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ADDRESSING  
THE ELEPHANT  
IN THE ROOM ON  
YOUR JOBSITE:

# SCAFFOLDING & COMPETENT PERSON TRAINING

by Shawn MacDonald,  
Safety Director, Superior Scaffold Services, Inc.

There is an OSHA regulation that is one of the most “overlooked” OSHA requirements by customers who rent scaffold; and it says, in essence, a scaffold must be inspected prior to each work shift by a competent person [1926.451(f)(3)].

You hire a scaffold company to come out and install a scaffold so your employees can safely perform a task. The reason you hired professionals to do the job is because your people are professionals at what your company does ... not at building scaffold. It's the same reason you hire a carpet installer or a plumber. Here's the problem. When the carpet is installed, and the pipes are all buttoned up, you don't have to worry about their condition changing and injuring a worker.

When your scaffold company completes your installation, and the scaffold “complies with OSHA requirements” and gets that coveted green tag, it's only valid until the next work shift. You read it correctly. It **must** be inspected by **your company's** Scaffold Competent Person before the next work shift.

Wait ... but ... who inspected the scaffold on your job today?

As an employer, you can designate anyone as your competent person (CP), and most employers have what they consider to be knowledgeable “scaffold guys” (or girls) they've chosen as their CP. Well, you did if you knew you needed one. TIP: When we built your scaffold, and discussed it with your authorized representative, they were informed (verified by initials) that the scaffolds needed to be inspected prior to each shift by a competent person.

Anyway, back to your “scaffold guy.” I'd like you to keep that person in mind when you read the next paragraphs. We'll call him/her Pat.

OSHA defines a CP as “one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.” Let's break that down.





### Capable of identifying existing hazards

Pat had OSHA 30 training, he knows what hazards to look for on a construction site. So that covers unsanitary, hazardous and dangerous. Was Scaffold Hazard Awareness part of OSHA 30? Yes, it was! So far, so good.

### Capable of identifying predictable hazards

This is where Pat's experience comes into play. Example: It's been dry for many days, and all is well with the scaffold. Yesterday the gutter crews installed a downspout that will empty right where one of the legs of the scaffold hits the ground. It's Pat's responsibility to recognize that there is a potential for an accident if it were to rain. The foundation of the scaffold could erode, leaving the scaffold unstable. It's also Pat's responsibility to take the necessary steps to correct the problem, and Pat has the authority to take steps to correct, because you designated Pat as the CP.

So it looks like we're good, as far as OSHA is concerned, if we designate Pat as our CP to do our daily scaffold inspections. By the way, OSHA requires Pat to be on site whenever the scaffold is being used to take corrective action any time the scaffold is being used incorrectly or falls into non-compliance, and after any significant event that may have altered the structural integrity of the scaffold. So if you haven't figured it out yet, Pat can only oversee the scaffold(s) on one site at a time. Your CP cannot travel from site-to-site if you have more than one scaffold in use at any given time. If Pat's your only "scaffold guy" you have a problem.

### The whole point of this ... is safety.

This is where I peel back the safety blanket to reveal a truth that could get me shunned from the "safety community." Safety and Profit are inseparable. By "Profit," I mean survival of the company. I'm not talking about greed, just keeping the doors open at the company. It's simple, if companies don't keep their workers safe, it becomes too expensive to stay in business. Insurance costs will put a company out of business very quickly. And in this day and age of "throw it against the wall and see what sticks" lawsuits, it behooves all of us to be safe. If we reverse engineer my above statement we get, "being safe, promoting safety, will make a company more profitable." Maybe my colleagues in the safety field will let me back in the fold now.

Let's get back to Pat. In regards to OSHA requirements, we're OK, but OSHA and more importantly, our insurance companies, don't like to take our word on matters like "competency." They kind of like to see proof. So much so that a trend in safety is to now pre-test trainees to see what they knew (or didn't know) before the class, so we can determine the effectiveness of the training.

In the insurance world's dictionary, "designating" means more than just "declaring." We must prove that Pat knows scaffold, because if something happens and your CP ends up on a witness stand, he or she better be competent. Training with a comprehensive test, is the only way to verify Pat's competency. It's the reason Pat took the OSHA 30, so in the event of an accident you can prove Pat's competency on safety in construction.

OSHA requires Scaffold to be "erected, dismantled or altered only under the supervision of a competent person." As a scaffold company our Scaffold Builders had to be CP. Where do these CPs come from?

Paraphrasing OSHA: A "Qualified Person" is the one who trains CPs. So our builders have been taking the Scaffold and Access Industry Association (SAIA)'s CP course since the 1980s. The SAIA is the "governing body" for the scaffold industry and is on the forefront of everything scaffold and safety related. As far as I am concerned, it is the most comprehensive training available.

Superior delivers scaffolding to dozens of jobsites every day. On every delivery, the customer's rep signs a contract that includes a warning that the scaffold must be inspected prior ... you know the rest. When we leave, who knows what happens. This didn't sit right with us. That and the fact that more customers were "becoming aware" and asking, "Where do we get Competent Person Training?"

This led us back to the SAIA. About four years ago, I successfully completed the SAIA's train the trainer program, to become qualified to administer Competent Person Training in Frame Scaffold, System Scaffold, and Suspended Scaffold.

That first year, the only people we trained were our employees. The following year, maybe one class every other month, mostly suspended scaffold, because it is OSHA's main focus when it comes to scaffold hazards. In the last 18 months, we are conducting three to five classes a month in all subjects.

Just last month I had an amazing opportunity presented to me. I got a call from SAIA that four OSHA Compliance officers wanted Competent Person Training in Frame & System Scaffold. The SAIA will provide training to any OSHA personnel at no charge. When I accepted the job, I contacted my local OSHA officer and asked if he and any of his coworkers wanted to attend. I ended up with eight compliance officers in a two-day class. I learned as much about how they work as they did about scaffold, which was the most valuable training I could ever receive.

### A superior solution

When I learned that SAIA would train OSHA as a professional courtesy, I had an idea ... Superior should offer training to safety directors in the area at no charge as well. I talked to our CEO, Guy Bianchini, and he agreed. If you are a Safety Director for your company, contact us about complimentary Competent Person Training.

I've been in the scaffold biz for going on 38 years. It's awesome to see this many people coming to get Competent Person Training. Why? Because I, like many of my colleagues, "take this stuff home at night." I used to worry about every install I did for the duration of the rental. As a technician I repaired hundreds of suspended scaffold hoists every year. These hoist are what hold my customer's lives by a thread. It's a lot of responsibility. I've seen Incompetent Persons first hand. Knowing that the safety directors of the world are checking credentials helps me sleep at night. Providing the knowledge behind the competency of all the Pats out there, is the icing on the cake.

In closing, when someone mentions the elephant in the room at your safety meeting, it won't be scaffolding. ■