# Salt Lake Community College Roof Access Policy

#### December 2013

### **Purpose**

The purpose of this policy is to provide information regarding access to campus building roofs. This policy is intended to supplement OSHA's Fall Protection Program as promulgated under 29 CFR 1926.500 that SLCC has adopted by reference. This program is also in place to satisfy R23-14-4 of the Utah Administrative Code wherein the Utah Division of Facilities Construction and Management requires responsible agencies in State buildings to implement procedures to provide for the control of and restricted access to buildings managed by that responsible party.

## Scope

This policy applies to all employees who may reasonably expect to require limited access to the rooftops of selected campus buildings in the course of their work, but are NOT engaged in activities that require application of the OSHA's Fall Protection Program. For roof access requiring fall protection please contact the Office of Environmental Health and Safety for equipment and training to be in compliance.

Only authorized employees are permitted to have limited access to the rooftops of SLCC buildings. Access by others is not permitted. Salt Lake Community College specifically prohibits students from being on the roof of any SLCC building unless escorted by authorized employees.

## **Program Components**

**Authorization:** The Assistant Director of Facilities, or his authorized representative, must authorize employees to gain limited access to selected rooftops for legitimate purposes. Access falls into three categories:

1- Employees with the need for regular roof access that are trained according to the standards of the Fall Protection Program may be issued an appropriate hatch key for a roof hatch that is not accessed from a locked custodial closet or mechanical equipment room. For the roof hatches that are accessed from those locked rooms, the same standards of notification and fall protection training apply. All ladders in locked locations will have a clip on the roof hatch so that it cannot be opened from the outside. The list of all employees with a hatch key will be maintained by the Key Office and reviewed at least annually. Training for fall protection and roof access will be provided on a regular basis by the Office of Environmental Health and Safety.

2- Campus Safety and Security personnel will also be issued roof hatch keys, but their use will be limited to emergencies and notification shall be made to the Assistant Director of Facilities or his authorized representative if access to the roof is necessary or has occurred. Issuance, replacement or retrieval of Hatch Keys will be established by the Assistant Director of Facilities and facilitated by the Key Office.

**Emergency Exemption.** While security personnel must comply with this policy in the course of normal operations, they are exempt during emergencies and may provide access to authorized technical personnel and first responders as needed.

3- All other authorized employees requesting periodic roof access must submit a Sprocket Work Order for the event and may be accompanied by the appropriate Facilities Department personnel if necessary to provide access and direct supervision of their activities.

The issuance of a hatch key for roof access must be specifically approved by the Assistant Director of Facilities and logged using the existing Key Office system. No key may be loaned to or used by anyone other than the person to whom it was issued.

Contractors requiring roof access will be required to check out the appropriate key or a hatch key from the Key Office on an as needed basis, once their work has been cleared by the appropriate Facilities Project Manager. These keys will be returned and accounted for at the end of each project.

**Hazard Determination:** The Office of Environmental Health and Safety will be responsible for reviewing requests for limited roof access. Criteria for review will include:

The purpose for the access is limited to; legitimate maintenance or security/emergency purposes, and activities necessary to the College's operations;

The activity being conducted will not cause damage to College property, or present unreasonable hazards to those involved;

The area being accessed and the activity being conducted does not require application of the Fall Protection Program or other College safety policies.

**Fall Protection Program Exemption.** The requirements of the Fall Protection Program need not be applied for limited rooftop access so long as the following criteria are met:

The area is accessed through a viable doorway or hatchway that does not require special measures (i.e., a safety harness);

The area being accessed is flat, safe to walk on in all weather conditions, and purposefully designed for occasional use by workers for maintenance activities.

The area being accessed does NOT come within 6 horizontal feet of the roof's outer edge or other location presenting a potential fall distance of greater than 6 vertical feet (i.e., from a higher portion of a flat roof to an adjacent lower portion), or is currently protected by a parapet or other solid barrier at least 42 inches in height.

Authorized employees should operate using the "buddy system" whenever possible when accessing rooftops.

All other circumstances involving roof access require application of the Fall Protection Program.