Ladder and Stairway Policy

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Exhibit 28A TAW Ladder Inspection Tag

Exhibit 28B Ladder Group Inspection Checklist

28.1 PURPOSE

To define the procedures for the safe use, storage, and handling of ladders and use of temporary stairways during construction.

To define the procedures for safety requirements in the use, erection and handling of ladders and stairways.

28.2 SCOPE

This program applies to all project operations involving ladders and temporary stairways in association with construction, renovation, maintenance and repair.

28.3 GENERAL REQUIREMENTS

All work areas shall meet the requirements for egress and access. Whenever an employee's point of access is broken in elevation by 19 inches or more and no ramp, egress embankment or personal hoist is provided, a stairway or ladder must be provided.

Whenever there is only one point of access or egress between levels, this will remain clear from obstructions to permit free passage by employees. If the passage becomes obstructed, then a second point of access or egress will be provided and used.

28.3.1 Ladders must be maintained in good condition at all times. Those that are defective in any way will be removed from service and RED TAGGGED with an unsafe equipment tag and returned to the Fabrication Shop for repair or disposal. They will not be stored or disposed of on site. Employees are not permitted to take damaged or defective ladders for personal use.

28.3.2 Ladders purchased for use on the job site must be appropriate for heavy-duty commercial or industrial applications. Light duty household ladders are not acceptable. T.A. Woods Company uses only non-conductive fiberglass ladders.

Ladders are ordered like all tools and equipment from the Shop Administrator. TAW ladders will have identification markings indicating it is the property of the company and division. Other than these markings, no other markings are permitted including employee names, project names, etc.

Employees marking on ladders will be subject to purchasing replacement ladders.

Superintendents and foreman will be assigned ladders in good working condition and are accountable for these ladders. Ladders are expected to be returned in the same condition as assignment with the consideration of every day wear and tear. Damaged ladders due to misuse will be replaced at a cost to the project, division or employee if evidence shows personal neglect or misuse resulting in damage.

28.4 USE, CARE, AND STORAGE OF LADDERS

- 1) Portable metal ladders cannot be used on T.A. Woods Company work sites. Non-conductive fiberglass ladders are the protocol.
- 2) All company ladders must be marked with "T.A. Woods Company", the division, and appropriate inventory code or number. All ladders must be logged in and assigned to a superintendent, foreman or designated employee. Appropriate Tool Assignment or Tool Transfer documents will be completed and retained in the Shop Administrator's office. Assigned ladders will be recorded on the Superintendent or Foreman's Tool Inventory.
- 3) Straight ladders must be tied, blocked, or otherwise be secured to prevent displacement and equipped with safety feet for indoor and outdoor use as applicable.
- 3) Straight ladders must be used at an angle of approximately 75° from the horizontal. This position may be readily established by placing the base of the ladder ¼ of its working length form the vertical plane of the top support.
- 4) Ladders whose upper bearing point is over 25 feet from the ground or floor must be secured at both top and bottom.
- 5) A ladder must not be placed in front of a door that may swing toward the ladder unless the door is safely blocked open, locked, or barricaded.
- 6) Ladders must only be used on firm, stable bases.

- 7) Ladders will not be spliced together to form longer sections.
- 8) Extension or straight ladders used to gain access from one level to another must be long enough so that the top extends three feet above the landing or suitable grab rails for safe moving are provided to or from the point of access.
- 9) The top landing and immediate two steps of ordinary stepladders cannot be used as steps. Standing on a ladder rung should not occur above the designated safety line of a stepladder.
- 10) Stepladders will only be used with legs fully extended. Thus, no stepladder should be used by leaning against a wall or other work surface or platform.
- 11) Three points of contact must be used when ascending and descending ladders. Employees must face the ladder when climbing, descending, or working from the ladder.
- 12) Personnel should not carry objects in their hands while ascending or descending a ladder. Tools should be secured in a tool belt. A handline can be used provided that provisions are made to protect employees below the lift area.
- 14) Ladders will be maintained free of oil, grease and other slip hazards.
- 15) Ladders will be used only for the purpose for which they were designed.
- 16) Decals noting Duty Rating, weight restrictions, safety instructions, and the like must be visible and readable on all T.A. Woods Company ladders. Replacement decals must be ordered through the Shop Administrator when necessary. Employees are expected to take precautions to ensure decals remain readable.
- 17) Areas at the top and bottom of the ladder will be kept clear of debris.
- 18) Ladders will not be moved, shifted, or extended while in use. NO WALKING of ladders.
- 19) A ladder must be inspected prior to use. TAW Ladder Tag (Exhibit A) should be affixed to the ladder. If site conditions do not allow the use of a Tag, a Ladder Group Inspection Checklist inspection document should be completed and filed on site.
- 20) During travel, ladders should be secured on ladder racks by using tie straps, wrenched ties or similar. Bungee cords should not be used to secure ladders. Prior to travel, ladders storage should be inspected to ensure security.
- 21) Ladder should not be permanently stored in outdoor conditions without overhead protection. This includes long-term storage on ladder racks, lay

down yards, or other outdoor facilities without overhead protection. UV rays can cause damage to fiberglass ladders.

22) Storage of ladders on project sites should be secure. Ladders should be secured with chains and locks. The superintendent and foremen should maintain the key or combination. Care should be taken when storing to ensure mandatory decals are not damaged. Preferably ladders should be stored vertically. If there is not method to secure ladders on site, ladders should be be returned to the connex at the end of the work day, prior to the last 5X3 Safety/Production Huddle.

28.5 STAIRWAYS

All stairways used during the process of construction, renovation, or repair, which are not a part of the permanent structure will be constructed in accordance with the appropriate standards.

- Landings at least 30 inches deep and 22 inches wide at every 12 feet or less of vertical rise
- Variations in riser height or stair tread depth will not exceed ¼ inch in any stairway system
- When doors or gates open directly onto a stairway, a platform that extends at least 20 inches past beyond the swing of the door will be provided.
- When metal pan landings and metal pan treads are used, they will be secured in place before filling. Empty metal pan treads are not to be used for access or egress unless filled with suitable material
- Slippery conditions on stairways will be corrected immediately
- Handrails are required on stairways having 4 or more risers, or rising more than 30 inches in height, whichever is less
- A stair rail shall be installed along each unprotected side or edge. When the edge of a stair rail system also serves as a handrail, the height of the top edge shall be no more than 37 inches nor less than 36 inches from the upper surface of the stair rail to the surface of the tread.
- Midrails, when used, will be located midway between the top of the stairway step and along the opening between top rail supports.
- Handrails and top rails of stair rail systems will be able to withstand, without failure, at least 200 pounds of weight applied within two inches of the top edge in any downward or outward direction, at any point along the top edge.
- The height of handrails will not be more than 37 inches nor less than 30 inches from the upper surface of the handrail to the surface of the tread.
- Stair rail systems and handrails should be smooth surfaced to prevent injuries such as puncture or lacerations and to keep clothing from snagging.
- Unprotected sides and edges of stairway landings will be provided with standard 42 inch guardrail system.

28.6 TRAINING

It is the responsibility of the supervisors such as superintendents/foremen/leads to ensure that employees have been provided ladder and stairway safety hazard recognition and instructions in the appropriate use of ladders. Effective 2018, Stairway and Ladder Safety Awareness is a component of the New Hire Orientation.

Employees observed using ladders unsafely, will be subject to retraining by the site supervisor or Safety/HR. Unsafe use and retraining will be documented on an Employee Intervention or Employee Warning per company policy.

28.7 INSPECTING LADDERS AND STAIRWAYS

- Ladders must be in good condition at all times. The user should inspect the ladder before each day's use. The ladder inspection will be documented using a TAW Ladder Tag which will be completed daily prior to use. The tag will be affixed to the ladder. If the site conditions do not permit the Ladder Tag, a Ladder Group Inspection Checklist (Exhibit B) will be completed and maintained on file.
- Bends, dents, cracks, loose or missing rivets, disconnected braces and corrosion weaken a ladder seriously. Carefully inspect the area around rivet points on fiberglass ladders for hairline stress cracks. Defective or damaged ladders will be RED TAGGED returned to the Shop Administrator in order for it to be removed from the superintendent or foreman Tool Inventory.

28.8 EXTENSION LADDERS

- 1) Extension ladders must not exceed 44 feet in length when extended to the limit permitted by the following lap schedule.
- 2) Extension ladders must not be fully extended but will have the following minimum laps:
 - a. Two-Section Ladders:
 - 3 feet for ladders with working length up to 33 feet.
 - 4 feet for ladders with working length up to 44 feet.
 - b. Three-Section Ladders:
 - 4 feet for each section.

^{**}Ladders must not be painted, except for contractor identification.

- 3) The lifting or pull rope of an extension ladder is to be attached on a specific rung of the upper section so that the ladder cannot be over extended. Allow for one rung of overlap for every 10' of ladder.
- 4) Extension ladders are not to be taken apart and used as two separate units.