(w) – mobile scaffold
29CFR 1926.453(b)(2)(v) – aerial lift tie off
VOSH Administrative Regulations Manual 16 VAC 25-60-120 or -130
ANSI/SIA A92.6-2006 at 8.10(1) – Self-Propelled Elevating Work Platforms

Of Special Note See VOSH Administrative Regulations Manual 16VAC25-60-120; effective September 21, 2006.

“The employers shall comply with the manufacturer’s specifications and limitations applicable to the operation, training, use, installation, inspection, testing, repair and maintenance of machinery, vehicles, tools, materials and equipment; unless specifically superseded by a more stringent corresponding requirement in Part 1910.” (also applies to Part 1926)

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Key Points

- According to Federal OSHA scaffolding standards – you are correct - there is no requirement to tie off on mobile scaffolding, but...
 - According to the VOSH Administrative Rule quoted above you may be required to tie off if the manufacturer requires you to do so.
 - The question of tying or not tying off is a good example of a safety practice that is growing and changing due to an improvement in technology and higher safety expectations.
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Details

At first it appears that the best way to answer your question is to say that even though OSHA does not have a requirement to tie off on scissor lifts, we must follow the more stringent VOSH rule which says we are to follow the manufacturer's guidance.

Yet, if you look at the most recent manufacturers' literature, you may find that they do not actually tell us we must tie off when using their equipment.

The message to "tie off" is more subtle. It can be seen in the product marketing literature which shows all workers tied off. Another hint is that all newer equipment is now sold or rented with designated anchor points and advisory signs indicating the user should tie off.

The manufacturers depend upon guiding documents created by consensus and trade organizations. So, let's look at the §8.10 (1) of the ANSI standard for Self-Propelled Elevating Work Platforms ...

"The guardrail system of the aerial platform provides fall protection. If occupant(s) of the platform are required to wear personal fall protection equipment (PFPE), occupants shall comply with instructions provided by the aerial platform manufacturer (remanufacturer) regarding anchorage(s)."

This seems to put us into an endless loop unless you focus on the part of the ANSI statement that says "required to wear." So, who is really requiring us to wear personal fall protection and tie off?

It's not OSHA, or VOSH, or ANSI or even the equipment manufacturer. It's your own employer or the controlling contractor or owner of your worksite who is requiring you to tie off.

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Technology Changes, So Does Safety

Today's lifts are well engineered to anchor a fall if used correctly. As manufacturers began to provide lifts with anchors, employers and workers began to use them. Tying off is becoming common practice, and lift manufacturers *expect* that users will tie off. This is why you are being asked to wear your fall protection. Remember, as lift technology develops, so do best practices in safety.

Circle Safety Recommends

We recommend that no matter what type of lift you use – powered scissor lift or aerial lift – you do the following:

- Make sure you are authorized and trained to use the equipment.
 - Inspect the equipment prior to use and according to the manufacturer's instructions.
 - Following manufacturer's instructions, make sure that all equipment is safely positioned on solid ground and is not exposed to any tipping hazards or wind load, or exposed to being struck by other equipment.
 - Make sure you wear the appropriate full body harness, with appropriate lanyard, and you know where the manufacturer's designated anchor points are on the equipment.
 - Tie Off immediately upon getting in and prior to starting or moving the equipment.
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Research & References

- Email conversations with Glenn Cox, VOSH Director, Virginia Department of Labor
 - Genie (www.genielift.com), JLG (www.jlg.com) and Sunbelt Rental (www.sunbeltrentals.com) websites
 - Association of Equipment Manufacturers (AEM) Safety Manual for Aerial Platforms <http://www.aem.org/Safety/>
 - Article by Rob Vetter at http://www.contractortoolsandsupplies.com/past/jobsite_safety/07JA_ToTieOff.htm
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