

EHS CONCEPTS

CONSTRUCTION TOP 10

The ten OSHA standards cited most in construction (NAICS 23) in fiscal year 2025, and the contractor's fix list for each. A free field guide.

Ryan L. Rinehart

Retired Navy Veteran · Navy Safety Technician (NEC 9571) · Navy Rescue Swimmer
19+ years in EHS · Author of Safe on Purpose and No License to Lead

Keep your people whole.

FROM RYAN

Same ten, different site

The examples in this letter (the ladder, the roof, the scaffold) are composites to show the pattern, not reports of real events.

OSHA's all-industry Top 10 gets the headlines every fall. But if you run crews, the list that matters is the one for your industry. OSHA publishes it. Most contractors never look.

In fiscal year 2025, federal OSHA's construction (NAICS 23) list (via HazComFast) was led by fall protection, ladders, fall protection training, and scaffolds. Four of the top ten are about people falling. Two more are about the gear on their heads and over their eyes. One is about paperwork after the citation: proving you fixed what OSHA found.

None of these is new. Everybody in this trade has heard that people fall off roofs. That is why I don't treat this list as a training problem. It is a bid, schedule, and equipment problem. If the guardrail stock is not on the truck, the crew will work without it the first time the day runs short.

For each of the ten you get the pain point, what the data says, why it really happens, the rule in plain words, controls in hierarchy order, a printable 30-minute self-audit, who owns what, how to verify it in the field, and one toolbox talk question.

Pick the one your next inspection would find first. Walk it this week.

Ryan L. Rinehart

Founder, EHS Concepts — The Ways of Safety

Keep your people whole.



EHS CONCEPTS
— THE WAYS OF SAFETY —

THE NUMBERS

What federal OSHA cited most in construction, FY 2025 (via HazComFast)

26,559

Federal OSHA citations in construction (NAICS 23), FY 2025 (Oct. 1, 2024 – Sept. 30, 2025), via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data

10,793

Construction inspections behind those citations

6,772

No. 1: fall protection, general requirements (29 CFR 1926.501)

5 of 10

Top-10 standards about falls: 1926.501, .1053, .503, .451, and .502*

14,518

Citations for those five fall standards, 74% of the 19,665 top-10 citations*

805

Citations for not certifying abatement (29 CFR 1903.19): the paperwork after the citation

FY 2025 counts via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Source: OSHA Frequently Cited Standards tool, NAICS 23, all establishment sizes, federal OSHA only, fiscal year 2025, as extracted Aug. 8, 2026 and published by HazComFast (FY2025 HazCom enforcement report). State-plan citations are not included. Counts are citations, not inspections or companies. * Rows marked with an asterisk are EHS Concepts counts or sums from the published figures.

The ten most cited standards in construction, FY 2025

	STANDARD	FY 2025 CITATIONS (NAICS 23, VIA HAZCOMFAST)	ALL-INDUSTRY FY 2025 RANK
1	Fall protection, general requirements · 1926.501	6,772	No. 1
2	Ladders · 1926.1053	2,758	No. 3
3	Fall protection, training requirements · 1926.503	2,171	No. 7
4	Scaffolds, general requirements · 1926.451	2,152	No. 6
5	Eye and face protection · 1926.102	1,926	No. 9
6	General safety and health provisions · 1926.20	866	Not in top 10
7	Head protection · 1926.100	852	Not in top 10
8	Abatement verification · 1903.19	805	Not in top 10
9	Hazard communication · 1910.1200	698	No. 2
10	Fall protection systems criteria and practices · 1926.502	665	Not in top 10

WHAT FEDERAL OSHA CITED MOST IN CONSTRUCTION, FY 2025 (VIA HAZCOMFAST)

All-industry ranks are from OSHA's FY 2025 Top 10 (final, Oct. 1, 2024 – Sept. 30, 2025). Counts are federal OSHA only, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data.

BEFORE THE TEN STANDARDS

The five basics that sit under all ten

<u>29 CFR 1926.20(b)</u> Safety program and inspections · CON	Run a program that prevents injuries, with frequent and regular inspections of jobsites, materials, and equipment by competent persons.
<u>29 CFR 1926.21</u> Training · CON	Instruct each employee to recognize and avoid unsafe conditions and the rules that apply to the work.
<u>29 CFR 1926.32(f)</u> Competent person · CON	Someone who can identify existing and predictable hazards and has authority to take prompt corrective measures to eliminate them. Both parts matter.
<u>29 CFR 1904.39</u> Severe injury reporting · ALL	Report a work-related fatality to OSHA within 8 hours, and an inpatient hospitalization, amputation, or loss of an eye within 24 hours.
<u>OSH Act Section 11(c)</u> Worker rights · ALL	Workers may report hazards and raise safety concerns without retaliation.

Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Ten-minute foundation check

#	CHECK	YES	NO
1	We know our own top three citation risks by trade and job type.	☐	☐
2	Fall protection equipment and setup time are in every bid and schedule.	☐	☐
3	A competent person is named for every active job today, with authority to stop work.	☐	☐
4	Every worker knows they can stop a task without retaliation, and we can name a recent stop that was backed up.	☐	☐
5	Subcontractors are held to the same fall, ladder, and scaffold rules as our own crews.	☐	☐
6	Everyone in charge knows the 8-hour and 24-hour OSHA reporting rules.	☐	☐
7	If we were cited, we know the abatement date and who certifies it.	☐	☐
8	A leader walks at least one active job a week and looks at edges, ladders, and scaffolds.	☐	☐

HOW TO USE THIS GUIDE

Walk it. Score it. Own it.

1. Start with the standard your crews are most exposed to this month, not the one at the top of the list.
2. Print the self-audit page. Walk one job, one crew, or one elevation. Thirty minutes.
3. Score what you can see or put your hand on. If the site plan and the roof disagree, the roof is the truth.
4. Every "No" gets one owner and one date before you leave. Anything that could hurt someone this shift gets stopped now.
5. Walk it again in 30 days. A fix that is not verified is a wish.

USE THIS EVERY TIME

When you find a gap: the eight-step response

1. Stop or contain.	If the gap is a live exposure (an unprotected edge, a bad ladder, a scaffold without planking or rails), stop that task now. Anyone can call it. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.
2. Fix the condition first.	Rail the edge, tag out the ladder, plank the scaffold. Then fix the paperwork so it says what is true.
3. Find the decision that allowed it.	Ask what made it normal: no setup time in the bid, equipment back at the shop, a foreman with no authority, a sub nobody watched.
4. One owner. One date.	One name, not a company. One date, not "ASAP."
5. Verify in the field.	The owner shows the fix at the job. Re-check in 30 days.
6. Look sideways.	If one crew had no rails, check every crew working at height this week.
7. Protect the person who raised it.	Thank them and tell them what changed. Retaliation for raising a safety concern is illegal under Section 11(c) of the OSH Act.
8. Get help when you need it.	OSHA's On-Site Consultation Program is free and confidential for small and medium businesses and is separate from enforcement (osha.gov/consultation).

Leaders own the conditions. Workers make choices inside the conditions we build. When a gap shows up, the first question is not "who did it?" It is "what did we build, fund, schedule, or tolerate that made this normal?"

This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace OSHA standards. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Citation counts are national federal OSHA figures and will not match any one contractor's experience.

01

Fall protection, general requirements

29 CFR 1926.501 [CON]

6,772

citations in construction, FY 2025 (via HazComFast), the most of any standard

6 ft

the construction trigger height for fall protection

No. 1

on OSHA's all-industry list too

THE PAIN POINT **A framing crew is setting trusses on a two-story house. The harnesses are in the trailer. The anchors never got installed because the roof was supposed to take an hour.** (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Fall protection, general requirements was the most cited standard in construction in FY 2025 with 6,772 citations. It was also No. 1 on OSHA's all-industry Top 10 for FY 2025. Residential construction, unprotected sides and edges, and roofs are the usual paragraphs.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Fall protection is not in the bid, so setup time is stolen from production.
- Anchors, guardrail stock, and harnesses are not on the truck.
- "It's only five minutes" tasks are treated as exempt. The rule has no five-minute exception.
- No competent person is named for that roof, or the person named cannot stop the work.
- Subcontractor crews are assumed to be someone else's problem.

REQUIREMENTS AND CONTROLS · FALL PROTECTION, GENERAL REQUIREMENTS

What the rules require, in plain words

1926.501(b)(1) · CON	Protect workers on any walking or working surface with an unprotected side or edge 6 feet or more above a lower level, using guardrails, safety nets, or personal fall arrest.
1926.501(b)(4) · CON	Protect workers from falling through holes, including skylights, 6 feet or more above a lower level.
1926.501(b)(10)–(11) · CON	Low-slope and steep roofs need the systems the rule allows for each.
1926.501(b)(13) · CON	Residential construction at 6 feet or more needs guardrails, nets, or personal fall arrest, unless the employer shows they are infeasible or create a greater hazard and uses a written plan under 1926.502(k).

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate	Build at ground level and lift into place. Design permanent guardrails or parapets into the drawings.
Engineer: passive	Guardrails, hole covers, nets, aerial lifts, or scaffolds instead of working at the edge.
Engineer: active	Restraint first, then fall arrest with rated anchors, enough clearance, and a rescue plan.
Administrative	Pre-task plan for every elevated task. Setup time in the bid and the schedule. Competent person named and empowered.
PPE	Harness, lanyard or SRL, inspected and fitted. The last layer, not the plan.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

01 · Fall protection, general requirements

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every surface 6 ft or higher has guardrails, nets, covers, or personal fall arrest in use right now.	☐	☐	☐	
2	Holes and skylights are covered, secured, and marked.	☐	☐	☐	
3	Anchors are rated or designed by a qualified person.	☐	☐	☐	
4	Harnesses are inspected, fitted, and connected, not just worn.	☐	☐	☐	
5	A rescue plan exists for a suspended worker and the crew can describe it.	☐	☐	☐	
6	Fall protection equipment was on site before the work started.	☐	☐	☐	
7	A competent person is named for this job today.	☐	☐	☐	
8	Any written fall protection plan is site specific and followed.	☐	☐	☐	
9	Subcontractor crews are protected to the same standard.	☐	☐	☐	
10	The schedule includes time to set and remove fall protection.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · FALL PROTECTION, GENERAL REQUIREMENTS

Who owns it

Owner / executive	Bids and schedules that fund fall protection.
Project manager / superintendent	Equipment on site before work starts; sub oversight.
Foreman / competent person	Daily setup and inspection; stops work when protection is missing.
Safety lead	Audits, rescue planning, coaching.
Every worker	Inspects their own gear and has the right to stop.

How to verify it is working in the field

- Stand at the edge. Count workers exposed and workers protected.
- Ask the foreman to show the anchor and who rated it.
- Ask a worker what happens if someone is left hanging in a harness.

TOOLBOX TALK STARTER

Where on this job is someone working 6 feet up with nothing but balance between them and the ground?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Stop work at any unprotected edge. Name the owner and date for the system and the root fix for why it was missing. Then run the eight-step gap response at the front of this guide.

02 Ladders

29 CFR 1926.1053 [CON]

2,758

citations in construction, FY 2025 (via HazComFast)

3 ft

side rails must extend above the landing (or use a grab device)

No. 3

on OSHA's all-industry list

THE PAIN POINT An electrician grabs the stepladder from the gang box. The spreader is bent and the top cap is cracked. He stands on the top step because the ceiling is a foot higher than the ladder. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Ladders were the second most cited construction standard in FY 2025 with 2,758 citations, and No. 3 on OSHA's all-industry Top 10.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- The right ladder (height, type, rating) is not on the job, so the wrong one gets used.
- Damaged ladders stay in service because nobody owns pulling them.
- Stepladders are used folded and leaning, or from the top step.
- Extension ladders are set short of the landing.
- Ladder work is treated as too quick to plan.

REQUIREMENTS AND CONTROLS · LADDERS

What the rules require, in plain words

1926.1053(b)(1) · CON	When a portable ladder is used to reach an upper landing, the side rails extend at least 3 feet above it, or the ladder is secured at the top and a grab device is provided.
1926.1053(b)(4) · CON	Use ladders only for the purpose they were designed for.
1926.1053(b)(13) · CON	Do not use the top or top step of a stepladder as a step.
1926.1053(b)(16) · CON	Mark or tag ladders with structural defects “Do Not Use” and remove them from service until repaired.
1926.1060 · CON	Train each employee who uses ladders to recognize ladder hazards, by a competent person.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate	Work from the floor with extension tools, or plan the work so it happens at ground level.
Engineer	Use mobile platforms, podium ladders, or aerial lifts for repeat or long tasks.
Equipment	Right height and duty rating on every job; tie-offs and levelers for extension ladders.
Administrative	Ladder inspection before use; a red-tag rule with a named owner; ladder choice in the pre-task plan.
Small-shop fix	Count every ladder this week. Cut up the bad ones on the spot.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

02 · Ladders

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Extension ladders extend 3 ft above the landing or are secured with a grab device.	☐	☐	☐	
2	Ladders are set at about a 4-to-1 angle.	☐	☐	☐	
3	No one is standing on the top step or top cap of a stepladder.	☐	☐	☐	
4	Stepladders are fully open with spreaders locked.	☐	☐	☐	
5	No damaged ladders are in use or in the gang box.	☐	☐	☐	
6	Defective ladders are tagged and removed.	☐	☐	☐	
7	Ladders are rated for the user plus tools and material.	☐	☐	☐	
8	Metal ladders are not used near energized lines.	☐	☐	☐	
9	Workers have been trained on ladder hazards.	☐	☐	☐	
10	The ladder is the right tool for this task, not a substitute for a lift.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · LADDERS

Who owns it

Superintendent	Funds and supplies the right ladders and lifts.
Foreman	Pre-use checks and pulls bad ladders.
Competent person	Ladder training.
Every worker	Inspects before climbing and reports damage.

How to verify it is working in the field

- Open the gang box. Count ladders and count defects.
- Watch three climbs. Check three points of contact and setup.
- Ask who throws away a broken ladder on this job.

TOOLBOX TALK STARTER

Which ladder on this job would you not let your kid climb?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Tag and remove any defective ladder now. Name the owner and date for the replacement and for fixing why it was still in use. Then run the eight-step gap response at the front of this guide.

03 Fall protection training

29 CFR 1926.503 [CON]

2,171

citations in construction, FY 2025 (via HazComFast)

Written

certification of training is required

No. 7

on OSHA's all-industry list

THE PAIN POINT The new laborer signed the sign-in sheet for fall protection training at the last company. Nobody here has checked whether he can inspect a harness or set an anchor. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Fall protection training requirements were cited 2,171 times in construction in FY 2025, third on the list. The usual problems are no training before exposure, training not given by a competent person, and no written certification record.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Training is assumed to travel with the worker from the last employer.
- New hires and temps go up the first day.
- Sign-in sheets stand in for the certification record.
- Training covers the harness but not the systems actually used on this job.
- Retraining does not happen when the job or the worker's behavior shows a gap.

REQUIREMENTS AND CONTROLS · FALL PROTECTION TRAINING

What the rules require, in plain words

1926.503(a)(1) · CON	Train each employee who might be exposed to fall hazards to recognize them and use the procedures to minimize them.
1926.503(a)(2) · CON	Training is given by a competent person and covers the systems, equipment, and procedures in use.
1926.503(b) · CON	Keep a written certification record: employee name, training date, and signature of the trainer or employer.
1926.503(c) · CON	Retrain when changes in the workplace or equipment make earlier training obsolete, or when a worker's actions show they did not keep the training.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Engineer	Choose passive systems that need less training to use correctly.
Administrative	No exposure before training. Written certification for every worker, including temps and subs.
Verify	Hands-on demonstration: inspect, don, connect, and describe rescue.
Retrain	Retrain on new systems and after any observed gap.
Small-shop fix	Build a one-page roster of who is certified for what. Check it before anyone goes up.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

03 · Fall protection training

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every worker exposed to fall hazards today has a written certification record.	☐	☐	☐	
2	Records show name, date, and trainer signature.	☐	☐	☐	
3	Training was given by a competent person.	☐	☐	☐	
4	Training covered the systems used on this job.	☐	☐	☐	
5	New hires and temps were trained before their first exposure.	☐	☐	☐	
6	Workers can show how to inspect and don a harness.	☐	☐	☐	
7	Workers can explain the rescue plan.	☐	☐	☐	
8	Retraining happened after the last system change.	☐	☐	☐	
9	Subcontractor workers' training was verified.	☐	☐	☐	
10	Training records are reachable on site.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · FALL PROTECTION TRAINING

Who owns it

Owner	Funds training time.
Safety lead	Competent-person training and records.
Foreman	Checks the roster before exposure.
Every worker	Speaks up when the system is new to them.

How to verify it is working in the field

- Pick three workers at height. Pull their certification records.
- Ask one to inspect a harness out loud.
- Ask the foreman what triggers retraining.

TOOLBOX TALK STARTER

If I asked the newest person on this job to inspect their harness right now, could they?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Remove untrained workers from exposure until trained and certified. Name the owner and date for the record fix. Then run the eight-step gap response at the front of this guide.

04 Scaffolds

29 CFR 1926.451 [CON]

2,152

citations in construction, FY 2025 (via HazComFast)

10 ft

guardrails or personal fall arrest required above this height

Each shift

competent-person inspection before work

THE PAIN POINT The masonry crew moved two planks to reach the corner. Now the platform has a gap and the guardrail stops 6 feet short. Nobody looked at it this morning. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Scaffolds were cited 2,152 times in construction in FY 2025, fourth on the list. Common gaps: unsafe access, incomplete planking, missing guardrails, and no competent-person inspection.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Scaffolds are modified by the trade using them, not by a competent person.
- Access is a climb up the cross-bracing.
- Planking is moved to fit the task.
- Inspection is a tag nobody updates.
- Footing is set on whatever is there.

REQUIREMENTS AND CONTROLS · SCAFFOLDS

What the rules require, in plain words

1926.451(b)(1) · CON	Each platform is fully planked or decked between front uprights and guardrail supports, with limited allowed gaps.
1926.451(c)(2) · CON	Supported scaffold poles, legs, and uprights bear on base plates and mud sills or other firm foundation.
1926.451(e)(1) · CON	Provide safe access (ladders, stair towers, ramps) when platforms are more than 2 feet above or below a point of access. Cross-braces are not access.
1926.451(f)(3) · CON	A competent person inspects scaffolds and components for visible defects before each work shift and after any occurrence that could affect integrity.
1926.451(g)(1) · CON	Protect each employee on a scaffold more than 10 feet above a lower level from falling.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate	Use mast climbers or lifts where they fit the work.
Engineer	Full planking, guardrails, toeboards, and built-in access on every scaffold.
Administrative	Only a competent person erects, moves, or alters a scaffold. Shift inspection with a tag that is dated.
Equipment	Base plates, mud sills, and screw jacks on site before erection.
Small-shop fix	Hang a dated inspection tag on every scaffold. No tag, no climb.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

04 · Scaffolds

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Platforms are fully planked with no unsafe gaps.	☐	☐	☐	
2	Guardrails are in place above 10 ft.	☐	☐	☐	
3	Access is by ladder, stair, or ramp, not cross-braces.	☐	☐	☐	
4	Legs are on base plates and mud sills on firm ground.	☐	☐	☐	
5	A competent person inspected before this shift.	☐	☐	☐	
6	The inspection tag is dated today.	☐	☐	☐	
7	No unauthorized changes since inspection.	☐	☐	☐	
8	Scaffold is tied to the structure as required.	☐	☐	☐	
9	Toeboards or screens protect people below.	☐	☐	☐	
10	Workers on the scaffold have had scaffold training.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · SCAFFOLDS

Who owns it

Superintendent	Scaffold plan and equipment on site.
Competent person	Erects, alters, and inspects each shift.
Foreman	Keeps trades off scaffolds they altered.
Every worker	Does not climb an untagged scaffold.

How to verify it is working in the field

- Read every tag. Check the dates.
- Walk one platform end to end and look for gaps.
- Ask who is allowed to move a plank.

TOOLBOX TALK STARTER

Who changed this scaffold since this morning, and who checked it after?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Clear the scaffold until a competent person inspects and corrects it. Name the owner and date for the root fix. Then run the eight-step gap response at the front of this guide.

05 Eye and face protection

29 CFR 1926.102 [CON]

1,926

citations in construction, FY 2025 (via HazComFast)

ANSI Z87.1

the consensus standard OSHA references

No. 9

on OSHA's all-industry list

THE PAIN POINT **A laborer is chipping concrete with his safety glasses pushed up on his hard hat because they fog. The grinder next to him is throwing sparks.** (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Eye and face protection was cited 1,926 times in construction in FY 2025, fifth on the list and No. 9 on the all-industry Top 10.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Glasses fog, scratch, or do not fit, so they come off.
- The wrong protection is supplied for the hazard (glasses where a face shield is needed).
- No hazard assessment ties tasks to required protection.
- Prescription wearers have no workable option.
- Leaders do not wear it themselves.

REQUIREMENTS AND CONTROLS · EYE AND FACE PROTECTION

What the rules require, in plain words

1926.102(a)(1) · CON	Provide eye and face protection when employees are exposed to hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
1926.102(a)(2) · CON	Provide side protection when there is a hazard from flying objects.
1926.102(a)(3) · CON	Prescription wearers get protection that includes the prescription or fits over it.
1926.95(c) · CON	PPE must be of safe design and construction and properly fit each affected employee.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate	Change the method: wet cutting, pre-cut materials, shields on tools.
Engineer	Tool guards and shields; screens between work zones.
Administrative	Task-based eye protection rules in the pre-task plan.
PPE	Anti-fog, well-fitting glasses, goggles, and face shields matched to the task; prescription options.
Small-shop fix	Buy two styles that fit and do not fog. Keep spares on every truck.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

05 · Eye and face protection

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Everyone exposed to flying particles is wearing eye protection now.	☐	☐	☐	
2	Grinding, chipping, and cutting tasks have face shields over glasses or goggles.	☐	☐	☐	
3	Protection has side protection.	☐	☐	☐	
4	Lenses are clean and not scratched.	☐	☐	☐	
5	Fit is right for each worker.	☐	☐	☐	
6	Prescription wearers have compliant protection.	☐	☐	☐	
7	Welding and cutting crews have proper shade.	☐	☐	☐	
8	Spares are available on site.	☐	☐	☐	
9	Leaders are wearing it.	☐	☐	☐	
10	Tasks requiring eye protection are in the pre-task plan.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · EYE AND FACE PROTECTION

Who owns it

Owner	Funds protection that fits and works.
Foreman	Enforces at the task, every time.
Safety lead	Hazard assessment and selection.
Every worker	Wears it and reports what does not work.

How to verify it is working in the field

- Count people near grinding or cutting. Count eye protection in use.
- Ask why glasses come off. Fix that reason.
- Check the spare box on the truck.

TOOLBOX TALK STARTER

What makes you take your glasses off on this job?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Stop the task until proper protection is on. Name the owner and date for fixing fit, fog, or supply. Then run the eight-step gap response at the front of this guide.

06 General safety and health provisions

29 CFR 1926.20 [CON]

866

citations in construction, FY 2025 (via HazComFast)

Competent persons

must make frequent and regular inspections

Not in

OSHA's all-industry Top 10

THE PAIN POINT The company has a safety manual from 2019. No one has walked the jobsite with a checklist since the project started. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. The general safety and health provisions were cited 866 times in construction in FY 2025, sixth on the list. This is the program standard: a safety program and regular inspections by competent persons.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- The program is a binder, not a practice.
- Inspections happen only when the GC or an insurer visits.
- No one is named competent for each hazard on the job.
- Findings are written but not closed.

REQUIREMENTS AND CONTROLS · GENERAL SAFETY AND HEALTH PROVISIONS

What the rules require, in plain words

1926.20(b)(1) · CON	Initiate and maintain programs needed to comply with Part 1926.
1926.20(b)(2) · CON	Provide frequent and regular inspections of jobsites, materials, and equipment by competent persons.
1926.20(b)(3) · CON	Tag, lock, or remove unsafe machinery, tools, materials, or equipment from service.
1926.20(b)(4) · CON	Permit only employees qualified by training or experience to operate equipment and machinery.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Administrative	Weekly documented jobsite inspection by a named competent person, with owners and dates for findings.
Equipment	A red-tag and lockout system for unsafe tools and equipment.
Verify	Leaders review open findings weekly.
Small-shop fix	One page, every Friday: walk the job, write three findings, name owners.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

06 · General safety and health provisions

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	We have a written program that matches the work we do now.	☐	☐	☐	
2	Competent persons are named for this job.	☐	☐	☐	
3	Jobsite inspections happen at least weekly and are recorded.	☐	☐	☐	
4	Findings have owners and due dates.	☐	☐	☐	
5	Unsafe tools and equipment are tagged or removed.	☐	☐	☐	
6	Only qualified people run equipment.	☐	☐	☐	
7	Last month's findings are closed.	☐	☐	☐	
8	Subcontractors are covered by inspections.	☐	☐	☐	
9	Inspection results reach the person who can fund fixes.	☐	☐	☐	
10	Workers know who the competent person is.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any "No" that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · GENERAL SAFETY AND HEALTH PROVISIONS

Who owns it

Owner	Program exists and is funded.
Superintendent	Inspections happen.
Competent person	Finds hazards and corrects them.
Every worker	Reports what they see.

How to verify it is working in the field

- Ask for the last three inspection records.
- Pick one finding and go see whether it was fixed.
- Ask a worker who the competent person is.

TOOLBOX TALK STARTER

When was the last time someone walked this job just to look for what could hurt us?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Name a competent person and run an inspection this week. Name the owner and date for closing findings. Then run the eight-step gap response at the front of this guide.

07 Head protection

29 CFR 1926.100 [CON]

852

citations in construction, FY 2025 (via HazComFast)

ANSI Z89.1

the consensus standard OSHA references

Proper fit

required of all construction PPE under 1926.95(c)

THE PAIN POINT The roofer took his hard hat off because it kept falling off when he looked up. A bundle of shingles is being lifted overhead. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Head protection was cited 852 times in construction in FY 2025, seventh on the list.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Hard hats are optional in practice on parts of the job.
- Fit and comfort problems are ignored.
- Overhead work is not coordinated with work below.
- Old, cracked, or painted hard hats stay in service.

REQUIREMENTS AND CONTROLS · HEAD PROTECTION

What the rules require, in plain words

1926.100(a) · CON	Protect employees with protective helmets where there is a possible danger of head injury from impact, falling or flying objects, or electrical shock and burns.
1926.100(b) · CON	Helmets must meet the referenced consensus standards (ANSI Z89.1).
1926.95(c) · CON	PPE must be of safe design and construction and properly fit each affected employee.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate	Schedule overhead work so no one is below.
Engineer	Toeboards, debris nets, and barricaded drop zones.
Administrative	Hard hats required in defined zones; overhead work coordination.
PPE	Helmets that fit, with chin straps where workers look up or work at height.
Small-shop fix	Check the date code on every hard hat this week. Replace old or damaged ones.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

07 · Head protection

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Everyone in head-hazard areas is wearing a hard hat.	☐	☐	☐	
2	Hard hats fit and stay on.	☐	☐	☐	
3	Shells are not cracked, painted, or drilled.	☐	☐	☐	
4	Suspensions are intact.	☐	☐	☐	
5	Electrical work uses electrically rated helmets.	☐	☐	☐	
6	Drop zones are barricaded.	☐	☐	☐	
7	Toeboards or nets protect people below.	☐	☐	☐	
8	Overhead work is coordinated.	☐	☐	☐	
9	Spares are on site.	☐	☐	☐	
10	Leaders wear theirs.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

Who owns it

Superintendent	Zones and overhead coordination.
Foreman	Enforces in the zone.
Safety lead	Selection and replacement.
Every worker	Wears and inspects it.

How to verify it is working in the field

- Walk under any overhead work. Count hard hats.
- Check five shells and suspensions.
- Ask why people take them off.

TOOLBOX TALK STARTER

What could fall on someone on this job today?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Clear the area below overhead work until protection is in place. Name the owner and date for fit and supply fixes. Then run the eight-step gap response at the front of this guide.

08

Abatement verification

29 CFR 1903.19 [ALL]

805

citations in construction, FY 2025 (via HazComFast)

10 days

to certify abatement after the abatement date

Every cited employer

is covered

THE PAIN POINT The company paid the fine last spring and fixed the edge. Nobody sent OSHA the certification letter. Now there is a new citation for the paperwork.

(illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Abatement verification was cited 805 times in construction in FY 2025, eighth on the list. It is the rule that requires you to prove you fixed what OSHA cited.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Nobody owns the citation after the closing conference.
- The fix is done but not documented.
- Jobs close and crews move before abatement is certified.
- Workers are not told what was cited and fixed.

REQUIREMENTS AND CONTROLS · ABATEMENT VERIFICATION

What the rules require, in plain words

1903.19(c) · ALL	Within 10 calendar days after the abatement date, certify to OSHA that each cited violation has been abated.
1903.19(d) · ALL	Provide abatement documentation (such as photos or receipts) when the citation says it is required.
1903.19(g) · ALL	Inform affected employees of abatement activities by posting or other means.
1903.19(h) · ALL	Tag movable equipment cited for a violation, and keep the tag on until abated.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Administrative	Assign one owner for each citation with the abatement date in their calendar.
Verify	Photograph and document every fix before you certify.
Communicate	Post abatement certification for employees.
Small-shop fix	Make a one-line tracker: item, fix, date, certified (yes/no).

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

08 · Abatement verification

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Every open citation has a named owner.	☐	☐	☐	
2	Abatement dates are on a calendar.	☐	☐	☐	
3	Fixes are documented with photos or receipts.	☐	☐	☐	
4	Certifications were sent within 10 days of each abatement date.	☐	☐	☐	
5	Employees were told what was abated.	☐	☐	☐	
6	Cited movable equipment is tagged.	☐	☐	☐	
7	The fix was applied to every similar job, not just the cited one.	☐	☐	☐	
8	Records are kept with the citation file.	☐	☐	☐	
9	Contested items are tracked separately.	☐	☐	☐	
10	Leaders review the tracker monthly.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · ABATEMENT VERIFICATION

Who owns it

Owner / executive	Assigns the citation owner.
Citation owner	Fixes, documents, and certifies on time.
Superintendent	Applies the fix on every job.
Safety lead	Keeps the tracker.

How to verify it is working in the field

- Pull the last citation. Check certification dates.
- Visit the cited condition or a similar one on another job.
- Ask a worker whether they heard what was fixed.

TOOLBOX TALK STARTER

If OSHA cited us today, who would own proving we fixed it?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Certify any overdue abatement now. Name the owner and date for the tracker. Then run the eight-step gap response at the front of this guide.

698

citations in construction, FY 2025 (via HazComFast)

No. 2

on OSHA's all-industry list

Nov. 20, 2026

the next HazCom 2024 compliance date for some employers

THE PAIN POINT The painting sub brought in a new coating. The safety data sheet is in an email in the office. The crew mixing it has never seen it. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Hazard communication was cited 698 times in construction in FY 2025, ninth on the construction list and No. 2 on the all-industry Top 10. It applies in construction through 29 CFR 1926.59.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- No written program, or one that lists chemicals no longer on site.
- SDSs are in the office, not on the job.
- Secondary containers are unlabeled.
- Training happened once, at hire, for other chemicals.
- Subs bring chemicals without telling anyone.

REQUIREMENTS AND CONTROLS · HAZARD COMMUNICATION

What the rules require, in plain words

1910.1200(e)(1) · GI→CON	Have a written hazard communication program with a chemical list, labeling, SDS, and training, and how you inform other employers on multi-employer sites.
1910.1200(f) · GI→CON	Keep containers labeled; label secondary containers with product identifier and hazards.
1910.1200(g)(8) · GI→CON	Keep SDSs readily accessible to employees during each work shift.
1910.1200(h) · GI→CON	Train employees on the hazardous chemicals in their work area at initial assignment and when a new hazard is introduced.

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Eliminate / substitute	Choose less hazardous products at purchase.
Engineer	Ventilation for mixing and spraying.
Administrative	Written program; SDS on site; chemical check-in for subs.
PPE	Gloves, eye protection, respirators as the SDS calls for.
Small-shop fix	Put an SDS binder or QR code in every truck and on every job board.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

09 · Hazard communication

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	A written program exists and matches chemicals on this job.	☐	☐	☐	
2	SDSs are reachable on site this shift.	☐	☐	☐	
3	Containers are labeled, including secondary containers.	☐	☐	☐	
4	Workers can name the hazards of what they are using.	☐	☐	☐	
5	Training covered these chemicals.	☐	☐	☐	
6	Subs disclosed their chemicals.	☐	☐	☐	
7	PPE matches the SDS.	☐	☐	☐	
8	New products get reviewed before use.	☐	☐	☐	
9	Chemical list is current.	☐	☐	☐	
10	Ventilation is adequate where products are mixed or sprayed.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

PREVENTION PLAYBOOK · HAZARD COMMUNICATION

Who owns it

Safety lead	Program, list, and training.
Superintendent	Sub chemical check-in.
Foreman	SDS access and labels on the job.
Every worker	Reads labels and asks.

How to verify it is working in the field

- Pick three containers. Check labels and SDS.
- Ask a worker what the SDS says about the product in their hands.
- Check the sub's chemicals against the list.

TOOLBOX TALK STARTER

What is the most dangerous product on this job, and where is its SDS?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Stop use of unlabeled or unknown products. Name the owner and date for labels, SDS, and training. Then run the eight-step gap response at the front of this guide.

10 Fall protection systems criteria and practices

29 CFR 1926.502 [CON]

665

citations in construction, FY 2025 (via HazComFast)

200 lb

top rail must withstand this force

5,000 lb

anchor capacity per worker, unless designed by a qualified person

THE PAIN POINT The guardrail is a 2x4 nailed to two stakes. The anchor is a vent pipe. Someone did put up fall protection. It would not hold. (illustrative)

What the data says

Counts: OSHA Frequently Cited Standards, NAICS 23, federal, FY 2025, via HazComFast; not verified against OSHA's tool, which now shows only FY2026 data. Fall protection systems criteria and practices were cited 665 times in construction in FY 2025, tenth on the list. This is the rule for how guardrails, nets, and personal fall arrest must be built and used.

Why it really happens

Not worker carelessness. These are the system and leadership conditions that make this predictable.

- Systems are improvised from job materials.
- Anchors are chosen for convenience, not strength.
- Fall clearance is not calculated.
- Guardrails are removed for material loading and not replaced.
- Nobody checks systems after weather or rework.

REQUIREMENTS AND CONTROLS · FALL PROTECTION SYSTEMS CRITERIA AND PRACTICES

What the rules require, in plain words

1926.502(b) · CON	Guardrail top rails are 42 inches plus or minus 3 inches high, withstand 200 pounds, and have midrails or equivalent.
1926.502(d)(15) · CON	Personal fall arrest anchors support at least 5,000 pounds per employee, or are designed with a safety factor of at least two under a qualified person's supervision.
1926.502(d)(16) · CON	Personal fall arrest systems limit free fall to 6 feet and keep the worker from contacting a lower level.
1926.502(i) · CON	Hole covers support at least twice the weight placed on them, are secured, and are marked "HOLE" or "COVER."

Paraphrased. Read the standard itself before you rely on it. State-plan states enforce their own versions, which must be at least as effective. Tags: CON = construction (29 CFR 1926). ALL = applies to every employer OSHA cites (29 CFR 1903). GI→CON = a general industry standard that applies in construction through 29 CFR 1926.59. GUIDANCE = advisory, not a rule.

Controls that work, in hierarchy order

Engineer	Manufactured guardrail and anchor systems.
Design	Qualified person designs anchors and calculates clearance.
Administrative	Inspection after weather, rework, or material loading.
Equipment	Covers made to spec and marked.
Small-shop fix	Buy one manufactured guardrail kit and one set of rated roof anchors. Retire the stakes.

Leaders own the conditions. If the guardrail, the ladder, or the harness only shows up when the GC's safety person is on site, it is not a control. Build it into the bid, the schedule, and the truck.

30-MINUTE SELF-AUDIT · PRINT AND TAKE TO THE FLOOR

10 · Fall protection systems criteria and practices

SITE	AREA / JOB / CREW	AUDITOR	DATE
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#	CHECK WHAT YOU CAN SEE OR PUT YOUR HAND ON	YES	NO	N/A	NOTES
1	Top rails are about 42 in. high with a midrail.	☐	☐	☐	
2	Guardrails would hold 200 lb.	☐	☐	☐	
3	Anchors are rated or engineered.	☐	☐	☐	
4	Fall clearance is enough for the system used.	☐	☐	☐	
5	Hole covers are secured and marked.	☐	☐	☐	
6	Systems were checked after the last weather event.	☐	☐	☐	
7	Guardrails removed for loading were replaced.	☐	☐	☐	
8	Nets are tested and installed as close under the work as practical.	☐	☐	☐	
9	Snap hooks are locking.	☐	☐	☐	
10	A competent person inspected systems this shift.	☐	☐	☐	

#	GAP FOUND	OWNER (ONE NAME)	DUE	VERIFIED

Rule: any “No” that is a live exposure gets stopped or contained before you leave the area. Stop is a right on this site. Restart is a decision. A named person makes it after the control is in place.

Who owns it

Superintendent	Buys rated systems.
Qualified person	Designs anchors and clearance.
Competent person	Inspects systems.
Every worker	Reports damaged or removed systems.

How to verify it is working in the field

- Push on a top rail. Measure its height.
- Ask what the anchor is rated for and who said so.
- Lift a hole cover. Check marking and securing.

TOOLBOX TALK STARTER

If someone fell into that guardrail right now, would it hold?

Ask it at the job, not in the break room. Then listen. Write down what you hear and give it an owner before you leave.

IF YOU FIND A GAP

Stop work behind any system that would not hold. Name the owner and date for the rated replacement. Then run the eight-step gap response at the front of this guide.

CHECK OUR WORK

Sources

1. OSHA, Frequently Cited OSHA Standards (search by NAICS; NAICS 23, federal). The tool now shows only FY2026 data; the FY 2025 counts in this guide were not verified against it
<https://www.osha.gov/ords/imis/citedstandard.html>
2. HazComFast, OSHA HazCom Enforcement Report FY2025 (construction top 10, extracted from OSHA's Frequently Cited Standards tool Aug. 8, 2026; source of the FY 2025 counts in this guide, not verified against OSHA's tool, which now shows only FY2026 data)
<https://hazcomfast.com/osha-data-research/hazcom-enforcement-report-fy2025>
3. OSHA, Top 10 Most Frequently Cited Standards (page now shows FY 2026 preliminary; FY 2025 final ranks per source 4)
<https://www.osha.gov/top10citedstandards>
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<https://www.safetyandhealthmagazine.com/osha-reveals-final-top-10-data-for-fy-2025/>
5. OSHA, Most Frequently Cited Serious Violations in Construction, FY 2025 (PDF)
https://www.osha.gov/sites/default/files/MFC_Construction_FY25.pdf
6. 29 CFR 1926.501, Duty to have fall protection
<https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.501>
7. 29 CFR 1926.502, Fall protection systems criteria and practices
<https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.502>
8. 29 CFR 1926.503, Training requirements (fall protection)
<https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.503>
9. 29 CFR 1926.1053, Ladders
<https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1053>
10. 29 CFR 1926.451, Scaffolds, general requirements
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13. 29 CFR 1903.19, Abatement verification
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14. 29 CFR 1910.1200, Hazard communication (applies in construction through 1926.59)
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200>
15. 29 CFR 1904.39, Reporting fatalities, hospitalizations, amputations, and losses of an eye
<https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.39>
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<https://www.osha.gov/consultation>

Sources retrieved and checked October 13, 2026. This guide is a practical summary for planning and self-audit. It is not legal advice and does not replace OSHA standards. Regulatory text is paraphrased. When this guide and a regulation disagree, the regulation controls. Citation counts are national federal OSHA figures and will not match any one contractor's experience.

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