

# Understanding the New OSHA ladder regulations

As of November 19<sup>th</sup>, 2018, OSHA implemented new requirements for fixed ladders on buildings. Understanding these new ladder regulations can be confusing, and at times overwhelming.

## Why is it such a challenge to find answers to my questions?

This was a question we asked ourselves many times. You can spend a great deal of time referencing the standard interpretations pages on the OSHA website and still not find the answers you need.

Ladder and fall arrest manufacturers are often willing to help, but do not necessarily have the answers either. In fact, it is surprising how difficult it can be to find the information you need.

## What Has OSHA Changed?

The first and primary change is the phasing out of cages on fixed ladders. Many see this as a step forward for ladder safety. The reality is that cages offer little in the way of fall protection. In fact, they can *increase* the risk of injury during a fall.

## “New” Fixed Ladder Installation

Do we order our new ladder with a cage or not? That’s a great question. Under the new rules, cages are not required or recommended for any new ladder install. We will get deeper into what this means for existing ladders later in this article.

The next question is- if OSHA takes away cages how are they planning to protect people from falls? This is accomplished using a **Personal Fall Arrest System** (PFAS) or ladders safety system. These come in wide variety of designs.

Three primary types are:

- Bolt on cable systems (with a cable grab fall arrester)
- Track systems (with a climbing trolley)
- Top mounted self-retracting lifelines

Of course, each type has their advantages and disadvantages. THE KEY: Each must meet the minimum OSHA requirements outlined in section 1926.502(d) of the OSHA codes.

## When Is A PFAS Required?

Under the new regulations, a ladder over 24’ foot high **“will”** require a personal fall arrest system or ladder safety system. 1910.28(b)(9)(i)(B)

You can choose any PFAS provided it meets the OSHA requirements. 1926.502(d)

**PLEASE NOTE:** A ladder that is less than 24’ feet high does **“not”** require a fall arrest system of any sort. 1910.28(b)(9)

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## What About Landing Platforms?

Multi-section ladders, with a climb of 24' feet or more, require rest points. These are meant to protect climbers as they ascend. Previously, a fixed ladder with a cage required a landing platform at a maximum interval of 30' feet.

The new regulations change this requirement dramatically. Fixed ladders without cages must now have a landing platform at maximum intervals of 150' feet. 1910.28(b)(9)(ii)(B)

Ladders **with** cages must now have a landing platform at maximum intervals of 50' feet. 1910.28(b)(9)(iii)(B)

## How Does the New Rules Effect Existing Ladders?

In the new rules, the modification of an existing ladder or replacement of a ladder section requires that **the modified or replaced section** be equipped with a fall arrest system. 1910.28(b)(9)(i)(C)

By November 18, 2036, **ALL** ladders 24' feet or higher must be retrofitted with a PFAS or ladder safety system. 1910.28(b)(9)(i)(D)

Here's the confusing part- Will all existing ladders with cages have to be replaced, or at least have the cages removed? **NO**. The existing caged ladder can stay. But as outlined above, a fall arrest system of some type will have to be retrofitted. 1910.28(b)(9)(iv)

In such cases, the cage must not interfere with whatever fall arrest system is installed. Choosing the right type fall arrest is critical in these retrofit situations.

## What Makes Choosing a Fall Arrest System Such a Challenge?

While the fall arrest systems themselves are not that complicated, many of the manufacturers and/or suppliers have difficulty explaining them.

For many suppliers, ladder related fall protection is just another part number in their computer. This makes getting information even more difficult. It puts the burden on the purchaser to try to figure out all the parts & pieces needed to make their ladder OSHA compliant.

It's not uncommon to select a fall arrest system, only to find out:

- **It's Discontinued** - The marketed product is no longer manufactured.
- **It's Not in Stock** - Product availability is extremely limited. Worse still, it may be completely unavailable, and suppliers are unsure when it will become available again.
- **It's Recalled** - Many systems are under extensive redesigns due to product recalls.
- **We Can't Get the Accessories** - The basic system is available; however, the necessary accessories to make it usable or compliant are not.

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This leads to a list of questions that you need to ask prior to picking a fall arrest system:

- Will this system work with my ladder and the height of my climb?
- What is the system's load capacity?
- Will the system allow for only one, or for multiple climbers? How many?
- What is the true product cost? Not just the base components, but any accessories needed to make the system OSHA compliant. (IE: harnesses, cable grabs, trolley's, carabiners, etc.)
- Is the system, and all its accessories, readily available?
- Will any future replacement parts be available?

Design Components, Inc. is a full-service provider of fixed ladders and fall protection accessories. We have experienced personnel that can help you navigate the uncharted waters of the new OSHA regulations.



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