# REVIEW MATERIALS Course 14135

# ELECTRICAL WORKPLACE SAFETY Lead in Construction Trenching and Excavations Stairways and Ladders



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<u>This Course has been approved by the Wisconsin Department</u> <u>of Safety and Professional Services for the following</u> <u>Certifications, Registrations or License.</u> Effective October 15, 2010 you may not retake the same training session for credit more than once during the 1, 2 or 4 year term of a specific credential. You may take the same course in a different education cycle.

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#### Course: 14135 ELECTRICAL WORKPLACE SAFETY

#### This course is valid for these credentials:

Credential Description	Cred Code	<b>Credit Hours</b>
Commercial Electrical Inspector	CEI	9.0
Industrial Journeyman Electrician	IJE	9.0
Journeyman Electrician	JE	9.0
Master Electrician	ME	9.0
Registered Electrician	BE	9.0
Residential Journeyman Electrician	RJE	9.0
Residential Master Electrician	RME	9.0
UDC-Electrical Inspector	UEI	9.0

#### Wisconsin Department of Safety and Professional Services <u>Electrical Workplace Safety</u> Lead in Construction; Trenching & Excavations; Stairways and Ladders Course Identification Number 14135 Expiration Date: 11/5/2025 Credit Hours: 9 hours

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**Course Type:** Continuing Education

#### ELECTRICAL WORKPLACE SAFETY

This course was developed for persons working in the electrical field who are exposed to a variety of workplace hazards. OSHA has developed extensive materials to reduce the incidents of work related accidents and workers should be aware of basic workplace safety practices. This course is an overview of the OSHA rules in regards to worker safety with an emphasis on more current issues such as Lead in Construction, Trenching and Excavations, and Stairway and Ladder safety practices which are required by OSHA.

# **Outline of Course**

# Lead In Construction

OSHA Introduction Health Hazards of Lead Exposure Symptoms of Chronic Overexposure Reproductive Risks Chelating Agents Worker Exposure

Construction Workers and Lead Exposure Most Vulnerable Workers OSHA's Lead Standard Exposure Limits Applicability to Construction

Employer Responsibilities Elements of a Compliance Program Initial Employee Exposure Assessment Biological Monitoring Tests Pending Employee Exposure Assessment Test Results Showing No Overexposures Employee Notification of Monitoring Results

**Medical Exams** 

Medical Surveillance Information for the Examining Physician When Monitoring Shows No Employee Exposures After the Medical Examinations Medical Removal Provisions

Worker Protections and Benefits Records Requirements Involving Medical Removal Recordkeeping Employer Requirements Exposure Assessment Records Medical Surveillance Records Documents for Employees Subject to Medical Removal Employer Requirements Related to Objective Data Documents for OSHA and NOISH Review When Closing a Business

**Exposure Reduction and Employee Protection** 

Engineering Controls Exhaust Ventilation Enclosure or Encapsulation Substitution Component Replacement Process or Equipment Modification Isolation

Housekeeping Practices Personal Hygiene Practices Change Areas Showers and Washing Facilities Personal Practices End-Of-Day Procedures

Protective Clothing and Equipment Employer Requirements Handling Contaminated Protective Clothing Preventing Heat Stress Respiratory Protection Providing Adequate Respiratory Protection Respiratory Protection Programs Selecting a Respirator Employee Information and Training Program Requirements Warning Signs

OSHA Assistance, Services and Products State Programs Consultation Assistance Safety and Health Achievement Recognition Program Voluntary Protection Programs Cooperative Partnerships Alliance Program Strategic Partnership Program Occupational Safety and Health Training Training Grants Other Assistance Materials In Case of an Emergency Or To File A Complaint OSHA Regional Offices Blood Lead Laboratories-Wisconsin

# **Trenches and Excavations**

Working Safely in Trenches Dangers of Trenching and Evacuation Protect Yourself Protective Systems Competent Person Access and Egress General Trenching and Excavation Rules

#### **Excavations**

Introduction Difference between Excavation and Trench Dangers OSHA Standard Rule Exemptions

#### Preplanning

Why is it important? Utility Lines and Pipes Informing Workers

#### **Protective Systems**

Preventing Cave-ins Most appropriate Protective System Design Other Safety Precautions Installation and Removal of Protective Systems Additional Hazards and Protections Warning Systems Water Accumulation Hazardous Atmospheres Means of Egress Pier Holes Site Inspection

OSHA Assistance, Services and Programs State Plans Consultation Assistance Privacy Cost Violations Voluntary Protection Programs Strategic Partnership Program OSHA Training for Employers and Employees Training Grants Contact OSHA

# **Stairways and Ladders**

RULES FOR STAIRWAYS

Stairways Used During Construction Temporary Stairs Stair Rails Handrails Midrails

#### LADDERS

Safety Tips General Requirements Rules for Ladders Specific Types of Ladders Step Ladders Portable Ladders Fixed Ladders Cages for Fixed Ladders Wells for Fixed Ladders Safety Devices Defective Ladders

#### **TRAINING REQUIREMENTS**

#### GLOSSARY

#### Exam

**100 Questions** related to the Reference Materials are used to test the attendee on their comprehension of the materials. A 70% score will need to be attained in order to pass this course.

#### The course attendee will receive the materials by one of the following delivery methods:

**Online:** The attendee will receive an email with the instructions and a link to the online course. The Reference/Instructional Materials and Exam will be available after registration is complete. The exam can be completed from the computer screen by use of "radio buttons". Answers are automatically saved. Reentry is done by the use of a personalized "resume code". Once the exam has been completed it is submitted. Grading will be done automatically by the computer program. The score and correct and incorrect answers are shown immediately.

**Email:** All materials are sent via email in PDF form to the attendees email address. The PDF documents can be saved to a file on the computer or they can be printed out. A bubble answer sheet needs to be printed; filled in and returned to us for grading.

**Compact Disc:** All PDF files are burned to a compact disc and sent to the attendee. The attendee has a choice of saving the PDF's to his/her computer desktop, just opening the files and working off the CD or printing the materials. A bubble answer sheet needs to be printed; filled in and returned to us for grading.

**Printed:** The Instructional/Reference Materials and Exam is sent in booklet form to the attendees' home of office. The bubble answer sheet is completed and returned to us for grading.



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# **OSHA Awareness Training – Lead In Construction**



#### Health Hazards of Lead Exposure

Pure lead (Pb) is a heavy metal at room temperature and pressure. A basic chemical element, it can combine with various other substances to form numerous lead compounds.

Lead has been poisoning workers for thousands of years. Lead can damage the central nervous system, cardiovascular system, reproductive system, hematological system, and kidneys. When absorbed into the body in high enough doses, lead can be toxic. In addition, workers' lead exposure can harm their children's development.

Short-term (acute) overexposure–as short as days--can cause acute encephalopathy, a condition affecting the brain that develops quickly into seizures, coma, and death from cardio respiratory arrest. Short-term occupational exposures of this type are highly unusual but not impossible.

Extended, long-term (chronic) overexposure can result in severe damage to the central nervous system, particularly the brain. It can also damage the blood-forming, urinary, and reproductive systems.

There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects that take longer to develop.

#### SYMPTOMS OF CHRONIC OVEREXPOSURE

Some of the common symptoms include:

- Loss of appetite;
- Constipation;
- Nausea;
- Excessive tiredness;
- Headache;
- Fine tremors;
- Colic with severe abdominal pain;
- Metallic taste in the mouth;
- Weakness;
- Nervous irritability;
- Hyperactivity;
- Muscle and joint pain or soreness;
- Anxiety;
- Pallor;

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- Insomnia;
- Numbness; and
- Dizziness.

#### **REPRODUCTIVE RISKS**

Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood. Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical followup--particularly if they are pregnant or actively seeking to have a child. Employers whose employees may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.



# Percent of Children Tested\* by County Wisconsin, 2008



\*<u>Percent of children tested</u>: The number of children less than 72 months of age tested for blood lead divided by the total number of children less than 72 months of age based on 2000 U.S. Census data, multiplied by 100.



Percent of Children with Elevated Blood Lead Levels\* by County Wisconsin, 2008



\*<u>Percent of children with elevated blood lead levels</u>: The number of children less than 72 months of age with a confirmed elevated blood lead level ≥10 μg/dL divided by the number of children less than 72 months of age tested for blood lead, multiplied by 100.

This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.

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# Percent of Children Tested\* by County Wisconsin, 2007



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#### CHELATING AGENTS

Under certain limited circumstances, a physician may prescribe special drugs called chelating agents to reduce the amount of lead absorbed in body tissues. Using chelation as a preventive measure--that is, to lower blood level but continue to expose a worker--is prohibited and therapeutic or diagnostic chelations of lead that are required must be done under the supervision of a licensed physician in a clinical setting, with thorough and appropriate medical monitoring. The employee must be notified in writing before treatment of potential consequences and allowed to obtain a second opinion.

#### Worker Exposure

Lead is most commonly absorbed into the body by inhalation. When workers breathe in lead as a dust, fume, or mist, their lungs and upper respiratory tract absorb it into the body. They can also absorb lead through the digestive system if it enters the mouth and is ingested.

A significant portion of the lead inhaled or ingested gets into the bloodstream. Once in the bloodstream, lead circulates through the body and is stored in various organs and body tissues. Some of this lead is filtered out of the body quickly and excreted, but some remains in the blood and tissues. As exposure continues, the amount stored will increase if the body absorbs more lead than it excretes.

The lead stored in the tissue can slowly cause irreversible damage, first to individual cells, then to organs and whole body systems.

# **Construction Workers and Lead Exposure**

#### HOW LEAD IS USED

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In construction, lead is used frequently for roofs, cornices, tank linings, and electrical conduits. In plumbing, soft solder, used chiefly for soldering tinplate and copper pipe joints, is an alloy of lead and tin. Soft solder has been banned for many uses in the United States. In addition, the Consumer Product Safety Commission bans the use of lead-based paint in residences.

Because lead-based paint inhibits the rusting and corrosion of iron and steel, however, lead continues to be used on bridges, railways, ships, lighthouses, and other steel structures, although substitute coatings are available.

Construction projects vary in their scope and potential for exposing workers to lead and other hazards. Projects such as removing paint from a few interior residential doors may involve limited exposure. Others projects, however, may involve removing or stripping substantial quantities of lead-based paints on large bridges and other structures.



# How widespread is Lead based paint in housing?

1. 87% of homes built before 1940 have lead based paint components.

 2. 69% of homes built during 1940 to 1959 have lead based paint components.
3. 24% of homes built during 1960 to 1978 have lead based paint components.

#### MOST VULNERABLE WORKERS

Workers potentially at risk for lead exposure include those involved in iron work; demolition work; painting; lead-based paint abatement; plumbing; heating and air conditioning maintenance and repair; electrical work; and carpentry, renovation, and remodeling work. Plumbers, welders, and painters are among those workers most exposed to lead. Significant lead exposures also can arise from removing paint from surfaces previously coated with lead-based paint such as bridges, residences being renovated, and structures being demolished or salvaged. With the increase in highway work, bridge repair, residential lead abatement, and residential remodeling, the potential for exposure to lead-based paint has become more common.

Workers at the highest risk of lead exposure are those involved in:

- Abrasive blasting and
- Welding, cutting, and burning on steel structures.

Other operations with the potential to expose workers to lead include:

- Lead burning;
- Using lead-containing mortar;
- Power tool cleaning without dust collection systems;
- Rivet busting;
- Cleanup activities where dry expendable abrasives are used;
- Movement and removal of abrasive blasting enclosures;
- Manual dry scraping and sanding;
- Manual demolition of structures;
- Heat-gun applications;
- Power tool cleaning with dust collection systems; and
- Spray painting with lead-based paint.



#### **Remember:**

- A tiny amount of lead can be extremely harmful.
- Leaded-dust particles are often so small that you cannot see them, yet you can breathe or swallow them.
- Adults can swallow or breathe dust during work activities.

#### **OSHA's Lead Standard**

OSHA's Lead Standard for the Construction Industry, Title 29 Code of Federal Regulations 1926.62, covers lead in a variety of forms, including metallic lead, all inorganic lead compounds, and organic lead soaps.

#### **EXPOSURE LIMITS**

The standard establishes maximum limits of exposure to lead for all workers covered, including a permissible exposure limit (PEL) and action level (AL).

The PEL sets the maximum worker exposure to lead: 50 micrograms of lead per cubic meter of air  $(50\mu g/m3)$  averaged over an eight-hour period. If employees are exposed to lead for more than eight hours in a workday, their allowable exposure as a TWA for that day must be reduced according to this formula:

Employee exposure (in  $\mu g/m3$ ) = 400 divided by the hours worked in the day.

The AL, regardless of respirator use, is an airborne concentration of  $30\mu g/m3$ , averaged over an eighthour period. The AL is the level at which an employer must begin specific compliance activities outlined in the standard.

# **APPLICABILITY TO CONSTRUCTION**

OSHA's lead in construction standard applies to all construction work where an employee may be exposed to lead. All work related to construction, alteration, or repair, including painting and decorating, is included. Under this standard, construction includes, but is not limited to:

- Demolition or salvage of structures where lead or materials containing lead are present;
- Removal or encapsulation of materials containing lead;
- New construction, alteration, repair, or renovation of structures, substrates, or portions or materials containing lead;
- Installation of products containing lead;
- Lead contamination from emergency cleanup;
- Transportation, disposal, storage, or containment of lead or materials containing lead where construction activities are performed; and
- Maintenance operations associated with these construction activities.



#### **Remember!**

The EPA and the Wisconsin Dept. of Health Services have specific definitions of Lead based paint as well.

#### Federal definition:

- 1 mg/cm2 of lead
- 0.5% lead by weight, **5,000 ppm**
- Wisconsin definition:
- 0.7 mg/cm2 of lead
- 0.06% lead by weight, or **600 ppm**

# Employer Responsibilities WORKER PROTECTIONS

Employers of construction workers are responsible for developing and implementing a worker protection program. At a minimum, the employer's worker protection program for employees exposed to lead above the PEL should include:

- Hazard determination, including exposure assessment;
- Medical surveillance and provisions for medical removal;
- Job-specific compliance programs;
- Engineering and work practice controls;
- Respiratory protection;
- Protective clothing and equipment;
- Housekeeping;
- Hygiene facilities and practices;
- Signs;
- Employee information and training; and
- Recordkeeping.

Because lead is a cumulative and persistent toxic substance and health effects may result from exposure over prolonged periods, employers must use these precautions where feasible to minimize employee exposure to lead.

The employer should, as needed, consult a qualified safety and health professional to develop and implement an effective, site specific worker protection program. These professionals may work independently or may be associated with an insurance carrier, trade organization, or onsite consultation program.

#### What is missing here? Anyone see any worker protection? How about acceptable Lead –Safe or Abatement work practices?



## ELEMENTS OF A COMPLIANCE PROGRAM

For each job where employee exposure exceeds the PEL, the employer must establish and implement a written compliance program to reduce employee exposure to the PEL or below. The compliance program must provide for frequent and regular inspections of job sites, materials, and equipment by a competent person.

Written programs, which must be reviewed and updated at least every six months, must include:

■ A description of each activity in which lead is emitted (such as equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures, and maintenance practices);

• The means to be used to achieve compliance and engineering plans and studies used to determine the engineering controls selected where they are required;

- Information on the technology considered to meet the PEL;
- Air monitoring data that document the source of lead emissions;

• A detailed schedule for implementing the program, including copies of documentation (such as purchase orders for equipment, construction contracts);

- A work practice program;
- An administrative control schedule, if applicable; and

Arrangements made among contractors on multi-contractor sites to inform employees of potential lead exposure.

Can you use the same work practice program for the two examples below? Why or why not?



#### **Hazard Assessment**

An employer is required to conduct an initial employee exposure assessment of whether employees are exposed to lead at or above the AL based on:

- Any information, observation, or calculation that indicates employee exposure to lead;
- Any previous measurements of airborne lead; and
- Any employee complaints of symptoms attributable to lead exposure.

Objective data and historical measurements of lead may be used to satisfy the standard's initial monitoring requirements.

## INITIAL EMPLOYEE EXPOSURE ASSESSMENT

Initial monitoring may be limited to a representative sample of those employees exposed to the greatest concentrations of airborne lead. Representative exposure sampling is permitted when there are a number of employees performing the same job, with lead exposure of similar duration and level, under essentially the same conditions. For employees engaged in similar work, the standard requires that the members of the group reasonably expected to have the highest exposure levels be monitored. This result is then attributed to the other employees of the group.

The employer must establish and maintain an accurate record documenting the nature and relevancy of previous exposure data.

Instead of performing initial monitoring, the employer may in some cases rely on objective data that demonstrate that a particular lead containing material or product cannot result in employee exposure at or above the action level when it is processed, used, or handled.



According to the Wisconsin Dept. of Health Services (DHS 163): (67) "Lead exposure" means a level of lead in the blood of 10 or more micrograms per 100 milliliters of blood.

#### **BIOLOGICAL MONITORING TESTS**

Analysis of blood lead samples must be conducted by an OSHA approved lab and be accurate (to a confidence level of 95 percent) within plus or minus 15 percent, or  $6 \mu g/dl$ , whichever is greater. If an employee's airborne lead level is at or above the AL for more than 30 days in any consecutive 12 months, the employer must make biological monitoring available on the following schedule:

• At least every two months for the first six months and every six months thereafter for employees exposed at or above the action level for more than 30 days annually;

• At least every two months for employees whose last blood sampling and analysis indicated a blood lead level at or above 40  $\mu$ g/dl; and

At least monthly while an employee is removed from exposure due an elevated blood lead level.

#### PENDING EMPLOYEE EXPOSURE ASSESSMENT

Until the employer performs an exposure assessment and documents that employees are not exposed above the PEL, OSHA requires some degree of interim protection for employees. This means providing respiratory protection, protective work clothing and equipment, hygiene facilities, biological monitoring, and training—as specified by the standards—for certain tasks prone to produce high exposure. These include:

■ Manual demolition of structures such as dry wall, manual scraping, manual sanding, and use of a heat gun where lead containing coatings or paints are present;

- Power tool cleaning with or without local exhaust ventilation;
- Spray painting with lead-containing paint;
- Lead burning;
- Use of lead-containing mortar;

■ Abrasive blasting, rivet busting, welding, cutting, or torch burning on any structure where leadcontaining coatings or paint are present;

- Abrasive blasting enclosure movement and removal;
- Cleanup of activities where dry expendable abrasives are used; and
- Any other task the employer believes may cause exposures in excess of the PEL.



Here are some very basic examples of respiratory protection and protective work clothing. Depending on the work practices performed, more protection may be required.

#### **TEST RESULTS SHOWING NO OVEREXPOSURES**

If the initial assessment indicates that no employee is exposed above the AL, the employer may discontinue monitoring. Further exposure testing is not required unless there is a change in processes or controls that may result in additional employees being exposed to lead at or above the AL, or may result in employees already exposed at or above the AL being exposed above the PEL.

The employer must keep a written record of the determination, including the date, location within the work site, and the name and social security number of each monitored employee.

#### **EMPLOYEE NOTIFICATION OF MONITORING RESULTS**

The employer must notify each employee in writing of employee exposure assessment results within five working days of receiving them. Whenever the results indicate that the representative employee exposure, without the use of respirators, is above the PEL, the employer must include a written notice stating that the employee's exposure exceeded the PEL and describing corrective action taken or to be taken to reduce exposure to or below the PEL.



#### BE AWARE OF YOUR RECORD KEEPING REQUIREMENTS:

The employer must notify each employee in writing of employee exposure assessment results within five working days of receiving them.

#### **Medical Surveillance**

When an employee's airborne exposure is at or above the AL for more than 30 days in any consecutive 12 months, an immediate medical consultation is required when the employee notifies the employer that he or she:

- Has developed signs or symptoms commonly associated with lead-related disease;
- Has demonstrated difficulty in breathing during respirator use or a fit test;
- Desires medical advice concerning the effects of past or current lead exposure on the employee's ability to have a healthy child; and
- Is under medical removal and has a medically appropriate need.

# MEDICAL EXAMS

The best indicator of personal lead exposure is through a blood test to indicate elevated blood lead levels. A medical exam must also include:

• Detailed work and medical histories, with particular attention to past lead exposure (occupational and non-occupational), personal habits (smoking and hygiene), and past gastrointestinal, hematologic, renal, cardiovascular, reproductive, and neurological problems;

■ A thorough physical exam, with particular attention to gums, teeth, hematologic, gastrointestinal, renal, cardiovascular, and neurological systems; evaluation of lung function if respirators are used;

- A blood pressure measurement;
- A blood sample and analysis to determine blood lead level;
  - Hemoglobin and hematocrit determinations, red cell indices, and an exam of peripheral smear morphology; and
  - Zinc protopor-phyrin; blood urea nitrogen; and serum creatinine;
- A routine urinalysis with microscopic exam; and
- Any lab or other test the examining physician deems necessary.

## INFORMATION FOR THE EXAMINING PHYSICIAN

The employer must provide all examining physicians with a copy of the lead in construction standard, including all appendices, a description of the affected employee's duties as they relate to the employee's exposure, the employee's lead exposure level or anticipated exposure level, a description of personal protective equipment used or to be used, prior blood lead determinations, and all prior written medical opinions for the employee.

# WHEN MONITORING SHOWS NO EMPLOYEE EXPOSURES ABOVE THE AL

Employers must make available, at no cost to the employee, initial medical surveillance for employees exposed to lead on the job at or above the action level on any one day per year. This initial medical surveillance consists of biological monitoring in the form of blood sampling and analysis for lead and zinc protoporyrin (ZPP) levels. In addition, a medical surveillance program with biological monitoring must be made available to any employee exposed at or above the action level for more than 30 days in any consecutive 12 months.



**Traditional Renovations Create Airborne Leaded Dust** 

(Source: EPA RRP Training Manual)

#### AFTER THE MEDICAL EXAMINATION

Employers must obtain and provide the employee a copy of a written opinion from each examining or consulting physician that contains only information related to occupational exposure to lead and must include:

• Whether the employee has any detected medical condition that would increase the health risk from lead exposure;

- Any special protective measures or limitations on the worker's exposure to lead,
- Any limitation on respirator use; and
- Results of the blood lead determinations.

In addition, the written statement may include a statement that the physician has informed the employee of the results of the consultation or medical examination and any medical condition that may require further examination or treatment.

The employer must instruct the physician that findings, including lab results or diagnoses unrelated to the worker's lead exposure, must not be revealed to the employer or included in the written opinion to the employer. The employer must also instruct the physician to advise employees of any medical condition, occupational or non-occupational, that necessitates further evaluation or treatment. In addition, some states also require laboratories and health care providers to report cases of elevated blood lead concentrations to their state health departments.

#### **Medical Removal Provisions**

Temporary medical removal can result from an elevated blood level or a written medical opinion. More specifically, the employer is required to remove from work an employee with a lead exposure at or above the AL each time periodic and follow-up (within two weeks of the periodic test) blood sampling tests indicate that the employee's blood level is at or above 50  $\mu$ g/dl. The employer also must remove from work an employee with lead exposure at or above the AL each time a final medical determination indicates that the employee needs reduced lead exposure for medical reasons. If the physician who is implementing the employer's medical program makes a final written opinion recommending the employee's removal or other special protective measures, the employer must implement the physician's recommendation.

For an employee removed from exposure to lead at or above the AL due to a blood lead level at or above 50  $\mu$ g/dl, the employer may return that employee to former job status when two consecutive blood sampling tests indicate that the employee's blood lead level is below 40  $\mu$ g/dl. For an employee removed from exposure to lead due to a final medical determination, the employee must be returned when a subsequent final medical determination results in a medical finding, determination, or opinion that the employee no longer has a detected medical condition that places the employee at increased risk of lead exposure.

The employer must remove any limitations placed on employees or end any special protective measures when a subsequent final medical determination indicates they are no longer necessary. If the former position no longer exists, the employee is returned consistent with whatever job assignment discretion the employer would have had if no removal occurred.

#### WORKER PROTECTIONS AND BENEFITS

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The employer must provide up to 18 months of medical removal protection (MRP) benefits each time an employee is removed from lead exposure or medically limited. As long as the position/job exists, the employer must maintain the earnings, seniority, and other employment rights and benefits as though the employee had not been removed from the job or otherwise medically limited. The employer may condition medical removal protection benefits on the employee's participation in follow up medical surveillance.

If a removed employee files a worker's compensation claim or other compensation for lost wages due to a lead-related disability, the employer must continue medical removal protection benefits until the claim is resolved. However, the employer's MRP benefits obligation will be reduced by the amount that the employee receives from these sources. Also, the employer's MRP benefits obligation will be reduced by any income the employee receives from employment with another employer made possible by virtue of the employee's removal.

#### **RECORDS REQUIREMENTS INVOLVING MEDICAL REMOVAL**

In the case of medical removal, the employer's records must include:

- The worker's name and social security number,
- The date of each occasion that the worker was removed from current exposure to lead,
- The date when the worker was returned to the former job status,
- A brief explanation of how each removal was or is being accomplished, and
- A statement indicating whether the reason for the removal was an elevated blood lead level.

#### Recordkeeping EMPLOYER REQUIREMENTS

The employer must maintain any employee exposure and medical records to document ongoing employee exposure, medical monitoring, and medical removal of workers. This data provides a baseline to evaluate the employee's health properly. Employees or former employees, their designated representatives, and OSHA must have access to exposure and medical records in accordance with 29 CFR 1910.1020. Rules of agency practice and procedure governing OSHA access to employee medical records are found in 29 CFR 1913.10.



#### **EXPOSURE ASSESSMENT RECORDS**

The employer must establish and maintain an accurate record of all monitoring and other data used to conduct employee exposure assessments as required by this standard and in accordance with 29 CFR 1910.1020. The exposure assessment records must include:

■ The dates, number, duration, location, and results of each sample taken, including a description of the sampling procedure used to determine representative employee exposure;

- A description of the sampling and analytical methods used and evidence of their accuracy;
- The type of respiratory protection worn, if any;

■ The name, social security number, and job classification of the monitored employee and all others whose exposure the measurement represents; and

• Environmental variables that could affect the measurement of employee exposure.

## MEDICAL SURVEILLANCE RECORDS

The employer must maintain an accurate record for each employee subject to medical surveillance, including:

- The name, social security number, and description of the employee's duties;
- A copy of the physician's written opinions;
- The results of any airborne exposure monitoring done for the employee and provided to the physician; and

• Any employee medical complaints related to lead exposure. In addition, the employer must keep or ensure that the examining physician keeps the following medical records:

• A copy of the medical examination results including medical and work history;

• A description of the laboratory procedures and a copy of any guidelines used to interpret the test results; and

• A copy of the results of biological monitoring. The employer or physician or both must maintain medical records in accordance with 29 CFR 1910,1020.

# DOCUMENTS FOR EMPLOYEES SUBJECT TO MEDICAL REMOVAL

The employer must maintain--for at least the duration of employment-an accurate record for each employee subject to medical removal, including:

■ The name and social security number of the employee;

• The date on each occasion that the employee was removed from current exposure to lead and the corresponding date which the employee was returned to former job status;

• A brief explanation of how each removal was or is being accomplished; and

• A statement about each removal indicating whether the reason for removal was an elevated blood level.

# EMPLOYER REQUIREMENTS RELATED TO OBJECTIVE DATA

The employer must establish and maintain an accurate record documenting the nature and relevancy of objective data relied on to assess initial employee exposure in lieu of exposure monitoring. The employer must maintain the record of objective data relied on for at least 30 years.

# **DOCUMENTS FOR OSHA AND NIOSH REVIEW**

The employer must make all records--including exposure monitoring, objective data, medical removal, and medical records--available upon request to affected employees, former employees, and their designated representatives and to the OSHA Assistant Secretary and the Director of the National Institute for Occupational Safety and Health (NIOSH) for examination and copying in accordance with 29 CFR 1910.1020.



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#### WHEN CLOSING A BUSINESS

When an employer ceases to do business, the successor employer must receive and retain all required records. If no successor is available, these records must be sent to the Director of NIOSH.

#### **Exposure Reduction and Employee Protection**

The most effective way to protect workers is to minimize their exposure through engineering controls, good work practices and training, and use of personal protective clothing and equipment, including respirators, where required. The employer needs to designate a competent person capable of identifying existing and predictable lead hazards and who is authorized to take prompt corrective measures to eliminate such problems. The employer should, as needed, consult a qualified safety and health professional to develop and implement an effective worker protection program.

These professionals may work independently or may be associated with an insurance carrier, trade organization, or onsite consultation program.



Training can be done on the job or in a controlled environment. The employer should, as needed, consult a qualified safety and health professional to develop and implement an effective worker protection program. These professionals may work independently or may be associated with an insurance carrier, trade organization, or onsite consultation program.

#### **Engineering Controls**

Engineering measures include local and general exhaust ventilation, process and equipment modification, material substitution, component replacement, and isolation or automation. Examples of recommended engineering controls that can help reduce worker exposure to lead are described as follows.

#### **EXHAUST VENTILATION**

Equip power tools used to remove lead-based paint with dust collection shrouds or other attachments so that paint is exhausted through a high-efficiency particulate air (HEPA) vacuum system. For operations such as welding, cutting/burning, or heating, use local exhaust ventilation. Use HEPA vacuums during cleanup operations.

For abrasive blasting operations, build a containment structure that is designed to optimize the flow of clean ventilation air past the workers' breathing zones. This will help reduce the exposure to airborne lead and increase visibility. Maintain the affected area under negative pressure to reduce the chances that

lead dust will contaminate areas outside the enclosure. Equip the containment structure with an adequately sized dust collector to control emissions of particulate matter into the environment.



#### **ENCLOSURE OR ENCAPSULATION**

One way to reduce the lead inhalation or ingestion hazard posed by lead-based paint is to encapsulate it with a material that bonds to the surface, such as acrylic or epoxy coating or flexible wall coverings. Another option is to enclose it using systems such as gypsum wallboard, plywood paneling, and aluminum, vinyl, or wood exterior siding. Floors coated with lead-based paint can be covered using vinyl tile or linoleum.

The building owner or other responsible person should oversee the custodial and maintenance staffs and contractors during all activities involving enclosed or encapsulated lead-based paint. This will minimize the potential for an inadvertent lead release during maintenance, renovation, or demolition.

#### **SUBSTITUTION**

Choose materials and chemicals that do not contain lead for construction projects. Among the options are:

■ Use zinc-containing primers covered by an epoxy intermediate coat and polyurethane topcoat instead of lead-containing coatings.

• Substitute mobile hydraulic shears for torch cutting under certain circumstances.

• Consider surface preparation equipment such as needle guns with multiple reciprocating needles completely enclosed within an adjustable shroud, instead of abrasive blasting under certain conditions. The shroud captures dust and debris at the cutting edge and can be equipped with a HEPA vacuum filtration with a self-drumming feature. One such commercial unit can remove lead-based paint from flat steel and concrete surfaces, outside edges, inside corners, and pipes.

• Choose chemical strippers in lieu of hand scraping with a heat gun for work on building exteriors, surfaces involving carvings or molding, or intricate iron work. Chemical removal generates less airborne lead dust. (Be aware, however, that these strippers themselves can be hazardous and that the employer must review the material safety data sheets (MSDSs) for these stripping agents to obtain information on their hazards.)

<u>Remember:</u> Using a paint stripper containing methylene chloride is a prohibited practice in Wisconsin

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#### **COMPONENT REPLACEMENT**

Replace lead-based painted building components such as windows, doors, and trim with new components free of lead-containing paint. Another option is to remove the paint offsite and then repaint the components with zinc-based paint before replacing them.

#### PROCESS OR EQUIPMENT MODIFICATION

When applying lead paints or other lead-containing coatings, use a brush or roller rather than a sprayer. This application method introduces little or no paint mist into the air to present a lead inhalation hazard. (Note that there is a ban on the use of lead-based paint in residential housing.)

Use non-silica-containing abrasives such as steel or iron shot/grit sand instead of sand in abrasive blasting operations when practical. The free silica portion of the dust presents a respiratory health hazard.

When appropriate for the conditions, choose blasting techniques that are less dusty than open-air abrasive blasting. These include hydro- or wet-blasting using high-pressure water with or without an abrasive or surrounding the blast nozzle with a ring of water, and vacuum blasting where a vacuum hood for material removal is positioned around the exterior of the blasting nozzle.

When using a heat gun to remove lead-based paints in residential housing units, be sure it is of the flameless electrical softener type. Heat guns should have electronically controlled temperature settings to allow usage below 700 degrees F. Equip heat guns with various nozzles to cover all common applications and to limit the size of the heated work area.

When using abrasive blasting with a vacuum hood on exterior building surfaces, ensure that the configuration of the heads on the blasting nozzle match the configuration of the substrate so that the vacuum is effective in containing debris.

Ensure that HEPA vacuum cleaners have the appropriate attachments for use on unusual surfaces. Proper use of brushes of various sizes, crevice and angular tools, when needed, will enhance the quality of the HEPA-vacuuming process and help reduce the amount of lead dust released into the air.



Lead-Safe Renovation (EPA & DHS) prohibited practices:

- Open-flame burning or torching.
- Heat gun above 1100° F.
- Power sanding, power grinding, power planing, needle guns, abrasive blasting and sandblasting, without shroud or containment system equipped with HEPA vacuum

#### **ISOLATION**

Although it is not feasible to enclose and ventilate some abrasive blasting operations completely, it is possible to isolate many operations to help reduce the potential for lead exposure.

Isolation consists of keeping employees not involved in the blasting operations as far away from the work area as possible, reducing the risk of exposure.



#### Housekeeping and Personal Hygiene

Lead is a cumulative and persistent toxic substance that poses a serious health risk. A rigorous housekeeping program and the observance of basic personal hygiene practices will minimize employee exposure to lead. In addition, these two elements of the worker protection program help prevent workers from taking lead contaminated dust out of the worksite and into their homes where it can extend the workers' exposures and potentially affect their families' health.

#### HOUSEKEEPING PRACTICES

An effective housekeeping program involves a regular schedule to remove accumulations of lead dust and lead-containing debris. The schedule should be adapted to exposure conditions at a particular worksite. OSHA's Lead Standard for Construction requires employers to maintain all surfaces as free of lead contamination as practicable. Vacuuming lead dust with HEPA-filtered equipment or wetting the dust with water before sweeping are effective control measures. Compressed air may not be used to remove lead from contaminated surfaces unless a ventilation system is in place to capture the dust generated by the compressed air.

In addition, put all lead-containing debris and contaminated items accumulated for disposal into sealed, impermeable bags or other closed impermeable containers. Label bags and containers as lead-containing waste. These measures provide additional help in controlling exposure.

Put all lead-containing debris and contaminated items accumulated for disposal into <u>sealed, impermeable bags or</u> <u>other closed impermeable containers.</u> Label bags and containers as leadcontaining waste.



#### PERSONAL HYGIENE PRACTICES

Emphasize workers' personal hygiene such as washing their hands and face after work and before eating to minimize their exposure to lead. Provide and ensure that workers use washing facilities. Provide clean change areas and readily accessible eating areas. If possible, provide a parking area where cars will not be contaminated with lead. These measures:

- Reduce workers' exposure to lead and the likelihood that they will ingest lead,
- Ensure that the exposure does not extend beyond the worksite,
- Reduce the movement of lead from the worksite, and
- Provide added protection to employees and their families.



If possible, provide a parking area where cars will not be contaminated with lead.

#### **CHANGE AREAS**

The employer must provide a clean change area for employees whose airborne exposure to lead is above the PEL. The area must be equipped with storage facilities for street clothes and a separate area with facilities for the removal and storage of lead-contaminated protective work clothing and equipment. This separation prevents cross contamination of the employee's street and work clothing.

Employees must use a clean change area for taking off street clothes, suiting up in clean protective work clothing, donning respirators before beginning work, and dressing in street clothes after work. No lead-contaminated items should enter this area.

Work clothing must not be worn away from the jobsite. Under no circumstances should leadcontaminated work clothes be laundered at home or taken from the worksite, except to be laundered professionally or for disposal following applicable federal, state, and local regulations.

#### SHOWERS AND WASHING FACILITIES

When feasible, showers must be provided for use by employees whose airborne exposure to lead is above the permissible exposure limit so they can shower before leaving the worksite. Where showers are provided, employees must change out of their work clothes and shower before changing into their street clothes and leaving the worksite. If employees do not change into clean clothing before leaving the worksite, they may contaminate their homes and automobiles with lead dust, extending their exposure and exposing other members of their household to lead.

In addition, employers must provide adequate washing facilities for their workers. These facilities must be close to the worksite and furnished with water, soap, and clean towels so employees can remove lead contamination from their skin.

Contaminated water from washing facilities and showers must be disposed of in accordance with applicable local, state, or federal regulations.

#### PERSONAL PRACTICES

The employer must ensure that employees do not enter lunchroom facilities or eating areas with protective work clothing or equipment unless surface lead dust has been removed. HEPA vacuuming and use of a downdraft booth are examples of cleaning methods that limit the dispersion of lead dust from contaminated work clothing.

In all areas where employees are exposed to lead above the PEL, employees must observe the prohibition on the presence and consumption or use of food, beverages, tobacco products, and cosmetics. Employees whose airborne exposure to lead is above the PEL must wash their hands and face before eating, drinking, smoking, or applying cosmetics.



No food, beverages, tobacco products or cosmetics are allowed in areas where employees are exposed to lead above the PEL. Employees whose airborne exposure to lead is above the PEL must wash their hands and face before eating, drinking, smoking, or applying cosmetics.

#### **END-OF-DAY PROCEDURES**

Employers must ensure that workers who are exposed to lead above the permissible exposure limit follow these procedures at the end of their workday:

■ Place contaminated clothes, including work shoes and personal protective equipment to be cleaned, laundered, or disposed of, in a properly labeled closed container.

■ Take a shower and wash their hair. Where showers are not provided, employees must wash their hands and face at the end of the work shift.

■ Change into street clothes in clean change areas.

## Protective Clothing and Equipment EMPLOYER REQUIREMENTS

Employers must provide workers who are exposed to lead above the PEL or for whom the possibility of skin or eye irritation exists with clean, dry protective work clothing and equipment that are appropriate for the hazard. Employers must provide these items at no cost to employees. Appropriate protective work clothing and equipment used on construction sites includes:



Examples of basic lead-safe renovation protective clothing. Depending on the job being performed, more protection might be needed.

• Coveralls or other full-body work clothing;



Example of a coverall with attached hood and booties.

■ Gloves, hats, and shoes or disposable shoe coverlets;



- Vented goggles or face shields with protective spectacles or goggles;
- Welding or abrasive blasting helmets; and
- 25 This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.

#### ■ Respirators.



Examples of N100 and R100 respirators for lead-safe renovation.

Clean work clothing must be issued daily for employees whose exposure levels to lead are above 200  $\mu$ g/m3, weekly if exposures are above the PEL but at or below 200  $\mu$ g/m3 or where the possibility of skin or eye irritation exists.

#### HANDLING CONTAMINATED PROTECTIVE CLOTHING

Workers must not be allowed to leave the worksite wearing lead contaminated protective clothing or equipment. This is an essential step in reducing the movement of lead contamination from the workplace into the worker's home and provides added protection for employees and their families. Disposable coveralls and separate shoe covers may be used, if appropriate, to avoid the need for laundering. Workers must remove protective clothing in change rooms provided for that purpose. Employers must ensure that employees leave the respirator use area to wash their faces and respirator face pieces as necessary. In addition, employers may require their employees to use HEPA vacuuming, damp wiping, or another suitable cleaning method before removing a respirator to clear loose particle contamination on the respirator and at the face-mask seal.

Place contaminated clothing that is to be cleaned, laundered, or disposed of by the employer in closed containers. Label containers with the warning: "Caution: Clothing contaminated with lead. Do not remove dust by blowing or shaking. Dispose of lead-contaminated wash water in accordance with applicable local, state, or federal regulations."

Workers responsible for handling contaminated clothing, including those in laundry services or subcontractors, must be informed in writing of the potential health hazard of lead exposure. At no time shall lead be removed from protective clothing or equipment by brushing, shaking, or blowing. These actions disperse the lead into the work area.

#### **PREVENTING HEAT STRESS**

Workers wearing protective clothing, particularly in hot environments or within containment structures, can face a risk from heat stress if proper control measures are not used.

Heat stress is caused by several interacting factors, including environmental conditions, type of protective clothing worn; the work activity required and anticipated work rate, and individual employee characteristics such as age, weight, and fitness level.

When heat stress is a concern, the employer should choose lighter, less insulating protective clothing over heavier clothing, as long as it provides adequate protection. Other measures the employer can take include: discussing the possibility of heat stress and its signs and symptoms with all workers; using appropriate work/rest regimens; and providing heat stress monitoring that includes measuring employees' heart rates, body temperatures, and weight loss. Employers must provide a source of water or electrolyte drink in a non-contaminated eating and drinking area close to the work area so workers

can drink often throughout the day. Workers must wash their hands and face before drinking any fluid if their airborne exposure is above the PEL.



Workers wearing protective clothing, particularly in hot environments can face a risk from heat stress if proper control measures are not used. Make sure you discuss other options to prevent a heat related injury.

#### **Respiratory Protection**

Although engineering and work practice controls are the primary means of protecting workers from exposure to lead, source control at construction sites sometimes is insufficient to control exposure. In these cases, airborne lead concentrations may be high or may vary widely. Respirators often must be used to supplement engineering controls and work practices to reduce worker lead exposures below the PEL. When respirators are required, employers must provide them at no cost to workers.

The standard requires that respirators be used during periods when an employee's exposure to lead exceeds the PEL, including

Periods necessary to install or implement engineering or work practice controls, and

• Work operations for which engineering and work practice controls are insufficient to reduce employee exposures to or below the PEL.

Respirators also must be provided upon employee request. A requested respirator is included as a requirement to provide increased protection for those employees who wish to reduce their lead burden below what is required by the standard, particularly if they intend to have children in the near future. In addition, respirators must be used when performing previously indicated high exposure or "trigger" tasks, before completion of the initial assessment.



# **PROVIDING ADEQUATE RESPIRATORY PROTECTION**

Before any employee first starts wearing a respirator in the work environment, the employer must perform a fit test. For all employees wearing negative or positive pressure tight-fitting face piece respirators, the employer must perform either qualitative or quantitative fit tests using an OSHA-accepted fit testing protocol.

In addition, employees must be fit tested whenever a different respirator face piece is used, and at least annually thereafter.

Where daily airborne exposure to lead exceeds 50  $\mu$ g/m3, affected workers must don respirators before entering the work area and should not remove them until they leave the high exposure area or have completed a decontamination procedure.

Employers must assure that the respirator issued to the employee is selected and fitted properly to ensure minimum leakage through the face piece-to-face seal.



Example of a half-face respirator

Example of a full-face respirator



#### **RESPIRATORY PROTECTION PROGRAMS**

When respirators are required at a worksite, the employer must establish a respiratory protection program in accordance with the OSHA standard on respiratory protection, 29 CFR 1910.134. At a minimum, an acceptable respirator program for lead must include:

Procedures for selecting respirators appropriate to the hazard;

■ Fit testing procedures;

■ Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations, including cartridge change schedules;

• Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;

• Training of employees in the respiratory hazard to which they are potentially exposed during routine and emergency situations;

• Training of employees in the proper use of respirators, including putting on and removing them, any limitations of their use, and their maintenance;

- Procedures for regularly evaluating the effectiveness of the program;
- Procedures to ensure air quality when supplied air is used;

A written program and designation of a program administrator; and

■ Recordkeeping procedures.

In addition, the construction industry lead standard stipulates medical evaluations of employees required to use respirators.

If an employee has difficulty in breathing during a fit test or while using a respirator, the employer must make a medical examination available to that employee to determine whether he or she can wear a respirator safely.

#### **SELECTING A RESPIRATOR**

The employer must select the appropriate respirator from Table 1 of the lead standard, 29 CFR 1926.62(f)(3)(i). The employer must provide a powered air-purifying respirator when an employee chooses to use this respirator and it will provide the employee adequate protection. A NIOSH-certified respirator must be selected and used in compliance with the conditions of its certification. In addition, if exposure monitoring or experience indicates airborne exposures to contaminants other than lead such as silica, solvents, or polyurethane coatings, these exposures must be considered when selecting respiratory protection.

Select type CE respirators approved by NIOSH for abrasive blasting operations. Currently, there are two kinds of CE respirators with the following assigned protection factors (APFs): a continuous flow respirator with a loose-fitting hood, APF 25; and a full face piece supplied-air respirator operated in a positive-pressure mode, APF 2,000. (Note: OSHA recognizes Bullard Helmets, Models 77 and 88 (1995); Clemco Appollo, Models 20 and 60 (1997); and 3M Model 8100 (1998) as having APFs of 1,000.)

Loose-Fitting Powered Air-Purifying Respirator (PAPR) APF= 25



Hood PoweredAir-Purifying Respirator (PAPR) APF= 25

For any airline respirator, it is important to follow the manufacturer's instructions regarding air quality, air pressure, and inside diameter and length of hoses. Be aware that using longer hoses or smaller inside diameter hoses than the manufacturer specifies or hoses with bends or kinks may reduce or restrict the airflow to a respirator.

#### **Employee Information and Training**

The employer must inform employees about lead hazards according to the requirement of OSHA's Hazard Communication standard for the construction industry, 29 CFR 1926.59, including-- but not limited to--the requirements for warning signs and labels, material safety data sheets (MSDSs), and employee information and training. (Refer to 29 CFR 1910.1200.)

# **PROGRAM REQUIREMENTS**

Employers must institute an information and training program and ensure that all employees subject to exposure to lead or lead compounds at or above the action level on any day participate. Also covered under information and training are employees who may suffer skin or eye irritation from lead compounds. Initial training must be provided before the initial job assignment. Training must be repeated at least annually and, in brief summary, must include:

- The content of the OSHA lead standard and its appendices;
- The specific nature of operations that could lead to lead expo-sure above the action level;
- 29 This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.
■ The purpose, proper selection, fit, use, and limitations of respirators;

■ The purpose and a description of the medical surveillance program, and the medical removal protection program;

- Information concerning the adverse health effects associated with excessive lead exposure;
- The engineering and work practice controls associated with employees' job assignments;
- The contents of any lead-related compliance plan in effect;
- Instructions to employees that chelating agents must not be used routinely to remove lead from their bodies and when necessary only under medical supervision and at the direction of a licensed physician; and

■ The right to access records under "Access to Employee Exposure and Medical Records," 29 CFR 1910.1020.

All materials relating to the training program and a copy of the standard and its appendices must be made readily available to all affected employees.

## WARNING SIGNS

Employers are required to post these warning signs in each work area where employee exposure to lead is above the PEL:

- WARNING
- LEAD WORK AREA
- POISON
- NO SMOKING OR EATING

All signs must be well lit and kept clean so that they are easily visible. Statements that contradict or detract from the signs' meaning are prohibited. Signs required by other statutes, regulations, or ordinances, however, may be posted in addition to, or in combination with, this sign.



## **OSHA Assistance, Services, and Products**

OSHA can provide extensive help through a variety of programs, including assistance about safety and health programs, state plans, workplace consultations, voluntary protection programs, strategic partnerships, alliances, and training and education. An overall commitment to workplace safety and health can add value to your business, to your workplace, and to your life.

How does safety and health management system assistance help employers and employees? Working in a safe and healthful environment can stimulate innovation and creativity and result in increased performance and higher productivity. The key to a safe and healthful work environment is a comprehensive safety and health management system.

OSHA has electronic compliance assistance tools, or eTools, on its website that walks users through the steps required to develop a comprehensive safety and health program. The eTools are posted at

www.osha.gov, and are based on guidelines that identify four general elements critical to a successful safety and health management system:

- Management leadership and employee involvement,
- Worksite analysis,
- Hazard prevention and control, and
- Safety and health training.

## **STATE PROGRAMS**

The Occupational Safety and Health Act of 1970 (OSH Act) encourages states to develop and operate their own job safety and health plans. OSHA approves and monitors these plans and funds up to 50 percent of each program's operating costs. State plans must provide standards and enforcement programs, as well as voluntary compliance activities that are at least as effective as federal OSHA's. Currently, 26 states and territories have their own plans. Twenty three cover both private and public (state and local government) employees and three states, Connecticut, New Jersey, and New York, cover only the public sector. For more information on state plans, see the list at the end of this publication, or visit OSHA's website at <u>www.osha.gov</u>.

# CONSULTATION ASSISTANCE

Consultation assistance is available on request to employers who want help establishing and maintaining a safe and healthful workplace. Funded largely by OSHA, the service is provided at no cost to small employers and is delivered by state authorities through professional safety and health consultants.

# SAFETY AND HEALTH ACHIEVEMENT RECOGNITION PROGRAM

Under the consultation program, certain exemplary employers may request participation in OSHA's Safety and Health Achievement Recognition Program (SHARP). Eligibility for participation includes, but is not limited to, receiving a full-service, comprehensive consultation visit, correcting all identified hazards, and developing an effective safety and health management system.

Employers accepted into SHARP may receive an exemption from programmed inspections (not complaint or accident investigation inspections) for 1 year initially, or 2 years upon renewal. For more information about consultation assistance, see the list of consultation projects at the end of this publication.

## **VOLUNTARY PROTECTION PROGRAMS**

Voluntary Protection Programs (VPP) are designed to recognize outstanding achievements by companies that have developed and implemented effective safety and health management programs. There are three VPP programs: Star, Merit, and Demonstration. All are designed to

■ Recognize who that have successfully developed and implemented effective and comprehensive safety and health management programs;

• Encourage these employers to continuously improve their safety and health management programs;

• Motivate other employers to achieve excellent safety and health results in the same outstanding way; and

• Establish a cooperative relationship between employers, employees, and OSHA.

VPP participation can bring many benefits to employers and employees, including fewer worker fatalities, injuries, and illnesses; lost-workday case rates generally 50 percent below industry averages; and lower workers' compensation and other injury- and illness-related costs. In addition, many VPP sites

report improved employee motivation to work safely, leading to a better quality of life at work; positive community recognition and interaction; further improvement and revitalization of already-good safety and health programs; and a positive relationship with OSHA.

After a site applies for the program, OSHA reviews an employer's VPP application and conducts a VPP onsite evaluation to verify that the site's safety and health management programs are operating effectively. OSHA conducts onsite evaluations on a regular basis.

Sites participating in VPP are not scheduled for regular, programmed inspections. OSHA does, however, handle any employee complaints, serious accidents, or significant chemical releases that may occur at VPP sites according to routine enforcement procedures.

Additional information on VPP is available from OSHA regional offices listed at the end of this booklet. Also, see "Cooperative Programs" on OSHA's website.

# **COOPERATIVE PARTNERSHIPS**

OSHA has learned firsthand that voluntary, cooperative partnerships with employers, employees, and unions can be a useful alternative to traditional enforcement and an effective way to reduce worker deaths, injuries, and illnesses. This is especially true when a partnership leads to the development and implementation of a comprehensive workplace safety and health management system.

# ALLIANCE PROGRAM

Alliances enable organizations committed to workplace safety and health to collaborate with OSHA to prevent injuries and illnesses in the workplace. OSHA and its allies work together to reach out to, educate, and lead the nation's employers and their employees in improving and advancing workplace safety and health.

Alliances are open to all, including trade or professional organizations, businesses, labor organizations, educational institutions, and government agencies. In some cases, organizations may be building on existing relationships with OSHA through other cooperative programs.

There are few formal program requirements for alliances, which are less structured than other cooperative agreements, and the agreements do not include an enforcement component. However, OSHA and the participating organizations must define, implement, and meet a set of short- and long-term goals that fall into three categories: training and education; outreach and communication; and promotion of the national dialogue on workplace safety and health.

## STRATEGIC PARTNERSHIP PROGRAM

OSHA Strategic Partnerships are agreements among labor, management, and government to improve workplace safety and health.

These partnerships encourage, assist, and recognize the efforts of the partners to eliminate serious workplace hazards and achieve a high level of worker safety and health. Whereas OSHA's Consultation Program and VPP entail one-on-one relationships between OSHA and individual worksites, most strategic partnerships build cooperative relationships with groups of employers and employees. For more information about this program, contact your nearest OSHA office or visit our website.

# **OCCUPATIONAL SAFETY AND HEALTH TRAINING**

The OSHA Training Institute in Arlington Heights, Ill., provides basic and advanced training and education in safety and health for federal and state compliance officers, state consultants, other federal agency personnel, and private-sector employers, employees, and their representatives.

# **TRAINING GRANTS**

OSHA awards grants to nonprofit organizations to provide safety and health training and education to employers and workers in the workplace. Grants often focus on high-risk activities or hazards or may help nonprofit organizations in training, education, and outreach.

OSHA expects each grantee to develop a program that addresses a safety and health topic named by OSHA, recruit workers and employers for the training, and conduct the training.

Grantees are also expected to follow up with students to find out how they applied the training in their workplaces.

For more information contact OSHA Office of Training and Education, 2020 Arlington Heights Rd., Arlington Heights, IL 60005; or call (847) 297-4810.

# **OTHER ASSISTANCE MATERIALS**

OSHA has a variety of materials and tools on its website at www.osha.gov. These include eTools such as Expert Advisors and Electronic Compliance Assistance Tools, information on specific health and safety topics, regulations, directives, publications, videos, and other information for employers and employees.

OSHA also has an extensive publications program. For a list of items, visit OSHA's website at <u>www.osha.gov</u> or contact the OSHA Publications Office, U.S. Department of Labor, 200 Constitution Avenue, NW, N-3101, Washington, DC 20210. Telephone (202) 693-1888 or fax to (202) 693-2498. In addition, OSHA's CD-ROM includes standards, interpretations, directives, and more. It is available for sale from the U.S. Government Printing Office. To order, write to the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402, or phone (202) 512-1800.

# IN CASE OF AN EMERGENCY OR TO FILE A COMPLAINT

To report an emergency, file a complaint, or seek OSHA advice, assistance, or products, call (800) 321-OSHA or contact your nearest OSHA regional office listed at the end of this publication. The teletypewriter (TTY) number is (877) 889-5627.

Employees can also file a complaint online and get more information on OSHA federal and state programs by visiting OSHA's website at <u>www.osha.gov</u>.

# **OSHA Regional Offices**

\*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut, New Jersey, and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard. Note: To get contact information for OSHA Area Offices, OSHA-approved state plans, and OSHA Consultation Projects, please visit us online at <u>www.osha.gov</u> or call us at (800) 321-OSHA.

Region I           (CT,* ME, MA, NH, RI, VT*)           Boston, MA 02203           (617) 565-9860           Region II	Region VI           (AR, LA, NM,* OK, TX)           525 Griffin Street, Room 602           Dallas, TX 75202           (214) 767-4731 or 4736 x224           Region VII
(NJ,* NY,* PR,* VI*) 201 Varick Street, Room 670 New York, NY 10014 (212) 337-2378	(IA,* KS, MO, NE) City Center Square 1100 Main Street, Suite 800 Kansas City, MO 64105 (816) 426-5861
Region III (DE, DC, MD,* PA,* VA,* WV) The Curtis Center 170 S. Independence Mall West Suite 740 West Philadelphia, PA 19106-3309 (215) 861-4900	<b>Region VIII</b> (CO, MT, ND, SD, UT,* WY*) 1999 Broadway, Suite 1690 PO Box 46550 Denver, CO 80202-5716 (303) 844-1600
Region IV (AL, FL, GA, KY,* MS, NC,* SC,* TN*) Atlanta Federal Center 61 Forsyth Street SW, Room 6T50 Atlanta, GA 30303 (404) 562-2300	Region IX (American Samoa, AZ,* CA,* HI, NV,* Northern Mariana Islands) 71 Stevenson Street, Room 420 San Francisco, CA 94105 (415) 975-4310
<b>Region V</b> (IL, IN,* MI,* MN,* OH, WI) 230 South Dearborn Street, Room 3244 Chicago, IL 60604 (312) 353-2220	Region X (AK,* ID, OR,* WA*) 1111 Third Avenue, Suite 715 Seattle, WA 98101-3212 (206) 553-5930

<sup>34</sup> This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.

# Blood Lead Laboratories - Wisconsin (as of 2/17/2012)

The OSHA Lead Standards for General Industry (<u>29 CFR 1910.1025</u>) and Construction (<u>29 CFR 1926.62</u>) require employers to provide biological monitoring for workers exposed to airborne lead above the action level. Monitoring must be provided for lead and zinc protoporphyrin (or free erythrocyte protoporphyrin) in blood. The employer is required to have these analyses performed by a laboratory that meets accuracy requirements specified by OSHA.

The OSHA List of Laboratories Approved for Blood Lead Analysis is designed to provide a source for regulated employers to locate laboratories that OSHA has determined meet the requirements of the accuracy provisions of the Lead Standards. Laboratories voluntarily provide proficiency test data to OSHA for evaluation.

ACL Industrial Toxicology Laboratory	Gundersen Lutheran Laboratory	
Mary J Reznicek	Gary Wickus	
8901 West Lincoln Avenue	1910 South Street	
P.O. Box 27167A	La Crosse, WI 54601	
West Allis, WI 53227]		
Bellin Hospital	Marshfield Med Ctr-St Josephs	
Laura Blecha	Robert A Carlson, MD	
744 South Webster Avenue	1000 North Oak Avenue	
Green Bay, WI 54305	Marshfield, WI 54449	
920-433-3650, x3067		
920-433-5761		
Fax: 920-433-5985		
e-mail: <u>lablec@bellin.org</u>		
Consultants Laboratory of Wisconsin	Milwaukee Health Department	
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## **OSHA Awareness Training – Trenching and Excavations**



## Do<u>NOT</u> enter an unprotected trench!



# Working safely in trenches

Each employee in a trench shall be protected from a cave-in by an adequate protective system. Some of the protective systems for trenches are:



(Source: Trench Safety Tips Card – OSHA)

# **OSHA FACT SHEET -** Trenching and Excavation Safety

Excavation and trenching are among the most hazardous construction operations. OSHA defines an excavation as any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal. A trench is defined as a narrow underground excavation that is deeper than it is wide, and is no wider than 15 feet (4.5 meters).



#### **Dangers of Trenching and Excavation**

Cave-ins pose the greatest risk and are much more likely than other excavation related accidents to result in worker fatalities. Other potential hazards include falls, falling loads, hazardous atmospheres, and incidents involving mobile equipment. Trench collapses cause dozens of fatalities and hundreds of injuries each year.

#### **Protect Yourself**

Do not enter an unprotected trench! Trenches 5 feet (1.5 meters) deep or greater require a protective system unless the excavation is made entirely in stable rock. Trenches 20 feet (6.1 meters) deep or greater require that the protective system be designed by a registered professional engineer or be based on tabulated data prepared and/ or approved by a registered professional engineer.



Would you say this worker is protecting himself? Why or why not!

#### **Protective Systems**

There are different types of protective systems. **Sloping** involves cutting back the trench wall at an angle inclined away from the excavation. **Shoring** requires installing aluminum hydraulic or other types of supports to prevent soil movement and caveins. **Shielding** protects workers by using trench boxes or other types of supports to prevent soil cave-ins. Designing a protective system can be complex because you must consider many factors: soil classification, depth of cut, water content of

soil, changes due to weather or climate, surcharge loads (eg., spoil, other materials to be used in the trench) and other operations in the vicinity.

Examples of Sloping, shoring and shielding:



#### **Competent Person**

OSHA standards require that trenches be inspected daily and as conditions change by a competent person prior to worker entry to ensure elimination of excavation hazards. A competent person is an individual who is capable of identifying existing and predictable hazards or working conditions that are hazardous, unsanitary, or dangerous to employees and who is authorized to take prompt corrective measures to eliminate or control these hazards and conditions.



A competent person needs to inspect a trench daily and as conditions change!

#### **Access and Egress**

OSHA requires safe access and egress to all excavations, including ladders, steps, ramps, or other safe means of exit for employees working in trench excavations 4 feet (1.22 meters) or deeper. These devices must be located within 25 feet (7.6 meters) of all workers.

#### **General Trenching and Excavation Rules**

- Keep heavy equipment away from trench edges.
- Keep surcharge loads at least 2 feet (0.6 meters) from trench edges.
- Know where underground utilities are located.
- Test for low oxygen, hazardous fumes and toxic gases.
- Inspect trenches at the start of each shift.
- Inspect trenches following a rainstorm.
- Do not work under raised loads.

#### **Two Examples of Vibration Failures**



Soil affected by the movement of the crane and susceptible to sliding

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Soil affected by the movement of the truck and susceptible to sliding

## **Additional Information**

Visit OSHA's Safety and Health Topics web page on trenching and excavation at <a href="http://www.osha.gov/SLTC/trenchingexcavation/index.html">http://www.osha.gov/SLTC/trenchingexcavation/index.html</a>

# **OSHA – EXCAVATIONS**

#### Introduction

Excavation and trenching are among the most hazardous construction operations. The Occupational Safety and Health Administration's (OSHA) Excavation and Trenching standard, Title 29 of the Code of Federal Regulation (CFR), Part 1926.650, covers requirements for excavation and trenching operations. This booklet highlights key elements of the standard, shows ways to protect employees against cave-ins, and describes safe work practices for employees.

#### What is the difference between an excavation and a trench?

OSHA defines an excavation as any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal. This can include excavations for anything from cellars to highways. A trench is defined as a narrow underground excavation that is deeper than it is wide, and no wider than 15 feet (4.5 meters).



This worker has cut a trench to		
extract a tree stump.		
His equipment is dangerously close		
and could possibly create a cave-in.		

#### What are the dangers of trenching and excavation operations?

Trenching and excavation work presents serious hazards to all workers involved. Cave-ins pose the greatest risk and are much more likely than other excavation-related accidents to result in worker fatalities. Other potential hazards include falls, falling loads, hazardous atmospheres, and incidents involving mobile equipment.



Heavy loads such as large equipment, heavy materials or large spoil piles can be too heavy for the soil to support, resulting in cave-ins. Tension cracks are often the first sign of a possible cave-in.

This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.

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# **OSHA's Excavation and Trenching Standard**

#### What does the OSHA standard cover, and what protections does it offer?

The rule applies to all open excavations made in the earth's surface, including trenches. Strict compliance with all sections of the standard will prevent or greatly reduce the risk of cave-ins as well as other excavation-related accidents.

## What kinds of excavations and trenches are not covered?

The standard does not apply to house foundation/ basement excavations, including those that become trenches by definition when constructing formwork, foundations, or walls. For this exemption to apply, all the following conditions must exist:

• The excavation is less than 7-1/2 feet (2.5 meters) deep or is benched for at least 2 feet (.61 meters) horizontally for every 5 feet (1.52 meters) or less of vertical height;

• The bottom of the excavation, from the excavation face to the formwork or wall, is at least 2 feet (.61 meters) wide, and wider if possible;

• No water, surface tension cracks, or other environmental conditions reduce the excavation's stability;

• No heavy equipment is vibrating the excavation while employees are in it;

• Soil, equipment, and material surcharge loads are no closer to the top edge of the excavation than the excavation is deep. When you use front-end loaders to dig the excavations, place the soil surcharge load as far back from the edge of the excavation as possible, but never closer than 2 feet (.61 meters);

• The fewest crew members possible are performing the work; and

• Workers spend the minimum time possible in the excavation.



Do you think this work site is exempt from the OSHA standards? Does it meet all 7 exemptions above?

This exemption does not apply to utility excavations or trenches, which are covered by 29 CFR 1926.652.

# Preplanning

#### Why is it important to preplan the excavation work?

No matter how many trenching, shoring, and backfilling jobs you have done in the past, it is important to approach each new job with the utmost care and preparation. Many on-the-job accidents result directly from inadequate initial planning. Waiting until after the work has started to correct mistakes in shoring or sloping slows down the operation, adds to the cost, and increases the possibility of a cave-in or other excavation failure.

## What safety factors should you consider when bidding on a job?

Before preparing a bid, you will want to know as much as possible about the jobsite and the materials you will need to have on hand to perform the work safely and in compliance with OSHA standards. A safety checklist may prove helpful when you consider specific site conditions such as the following: • Traffic,

- Proximity and physical conditions of nearby structures,
- Soil,
- Surface and ground water,
- Location of the water table,
- Overhead and underground utilities, and
- Weather.

You can determine these and other conditions through jobsite studies, observations, test borings for soil type or conditions, and consultations with local officials and utility companies. This information will help you determine the amount, kind, and cost of safety equipment you will need to perform the work in the safest manner possible.

## How can you avoid hitting underground utility lines and pipes during excavation work?

Before starting work, the OSHA standard requires you to do the following:

• Determine the approximate location of utility installations—sewer, telephone, fuel, electric, and water lines; or any other underground installations;

• Contact the utility companies or owners involved to inform them of the proposed work within established or customary local response times; and

• Ask the utility companies or owners to find the exact location of underground installations. If they cannot respond within 24 hours (unless the period required by state or local law is longer) or cannot find the exact location of the utility installations, you may proceed with caution.

If your excavation work exposes underground installations, OSHA regulations require you to protect, properly support, or remove them.





## What should you tell workers before they start the project?

When you share the details of your safety and health program with employees, it is important to emphasize the critical role you expect them to play in keeping the jobsite safe. You may want to emphasize specific rules to help reduce the risk of on-the-job injuries. These rules may include requirements that workers

• Remove or minimize all surface obstacles at the worksite that may create a hazard,

• Wear warning vests or other reflective or high-visibility garments that you provide when they are exposed to vehicular traffic,

• Wear or use prescribed protective gear and equipment correctly,

• Operate equipment only if they have been trained properly in its use and alerted to its potential hazards, and

• Follow safe work practices.

It also is important to establish and maintain a safety and health management system for the worksite that provides adequate systematic policies, procedures, and practices to protect employees from, and allow them to recognize, job-related safety and health hazards.



## **Protective Systems**

#### How can you prevent cave-ins?

OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by

- Sloping or benching the sides of the excavation,
- Supporting the sides of the excavation, or
- Placing a shield between the side of the excavation and the work area.

#### How do you choose the most appropriate protective system design?

Designing a protective system can be complex because you must consider many factors: soil classification, depth of cut, water content of soil, changes due to weather and climate, or other operations in the vicinity. You are free to choose the most practical design approach for any particular circumstance.

Once you have selected an approach, however, the system must meet the required performance criteria.

The OSHA standard describes methods and approaches for designing protective systems such as the following:

**Method 1** - Slope the sides to an angle not steeper than 1-1/2:1; for example, for every foot of depth, the trench must be excavated back 1-1/2 feet. All simple slope excavations 20 feet (6.11 meters) or less deep should have a maximum allowable slope of 1-1/2:1. These slopes must be excavated to form configurations similar to those for Type C soil, as described in Appendix B of the standard. A slope of this gradation or less is safe for any type of soil.



**Method 2** - Use tabulated data such as tables and charts approved by a registered professional engineer to design the excavation. These data must be in writing and must include enough explanatory information, including the criteria for making a selection and the limits on the use of the data, for the user to make a selection. At least one copy of the data, including the identity of the registered professional engineer who approved it, must be kept at the worksite during construction of the protective system. After the system is completed, the data may be stored away from the jobsite, but a copy must be provided upon request to the Assistant Secretary of Labor for OSHA.

**Method 3** - Use a trench box or shield designed or approved by a registered professional engineer or based on tabulated data prepared or approved by a registered professional engineer. Timber, aluminum, or other suitable materials may also be used. OSHA standards permit the use of a trench shield (also known as a welder's hut) if it provides the same level of protection or more than the appropriate shoring system.



Figure 2. Trench Shields

Employers can choose the most practical method for the particular circumstance, but that system must meet the required performance criteria. The standard does not require a protective system when an excavation is made entirely in stable rock or is less than 5 feet (1.52 meters) deep, if a competent person has examined the ground and found no indication of a potential cave-in.

#### What other safety precautions are you required to take?

The standard requires you to provide support systems such as shoring, bracing, or underpinning to ensure that adjacent structures such as buildings, walls, sidewalks, or pavements remain stable. The standard also prohibits excavation below the base or footing of any foundation or retaining wall unless

- You provide a support system such as underpinning,
- The excavation is in stable rock, or

• A registered professional engineer determines that the structure is far enough away from the excavation and that excavation will not pose a hazard to employees.

Excavations under sidewalks and pavements are prohibited unless you provide an appropriately designed support system or another effective means of support.

#### Example of Air Shoring or Hydraulic Shoring



#### How do you safely install and remove protective systems?

The standard requires you to take the following steps to protect employees when installing support systems:

- Connect members of support systems securely,
- Install support systems safely,
- · Avoid overloading members of support systems, and

• Install other structural members to carry loads imposed on the support system when you need to remove individual members temporarily.

In addition, the standard permits excavation of 2 feet (.61 meters) or less below the bottom of the members of a support or shield system of a trench if the system is designed to resist the forces

calculated for the full depth of the trench. In addition, there must be no indications, while the trench is open, of a possible cave-in below the bottom of the support system. Also, you must coordinate the installation of support systems closely with the excavation work.

As soon as work is completed, you are required to backfill the excavation when you dismantle the protective system. After the excavation is cleared, remove the protective system from the bottom up, taking care to release members slowly.

#### How should you maintain materials and equipment used for protective systems?

You are responsible for maintaining materials and equipment used for protective systems. Defective and damaged materials and equipment can cause failure of a protective system and other excavation hazards.

To avoid possible failure of a protective system, you must ensure that

• Materials and equipment are free from damage or defects;

• Manufactured materials and equipment are used and maintained consistent with the manufacturer's recommendations, so as to prevent employee exposure to hazards; and while in operation,

• A competent person examines any damaged materials and equipment. You must remove unsafe materials and equipment from service until a registered professional engineer evaluates and approves them for use.

## **Additional Hazards and Protections**

#### What other excavation hazards do you need to protect workers against?

In addition to cave-ins and related hazards, workers involved in excavation work also are exposed to hazards involving falls, falling loads, and mobile equipment. To protect employees from these hazards, OSHA requires you to take the following precautions:

• Keep materials or equipment that might fall or roll into an excavation at least 2 feet (.61 meters) from the edge of excavations, or use retaining devices, or both.



The remains of this house are a safety hazard for workers. The debris is too close to the excavation and there is no protective barricade. Is there anything else missing?

• Provide warning systems such as mobile equipment, barricades, hand or mechanical signals, or stop logs to alert operators to the edge of an excavation. If possible, keep the grade away from the excavation.

• Provide scaling to remove loose rock or soil, or install protective barricades and other equivalent protection to protect employees against falling rock, soil, or materials.

• Prohibit employees from working on faces of sloped or benched excavations at levels above other employees unless you provide the employees at the lower levels adequate protection from the hazard of falling, rolling, or sliding material or equipment.

• Prohibit employees from standing or working under loads being handled by lifting or digging equipment. Require workers to stand away from vehicles being loaded or unloaded to protect them from being struck by any spillage or falling materials. You may permit operators to remain inside cabs of vehicles if they provide adequate protection from falling loads during loading and unloading operations.



These employees are	standing or working
too close to the diggin	ng equipment.

#### What is the effect of water accumulation on excavation safety?

Among the additional hazards stemming from water in an excavation are undermining the sides and making it more difficult to get out of the excavation. The OSHA standard prohibits employees from working without adequate protection in excavations where water has accumulated or is accumulating. If you use water removal equipment to control or prevent water accumulation, you must ensure that a competent person monitors the equipment and its operation to ensure proper use. OSHA standards also require the use of diversion ditches, dikes, or other suitable means to prevent surface water from entering an excavation and to provide adequate drainage of the adjacent area. In addition, a competent person must inspect excavations subject to runoffs from heavy rains.



#### How can you protect workers against hazardous atmospheres inside excavations?

A competent person must test any excavation deeper than 4 feet (1.22 meters) or where an oxygen deficiency or a hazardous atmosphere is present or could reasonably be expected, such as a landfill or where hazardous substances are stored nearby, before an employee enters it. If there are any hazardous conditions, you must provide the employee controls such as proper respiratory protection or ventilation. In addition, you are responsible for regularly testing all controls used to reduce atmospheric contaminants to acceptable levels.

If unhealthful atmospheric conditions exist or develop in an excavation, you must provide emergency rescue equipment such as a breathing apparatus, safety harness and line, and basket stretcher and ensure that it is readily available. This equipment must be attended when in use.

#### What means of access and egress are you required to provide?

OSHA requires you to provide safe access and egress to all excavations, including ladders, steps, ramps, or other safe means of exit for employees working in trench excavations 4 feet (1.22 meters) or deeper. These devices must be located in the excavation within 25 feet (7.62 meters) of all workers.

Any structural ramps you use in your operation must be designed by a competent person if they are used for employee access or egress, or by a competent person qualified in structural design if they are used for vehicles. Also, structural members used for ramps or runways must be uniform in thickness and joined in a manner to prevent tripping or displacement.



A safe means of egress shall be provided within 25 feet of workers in a trench

# What protective equipment are employees in pier holes and confined footing excavations required to use?

An employee who enters a bell-bottom pier hole or similar deep and confined footing excavation must wear a harness with a lifeline. The lifeline must be attached securely to the harness and must be separate from any line used to handle materials. Also, while the employee wearing the lifeline is in the excavation, an observer must be on hand to ensure that the lifeline is working properly and maintain communication with the employee.



Which one of these workers is wearing his harness correctly?

The one on left ... or the one on the right?



You are correct...... the one on the right.

#### When should you conduct a site inspection?

The standard requires that a competent person inspect an excavation and the areas around it daily for possible cave-ins, failures of protective systems and equipment, hazardous atmospheres, or other hazardous conditions. Inspections also are required after natural events such as heavy rains or manmade events such as blasting that may increase the potential for hazards. If the inspector finds any unsafe conditions during an inspection, you must clear employees from the hazardous area until you take safety precautions.

The standard also requires that a competent person inspect excavations and the adjacent areas daily for possible cave-ins, failures of protective systems and equipment, hazardous atmospheres, and other hazardous conditions. If the competent person finds these conditions, all exposed employees must leave the hazardous area until necessary safety precautions are taken.

Larger and more complex operations should have a full-time safety official who makes recommendations to improve implementation of the safety plan. In a smaller operation, the safety official may be part-time and usually will be a supervisor.

Supervisors are the contractor's representatives on the job. Supervisors should conduct inspections, investigate accidents, and anticipate hazards. They should ensure that employees receive on-the-job safety and health training. They also should review and strengthen overall safety and health precautions to guard against potential hazards, get the necessary worker cooperation in safety matters, and make frequent reports to the contractor.

# **OSHA Assistance, Services, and Programs**

## How can OSHA help me?

OSHA can provide extensive help through a variety of programs, including assistance about safety and health programs, state plans, workplace consultations, Voluntary Protection Programs, strategic partnerships, training and education, and more.

## How does safety and health program management help employers and employees?

Effective management of worker safety and health protection is a decisive factor in reducing the extent and severity of work-related injuries and illnesses and their related costs. In fact, an effective safety and health management system forms the basis of good worker protection and can save time and money—about \$4 for every dollar spent—and increase productivity.

To assist employers and employees in developing effective safety and health programs, OSHA published recommended Safety and Health Program Management Guidelines (Federal Register 54(18):3904–3916, January 26, 1989).

These voluntary guidelines can be applied to all worksites covered by OSHA.

The guidelines identify four general elements critical to the development of a successful safety and health management program:

- Management leadership and employee participation,
- Worksite analysis,
- · Hazard prevention and control, and
- Safety and health training.

The guidelines recommend specific actions under each of these general elements to achieve an effective safety and health program. The Federal Register notice is available online at <u>www.osha.gov</u>

#### What are state plans?

State plans are OSHA-approved job safety and health programs operated by individual states or territories instead of Federal OSHA. The Occupational Safety and Health Act of 1970 (OSH Act ) encourages states to develop and operate their own job safety and health plans and permits state enforcement of OSHA standards if the state has an approved plan. Once OSHA approves a state plan, it funds 50 percent of the program's operating costs. State plans must provide standards and enforcement programs, as well as voluntary compliance activities that are at least as effective as those of Federal OSHA.

There are 26 state plans: 23 cover both private and public (state and local government) employment, and 3 (Connecticut, New Jersey, and New York) cover only the public sector. For more information on state plans, see the listing at the end of this publication, or visit OSHA's website at <u>www.osha.gov</u>

#### How can consultation assistance help employers?

In addition to helping employers identify and correct specific hazards, OSHA's consultation service provides free, onsite assistance in developing and implementing effective workplace safety and health management systems that emphasize the prevention of worker injuries and illnesses.

Comprehensive consultation assistance provided by OSHA includes a hazard survey of the worksite and an appraisal of all aspects of the employer's existing safety and health management system. In addition, the service offers assistance to employers in developing and implementing an effective safety and health management system. Employers also may receive training and education services, as well as limited assistance away from the worksite.

#### Who can get consultation assistance and what does it cost?

Consultation assistance is available to small employers (with fewer than 250 employees at a fixed site and no more than 500 corporatewide) who want help in establishing and maintaining a safe and healthful workplace.

Funded largely by OSHA, the service is provided at no cost to the employer. Primarily developed for smaller employers with more hazardous operations, the consultation service is delivered by state governments employing professional safety and health consultants. No penalties are proposed or citations issued for hazards identified by the consultant. The employer's only obligation is to correct all identified serious hazards within the agreed-upon correction time frame.

## Can OSHA assure privacy to an employer who asks for consultation assistance?

OSHA provides consultation assistance to the employer with the assurance that his or her name and firm and any information about the workplace will not be routinely reported to OSHA enforcement staff.

#### Can an employer be cited for violations after receiving consultation assistance?

If an employer fails to eliminate or control a serious hazard within the agreed-upon time frame, the consultation project manager must refer the situation to the OSHA enforcement office for appropriate action. This is a rare occurrence, however, since employers request the service for the expressed purpose of identifying and fixing hazards in their workplaces.

#### Does OSHA provide any incentives for seeking consultation assistance?

Yes. Under the consultation program, certain exemplary employers may request participation in OSHA's Safety and Health Achievement Recognition Program (SHARP). Eligibility for participation in SHARP includes, but is not limited to, receiving a full-service, comprehensive consultation visit, correcting all identified hazards, and developing an effective safety and health management system.

Employers accepted into SHARP may receive an exemption from programmed inspections (not complaint or accident investigation inspections) for a period of 1 year initially, or 2 years upon renewal. For more information concerning consultation assistance, see the list of consultation offices or contact your regional or area OSHA office, or visit OSHA's website at www.osha.gov.

#### What are the Voluntary Protection Programs?

Voluntary Protection Programs (VPPs) represent one part of OSHA's effort to extend worker protection beyond the minimum required by OSHA standards. VPP - along with onsite consultation services, full-service area offices, and OSHA's Strategic Partnership Program (OSPP) - represents a cooperative approach which, when coupled with an effective enforcement program, expands worker protection to help meet the goals of the OSH Act.

#### How do the VPP work?

There are three levels of VPPs: Star, Merit, and Demonstration. All are designed to do the following: • Recognize employers who have successfully developed and implemented effective and comprehensive safety and health management systems;

• Encourage these employers to continuously improve their safety and health management systems;

• Motivate other employers to achieve excellent safety and health results in the same outstanding way; and

• Establish a relationship between employers, employees, and OSHA that is based on cooperation.

#### How do VPP help employers and employees?

VPP participation can mean the following:

- Fewer worker fatalities, injuries, and illnesses;
- Lost-workday case rates generally 50 percent below industry averages;
- Lower workers' compensation and other injury- and illness-related costs;
- Improved employee motivation to work safely, leading to a better quality of life at work;
- Positive community recognition and interaction;
- Further improvement and revitalization of already-good safety and health programs; and a
- Positive relationship with OSHA.

#### How does OSHA monitor VPP sites?

OSHA reviews an employer's VPP application and conducts a VPP Onsite Evaluation to verify that the safety and health management systems described are operating effectively at the site. OSHA conducts onsite evaluations on a regular basis, annually for participants at the Demonstration level,

every 18 months for Merit, and every 3 to 5 years for Star. Each February, all participants must send a copy of their most recent annual evaluation to their OSHA regional office. This evaluation must include the worksite's record of injuries and illnesses for the past year.

#### Can OSHA inspect an employer who is participating in the VPP?

Sites participating in VPP are not scheduled for regular, programmed inspections. OSHA handles any employee complaints, serious accidents, or significant chemical releases that may occur at VPP sites according to routine enforcement procedures.

Additional information on VPP is available from OSHA national, regional, and area offices. Also, see **Outreach** on OSHA's website at <u>www.osha.gov</u>.

#### How can a partnership with OSHA improve worker safety and health?

OSHA has learned firsthand that voluntary, cooperative partnerships with employers, employees, and unions can be a useful alternative to traditional enforcement and an effective way to reduce worker deaths, injuries, and illnesses.

This is especially true when a partnership leads to the development and implementation of a comprehensive workplace safety and health management system.

#### What is OSHA.s Strategic Partnership Program (OSPP)?

OSHA Strategic Partnerships are alliances among labor, management, and government to foster improvements in workplace safety and health. These partnerships are voluntary, cooperative relationships between OSHA, employers, employee representatives, and others such as trade unions, trade and professional associations, universities, and other government agencies. OSPPs are the newest of OSHA's cooperative programs.

#### What do OSPPs do?

These partnerships encourage, assist, and recognize the efforts of the partners to eliminate serious workplace hazards and achieve a high level of worker safety and health.

Whereas OSHA's Consultation Program and VPP entail one-on-one relationships between OSHA and individual worksites, most strategic partnerships seek to have a broader impact by building cooperative relationships with groups of employers and employees.

#### What are the different kinds of OSPPs?

There are two major types:

• Comprehensive, which focus on establishing comprehensive safety and health management systems at partnering worksites; and

• Limited, which help identify and eliminate hazards associated with worker deaths, injuries, and illnesses, or have goals other than establishing comprehensive worksite safety and health programs. OSHA is interested in creating new OSPPs at the national, regional, and local levels. OSHA also has found limited partnerships to be valuable. Limited partnerships might address the elimination or control of a specific industry hazard.

#### What are the benefits of participation in the OSPP?

Like VPP, OSPP can mean the following:

- Fewer worker fatalities, injuries, and illnesses;
- Lower workers' compensation and other injury- and illness-related costs;
- 18 This handout is intended for use as a reference guide to our OSHA Awareness Series. Contact Kevin Wunderlin LLC – 608-348-6688 – if you have questions or comments.

• Improved employee motivation to work safely, leading to a better quality of life at work and enhanced productivity;

- Positive community recognition and interaction;
- Development of or improvement in safety and health management systems; and
- Positive interaction with OSHA.

For more information about this program, contact your nearest OSHA office or go to the agency website at **www.osha.gov**.

#### Does OSHA have occupational safety and health training for employers and employees?

The OSHA Training Institute in Des Plaines, IL, provides basic and advanced training and education in safety and health for federal and state compliance officers, state consultants, other federal agency personnel, and private sector employers, employees, and their representatives.

Institute courses cover diverse safety and health topics including electrical hazards, machine guarding, personal protective equipment, ventilation, and ergonomics. The facility includes classrooms, laboratories, a library, and an audiovisual unit. The laboratories contain various demonstrations and equipment, such as power presses, woodworking and welding shops, a complete industrial ventilation unit, and a sound demonstration laboratory.

More than 57 courses dealing with subjects such as safety and health in the construction industry and methods of compliance with OSHA standards are available for personnel in the private sector. In addition, OSHA's 73 area offices are full-service centers offering a variety of informational services such as personnel for speaking engagements, publications, audiovisual aids on workplace hazards, and technical advice.

For more information on grants, training, and education, write: OSHA Training Institute, Office of Training and Education, 1555 Times Drive, Des Plaines, IL 60018; call (847) 297–4810; or see **Outreach** on OSHA's website at <u>www.osha.gov</u>.

#### Does OSHA give money to organizations for training and education?

OSHA awards grants through its Susan Harwood Training Grant Program to nonprofit organizations to provide safety and health training and education to employers and workers in the workplace. The grants focus on programs that will educate workers and employers in small business (fewer than 250 employees), training workers and employers about new OSHA standards or about high-risk activities or hazards. Grants are awarded for 1 year and may be renewed for an additional 12 months depending on whether the grantee has performed satisfactorily.

OSHA expects each organization awarded a grant to develop a training and/or education program that addresses a safety and health topic named by OSHA, recruit workers and employers for the training, and conduct the training.

Grantees are also expected to follow up with people who have been trained to find out what changes were made to reduce the hazards in their workplaces as a result of the training.

Each year OSHA has a national competition that is announced in the Federal Register and on the Internet at <u>www.osha-slc.gov/Training/sharwood/sharwood.html</u>.

If you do not have access to the Internet, you can contact the OSHA Office of Training and Education, 1555 Times Drive, Des Plaines, IL 60018, (847) 297–4810, for more information.

#### Does OSHA have other assistance materials available?

OSHA has a variety of materials and tools available on its website at <u>www.osha.gov</u>. These include eTools, Expert Advisors, Electronic Compliance Assistance Tools (e-CATs), Technical Links,

regulations, directives, publications, videos, and other information for employers and employees. OSHA's software programs and compliance assistance tools walk you through challenging safety and health issues and common problems to find the best solutions for your workplace. OSHA's comprehensive publications program includes more than 100 titles to help you understand OSHA requirements and programs.

OSHA's CD-ROM includes standards, interpretations, directives, and more and can be purchased on CD-ROM from the U.S. Government Printing Office. To order, write to the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402, or phone (202) 512–1800. Specify OSHA Regulations, Documents and Technical Information on CD-ROM (ORDT), GPO Order No. S/N 729-013-00000-5.

#### What do I do in case of an emergency or if I need to file a complaint?

To report an emergency, file a complaint, or seek OSHA advice, assistance, or products, call (800) 321–OSHA or contact your nearest OSHA regional or area office listed at the end of this publication. The teletypewriter (TTY) number is (877) 889–5627.

You can also file a complaint online and obtain more information on OSHA federal and state programs by visiting OSHA's website at <u>www.osha.gov</u>.

# **OSHA Regional and Area Offices**

#### **OSHA Regional Offices**

\*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut, New Jersey and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.

Region I	Region VI
(CT * ME MA NU DI VT*)	(AD I A NM * OV TV)
(C1, ME, MA, NH, KI, V1)	(AK, LA, NW, OK, IA)
JFK Federal Building, Room E340	525 Griffin Street, Room 602
Boston, MA 02203	Dallas, TX 75202
(617) 565–9860	(214) 767–4731 or 4736 x224
Region II	Region VII
(NJ,* NY,* PR,* VI*)	(IA,* KS, MO, NE)
201 Varick Street, Room 670	City Center Square
New York, NY 10014	1100 Main Street, Suite 800
(212) 337–2378	Kansas City, MO 64105
	(816) 426–5861
Region III	Region VIII
(DE, DC, MD,* PA,* VA,* WV)	(CO, MT, ND, SD, UT,* WY*)
The Curtis Center	1999 Broadway, Suite 1690
170 S. Independence Mall West	PO Box 46550
Suite 740 West	Denver, CO 80202-5716
Philadelphia, PA 19106-3309	(303) 844–1600
(215) 861–4900	

Region IV	Region IX
(AL, FL, GA, KY,* MS, NC,* SC,* TN*)	(American Samoa, AZ,* CA,* HI,
SNAF	NV,* Northern Mariana Islands)
61 Forsyth Street SW	71 Stevenson Street, Room 420
Room 6T50	San Francisco, CA 94105
Atlanta, GA 30303	(415) 975–4310
(404) 562–2300	
Region V	Region X
(IL, IN,* MI,* MN,* OH, WI)	(AK,* ID, OR,* WA*)
230 South Dearborn Street,	1111 Third Avenue, Suite 715
Room 3244	Seattle, WA 98101-3212
Chicago, IL 60604	(206) 553–5930
(312) 353–2220	

\*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut, New Jersey and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.

# **OSHA Area Offices**

Anchorage, AK	North Aurora, IL	Avenel, NJ	Pittsburgh, PA
(907) 271–5152	(630) 896-8700	(732) 750–3270	(412) 395–4903
Birmingham, AL	Peoria, IL	Hasbrouck Heights,	Wilkes-Barre, PA
(205) 731–1534	(309) 671–7033	NJ	(570) 826–6538
		(201) 288–1700	
Mobile, AL	Indianapolis, IN	Marlton, NJ	Guaynabo, PR
(334) 441–6131	(317) 226–7290	(609) 757–5181	(787) 277–1560
Little Rock, AR	Wichita, KS	Parsippany, NJ	Providence, RI
(501) 324–6291	(316) 269–6644	(973) 263–1003	(401) 528-4669
(5818)			
Phoenix, AZ	Frankfort, KY	Albuquerque, NM	Columbia, SC
(602) 640–2348	(502) 227–7024	(505) 248–5302	(803) 765–5904
Sacramento, CA	Baton Rouge, LA	Carson City, NV	Nashville, TN
(916) 566-7471	(225) 389–0474	(775) 885–6963	(615) 781–5423
	(0431)		
San Diego, CA	Braintree, MA	Albany, NY	Austin, TX
(619) 557–5909	(617) 565–6924	(518) 464–4338	(512) 916–5783
			(5788)
Denver, CO	Methuen, MA	Bayside, NY	Corpus Christi, TX
(303) 844–5285	(617) 565-8110	(718) 279–9060	(512) 888-3420
Englewood, CO	Springfield, MA	Bowmansville, NY	Dallas, TX
(303) 843–4500	(413) 785–0123	(716) 684–3891	(214) 320–2400
			(2558)

Bridgeport, CT	Linthicum, MD	New York, NY	El Paso, TX
(203) 579–5581	(410) 865-2055/2056	(212) 466–2482	(915) 534–6251
Hartford, CT	August, ME	North Syracuse, NY	Fort Worth, TX
(860) 240–3152	(207) 622-8417	(315) 451–0808	(817) 428–2470
			(485–7647)
Wilmington, DE	Bangor, ME	Tarrytown, NY	Houston, TX
(302) 573–6518	(207) 941-8177	(914) 524–7510	(281) 591–2438
			(2787)
Fort Lauderdale, FL	Portland, ME	Westbury, NY	Houston, TX
(954) 424–0242	(207) 780–3178	(516) 334–3344	(281) 286–
			0583/0584 (5922)
Jacksonville, FL	Lansing, MI	Cincinnati, OH	Lubbock, TX
(904) 232–2895	(517) 327–0904	(513) 841–4132	(806) 472–7681
			(7685)
Tampa, FL	Minneapolis, MN	Cleveland, OH	Salt Lake City, UT
(813) 626–1177	(612) 664–5460	(216) 522–3818	(801) 530-6901
Savannah, GA	Kansas City, MO	Columbus, OH	Norfolk, VA
(912) 652–4393	(816) 483–9531	(614) 469–5582	(757) 441–3820
Smyrna, GA	St. Louis, MO	Toledo, OH	Bellevue, WA
(770) 984-8700	(314) 425–4289	(419) 259–7542	(206) 553-7520
Tucker, GA	Jackson, MS	Oklahoma City,OK	Appleton, WI
(770) 493–	(601) 965-4606	(405) 231–5351	(920) 734–4521
6644/6742/ 8419		(5389)	
Des Moines, IA	Billings, MT	Portland, OR	Eau Claire, WI
(515) 284–4794	(406) 247–7494	(503) 326–2251	(715) 832–9019
Boise, ID	Raleigh, NC	Allentown, PA	Madison, WI
(208) 321–2960	(919) 856-4770	(610) 776–0592	(608) 264–5388
Calumet City, IL	Bismark, ND	Erie, PA	Milwaukee, WI
(708) 891–3800	(701) 250-4521	(814) 833–5758	(414) 297–3315
Des Plaines, IL	Omaha, NE	Harrisburg, PA	Charleston, WV
(847) 803–4800	(402) 221-3182	(717) 782–3902	(304) 347–5937
Fairview Heights, IL	Concord, NH	Philadelphia, PA	
(618) 632–8612	(603) 225–1629	(215) 597–4955	



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# **OSHA Awareness Training – Stairways and Ladders**





## **Portable Ladder - Safety Tips**

Falls from portable ladders (step, straight, combination and extension) are one of the leading causes of occupational fatalities and injuries.

• Read and follow all labels/markings on the ladder.

• Avoid electrical hazards! – Look for overhead power lines before handling a ladder. Avoid using a metal ladder near power lines or exposed energized electrical equipment.

• Always inspect the ladder prior to using it. If the ladder is damaged, it must be removed from service and tagged until repaired or discarded.

• Always maintain a 3-point (two hands and a foot, or two feet and a hand) contact on the ladder when climbing. Keep your body near the middle of the step and always face the ladder while climbing (see diagram).



• Only use ladders and appropriate accessories (ladder levelers, jacks or hooks) for their designed purposes.

• Ladders must be free of any slippery material on the rungs, steps or feet.

• Do not use a self-supporting ladder (e.g., step ladder) as a single ladder or in a partially closed position.

• Do not use the top step/rung of a ladder as a step/rung unless it was designed for that purpose.

• Use a ladder only on a stable and level surface, unless it has been secured (top or bottom) to prevent displacement.

• Do not place a ladder on boxes, barrels or other unstable bases to obtain additional height.

• Do not move or shift a ladder while a person or equipment is on the ladder.

• An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support. Do not stand on the three top rungs of a straight, single or extension ladder.

• The proper angle for setting up a ladder is to place its base a quarter of the working length of the ladder from the wall or other vertical surface.

• A ladder placed in any location where it can be displaced by other work activities must be secured to prevent displacement or a barricade must be erected to keep traffic away from the ladder.

• Be sure that all locks on an extension ladder are properly engaged.

• Do not exceed the maximum load rating of a ladder. Be aware of the ladder's load rating and of the weight it is supporting, including the weight of any tools or equipment.

# Guide to OSHA Rules for Stairways and Ladders

#### Introduction

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Working on and around stairways and ladders is hazardous. Stairways and ladders are major sources of injuries and fatalities among construction workers for example, and many of the injuries are serious enough to require time off the job. OSHA rules apply to all stairways and ladders used in construction, alteration, repair, painting, decorating and demolition of worksites covered by OSHA's construction safety and health standards.

## **General Requirements**

These rules specify when employers must provide stairways and ladders. In general, the standards require the following:

When there is a break in elevation of 19 inches (48 cm) or more and no ramp, runway, embankment or personnel hoist is available, employers must provide a stairway or ladder at all worker points of access.
When there is only one point of access between levels, employers must keep it clear of obstacles to permit free passage by workers. If free passage becomes restricted, employers must provide a second point of access and ensure that workers use it.

- When there are more than two points of access between levels, employers must ensure that at least one point of access remains clear.

In addition, employers must install all stairway and ladder fall protection systems required by these rules and ensure that their worksite meets all requirements of the stairway and ladder rules before employees use stairways or ladders. See 29 *CFR* 1926.1050-1060 for the details of the standard. *Note:* The standard does not apply to ladders specifically manufactured for scaffold access and egress, but does apply to job-made and manufactured portable ladders intended for general purpose use. Rules

for ladders used on or with scaffolds are addressed in 29 CFR 1926.451 Subpart L.



Each year falls from ladders account for approximately 100 fatalities. Factors that contribute to falls from ladders are ladder slip (top or bottom), overreaching, slipping on rung/steps, defective equipment, and improper ladder selection for a given task.

## **Rules for Ladders - All Ladders**

The following rules apply to all ladders:

- Maintain ladders free of oil, grease and other slipping hazards.

- Do not load ladders beyond their maximum intended load nor beyond their manufacturer's rated capacity.

- Use ladders only for their designed purpose.

- Use ladders only on stable and level surfaces unless secured to prevent accidental movement.

- Do not use ladders on slippery surfaces unless secured or provided with slip-resistant feet to prevent

accidental movement. Do not use slip resistant feet as a substitute for exercising care when placing, lashing or holding a ladder upon slippery surfaces.

- Secure ladders placed in areas such as passageways, doorways or driveways, or where they can be displaced by workplace activities or traffic to prevent accidental movement. Or use a barricade to keep traffic or activity away from the ladder.

- Keep areas clear around the top and bottom of ladders.

- Do not move, shift or extend ladders while in use.

- Use ladders equipped with nonconductive side rails if the worker or the ladder could contact exposed energized electrical equipment.

- Face the ladder when moving up or down.

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- Use at least one hand to grasp the ladder when climbing.

- Do not carry objects or loads that could cause loss of balance and falling.



Can you identify the hazard?

The stepladder is improperly used. The stepladder is very unstable when it is used this way. Also, a guardrail is needed on the upper level.

In addition, the following general requirements apply to all ladders, including ladders built at the jobsite: - *Double-cleated ladders* or two or more ladders must be provided when ladders are the only way to enter or exit a work area where 25 or more employees work or when a ladder serves simultaneous two-way traffic.

- Ladder rungs, cleats and steps must be parallel, level and uniformly spaced when the ladder is in position for use.

Rungs, cleats and steps of *portable and fixed ladders* (except as provided below) must not be spaced less than 10 inches (25 cm) apart, nor more than 14 inches (36 cm) apart, along the ladder's side rails.
Rungs, cleats and steps of *step stools* must not be less than 8 inches (20 cm) apart, nor more than 12 inches (31 cm) apart, between center lines of the rungs, cleats and steps.

- Rungs, cleats and steps at the base section of *extension trestle ladders* must not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, between center lines of the rungs, cleats and steps. The rung spacing on the extension section must not be less than 6 inches (15 cm) nor more than 12 inches (31 cm).

- Ladders must not be tied or fastened together to create longer sections unless they are specifically designed for such use.

- When splicing side rails, the resulting side rail must be equivalent in strength to a one-piece side rail made of the same material.

Two or more separate ladders used to reach an elevated work area must be offset with a platform or landing between the ladders, except when portable ladders are used to gain access to fixed ladders.
Ladder components must be surfaced to prevent snagging of clothing and injury from punctures or lacerations.

- *Wood ladders* must not be coated with any opaque covering except for identification or warning labels, which may be placed only on one face of a side rail.

*Note:* A competent person must inspect ladders for visible defects periodically and after any incident that could affect their safe use.

# **Specific Types of Ladders**

- Do not use *single-rail ladders*.

- Use *non-self-supporting ladders* at an angle where the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder.

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- Use *wooden ladders* built at the jobsite with spliced side rails at an angle where the horizontal distance is one-eighth of the working length of the ladder.

In addition, the top of a non-self-supporting ladder must be placed with two rails supported equally unless it is equipped with a single support attachment.

#### Stepladders

- Do not use the top or top step of a stepladder as a step.

- Do not use cross bracing on the rear section of stepladders for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.

- Metal spreader or locking devices must be provided on stepladders to hold the front and back sections in an open position when ladders are being used.



#### **Portable Ladders**

The minimum clear distance between side rails for all portable ladders must be 11.5 inches (29 cm).

In addition, the rungs and steps of portable metal ladders must be corrugated, knurled, dimpled, coated with skid-resistant material or treated to minimize slipping.

Non-self-supporting and self-supporting portable ladders must support at least four times the maximum intended load; extra heavy-duty type 1A metal or plastic ladders must sustain 3.3 times the maximum intended load. To determine whether a self-supporting ladder can sustain a certain load, apply the load to the ladder in a downward vertical direction with the ladder placed at a horizontal angle of 75.5 degrees.

When portable ladders are used for access to an upper landing surface, the side rails must extend at least 3 feet (.9 m) above the upper landing surface. When such an extension is not possible, the ladder must be secured and a grasping device such as a grab rail must be provided to assist workers in mounting and dismounting the ladder. A ladder extension must not deflect under a load that would cause the ladder to slip off its supports.

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## **Fixed Ladders**

If the total length of the climb on a fixed ladder equals or exceeds 24 feet (7.3 m), the ladder must be equipped with ladder safety devices; *or* self-retracting lifelines and rest platforms at intervals not to exceed 150 feet (45.7 m); *or* a cage or well and multiple ladder sections with each ladder section not to exceed 50 feet (15.2 m) in length. These ladder sections must be offset from adjacent sections and landing platforms must be provided at maximum intervals of 50 feet (15.2 m). In addition, fixed ladders must meet the following requirements:

- Fixed ladders must be able to support at least two loads of 250 pounds (114 kg) each, concentrated between any two consecutive attachments. Fixed ladders also must support added anticipated loads caused by ice buildup, winds, rigging and impact loads resulting from using ladder safety devices.

- Individual rung/step ladders must extend at least 42 inches (1.1 m) above an access level or landing platform either by the continuation of the rung spacings as horizontal grab bars or by providing vertical grab bars that must have the same lateral spacing as the vertical legs of the ladder rails.

- Each step or rung of a fixed ladder must be able to support a load of at least 250 pounds (114 kg) applied in the middle of the step or rung.

- Minimum clear distance between the sides of individual rung/step ladders and between the side rails of other fixed ladders must be 16 inches (41 cm).

- Rungs of individual rung/step ladders must be shaped to prevent slipping off the end of the rungs.

- Rungs and steps of fixed metal ladders manufactured after March 15, 1991, must be corrugated, knurled, dimpled, coated with skid-resistant material or treated to minimize slipping.

- Minimum perpendicular clearance between fixed ladder rungs, cleats, and steps and any obstruction behind the ladder must be 7 inches (18 cm), except that the clearance for an elevator pit ladder must be 4.5 inches (11 cm).

- Minimum perpendicular clearance between the centerline of fixed ladder rungs, cleats and steps, and any obstruction on the climbing side of the ladder must be 30 inches (76 cm). If obstructions are unavoidable, clearance may be reduced to 24 inches (61 cm), provided a deflection device is installed to guide workers around the obstruction.

- Step-across distance between the center of the steps or rungs of fixed ladders and the nearest edge of a landing area must be no less than 7 inches (18 cm) and no more than 12 inches (30 cm). A landing platform must be provided if the step-across distance exceeds 12 inches (30 cm).

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- Fixed ladders without cages or wells must have at least a 15-inch (38 cm) clearance width to the nearest permanent object on each side of the centerline of the ladder.

- Fixed ladders must be provided with cages, wells, ladder safety devices or self-retracting lifelines where the length of climb is less than 24 feet (7.3 m) but the top of the ladder is at a distance greater than 24 feet (7.3 m) above lower levels.

- Side rails of through or side-step fixed ladders must extend 42 inches (1.1 m) above the top level or landing platform served by the ladder. Parapet ladders must have an access level at the roof if the parapet is cut to permit passage through it. If the parapet is continuous, the access level is the top of the parapet.

- Steps or rungs for through-fixed-ladder extensions must be omitted from the extension; and the extension of side rails must be flared to provide between 24 inches (61 cm) and 30 inches (76 cm) clearance between side rails.

- When safety devices are provided, the maximum clearance distance between side rail extensions must not exceed 36 inches (91 cm).

- Fixed ladders must be used at a pitch no greater than 90 degrees from the horizontal, measured from the back side of the ladder.

# Cages for Fixed Ladders

The requirements for cages for fixed ladders are as follows:

- Horizontal bands must be fastened to the side rails of rail ladders or directly to the structure, building or equipment for individual-rung ladders. Vertical bars must be on the inside of the horizontal bands and must be fastened to them.

- Cages must not extend less than 27 inches (68 cm), or more than 30 inches (76 cm) from the centerline of the step or rung and must not be less than 27 inches (68 cm) wide.

- Insides of cages must be clear of projections.

- Horizontal bands must be spaced at intervals not more than 4 feet (1.2 m) apart measured from centerline to centerline.

- Vertical bars must be spaced at intervals not more than 9.5 inches (24 cm), measured centerline to centerline.

- Bottoms of cages must be between 7 feet (2.1 m) and 8 feet (2.4 m) above the point of access to the bottom of the ladder. The bottom of the cage must be flared not less than 4 inches (10 cm) between the bottom horizontal band and the next higher band.

- Tops of cages must be a minimum of 42 inches (1.1 m) above the top of the platform or the point of access at the top of the ladder. There must be a way to access the platform or other point of access.

## Wells for Fixed Ladders

The requirements for wells for fixed ladders are as follows:

- Wells must completely encircle the ladder.

- Wells must be free of projections.

- Inside faces of wells on the climbing side of the ladder must extend between 27 inches (68 cm) and 30 inches (76 cm) from the centerline of the step or rung.

- Inside widths of wells must be at least 30 inches (76 cm).

- Bottoms of wells above the point of access to the bottom of the ladder must be between 7 feet (2.1 m) and 8 feet (2.4 m).

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## Ladder Safety Devices and Related Support Systems for Fixed Ladders

The connection between the carrier or lifeline and the point of attachment to the body belt or harness must not exceed 9 inches (23 cm) in length. In addition, ladder safety devices and related support systems on fixed ladders must conform to the following:

- All safety devices must be able to withstand, without failure, a drop test consisting of a 500-pound weight (226 kg) dropping 18 inches (41 cm).

- All safety devices must permit the worker to ascend or descend without continually having to hold, push or pull any part of the device, leaving both hands free for climbing.

- All safety devices must be activated within 2 feet (.61 m) after a fall occurs and limit the descending velocity of an employee to 7 feet/second (2.1 m/sec) or less.

# **Requirements for Mounting Ladder Safety Devices for Fixed Ladders**

The requirements for mounting ladder safety devices for fixed ladders are as follows:

Mountings for rigid carriers must be attached at each end of the carrier, with intermediate mountings spaced along the entire length of the carrier, to provide the necessary strength to stop workers' falls.
Mountings for flexible carriers must be attached at each end of the carrier. Cable guides for flexible carriers must be installed with a spacing between 25 feet (7.6 m) and 40 feet (12.2 m) along the entire length of the carrier, to prevent wind damage to the system.

- Design and installation of mountings and cable guides must not reduce the strength of the ladder.

- Side rails and steps or rungs for side-step fixed ladders must be continuous in extension.

### **Defective Ladders**

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Ladders needing repairs are subject to the following rules:

Portable ladders with structural defects—such as broken or missing rungs, cleats or steps, broken or split rails, corroded components or other faulty or defective components—must immediately be marked defective or tagged with "Do Not Use" or similar language and 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— must be withdrawn from service until repaired.

- Defective fixed ladders are considered withdrawn from use when they are immediately tagged with "Do Not Use" or similar language, *or* marked in a manner that identifies them as defective, *or* blocked—such as with a plywood attachment that spans several rungs.

- Ladder repairs must restore the ladder to a condition meeting its original design criteria before the ladder is returned to use.

# Guide to OSHA Rules for Stairways

The rules covering stairways and their components generally depend on how and when stairs are used. Specifically, there are rules for stairs used during construction and stairs used temporarily during construction, as well as rules governing stair rails and handrails.



### **Stairways Used During Construction**

The following requirements apply to all stairways used during construction:

Stairways that will not be a permanent part of the building under construction must have landings at least 30 inches deep and 22 inches wide (76 x 56 cm) at every 12 feet (3.7 m) or less of vertical rise. Stairways must be installed at least 30 degrees —and no more than 50 degrees —from the horizontal.
Variations in riser height or stair tread depth must not exceed 1/4 inch in any stairway system,

including any foundation structure used as one or more treads of the stairs.

- Doors and gates opening directly onto a stairway must have a platform that extends at least 20 inches (51 cm) beyond the swing of the door or gate.

- Metal pan landings and metal pan treads must be secured in place before filling.
- Stairway parts must be free of dangerous projections such as protruding nails.
- Slippery conditions on stairways must be corrected.
- Workers must not use spiral stairways that will not be a permanent part of the structure.

### **Temporary Stairs**

The following requirements apply to *stairways used temporarily during construction*. Except during construction of the stairway,

- Do not use stairways with metal pan landings and treads if the treads and/or landings have not been filled in with concrete or other materials unless the pans of the stairs and/or landings are temporarily filled in with wood or other materials. All treads and landings must be replaced when worn below the top edge of the pan.

- Do not use skeleton metal frame structures and steps (where treads and/or landings will be installed later) unless the stairs are fitted with secured temporary treads and landings.

*Note:* Temporary treads must be made of wood or other solid material and installed the full width and depth of the stair.

## **Stair Rails**

The following general requirements apply to all stair rails:

- Stairways with four or more risers or rising more than 30 inches (76 cm) in height— whichever is less—must be installed along each unprotected side or edge. When the top edge of a stair rail system also serves as a handrail, the height of the top edge must be no more than 37 inches (94 cm) nor less than 36 inches (91.5 cm) from the upper surface of the stair rail to the surface of the tread.

- Stair rails installed after March 15, 1991, must be not less than 36 inches (91.5 cm) in height.

- Top edges of stair rail systems used as handrails must not be more than 37 inches (94 cm) high nor less than 36 inches (91.5 cm) from the upper surface of the stair rail system to the surface of the tread. (If installed before March 15, 1991, not less than 30 inches [76 cm]).

- Stair rail systems and handrails must be surfaced to prevent injuries such as punctures or lacerations and to keep clothing from snagging.

- Ends of stair rail systems and handrails must be built to prevent dangerous projections, such as rails protruding beyond the end posts of the system.

In addition,

- Unprotected sides and edges of stairway landings must have standard 42-inch (1.1 m) guardrail systems.

- Intermediate vertical members, such as balusters used as guardrails, must not be more than 19 inches (48 cm) apart.

- Other intermediate structural members, when used, must be installed so that no openings are more than 19 inches (48 cm) wide.

- Screens or mesh, when used, must extend from the top rail to the stairway step and along the opening between top rail supports.



#### Handrails

Requirements for handrails are as follows:

- Handrails and top rails of the stair rail systems must be able to withstand, without failure, at least 200 pounds (890 n) of weight applied within 2 inches (5 cm) of the top edge in any downward or outward direction, at any point along the top edge.

- Handrails must not be more than 37 inches (94 cm) high nor less than 30 inches (76 cm) from the upper surface of the handrail to the surface of the tread.

- Handrails must provide an adequate handhold for employees to grasp to prevent falls.

- Temporary handrails must have a minimum clearance of 3 inches (8 cm) between the handrail and walls, stair rail systems and other objects.

- Stairways with four or more risers, or that rise more than 30 inches (76 cm) in height— whichever is less—must have at least one handrail.

- Winding or spiral stairways must have a handrail to prevent use of areas where the tread width is less than 6 inches (15 cm).

#### Midrails

Midrails, screens, mesh, intermediate vertical members or equivalent intermediate structural members must be provided between the top rail and stairway steps to the stair rail system. When midrails are used, they must be located midway between the top of the stair rail system and the stairway steps.

#### **Training Requirements**

Employers must train all employees to recognize hazards related to ladders and stairways, and instruct them to minimize these hazards. For example, employers must ensure that each employee is trained by a competent person in the following areas, as applicable:

- Nature of fall hazards in the work area;

- Correct procedures for erecting, maintaining and disassembling the fall protection systems to be used;

- Proper construction, use, placement and care in handling of all stairways and ladders; and

- Maximum intended load-carrying capacities of ladders used.

*Note:* Employers must retrain each employee as necessary to maintain their understanding and knowledge on the safe use and construction of ladders and stairs.

### Glossary

**cleat** —A ladder crosspiece of rectangular cross section placed on edge upon which a person may step while ascending or descending a ladder.

**double-cleat ladder** —A ladder with a center rail to allow simultaneous two-way traffic for employees ascending or descending.

failure — Load refusal, breakage or separation of components.

**fixed ladder** — A ladder that cannot be readily moved or carried because it is an integral part of a building or structure.

handrail — A rail used to provide employees with a handhold for support.

**job-made ladder** — A ladder that is fabricated by employees, typically at the construction site; noncommercially manufactured.

load refusal — The point where the structural members lose their ability to carry the load.

**point of access** — All areas used by employees for work-related passage from one area or level to another.

portable ladder — A ladder that can be readily moved or carried.

**riser height** — The vertical distance from the top of a tread or platform/landing to the top of the next higher tread or platform/landing.

**side-step fixed ladder** — A fixed ladder that requires a person to get off at the top to step to the side of the ladder side rails to reach the landing.

**single-cleat ladder** — A ladder consisting of a pair of side rails connected together by cleats, rungs or steps.

**stair rail system** — A vertical barrier erected along the unprotected sides and edges of a stairway to prevent employees from falling to lower levels.

**temporary service stairway** — A stairway where permanent treads and/or landings are to be filled in at a later date.

**through fixed ladder** — A fixed ladder that requires a person getting off at the top to step between the side rails of the ladder to reach the landing.

tread depth — The horizontal distance from front to back of a tread, excluding nosing, if any.