

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 81-1910.23-7

Subject: Height of Guardrails in General Industry Applications.

Standard: Subarticle 6, Section 1910.23 (e) (1), Rules and Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.23 (e) (1).

Background: A Federal Field Information Memorandum #74-87 (FIM) was previously issued regarding the height of guardrails. At the time FIM's were reissued and converted to federal OSHA #100 Series Program Directives, federal FIM #74-87 was not converted pending the issuance of a major revision to Subpart D of 29 CFR 1910. The intended revision is not yet available; therefore, to provide equitable enforcement which does not place unnecessary cost burdens upon employers, or have a direct or immediate effect upon the safety or health of employees, this instruction reissues the previous policy of federal FIM #74-87 and presents compatible criteria to the anticipated revision of Subpart D.

- a) The stipulation set forth herein provide for compatible specifications between ANSI, the NFPA, and OSHA, regarding the acceptable height of guardrails in workplaces.
- b) In consideration of the findings by the National Bureau of Standards research study, Report Number NBSIR 76-1139, Investigation of Guardrails for Protection of Employees from Occupational Hazards, dated July 1976, this instruction permits the application of some applicable determinations in advance of the eventual promulgation of a revision to Subpart D of Subarticle 6.

Interpretation: The Assistant Director/OSH Compliance, OSH Supervisors, and Safety Specialists shall classify technical violations of Subarticle 6, Section 1910.23 (e) (1) as de minimis violations, where the employer has provided guardrails which meet the following specifications:

- a) Existing guardrailing shall consist of a top rail, intermediate rail, and posts, or equivalent, and shall have a minimum vertical height

of 36 inches to 44 inches from the upper surface of the top rail to the floor platform, runway or ramp level.

- b) Guardrailings with heights greater than 44 inches are permissible provided the extra height does not create a dangerous situation for employees. Openings beneath the top rail that would permit the passage of a 19 inch or larger spherical object would create an unsafe condition, therefore, additional mid-rails may be necessary.
- c) Deviations from the standard which are deemed to be de minimis violations, as herein described, apply only to the General Industry Standards, Subarticle 6, and do not affect the specified requirements for guardrailings set forth in the Construction standards.

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
August 20, 1981