

Memorandum

Date: January 27, 2016

To: Marley Hart, Executive Officer
Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

From: Juliann Sum, Chief
Cal/OSHA



Subject: Request for Change in Title 8 Section 1637 Scaffolds General Requirements. F9-85

Title 8 section 1637 contains general requirements for scaffolds. Cal/OSHA staff has discovered that the existing language in section 1637 is not at least as effective as the federal standard.

Federal OSHA Construction standard 1926.451(e)(2)(iii) contains specific requirement for rest platforms on a supported scaffold more than 35 feet high when hook-on and attachable ladders are used. Title 8 section 1637 does not have requirements as effective as Federal OSHA when hook-on and attachable ladders are used. The proposed change would allow employees to take breaks on rest platforms while climbing hook-on and attachable ladders on a supported scaffold more than 35 feet high.

The proposed change to the regulation would ensure that California is at least as effective as (ALAEA) the federal standard that pertains to use of hook-on and attachable ladders on a supported scaffold.

Cal/OSHA 9

State of California
Department of Industrial Relations
Division of Occupational Safety and Health

1. **Date:** January 27, 2016
2. **Eng/IH:** Gary McIver, SSE
3. **Region/District/Unit:** Consultation

REQUEST FOR NEW, OR CHANGE IN EXISTING, SAFETY ORDER

4. **Industry:**

Construction and General Industries

5. **Proposal for New Safety Order or Change in Existing Safety Order:**

See Part 2

PART 1 NEW SAFETY ORDER

6. **Hazard Description (include process, condition, machinery, equipment or product involved):**

N/A

7. **Recommended New Safety Order Language (Use any guidelines, standards or codes of work practices):**

N/A

PART 2 CHANGE IN EXISTING SAFETY ORDER

8. **Reason(s) for request (employer's appeal granted, advice of Legal Unit Staff, Safety Order needs clarification or other):**

Federal OSHA Construction standard 1926.451(e)(2)(iii) contains specific requirement for rest platforms on a supported scaffold more than 35 feet high when hook-on and attachable ladders are used. Title 8 section 1637 does not have requirements as effective as Federal OSHA when hook-on and attachable ladders are used. The proposed change would allow employees to take breaks on rest platforms while climbing hook-on and attachable ladders on a supported scaffold.

9. **Section/Subsection reference to existing Title 8 Safety Order:**

Subchapter 4. Construction Safety Orders
Article 21. Scaffolds – General Requirements
Section 1637. General Requirements

10. **Suggested change(s) to existing Safety Order (exact new wording):**

(n) Access.

(2) Climbing ladders or stairways on scaffolds used for access and egress shall be affixed or built into the scaffold by proper design and engineering, and shall be so located that their use will not disturb the stability of the scaffold.

(A) Manufactured hook-on and attachable ladders shall be securely attached to the scaffold and:

4. When hook-on and attachable ladders are used on a supported scaffold more than 35 feet high, they shall have rest platforms at 35-foot maximum vertical intervals.

11. Gary McIver
Signature of Requestor

12. E. Berry
Signature of Supervisor