

South Carolina Department of Labor, Licensing and Regulation  
Division of Labor  
Office of Occupational Safety and Health  
Columbia, South Carolina 29211

**OSH Program Directive Number 78-1910.23-4**

**Subject:** Article VI, Section 1910.23, Guarding Floor and Wall Opening and Holes – General Industry.

**Standard:** Article VI, Section 1910.23(c)(1), Rules and Regulations, Commissioner of Labor, State of South Carolina.

**Cross Reference to Federal Standards:** 29 CFR 1910.23(c)(1)

**Background:** The purpose of this directive is to provide guidance to field personnel when encountering situations where the rules of another federal agency other than federal OSHA may be met.

The present standard, Section 1910.23(c)(1) requires platforms and runways four (4) feet or more above adjacent floor or ground level be guarded by a standard railing or the equivalent as specified in Section 1910.23(e)(3). The federal proposed changes to Walking-Working Surfaces, 29 CFR 1910.23, states in part that when standard railings are not feasible because it would result in an impairment of the work being performed or because some accommodation is needed so that the rules or another federal agency may be met, alternative protection may be provided for employees which is as safe as that which would be afforded by Section 1910.23(c)(1).

**Interpretation:** Pending final approval of the federal proposed changes in the standards, any violation of the requirement for a standard railing or equivalent in Section 1910.23(c)(1) shall be considered de minimis provided that the use of guard rails are not feasible and that alternate protection is provided. In some instances, alternate protection may include, but is not limited to, a tie off system using safety belts and lanyard.

**Effective Date:** This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand  
December 15, 1977

