

# TECHNICAL WHITE PAPER for your enjoyment and enlightenment

#### FIXED LADDERS

#### THE DECIPHERING OF RECENT OSHA LADDER CHANGES

When OSHA came out with its revision to ladder fall protection, many of us were left wondering what it would mean for us. As with most things we hear through the grapevine, the reality is far less confusing than the rumors indicated. This white paper provides a quick summary of the new OSHA ladder requirements, along with the MSHA requirements; for those that have the distinct pleasure of working under both agencies. We will use "fall protection" to include "ladder safety systems". See the sketches on the next page for the general geometric requirements.

#### OSHA

- 1) Fall protection is required when a ladder is over 24'-0 above a lower level.
- 2) Rest platforms are required every 150'-0, when fall protection is provided, 50'-0 for existing caged ladders.
- 3) Some important dates, for ladders over 24'
  - a) Ladders constructed before Nov 19, 2018, ladders must have a cage, well, or fall protection system.
  - b) Ladders constructed or modified after Nov 19, 2018 must have a fall protection system.
  - c) All ladders after Nov. 18, 2036 must have a fall protection system.
- 4) Cages can still be used on new ladders with fall protection systems. They just don't count anymore as adequate fall protection.

#### **MSHA**

- 1) A cage or fall protection is required when a ladder is over 30'-0 above a lower level.
- 2) Rest platforms are required every 30'-0 if a cage or fall protection are not used. (See safety thought below.)
- 3) A ladder must "be of substantial construction and maintained in good condition".
- 4) MSHA currently recognizes cages as fall protection, unlike OHSA.
- 5) Fall protection systems are recognized by MSHA.
- 6) There is no limit to ladder height that has a cage fall protection.

#### SOME GENERAL THOUGHTS ON LADDER SAFETY

- 1) Look before you climb. Look at the ladder you are about to use. If it looks "jenky", find another way up, and get it fixed.
- 2) OSHA requires one hand free when climbing the ladder, that one faces the ladder, and doesn't carry anything that could cause them to lose their balance.
- 3) MSHA requires both hands free when climbing the ladder, and that one faces the ladder.
- 4) In our opinion, in the MSHA world, fall protection on a tall ladder system will be much safer than a platform every 30 feet, that you hopefully land on if you fall.
- 5) OSHA requires fall protection systems to function without the use of your hands while climbing. Not every system out there meets this requirement.

## **MSHA**

### OSHA





