

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



February 9, 1983

Lawrence R. Stafford, P.E.
Consulting Engineer
8 Gracemore Street
Albany, New York 12203

Dear Mr. Stafford:

This is in response to your letter of January 28, 1983, concerning perimeter protection at setback roof levels.

A parapet height of 29 inches, where employees are exposed to falls from a roof, does not comply with the height requirement in 29 CFR 1910.23(e)(1) and can not be considered acceptable by OSHA. The employer may install a temporary portable section of guardrail which will comply with 29 CFR 1910.23(e)(3)(v) and provide a minimum height of 36 inches at the exposure locations. Employers may also use a safety belt and rope tie-off system in this type of exposure.

If I may be of further assistance, please feel free to contact me.

Sincerely,

John K. Barto
Chief, Division of Occupational
Safety Programming