

# DOSH DIRECTIVE

Department of Labor and Industries  
Division of Occupational Safety and Health  
*Keeping Washington safe and working*

## 6.55

# Channelizing Device Placement Operations

**Date: May 12, 2021**

### **I. Purpose**

This DOSH Directive provides guidance to DOSH compliance and consultation staff when they encounter channelizing device placement and/or retrieval operations from motor vehicles on publicly traveled roadways, highways or construction projects.

### **II. Scope and Application**

This Directive applies to all DOSH compliance and consultation operations statewide regarding protection of employees per the requirements of WAC 296-155-610(2)(i), Securing Material and Employees.

This Directive has been reviewed and updated with current references, and supersedes DD 6.55 dated July 10, 2019.

### **III. References**

- Chapter 296-880 WAC, Unified Safety Standards for Fall Protection
- WAC 296-155-610(2)(i), Securing Material and Employees (Motor Vehicles on Construction Sites)
- Manual on Uniform Traffic Control Devices (MUTCD) Part 6, 2009 Edition

### **IV. Background**

This Directive is based on an inspection where employees were placing channelizing devices from a motor vehicle without the protection of seats and seatbelts. As a result of this inspection DOSH entered into an agreement with the employer, which provided alternate means of protection for employees when placing and/or retrieving channelizing devices. Since then, other employers have incorporated these alternate methods of protection into their operations. The alternate methods of protection are listed in Section VI of this Directive.

### **V. Definitions**

- **Channelizing Device:** A device used to warn road users of conditions created by work activities in or near the roadway and to guide road users. Channelizing devices include cones, tubular markers, vertical panels, drums, barricades and longitudinal channelizing devices.

- **Work Zone:** An area of a highway with construction, maintenance or utility work activities. A work zone is typically marked by signs, channelizing devices, barriers, pavement markings and/or work vehicles. It extends from the first warning sign or high-intensity rotating, flashing, oscillating or strobe lights on a vehicle to the “END ROAD WORK” sign or the last TTC device.

## VI. Enforcement Policies


- A. When channelizing devices are being placed and/or retrieved from a motor vehicle, employees must be protected by the use of seats and seatbelts, standard guardrail systems or personal fall restraint systems, as defined in **Chapter 296-880 WAC, Unified Safety Standards for Fall Protection.**
- B. Employers can use the alternate methods of protection while actively placing and/or retrieving channelizing devices in the following areas of a traffic control zone:
  - Shoulder taper
  - Transition area
  - Activity area
  - Downstream taper, as defined in MUTCD, Part 6, 2009 Edition.
- C. When transporting employees, the requirements in WAC 296-155-610(2)(i), Securing Materials and Employees, are required to be met.
- D. The equipment being used will be constructed in a manner suitable to sustain the load, including personnel. At no time will the equipment and personnel cause the gross vehicle weight rating (GVWR) of the vehicle to exceed the rating of any hitch or attachment used to secure the equipment.
- E. Specifications for the strength and design of the vehicle-mounted platforms must be made available to the Department upon request.
- F. A quick-release chain or gate will be used at either end of vehicle-mounted platforms. If the centerline of the platform is marked, the chain may be down for escape purposes only if employees stay on the safe side of the centerline.
- G. Other protective measures such as a shadow truck, a vehicle with a truck-mounted attenuator to follow the work vehicle, or the use of law enforcement, will be considered.
- H. Procedures for the placement and/or retrieval of channelizing devices from motor vehicles must be found in the employer’s accident prevention program or other separate policies or documents.
- I. When DOSH consultation and compliance staff determine that the employer is following the procedures outlined above, DOSH considers it a de minimis violation, and will not issue a citation, or identify the violation as a hazard in the consultation report.

**VII. Who to Contact**

DOSH staff should contact DOSH Technical Services if they have questions, or need additional guidance or interpretive assistance regarding traffic control requirements and channeling device placement and/or retrieval operations.

**VIII. Review and Cancellation**

DOSH will review this Directive within two years from the issue date, and it will remain effective until superseded or canceled.

Approved:   
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Craig Blackwood, L&I Acting Assistant Director  
Division of Occupational Safety and Health