

National Association of Reinforcing Steel Contractors



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March 16, 2005

Stew Burkhammer
Office of the Directorate of Construction
U. S. Department of Labor - OSHA
200 Constitution Avenue, N.W., Room N3468
Washington, D. C. 20210

Dear Mr. Burkhammer:

The purpose of this letter is to request that OSHA issue a clarification as to the protection requirements during the installation of reinforcing steel in a slab. The requested clarification deals with the protective coverings for protrusions through the slab which was the subject of your March 10, 2005, discussion with Frank Migliaccio, Executive Director for Safety, International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers. The protrusions could be reinforcing steel, "chairs" or other accessories.

We submit that coverings of these protrusions is not feasible during the active construction of a slab, in essence, a work in progress. Slabs frequently are layered with protrusions coming from the lower slab.

1. If a top layer (mat) is called for, it will become impossible to remove protective caps or other coverings before installation of the covering layer.

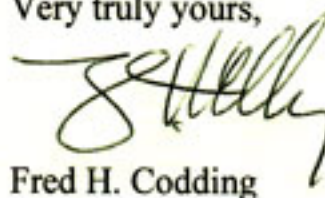
2. If protective caps or other coverings are removed before another layer is constructed, the employer is subject to citations because the employee is working on the slab. An active working area involving the installation of reinforcing steel is analogous to "leading edge" work.

3. There has never been a requirement for coverage in an active working area under these circumstances. Further, the 1988 Preamble to Subpart Q stated, in part, that "no additional requirements were need in this subpart to protect employees while they erect reinforcing steel."

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We respectfully wish to emphasize the urgency of this request for clarification. A clear and unambiguous understanding of the requirements for Iron Workers performing installation of reinforcing steel on slabs would assist our contractors. One Regional Office has raised this issue for the first time to our knowledge. This has never been an issue in an active working slab according to our contractors.

Very truly yours,



Fred H. Coddington

FHC/pal

cc: Members, National Safety Committee
for the Reinforcing Steel Industry
Frank Migliaccio