

Protecting Employees from Falls

For the wine industry there are two main sections of the Washington Administrative Code (WAC) that apply. 296-307 for Agriculture and 296-800 for General Industry. While most wineries fall under General Industry, both General Industry and Agriculture standards are used in this outline as some components of each apply to winery work. Best management practices are also provided.

Definition: Fall hazards are often an overlooked safety issue in wineries. Fall protection standards enforced by DOSH vary depending on heights and tasks being performed. Unless an area is under construction, all open-sided floors, walkways, and platforms 4' or more, and/or above or adjacent to dangerous equipment regardless of height, require a standard guardrail system, a system of fall arrest, or fall restraint.

Examples within a Winery: Fall hazards can be encountered when accessing the top of wine tanks, tanker trucks, high-stacked barrels, or working over auger pits during crush. Some wineries have grape sorting equipment with work platforms of 4' or more. Older wineries or buildings converted to a winery may have hatchways, manholes, or floor openings of 4' or deeper that also require fall protection.

Regulatory Summary (with emphasis on application for wineries covered under general industry):

1. DOSH requires employers to be in compliance with the Washington Administrative Codes (WAC) related to fall protection. Specifically, employers are required to conduct a personal protective equipment (PPE) hazard assessment in accordance with WAC 296-800-160, as well as meeting other specific requirements in WAC 296-800 and WAC 296-24 (see below for links).
2. Wineries who use powered platforms are required to use personal fall arrest systems per WAC 296-24-88050. Part I of Appendix C sets out the mandatory criteria for personal fall arrest systems for all employees using powered platforms (see below for link).
3. Wineries who use walkways or platforms of 4' or more in height (for example, to access wine tank tops or storage areas) must provide a standard railing (or equivalent) on all open sides, except where there is an entrance to a ramp, stairway, or fixed ladder (according to WAC 296-307-25015). The railing must have a toe board wherever, beneath the open sides:
 - A person can pass; or
 - There is moving machinery (such as an auger); or
 - Materials falling onto equipment would create a hazard
4. Wineries who use walkways or platforms above dangerous machinery (i.e., grape receiving augers), regardless of height, these must be guarded with a standard railing and toe-board (see link to WAC 296-307-25015 below).
5. Tools or loose machinery/tank parts must not be left on overhead platforms or scaffolds.

Best Management Practices

1. If guard railings must be temporarily removed to perform a specific task, the area should be constantly attended by a monitor until the guardrail is replaced. The only duty the monitor shall perform is to warn persons entering the area of the fall hazard).
2. Personal fall arrest systems (PFAS) may also be used as a means of fall protection (i.e., when accessing tops of tanks, presses or tanker cars). A PFAS is a type of fall protection that includes an approved body harness, lanyard, deceleration device, drop-line, horizontal and/or vertical lifelines, and anchorages. These components are often interconnected and rigged so they arrest a worker in the event of a free fall. The fall arrest system must be designed so that the worker cannot free fall more than 6-feet and cannot hit the floor below if they fall. Most importantly, a fall arrest system only works when the worker puts it on and uses it properly.
3. Other forms of fall protection systems include:
 - A safety net system
 - A catch platform
 - A warning line
4. Wineries should have a written fall protection safety plan and provide documented training. As long as the written fall protection safety plan meets all of the requirements under the code, it can be a section or chapter within your written Accident Prevention Program (APP).

Separate downloadable documents are provided at the following links and under the Winery Safety tab at www.winerywise.com:

- PPE Hazard Assessment: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-800-160>
- Safety and Health Core Rules: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-800>
- General Safety and Health Standards: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-24>
- Link to WAC 296-307-25015: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-307-25015>
- Link to WAC 296-24-88050: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-24-88050>
- Winery specific fall protection: [Winerywise web site/winery safety/Fall Protection](http://www.winerywise.com/winery-safety/Fall-Protection)