United States Department of Agriculture
Agricultural Marketing Service
Federal Grain Inspection Service

Directive

9170.14 August 4, 2014

FGIS ROLLING STOCK FALL PROTECTION

Contents

1. PURPOSE

This directive is issued by the Federal Grain Inspection Service (FGIS) to provide procedures for identifying rolling stock fall hazards and conducting a fall protection feasibility assessment. The requirements of this directive apply to FGIS employees only. Official Agencies may adopt this policy, or use it as a guideline to establish their own policy to comply with local and national safety requirements.

2. DEFINITIONS

For the purposes of this directive, FGIS defines the following terms:

Fall Protection – a mechanical system designed to prevent falls. This may include a mobile harness and pulley system, or a suspended walkway.

OSHA – Occupational Safety and Health Administration. An agency within the Department of Labor that sets safety standards for Federal and many private sector employees.

Miles Memo – A 1996 memorandum from John B. Miles, Jr., former OSHA Directorate of Compliance Programs, regarding enforcement of fall protection on moving (rolling) stock.

PPE – Personal Protective Equipment. Equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.

Railcar – for the purposes of this directive, a railcar will refer to a hopper-bottom type railroad car generally used for the purposes of carrying bulk grain or similar commodities. This directive will assume these types of cars have a suitable metal walkway on the top of the car to access the compartments from above.

Rolling Stock – a general term used to describe a railroad car (such as a hopper-bottom railcar typically used to carry grain) or a truck trailer used to carry grain (flat bottom or hopper bottom).

Truck – for the purposes of this directive, a truck will be defined as a flat- or hopper-bottom truck typically used for the transportation of bulk grain or similar commodities.

3. BACKGROUND

In 2013, FGIS and GIPSA's Safety and Health Manager met with OSHA officials to discuss the 1996 "Miles Memo" and how it applies to the use of fall protection today. These discussions led FGIS to the interpretation outlined in this policy. For the safety of our employees and to comply with OSHA standards, FGIS must take the following steps to identify fall hazards and formulate a plan to best mitigate those hazards.

4. POLICY

FGIS is committed to providing a safe working environment for our employees. Working on top of railcars and trucks presents several inherent hazardous conditions that employees must be made aware of and protected from. FGIS will utilize a hierarchy of controls, such as employee training and personal protective equipment, to mitigate these hazards. FGIS must also conduct an assessment to determine the potential hazards of each worksite and to determine the availability of fall protection.

The results of a fall protection assessment at each location will determine if fall protection is required. If fall protection is available, FGIS employees must use fall protection while working on top of rolling stock. If fall protection is not available, FGIS employees may provide service on top of rolling stock without fall protection.

5. RESPONSIBILITIES

a. FGIS Responsibilities.

(1) All employees who work on or around rolling stock must complete Fall Hazard Awareness Training. The material for this training will be provided by the GIPSA Training Office, and the field office will be responsible for documenting the training and maintaining the records for each employee.

(2) FGIS will direct employees what PPE will be required for a specific task when working on or around rolling stock. FGIS will provide this equipment in most cases; however, if FGIS does not provide the equipment FGIS will instruct the employee what PPE will be required (for example, safety shoes). FGIS will provide a harness for employee use while working under fall protection.

Field Offices are required to train each employee who must use PPE. Employees must be trained to know at least the following:

- When PPE is necessary;
- What PPE is necessary;
- How to properly put on, take off, adjust and wear the PPE;
- The limitations of the PPE;
- Proper care, maintenance, useful life and disposal of PPE.

(3) Designate personnel within a Field Office to conduct Fall Protection Assessments and complete Fall Protection Assessment training.

(4) Conduct a Fall Protection Assessment at any worksite where FGIS personnel are requested to perform service on top of rolling stock. This assessment includes an evaluation of any available fall protection equipment that FGIS personnel will be using.

(5) When using fall protection at an applicant's facility, complete any training offered or required by the facility where work is performed (e.g., training on how to use a fall protection system installed at that facility).

b. Applicant Responsibilities.

(1) Provide safe means for FGIS to access railcars and trucks.

(2) Provide, when necessary, additional personnel to witness FGIS personnel while working on top of railcars and trucks so they may render aid in case of an emergency.

(3) Train FGIS employees on the use of any available fall protection equipment at the facility.

(4) When using a fall protection system, provide any lanyards, self-retracting lanyards (SRL), or any other equipment necessary to connect to the fall protection equipment. The connection must be accessible at ground level, or another platform where fall protection is not needed (i.e., FGIS personnel should be able to fully connect to the system before stepping on the rolling stock). FGIS will provide employees a harness to use while working under fall protection.

(5) Work with FGIS to mitigate any potential hazards found in a Fall Protection Assessment.

(6) Inform FGIS personnel of the facility rescue plan. If a fall protection system is used and foot suspension relief straps are part of the rescue plan, provide straps for FGIS personnel use in the event of an emergency.

6. DOCUMENTATION

Perform a Fall Protection Assessment at least once per year at each active facility where FGIS employees perform work on top of rolling stock. Conduct another assessment any time when the facility or conditions change (including weather conditions). For facilities with varying weather conditions or multiple scenarios for requesting service on top of rolling stock, this may mean conducting an assessment each time a service is requested.

For example, an assessment conducted on a snowy or windy day might be done differently than one conducted on a sunny day with no wind, even at the same facility.

NOTE: If inclement weather (e.g., icy conditions or heavy rain and wind) or other hazardous conditions make working on top of the railcars unsafe, decline the request for service.

7. EXAMPLES

See the attached “Appendix A” for examples of a Fall Protection Assessment.

8. QUESTIONS

Direct any questions regarding this directive to Mark Kemp, GIPSA Safety and Health Manager, at (202) 720-0061, or Anthony Goodeman, FGIS Field Management Division, at (202) 720-0291.

/s/Robert Lijewski

Robert S. Lijewski, Director
Field Management Division

LOCATION: _____

NAME/TITLE: _____

SIGNATURE: _____

DATE: _____

Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams?

   _____

   a. Is the system free of hazards? (e.g., overhead clearance)-

      _____

   b. Are there any other hazardous conditions which make working on top of the railcars unsafe?

      _____

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure?

   _____

   If yes, why isn't fall protection provided?

   _____

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam?

   _____

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place?

   _____

5. Is this a multiple track yard?

   _____

   If yes, how many tracks are used for sampling?

   _____

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used?

   _____

7. Can a freestanding mobile system be used?

_____

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses.

_____

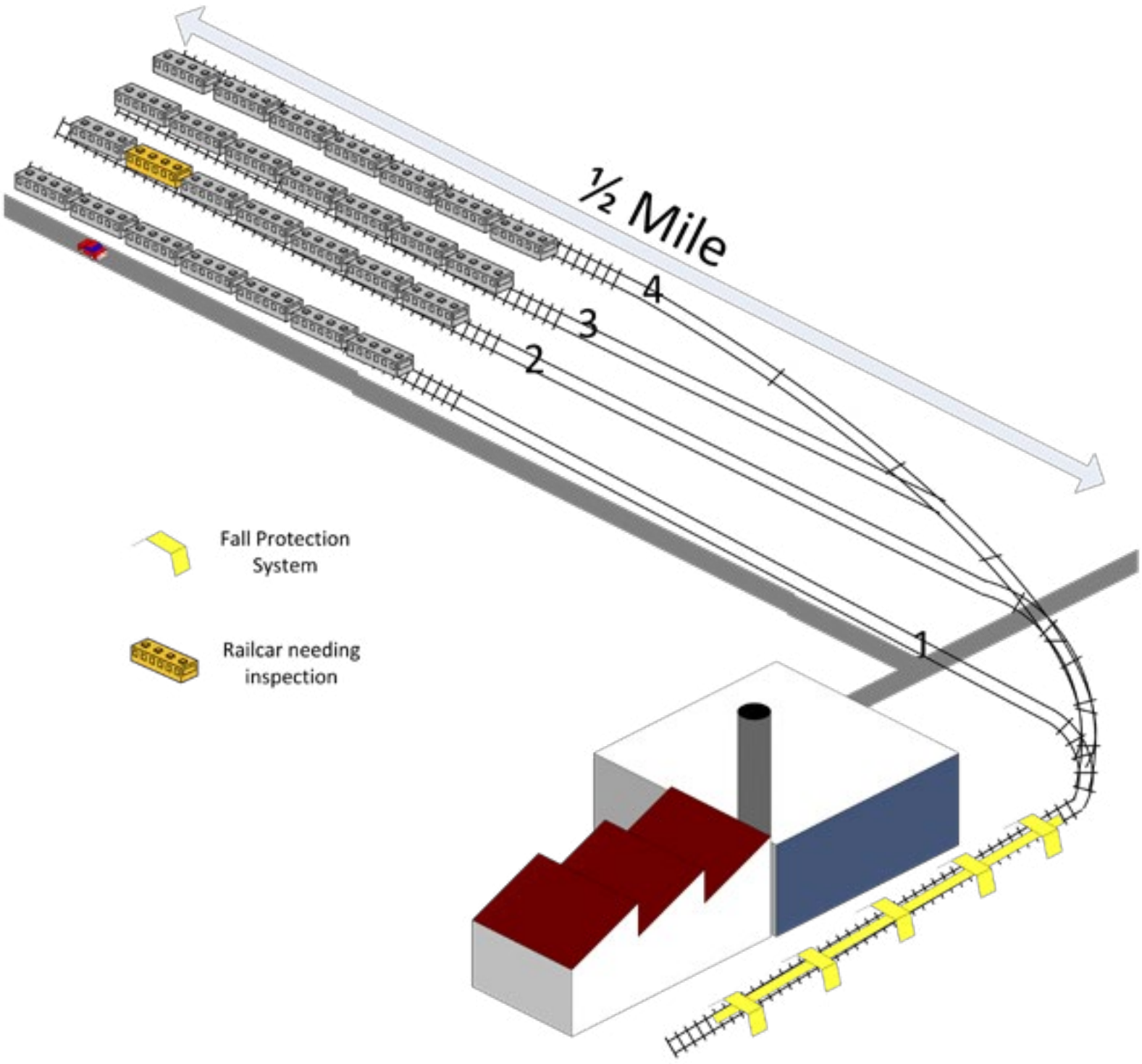
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

_____

Example #1

Situation: Railcar on Track 2 needs to be probed. Fall protection is positioned near the elevator approximately ½ mile away.

Result: Is fall protection feasible?



EXAMPLE #1 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *No. Car is being sampled approximately ½ mile away from existing fall protection.*

    a. Is the system free of hazards? (e.g., overhead clearance) *N/A*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *No.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *No.*

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *Approximately ½ mile.*

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *Gravel*

5. Is this a multiple track yard? *Yes*.

    a. If yes, how many tracks are used for sampling? *As many as 4*.

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *No, the railcar cannot be moved. There is no locomotive available.*

7. Can a freestanding mobile system be used? *No.*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *Yes. FGIS has been provided a copy of the facility rescue plan. Fall protection is not being used therefore suspension straps are not necessary.*

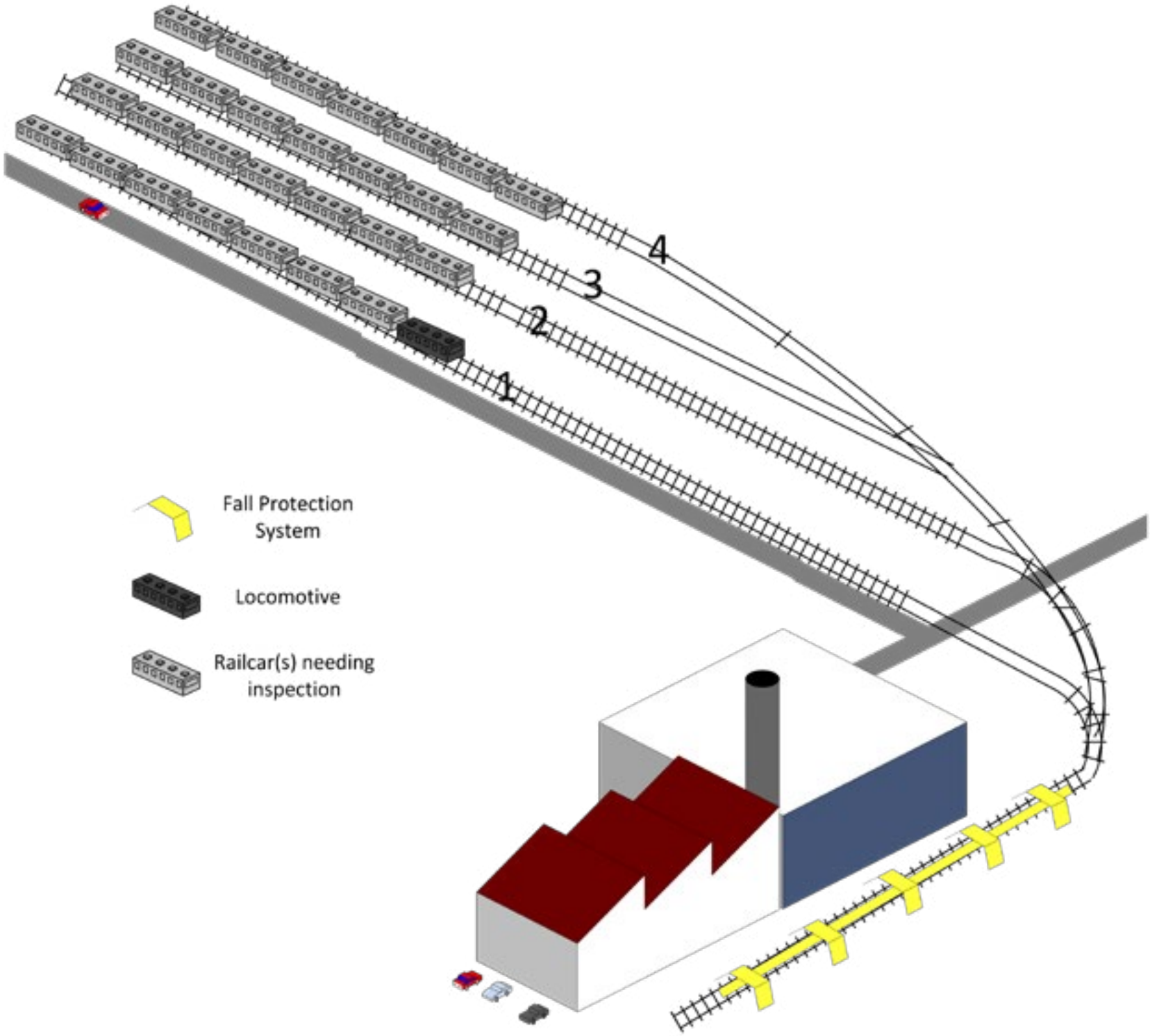
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

No. There is no fall protection available contiguous to where the work is being performed. If the applicant was able to position the railcar under the fall protection, then fall protection would be feasible. Under the current circumstances, it is not feasible.

Example #2

Situation: Every car in the rail yard needs a stowage exam prior to loading. The grain elevator sends a crew out in the morning to prepare the cars for loading. The grain elevator requests official personnel to perform the stowage exams at the same time. Fall protection is not contiguous to where the work is being performed.

Is fall protection feasible?



EXAMPLE #2 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *No. Cars are being examined approximately ½ mile away from existing fall protection.*

    a. Is the system free of hazards? (e.g., overhead clearance) *N/A*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *No*.

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *No*.

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *Approximately ½ mile.*

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *Gravel*

5. Is this a multiple track yard? *Yes.*

    a. If yes, how many tracks are used for sampling? *As many as 4.*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *No, the railcars cannot be moved.*

7. Can a freestanding mobile system be used? *No.*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *Yes. FGIS has been provided a copy of the facility rescue plan. Fall protection is not being used therefore suspension straps are not necessary.*

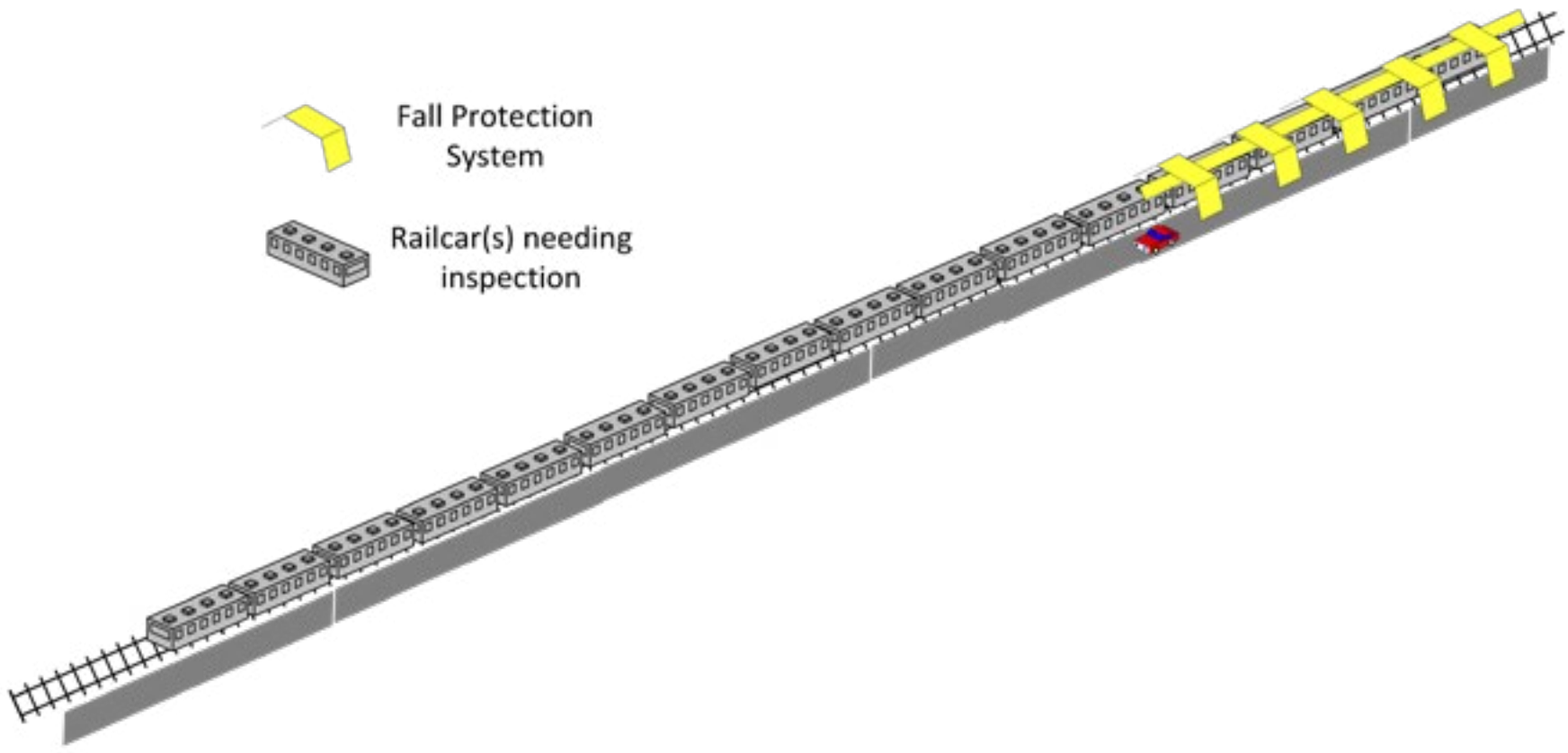
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

No. There is no fall protection available contiguous to where the work is being performed. If the applicant was able to position the railcars under the fall protection, then fall protection would be feasible. Under the current circumstances, it is not feasible.

Example #3

Situation: All 16 cars on track need probed. Fall protection at this facility is only 5-cars long. There is no locomotive available to move the cars under fall protection.

Is fall protection feasible?



EXAMPLE #3 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *Yes, but only approx 5 car lengths long.*

    a. Is the system free of hazards? (e.g., overhead clearance) *Yes.*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *No.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *No*.

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *N/A*.

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *Gravel*

5. Is this a multiple track yard? *No.*

    a. If yes, how many tracks are used for sampling? *N/A*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *No, the railcar cannot be moved. There is no locomotive available.*

7. Can a freestanding mobile system be used? *No*.

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *Yes. FGIS has been provided a copy of the facility rescue plan. The facility has suspension relief straps available for FGIS personnel working under fall protection.*

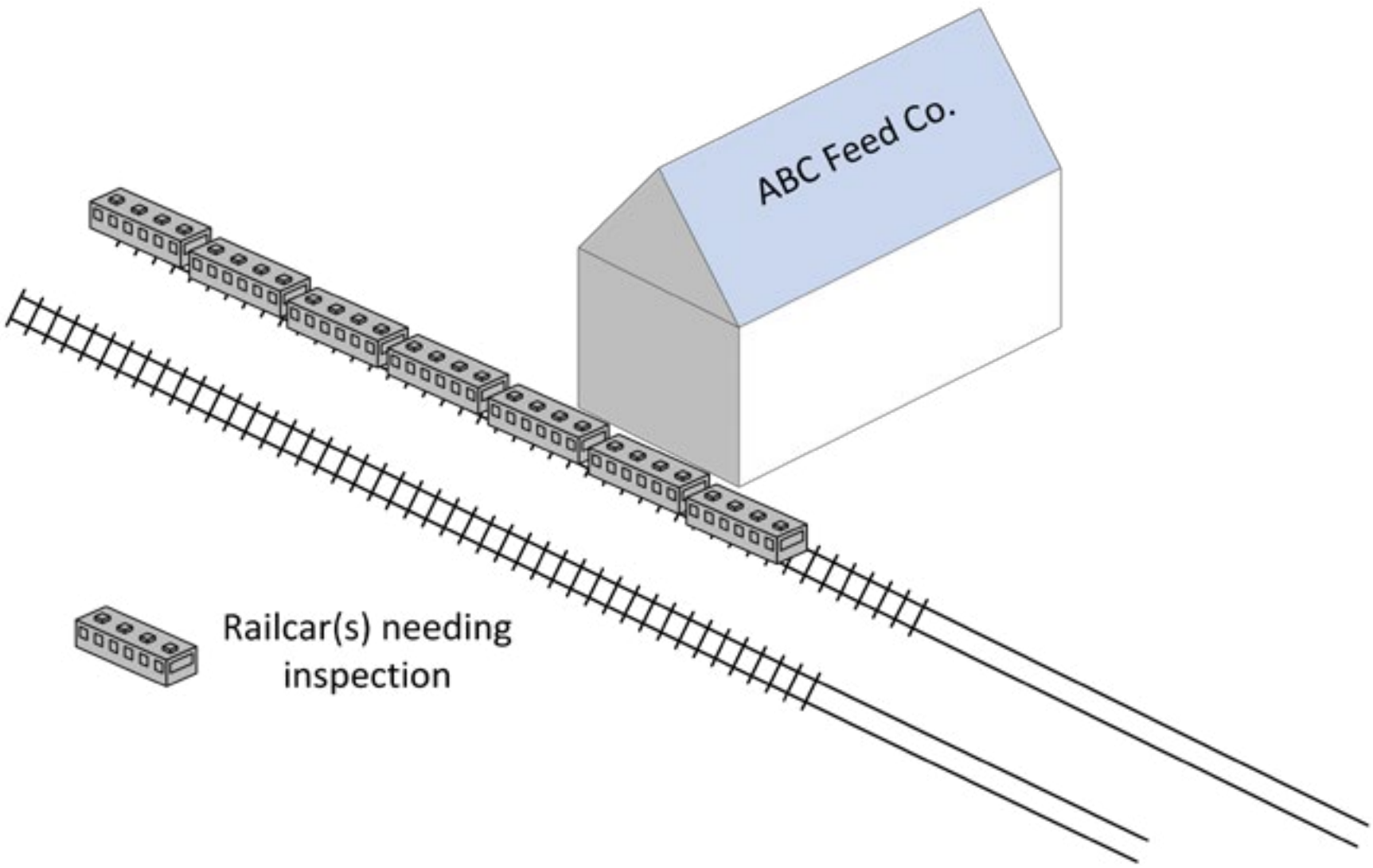
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

Yes for the first 5 cars, but no for the remaining 11 cars. Use FP for the cars positioned under fall protection, however FP is not feasible for the remaining 11 cars.

Example #4

Situation: FGIS is called out to a feed mill in a remote area. All 7 railcars pictured need probed. They are contiguous to a building. There is no fall protection equipment on-site or readily available.

Is fall protection feasible?



EXAMPLE #4 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *No.*

    a. Is the system free of hazards? (e.g., overhead clearance) *N/A*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *No.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *Yes, the cars are positioned next to a warehouse.*

    a. If yes, why isn't fall protection provided? *The warehouse was not designed to support a fall protection system, and no system is installed.*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *Next to the railcars.*

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *Gravel*

5. Is this a multiple track yard? *Yes.*

    a. If yes, how many tracks are used for sampling? *2.*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *The railcars are positioned next to a building, but it is not suitable to sustain fall protection.*

7. Can a freestanding mobile system be used? *No. The applicant does not have a mobile system.*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *Yes. FGIS has been provided a copy of the facility rescue plan.*

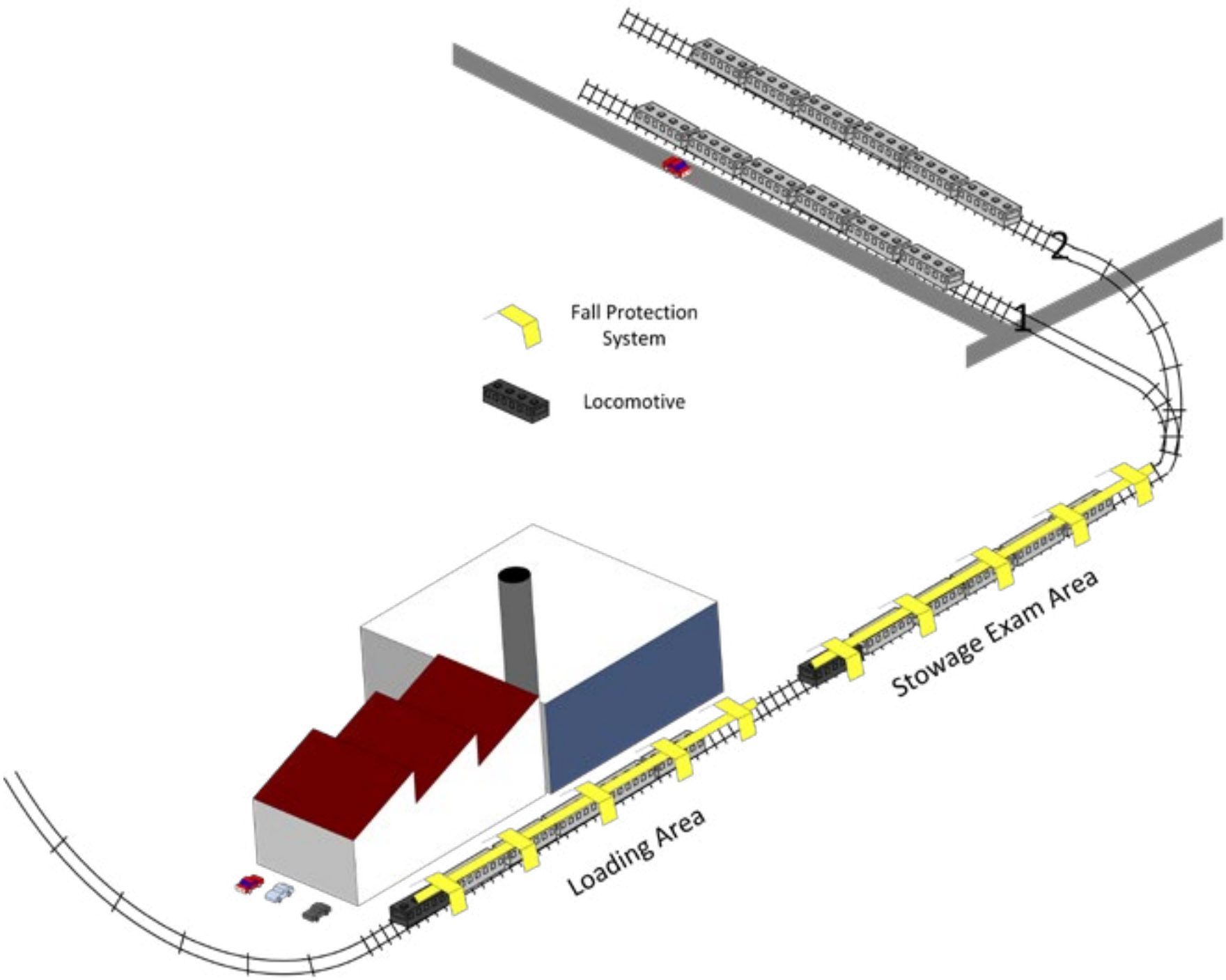
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

No. Although there is a building located adjacent to where the work is being performed, it does not have a fall protection system, nor was it designed to accommodate one. Fall protection is not feasible.

Example #5

Situation: FGIS must perform a stowage exam on each car before they are loaded. At this location, elevator personnel bring up 5 cars at a time. Elevator personnel then hook up to fall protection and open the lids to prepare the cars for loading (this is done in the "Stowage Exam Area"). Once the cars are prepared and pass stowage inspection, the cars are moved to the "Loading Area" for loading. Elevator personnel request FGIS to come out to the "Stowage Exam Area" to perform a stowage exam while the elevator crew preps the cars for loading.

If FGIS personnel perform a stowage exam in the "Stowage Exam Area," is fall protection feasible?



EXAMPLE #5 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *YES*

    a. Is the system free of hazards? (e.g., overhead clearance) *Yes.*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *No.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *No.*

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *Approx 50 feet.*

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *Asphalt*

5. Is this a multiple track yard? *Yes.*

    a. If yes, how many tracks are used for sampling? *2.*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *Yes. The railcars are positioned under fall protection.*

7. Can a freestanding mobile system be used? *No (the applicant has a permanent fall protection system in place).*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *Yes. FGIS has been provided a copy of the facility rescue plan. The facility rescue plan calls for the applicant to provide suspension straps to FGIS personnel working on fall protection in the event of an emergency.*

FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

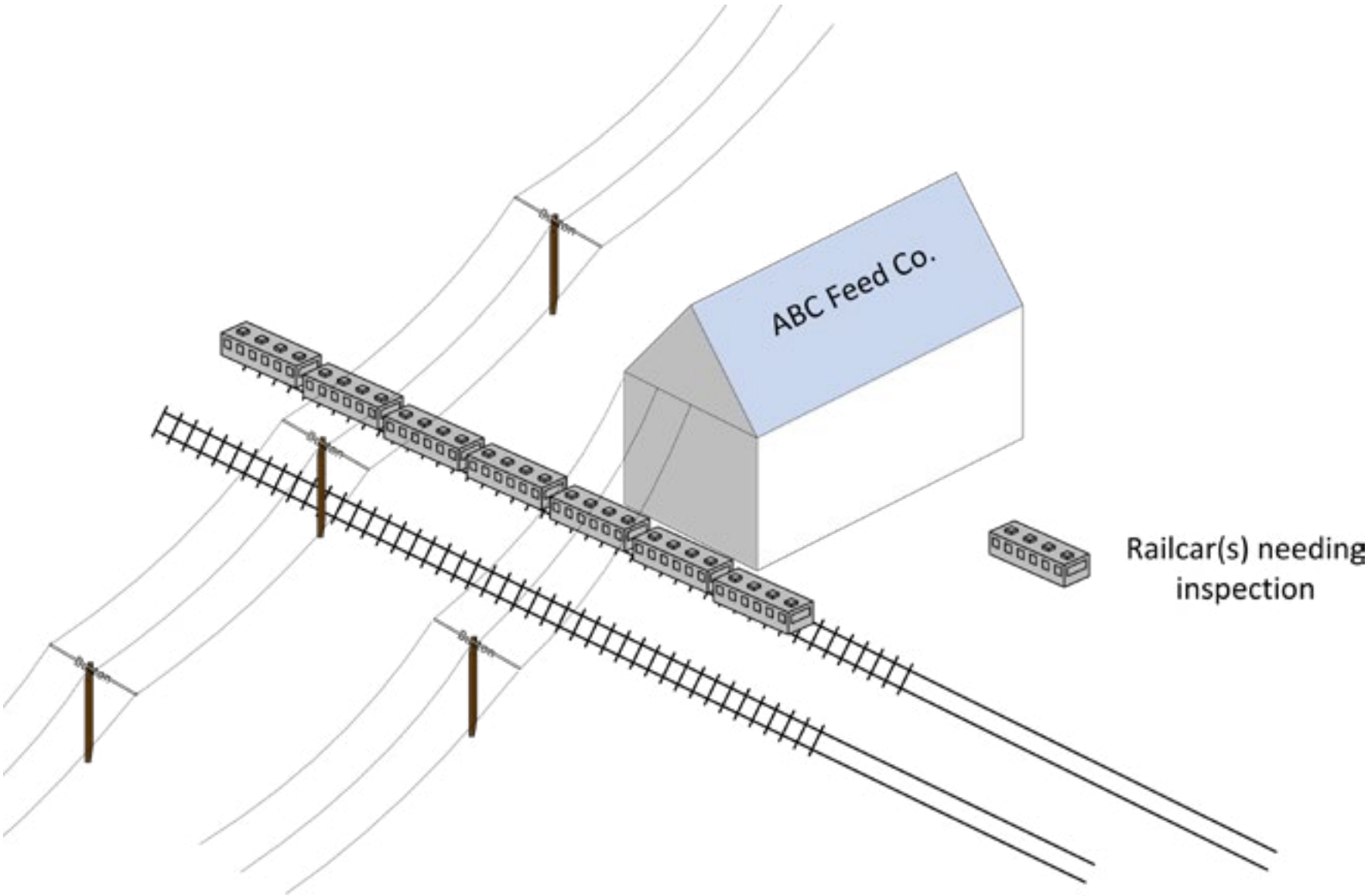
YES. In this scenario, FGIS employees must use fall protection.

The important thing to consider is where the work is being performed. Elevator personnel move the cars under fall protection into the "Stowage Exam Area" and request service at that location. Therefore, FGIS personnel must use fall protection. If the service was requested out in the railyard on "Track 1," and the cars could not be moved into the "Stowage Exam Area," fall protection would not be feasible.

Example #6

Situation: FGIS is called out to a feed mill in a remote area. All 7 railcars pictured need probed. They are contiguous to a building. There is no fall protection equipment on-site or readily available. There are also several overhead power lines above where the railcars will be sampled.

Is fall protection feasible?



EXAMPLE #6 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *No.*

    a. Is the system free of hazards? (e.g., overhead clearance) *N/A.*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *YES – overhead power lines above the railcars. Dismiss the request for service.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *N/A.*

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *N/A*.

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *N/A*

5. Is this a multiple track yard? *N/A*.

    a. If yes, how many tracks are used for sampling? *N/A*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *N/A*

7. Can a freestanding mobile system be used? *N/A*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *N/A*

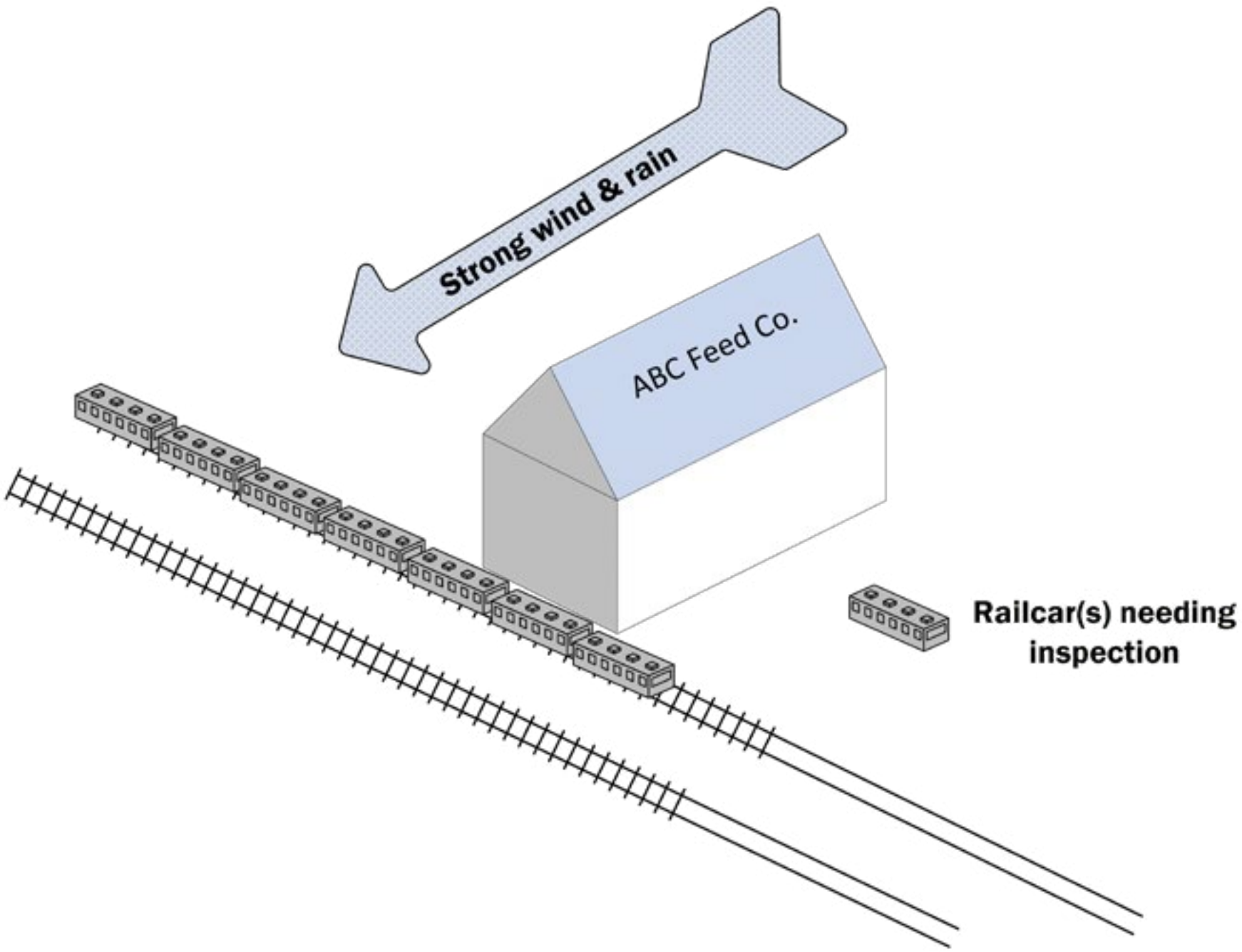
FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

Not applicable. The overhead power lines present a hazard and FGIS personnel may not provide service, regardless of fall protection.

Example #7

Situation: FGIS is called out to a feed mill in a remote area. All 7 railcars pictured need probed. They are contiguous to a building, however there is heavy rain and a 45 mph wind. There is no fall protection equipment on-site or readily available.

Is fall protection feasible?



EXAMPLE #7 - Rolling Stock Fall Protection Assessment:

1. Is a suitable fall arrest system installed in location where GIPSA employees are sampling or performing stowage exams? *No.*

    a. Is the system free of hazards? (e.g., overhead clearance) *N/A.*

    b. Are there any other hazardous conditions which make working on top of the railcars unsafe? *YES. There is strong wind and rain, which could make working on top of rolling stock hazardous. Dismiss the request for service.*

2. Is the area where sampling/stowage exam is to take place contiguous to a building or permanent structure? *N/A*

    a. If yes, why isn't fall protection provided? *N/A*

3. How far is the nearest building or permanent structure from the area GIPSA employees are to sample/perform stowage exam? *N/A*

4. What type of surface is contiguous to the area where sampling/stowage exam is to take place? *N/A*

5. Is this a multiple track yard? *N/A.*

    a. If yes, how many tracks are used for sampling? *N/A.*

6. Can railcars be positioned next to a building, structure, or other area where fall arrest system may be used? *N/A*

7. Can a freestanding mobile system be used? *N/A*

8. Does the facility have a rescue plan in place to assist someone in an emergency? This may also include providing suspension/relief foot straps for fall protection harnesses. *N/A*

FINAL ASSESSMENT – IS FALL PROTECTION FEASIBLE?

Not applicable. The severe weather presents a hazard and FGIS personnel may not provide service.