



JAN 11 2001

Reply to the Attention of:

Mr. Ted Palmer
Protective Roofing Products Ltd.
10 Pinelands Ave., Unit #5
Stoney Creek, Ontario
L8E 3A5

RE: PR 600 Mobile Fall Protection System

Dear Mr. Palmer:

This is in response to your letter of August 9, 2000 and follow-up communications in which you ask OSHA to review the PR 600 Mobile Fall Protection System. OSHA is generally precluded from approving or endorsing specific products. The variable working conditions at job sites and possible alteration or misapplication of an otherwise safe piece of equipment could easily create a hazardous condition beyond the control of the equipment manufacturer. However, where appropriate, we try to give some guidance to help employers assess whether products are appropriate to use in light of OSHA requirements.

The information in the materials you submitted, including tests by a testing service, indicates that, if an employer follows the manufacturer's instructions for the use of the PR 600 Mobile Fall Protection System (including the additional instruction outlined below from your brochure), the employer should be in compliance with the requirements in 29 CFR 1926.502 for fall protection system anchors.¹ That additional instruction is:

If there is no existing roofing membrane, then an accessory plate will be bolted to the pivot arm plates and then mechanically fastened to the roof deck with 1/4" x 2" wedge anchor or equal, imbedded a minimum of 1 1/2 inches into concrete.

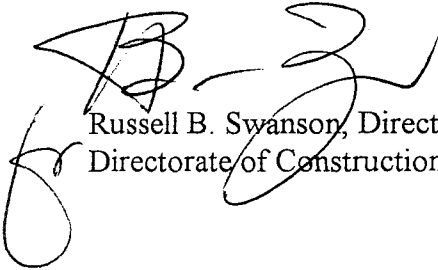
NOTE: The PR 600 mobile Anchoring System is not to be used for leading edge work if the parapet exceeds 30" in height.

As described in an e-mail from our office, we recommend that you include this in your installation instructions.

¹ This assumes the accuracy of the test results, which we did not attempt to verify.

If you require any further assistance, please do not hesitate to contact us again by writing to:
Directorate of Construction - OSHA, Office of Construction Standard and Compliance
Assistance, Room N3468, 200 Constitution Avenue N.W., Washington, D.C. 20210.

Sincerely,



Russell B. Swanson, Director
Directorate of Construction

NOTE: OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>.