

Attachment No. 1
Advisory Committee Background and Overview
General Industry Safety Orders, Section 3277
Fixed Ladders

Background:

This proposed rulemaking is the result of a Division of Occupational Safety and Health (DOSH) Form 9, Request for Change in Existing Safety Order, which was prompted by a fatal accident in a mining operation. It is thought that the victim fell while descending a caged ladder, struck the landing and fell back over the guardrail to his death 30 feet below. The Division believes that a back guard at this location would have prevented this type of accident from occurring.

GISO Section 3277 addresses a variety of ladder safety issues, including, but not limited to, design of ladder cages, wells and landing platforms, counterweighted hatch covers, use of ladder safety devices, and contains a number of diagrams depicting fixed ladder installations.

The Division opines that Section 3277 is deficient and vague in a number of areas. Therefore, they have requested changes and clarifications including fall protection at caged ladder landings, maximum clearances for ladder wells, and the use of ladder safety systems.

Overview:

Proposed changes to Section 3277 include the following modifications and amendments:

Subsection (b).

Definitions for “Carrier” and “Safety Sleeve” are proposed. These definitions are taken from ANSI A14.3-2002 and are needed to add clarity to the definition for “Ladder Safety System.” The existing definition for “Ladder Safety Device” is proposed to be replaced with a new definition for “Ladder Safety System” which is based on ANSI A14.3-2002 with minor clarifications.

Subsection (f)(7).

Requirements have been clarified to apply to all hatch covers, and not just to counterweighted hatch covers.

Subsection (g)(2), Exception 2.

The term “approved safety belts and lanyards” is proposed to be replaced with “approved personal fall protection system.” This modification is recommended for consistency with changes pending for Sections 3414 and 3416 - Outdoor Advertising Structures (a separate rulemaking, currently noticed for public comment).

Subsection (g)(4).

Proposed modifications would add provisions to ensure protection of employees where a caged ladder terminates on a platform or walkway at an elevation greater than 30 inches above the ground.

Subsection (g)(5).

A proposed non-substantive modification to clarify spacing for vertical bars on cages.

Subsection (g)(6).

A proposed modification will specify a maximum dimension for a ladder well, in agreement with the ANSI A14.3-1992 and 2002 editions. Doing so will provide fall protection equivalent to that required for a cage.

Subsection (j)(1).

Modifications are proposed that will clarify when landing platforms must be provided.

Subsection (j)(3).

A modification is proposed to clarify when walkways, catwalks and work platforms may be used as landing platforms.

Subsection (m).

This subsection proposes to rename “ladder safety devices” to “ladder safety systems” (ANSI A14.3-2002 terminology) and to permit them to be used in applications other than towers, water tanks and chimneys provided landing platforms are provided every 150 feet and provided they are designed in accordance with A14.3-2002 standards.

Should you wish to compare the proposal with existing Title 8, Section 3277, verbiage, the existing section may be viewed on the internet at: <http://www.dir.ca.gov/title8/3277.html>