

POLICY

E & B Oilfield Services Inc. has implemented this policy to ensure no employee is exposed to hazards caused by improper or unsafe use of ladders and/or stairways. E & B Oilfield Services Inc. will provide a training program for each employee using ladders and stairways. The program will enable each employee to recognize hazards related to ladders and stairways and will train each employee in the procedures to be followed to minimize these hazards.

REFERENCES

- §1926.1050 – Ladders and Stairways

RESPONSIBILITIES

Ladder and stairway safety are a responsibility shared between the Company and its employees.

Employer Responsibilities

- Providing and installing all stairway and ladder fall protection systems required by this subpart and will comply with all other pertinent requirements of this subpart before employees begin the work that necessitates the installation and use of stairways, ladders and their respective fall protection systems
- Ensuring that visual safety inspections of ladders and stairways occur on a regular basis
- Training employees
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

- Assist in job site ladders and stairways as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in job site ladder and stairway inspections
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

Kirk Duncan will ensure each employee has been trained by a competent person in the following areas as applicable: the nature of fall hazards in the work area; the correct procedures for erecting, maintaining and disassembling the fall protection systems to be used; the proper construction, use, placement and care in handling of all stairways and ladders; the maximum intended load-carrying capacities of ladder; and the standards contained in §1926.1050 – Ladders and Stairways.

Retraining will be provided for each employee as necessary so that the employee maintains the understanding and knowledge acquired through previous training required for OSHA compliance.

SAFE PRACTICES

A stairway or ladder will be at all access points with a break-in elevation of 19 in. or more without a ramp, runway, sloped embankment, or personnel hoist.

- Employees will not use any spiral stairways that will not be a permanent part of the structure on which construction work is being performed.
- A double-cleated ladder or two (2) or more separate ladders will be provided when ladders are the only means of access or exit from a working area for 25 or more employees, or when a ladder is to serve simultaneous two-way traffic.
- When a building or structure has only one (1) point of access between levels, that point of access will be kept clear to permit free passage of employees. When work will be performed or equipment will be used such that free passage at that point of access is restricted, a second point of access will be provided and used.
- When a building or structure has two (2) or more points of access between levels, at least one (1) point of access will be kept clear to permit free passage of employees.

Ladder Use

Kirk Duncan will ensure the following requirements are adhered to concerning the use of all ladders:

- When portable ladders are used for access to an upper landing surface, the ladder side will extend at least three (3) ft. above the upper landing surface to which the ladder is used to gain access or, when such an extension is not possible because of the ladder's length, then the ladder will be secured at its top to a rigid support that will not deflect and a grasping device, such as a grabrail, will be provided to assist employees in mounting and dismounting the ladder. In no case will the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support
- Ladders will be maintained free of oil, grease and other slipping hazards.
- Ladders used by employees will meet OSHA/ANSI specifications.
- Ladder rungs, cleats and steps will be parallel, level and uniformly spaced when the ladder is in position for use.
- Ladders will not be loaded beyond the maximum intended load for which they were built or beyond their manufacturer's rated capacity. Ladders need to have the load capacity needed for the task.
- Rungs, cleats and steps of portable ladders (except as provided below) and fixed ladders (including individual rung/step ladders) will be spaced not less than 10 in. (25 cm.) apart, nor more than 14 in. (36 cm.) apart, as measured between center lines of the rungs, cleats and steps.
- Rungs, cleats and steps of step stools will be not less than eight (8) in. (20 cm.) apart, nor more than 12 in. (31 cm.) apart, as measured between center lines of the rungs, cleats and steps.

- Rungs, cleats and steps of the base section of extension trestle ladders will not be less than eight (8) in. (20 cm.) nor more than 18 in. (46 cm.) apart, as measured between center lines of the rungs, cleats and steps.
- The rung spacing on the extension section of the extension trestle ladder will be not less than six (6) inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats and steps
- The minimum clear distance between the sides of individual rung/step ladders and the minimum clear distance between the side rails of other fixed ladders will be 16 in. (41 cm.).
- The minimum clear distance between side rails for all portable ladders will be 11 1/2 inches (29 cm).
- The rungs of individual rung/step ladders will be shaped such that employees' feet cannot slide off the end of the rungs.
- The rungs and steps of portable metal ladders will be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.
- Ladders will be used only for the purpose for which they were designed.
- Non-self-supporting ladders will be used at a 75° angle.
- Wood job-made ladders with spliced side rails will be used at an angle such that the horizontal distance is one-eighth the working length of the ladder.
- Fixed ladders will be used at a pitch no greater than 90° from the horizontal.
- Ladders will be used only on stable and level surfaces unless secured.
- Ladders will not be used on slippery surfaces without slip-resistant feet unless secured. Slip-resistant feet will not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces, including flat metal or concrete surfaces that are constructed so they cannot be prevented from becoming slippery.
- Ladders placed where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, will be secured to prevent accidental displacement or a barricade will be used to keep the activities or traffic away from the ladder.
- The area around the top and bottom of the ladders will be kept clear.
- The top of a non-self-supporting ladder will be placed with the two (2) rails supported equally unless it is equipped with a single support attachment.
- Ladders will not be moved, shifted, or extended while occupied.
- Ladders will have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized electrical equipment.
- The top or top step of a stepladder will not be used as a step.
- Cross-bracing on the rear section of stepladders will not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
- Ladders will be inspected by a competent person before initial use in each work shift and more frequently as necessary, and after any occurrence that could affect their safe use to identify any visible defects that could cause employee injury.
- Portable ladders with structural defects will either be immediately marked in a manner that readily identifies them as defective or be tagged with "DO NOT USE" or similar language and will be withdrawn from service until repaired.
- Fixed ladders with structural defects, such as broken or missing rungs, cleats, or steps, broken or split rails, or corroded components, will be withdrawn from service until repaired. The defective ladder will be withdrawn from service in the following manner: immediately tagged with "Do Not Use" or similar language; marked in a method that readily identifies it as defective; blocked from further use, such as with a plywood attachment that spans several rungs.
- Before the damaged or defective ladder may be returned to service, repairs will be made to restore the ladder to its original design specifications.

- Single-rail ladders will not be used.
- When ascending or descending a ladder, the user will face the ladder.
- Each employee will use at least one (1) hand to grasp the ladder when progressing up and/or down the ladder.
- An employee will not carry any object or load that could cause the employee to lose balance and fall.
- Extension ladders will be placed one (1) unit away from the vertical surface for every four (4) units high.

Stairways

Kirk Duncan will ensure the following requirements are applied to all stairways:

- Stairways that will not be a permanent part of the structure on which construction work is being performed will have landings of not less than 30 in. in the direction of travel and extend at least 22 in. in width at every 12 ft. or less of vertical rise
- Stairs will be installed between 30° and 50° from horizontal.
- Riser height and tread depth will be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs. Variations in riser height or tread depth will not be over 1/4 in. in any stairway system.
- Where doors or gates open directly on a stairway, a platform will be provided and the swing of the door will not reduce the effective width of the platform to less than 20 in.
- Metal pan landings and metal pan treads, when used, will be secured in place before filling with concrete or other material.
- All parts of stairways will be free of hazardous projections, such as protruding nails.
- Slippery conditions on stairways will be eliminated before the stairways are used to reach other levels.
- Except during stairway construction, foot traffic is prohibited on stairways with pan stairs where the treads and/or landings are to be filled in with concrete or other material at a later date unless the stairs are temporarily fitted with wood or other solid material at least to the top edge of each pan. Such temporary treads and landings will be replaced when worn below the level of the top edge of the pan.
- Except during stairway construction, foot traffic is prohibited on skeleton metal stairs where permanent treads and/or landings are to be installed later unless the stairs are fitted with secured temporary treads and landings long enough to cover the entire tread and/or landing area.
- Treads for temporary service will be made of wood or other solid material and will be installed at the full width and depth of the stair.
- Stairways having four or more risers or rising more than 30 in., will be equipped with at least one (1) handrail and one (1) stair rail system along each unprotected side or edge.
- Winding and spiral stairways will be equipped with a handrail offset sufficiently to prevent walking on those portions of the stairways where the tread width is less than 6 in.
- The height of stair rails will be as follows be not less than 36 in. from the upper surface of the stair rail system to the surface of the tread, in line with the face of the riser at the forward edge of the tread..
- Mid-rails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members, will be provided between the top rail of the stair rail system and the stairway steps.
 - Mid-rails will be located at a height midway between the top edge of the stair rail system and the stairway steps

- Screens or mesh will extend from the top rail to the stairway step and along the entire opening between top rail supports
- When intermediate vertical members, such as balusters, are used between posts, they will be not more than 19 in. apart
- Other structural members will be installed such that there are no openings in the stair rail system that are more than 19 in. wide
- Handrails and the top rails of stair rail systems will be capable of withstanding, without failure, a force of at least 200 lbs. applied within two (2) in. of the top edge, in any downward or outward direction, at any point along the top edge.
- The height of handrails will be not more than 37 in. or less than 30 in. from the upper surface of the handrail to the surface of the tread.
- When the top edge of a stair rail system also serves as a handrail, the height of the top edge will be not more than 37 in. or less than 36 in.
- Stair rail systems and handrails will be so surfaced as to prevent injury to employees from punctures or lacerations and to prevent snagging of clothing.
- Handrails will provide an adequate handhold for employees grasping them to avoid falling
- The ends of stair rail systems and handrails will be constructed so as not to constitute a projection hazard.
- Handrails that will not be a permanent part of the structure being built will have a minimum clearance of 3 in. between the handrail and walls, stair rail systems and other objects
- Unprotected sides and edges of stairway landings will be provided with guardrail systems

Inspections

- Ladders used by employees will meet OSHA/ANSI specifications
- Inspect ladders for damage or wear prior to use
- Ladders will be free of oil, grease and other slipping hazards
- A metal spreader or locking device will be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used
- Ladder components will be constructed to prevent injury from punctures or lacerations and prevent snagging of clothing
- Wood ladders will not be coated with any opaque covering, except for identification or warning labels, which may be placed only on one (1) face of a side rail
- Ladders will have nonconductive side rails if they are used where the worker or the ladder could contact exposed energized electrical equipment
- Ladders with conductive metal sides will be marked with the words “WARNING — Do not use around energized electrical equipment” and will not be used around energized electrical equipment.
- Ladder rungs, cleats and steps will be parallel, level and uniformly spaced, when the ladder is in position for use to meet all OSHA/ANSI specifications
- Ladders will be inspected by a competent person for visible defects periodically and after any incident that could affect their safe use
- In addition to each pre-use inspection, a semi-annual inspection of all ladder components will be performed.

