Understanding OSHA: Proper Use of Covers

The Occupational Safety and Health Administration (OSHA) allows use of covers to protect employees on walking/working surfaces from falling through holes, including skylights, more than 6 feet above lower levels. OSHA defines a hole as “a gap or void 2 or more inches in its least dimension in a floor, roof or other walking/working surface.”

Covers are required to protect employees from tripping in, stepping into or through holes, including skylights. Covers also protect employees from objects falling through holes and skylights.

When covers will be used to address hazards associated with holes and skylights, OSHA imposes certain requirements on construction employers, pursuant to 29 C.F.R. § 1926.502(i) and its subparts. To satisfy OSHA requirements, 29 C.F.R. §1926.502(i) requires covers to:

- be capable of supporting, without failure, at least twice the weight of employees, equipment and materials that may be imposed on the cover at any one time;
- be secured when installed to prevent accidental displacement by wind, equipment or employees;
- be color-coded or marked with “HOLE” or “COVER” to provide warning of the hazard.

When using covers, foremen and superintendents need to ensure:

- They are aware of the presence of all holes and skylights on the roof. Before beginning any roofing work, inspect the roof for any holes or skylights.
- If there are no guardrails erected around such holes or skylights, covers meeting OSHA’s requirements as set forth above are installed. A hole or skylight that only may be open for a brief period of time is not an excuse for not using a cover. Brevity of exposure to a fall hazard is not a defense to an OSHA citation under the standard addressing holes and skylights.

If a skylight meets OSHA’s requirements, as a matter of enforcement policy, OSHA will treat the skylight as a cover.

www.nrlrc.net