



38TH CRCA TRADE SHOW & SEMINARS

JANUARY 19-21, 2022

DRURY LANE, OAK BROOK TERRACE, IL

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2022 CRCA TRADE SHOW & SEMINARS SPONSORS

CANVAS BAG



RAFFLE



COFFEE BREAK



SANITIZER STATIONS



BREAKFAST





Frank Marino



Top Ten Most Frequently Cited OSHA Standards for the Roofing Industry NAICS: 238160

Fall Prevention Considerations: The Walking-Working Surface



OSHA Top 10 – FY 2021

Most Frequently Cited Standards

NAICS: 238160 (Roofing Contractors)

Proportion of all
Construction
Industry (NAICS: 23)
Penalties issued to
Roofing Contractors

1. Duty to Have Fall Protection	\$11,602,061	51%
2. Ladders	\$2,410,001	53%
3. Fall Protection Training	\$1,172,802	54%
4. Eye & Face Protection	\$1,719,612	44%
5. Programs / Inspections	\$902,921	34%
6. Head Protection	\$634,035	34%
7. Fall Protection Systems	\$409,798	44%
8. Scaffolding	\$451,131	10%
9. Abatement Verification	\$40,574	61%
10. Ladder Training	\$48,861	25%





OSHA Penalty Increase

Effective 1/16/2022; to be adjusted no later than 1/15/2023

Type of Violation	Penalty
Serious Other-Than-Serious Posting Requirements	\$14,502 per violation
Failure to Abate	\$14,502 per day beyond the abatement date
Willful or Repeated	\$145,027 per violation

1. Duty to have Fall Protection

- 6 feet or more above lower levels

Inspections: 2,200

Citations: 2,245

Penalties: \$11.7 M



2. Ladders

Inspections: 780

Citations: 876

Penalties: \$2.4 M





3. Fall Protection Training

Inspections: 763

Citations: 792

Penalties: \$1.2 M



4. Eye & Face Protection

Inspections: 558

Citations: 559

Penalties: \$1.7 M

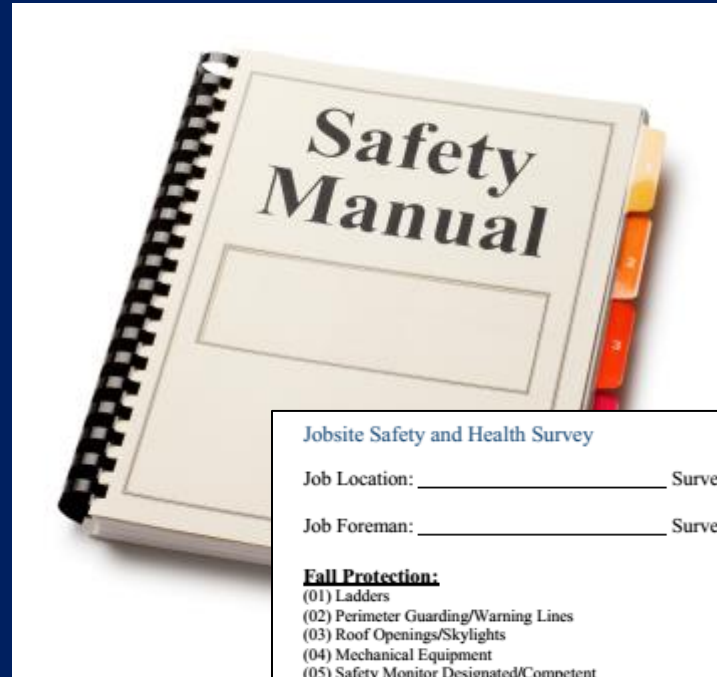


5. Accident Prevention Programs / Inspections

Inspections: 232

Citations: 258

Penalties: \$903 K



Jobsite Safety and Health Survey

Job Location: _____ Survey Date: _____

Job Foreman: _____ Surveyed By: _____

Fall Protection:

- (01) Ladders
- (02) Perimeter Guarding/Warning Lines
- (03) Roof Openings/Skylights
- (04) Mechanical Equipment
- (05) Safety Monitor Designated/Competent

Fire Safety:

- (06) Fire Extinguishers
- (07) Propane Cylinders/Equipment
- (08) Flammable Liquids/Material Storage

Electrical Safety:

- (09) Power Lines
- (10) Electrical Cords
- (11) GFCI

Hand/Power Tool Safety:

- (12) Maintenance/Storage
- (13) Proper Use/Condition
- (14) Machine Guarding

General Safety:

- (15) Housekeeping
- (16) Chemical Exposures
- (17) Safety Data Sheets (SDS)
- (18) Material Handling/Lifting
- (19) Safe Activities/Conditions
- (20) Signage/Barricades

PPE:

- (21) Hard Hats
- (22) Eye/Face/Respiratory
- (23) Safety Shoes/Gloves
- (24) Proper Clothing/Protection

Equipment Safety:

- (25) Daily Inspections Performed
- (26) Hoist/Slings Use/Condition
- (27) Qualified Operators

Subcontractor Safety:

- (28) Accountability
- (29) Recordkeeping

Safety Talk: _____

Comments: _____

Recommendations: _____

Distribution: Project Corporate Office Subcontractor

6. Head Protection



Inspections: 249

Citations: 250

Penalties: \$634 K



7. Fall Protection Systems

Inspections: 143

Citations: 178

Penalties: \$410 K



8. Scaffolding

Inspections: 100

Citations: 159

Penalties: \$451 K





9. Abatement Verification

Inspections: 127

Citations: 143

Penalties: \$41 K

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: _____

Company Name: _____
Inspection Site: 4 _____
Issuance Date: 1 ____/____/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 8505 W. 183rd Street, Suite C, Tinley Park, IL 60487**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

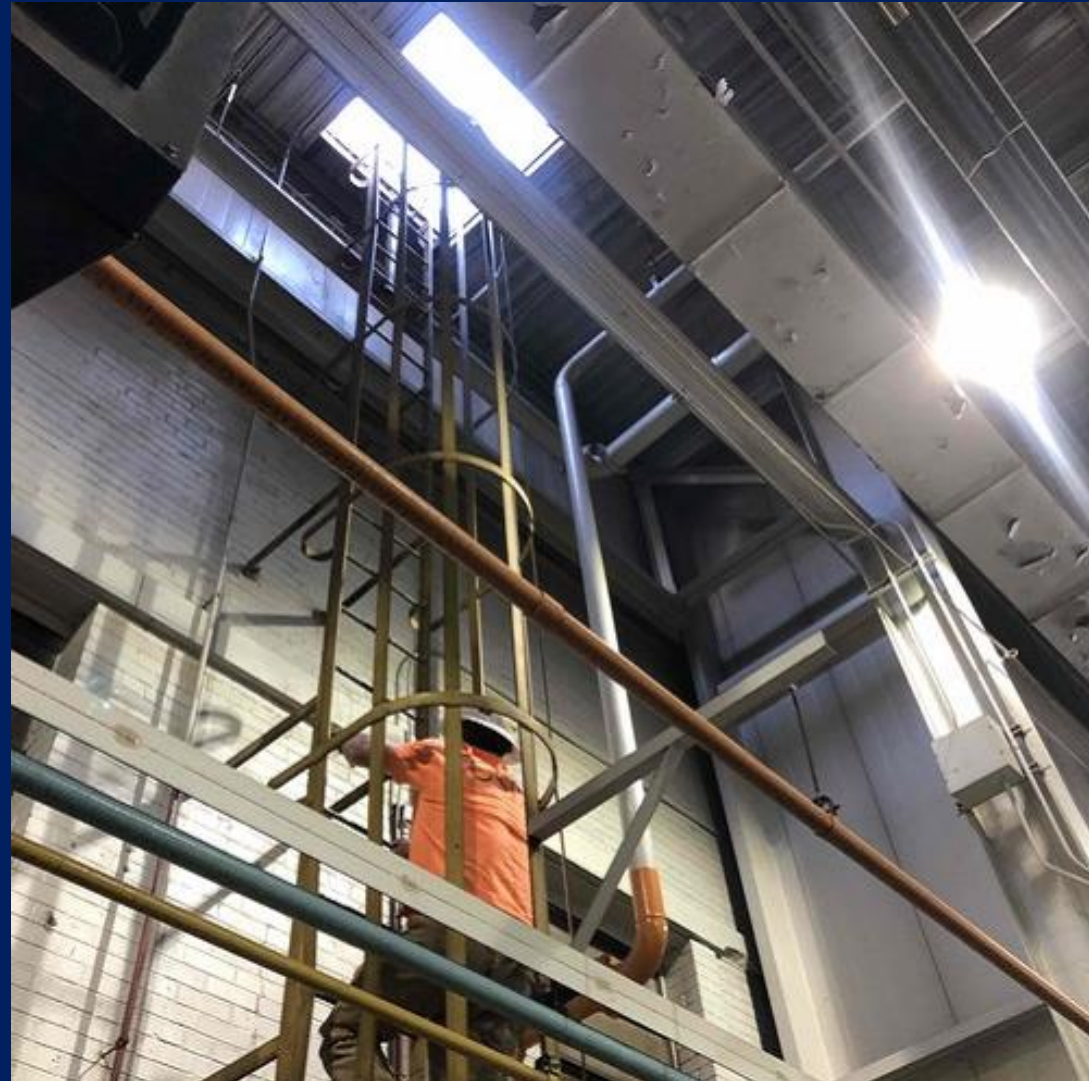
Signature _____ Date _____
Typed or Printed Name _____ Title _____

10. Ladder Training

Inspections: 86

Citations: 86

Penalties: \$49 K



Fall Prevention Considerations: The Walking-Working Surface



29 CFR 1926.501(a)(2): The employer shall determine if the walking/working surfaces on which its employees are to work have the strength and structural integrity to support employees safely. Employees shall be allowed to work on those surfaces only when the surfaces have the requisite strength and structural integrity.

The above OSHA standard is separate from any 6-foot rule, duty to provide fall protection (e.g. unprotected edges, holes/skylights, etc.), as well as any requirement for the use of fall protection systems.





Fall Prevention Considerations: The Walking-Working Surface

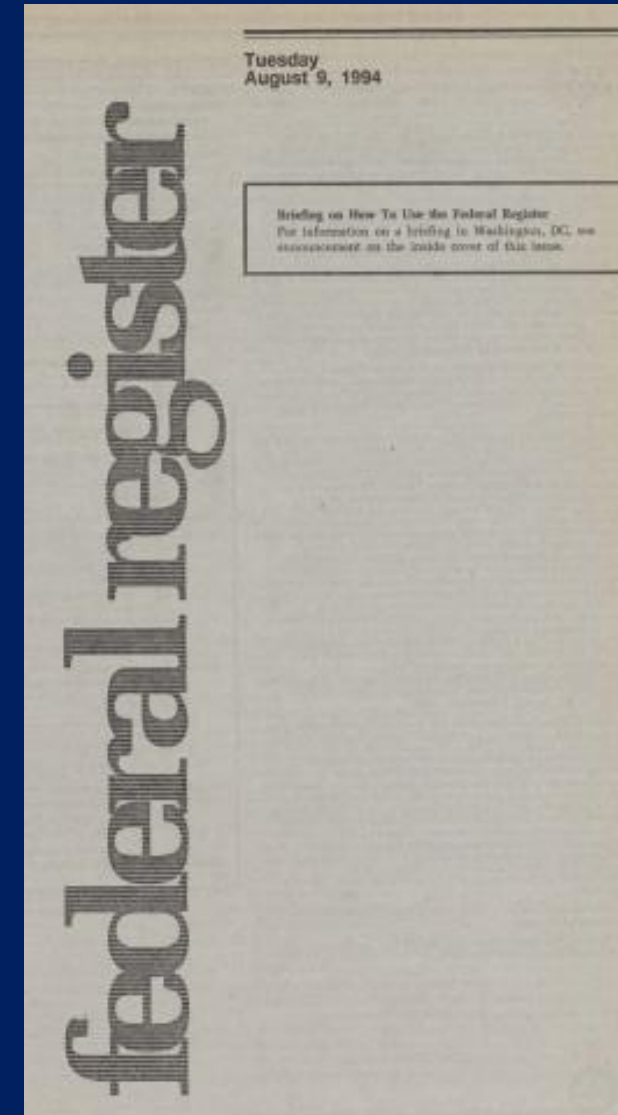
In the 1994 rulemaking process for Subpart M, one commenter opposed to an inspection requirement stated:

“The problem is that persons do not recognize hazards and respond sensibly to the situation at hand,” adding that education and training would help.

OSHA decided to adopt the proposed inspection requirement by including language such as “employer shall determine”, and the following training requirement:

...the training program...shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards.

...including...The nature of fall hazards in the work area;



Demolition Standards

29 CFR 1926.850(a): Prior to permitting employees to start demolition operations, an engineering survey shall be made, by a competent person, of the structure to determine the condition of the framing, floors, and walls, and possibility of unplanned collapse of any portion of the structure. Any adjacent structure where employees may be exposed shall also be similarly checked. The employer shall have in writing evidence that such a survey has been performed.

29 CFR 1926.850(b): When employees are required to work within a structure to be demolished which has been damaged by fire, flood, explosion, or other cause, the walls or floor shall be shored or braced.





“Tie-off”, or use of personal fall arrest systems (PFAS), is not sufficient by itself

Employers must improve the walking-working surface

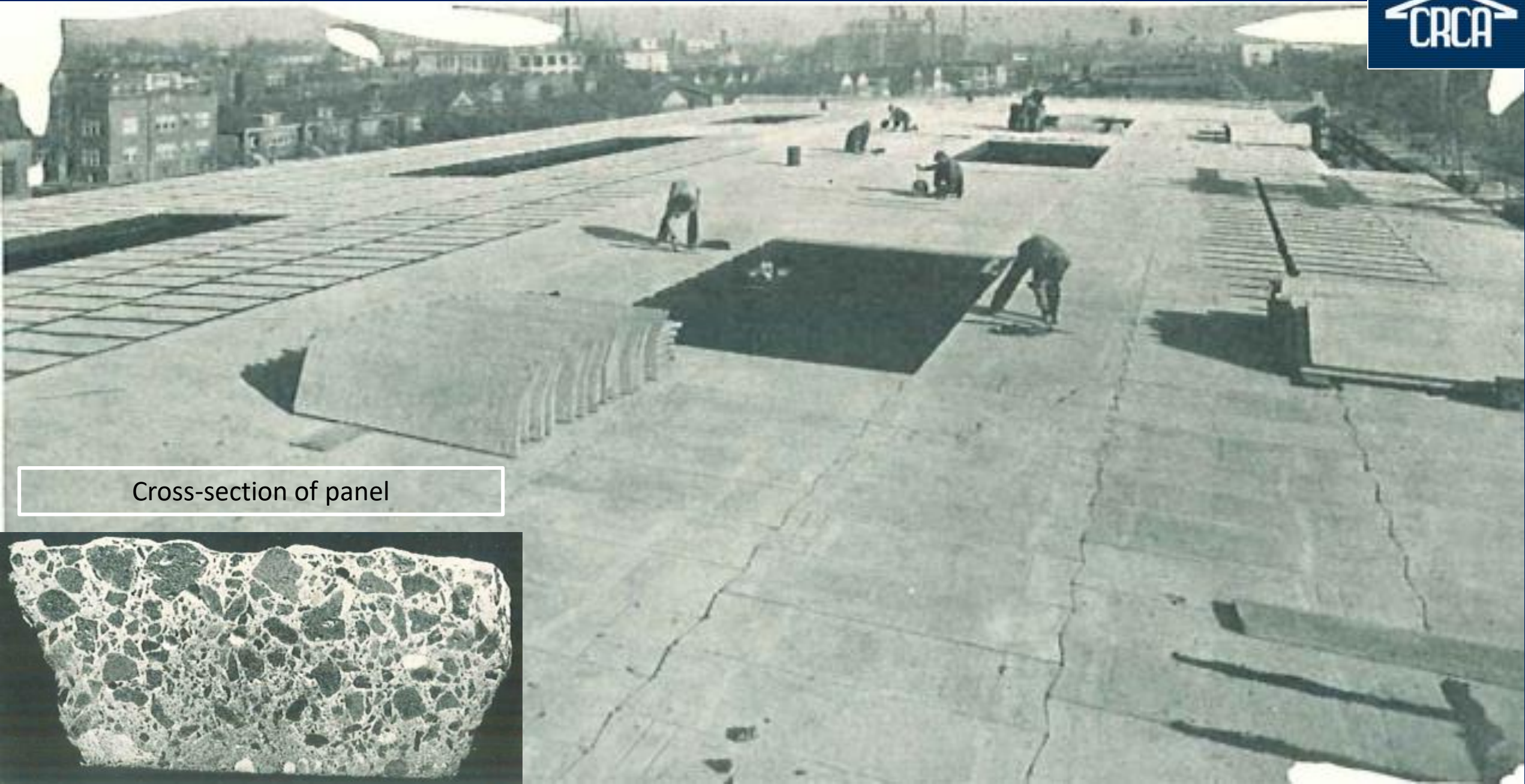


Federal Cement
Tile is always
suspect

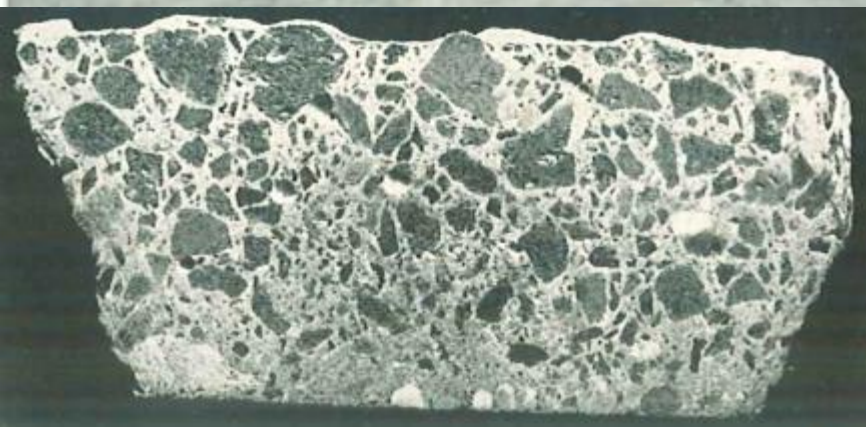
The aggregate used to
make the tile comes
from shale, which is
ground and vitrified
creating a lightweight
cellular structure

Damage is not
easily seen

Federal-American Cement Tile



Cross-section of panel





Employers must improve the walking-working surface, and use fall protection if employees can fall from that surface

SEARCH OSHA

[Return to Accident Search Results](#)

Accident Report Detail

Accident: 135632.015 - Employee Falls, Fractures Skull, And Is Killed

Accident: 135632.015 -- Report ID: 0213100 -- Event Date: 05/17/2021

Inspection	Open Date	SIC	Establishment Name
1531221.015	05/18/2021		Tri-City Roofing And Siding, Inc

At 10:30 a.m. on May 17, 2021, an employee worked to replace rotted roof decking . While working a section of roof decking collapsed and the employee fell approx imately forty feet, received a skull fracture and was killed.

Keywords: collapse, deck, fall, fall protection, fracture, roof, roof collapse, roofer, skull

End Use	Proj Type	Proj Cost	Stories	NonBldgHt	Fatality
Commercial building	Maintenance or repair			40	X

Employee #	Inspection	Age	Sex	Degree	Nature	Occupation	Construction
1	1531221.015	42	M	Fatality		Roofers	FallDist: 40 FallHt: 40 Cause: Roofing FatCause:

[Return to Accident Search Results](#)

Accident Report Detail

Accident: 135888.015 - Employee Falls From Roof And Is Killed

Accident: 135888.015 -- Report ID: 0215000 -- Event Date: 05/27/2021

Inspection	Open Date	SIC	Establishment Name
1533454.015	05/27/2021		Richmond Construction Inc.

At 8:37 a.m. on May 27, 2021, an employee completed jackhammering a section of r oof as part of a demolition job and began to walk along the exposed edge. At som e point, a section of the roof that the employee walked on broke apart; the empl oyeey fell approximately sixty feet and was killed.

Keywords: demolition, fall, fall protection, jackhammer, roof, roof collapse, roof opening

End Use	Proj Type	Proj Cost	Stories	NonBldgHt	Fatality		
Commercial building	Demolition		6		X		
Employee #	Inspection	Age	Sex	Degree	Nature	Occupation	Construction
1	1533454.015	49	M	Fatality		Construction laborers	FallDist: 60 FallHt: Cause: Demolition FatCause:



Inspect the deck from underneath whenever possible

If deck cannot be inspected prior to tear-off, and there are other indicators of poor condition, assume it cannot be walked on and plan accordingly







