

Compliance checklist: a dropped-object action plan

1. Conduct a dropped-object risk assessment

- Walk every elevated walking-working surface and identify where employees are exposed to falling objects below.
- For each location, document: height, frequency of overhead activity, materials/tools present, environmental factors (corrosion, vibration, weather).
- Distinguish “static” risks (corroded or loose fixtures) from “dynamic” risks (active dropped tools and materials).
- Identify all fixed equipment at height that requires secondary retention.

2. Audit guardrail and toeboard compliance

- Toeboards present on every exposed edge of an overhead walking-working surface: minimum 3.5 inches, ≤0.25-inch clearance, ≤1-inch openings.
- Where materials at height exceed toeboard height, paneling or screening installed from toeboard to top rail (or equivalent) per 1910.29(k)(2)(i).
- Where gaps exist, plan retrofit. Guardrail infill systems such as the Dropsafe Barrier are appropriate where replacing the full guardrail is not practical.

3. Audit fixed-equipment safety securing

- Inventory all overhead fixtures: lighting, CCTV, antennae, speakers, signage, instrumentation.
- Assess primary fixings for corrosion, fatigue, and vibration risk.
- Where single-point-of-failure risk exists, specify safety securing. Dropsafe Nets are the established approach for offshore and harsh-environment fixtures.
- Set inspection intervals for both primary fixings and secondary retention.

4. Audit tool and handheld-equipment controls

- Specify ANSI/ISEA 121-2023-compliant tethering for all work at height where handheld tools are used.
- Establish tool inventory and tool-out/tool-in procedures.
- Equip workers with appropriate pouches for tools, detectors, radios, and other handheld items.
- Train workers on inspection and use.

5. Establish administrative controls

- Drop zone and exclusion zone procedures with physical demarcation.
- Pre-task dropped-object hazard assessments integrated into the permit-to-work system.
- Documented inspection regime for fixtures at height, with intervals appropriate to the environment.
- Reporting and investigation process for both incidents and near-misses, including underreported dropped-tool events.

6. PPE

- Head protection meeting ANSI Z89.1 issued and enforced for all personnel below work at height.
- Appropriate helmet class (Class E for electrical exposure, etc.) specified per task.

7. Documentation

- Written dropped-object prevention program.
- Risk assessments, inspection records, training records.
- Procurement specifications referencing OSHA standards and ANSI/ISEA 121 where applicable.
- Incident and near-miss records.