

Are Chains Allowed for Fall Protection on Ladderways?



Please see an excerpt from a recently published story by **John Braun- CHST CSP** addressing the use of “Chains” as a means to prevent falls, through a fixed mounted ladder opening.

The story refers to changes in the (FED) OSHA regulations. Please keep in mind Cal/OSHA Standards are addressing this issue in §3212. *Floor Openings, Floor Holes, Skylights and Roofs*. It states “[§3212(a)(2)(A).....*The opening through the railing shall have either a swinging gate or equivalent protection, or the passageway to the opening shall be so offset that a person cannot walk directly into the opening.*”

As most of you knowor should know, “chains” are not an approved barrier / protection from falls through fixed mount ladder opening.

Are Chains Allowed for Fall Protection on Ladderways?

With the update to OSHA's Walking/Working Surface rule last year, there has been a focus on the change in requirements for the use of ladder cages versus ladder safety devices. While this is important to understand, there was another significant change that did not receive as much attention. Simply put, chains, once a viable option for protection of ladder access, are no longer allowed by OSHA.

There are many published articles on the danger of using chains as protection – from weak plastic chains to S-hooks that could come loose, to workers failing to re-hook them, or even unhooked chains being a tripping hazard near a roof or platform edge. For those reasons and more, chains always posed some danger as a fall solution.

Becoming more aware of these hazards, OSHA made a specific change in the Walking/Working Surface rule that specifically prohibited chains in this function.

Though OSHA never addressed the use of chains in the code, they were accepted as a legal means of fall protection in a couple of Letters of Interpretations. This change essentially negated these Letters of Interpretation, now requiring a self-closing safety gate in its stead.

The language of 29 CFR 1910.28(b)(3)(iv) reads: Each employee is protected from falling into a ladderway floor hole or ladderway platform hole by a guardrail system and toeboards erected on all exposed sides, except at the entrance to the hole, where a self-closing gate or an offset must be used.

In our opinion, the main reason OSHA went this way is to remove human error as much as possible. By putting the action into the hands of employees, the use of chains was allowing too much risk. Either the worker could not re-hook the chain, or they would inevitably be put in harm's way by standing at the edge while they were re-hooking. This defeated the purpose of having the ladder protection there in the first place.

Remember, the standard allows for two options: a self-closing gate or an offset. Gates are more durable and do not require action by the employee to close them. Self-closing gates are also stronger than many of the chains that were on the market, considering you could buy chains made of plastic.

The other option is an offset which, as opposed to a gate, does not necessarily provide a physical barrier right at the point of entry. However, it does prevent a person from accidentally falling into a ladderway by designating a specific area of entry to the ladder. Meaning it will require effort to access the hazard, keeping you and your workers more alert.

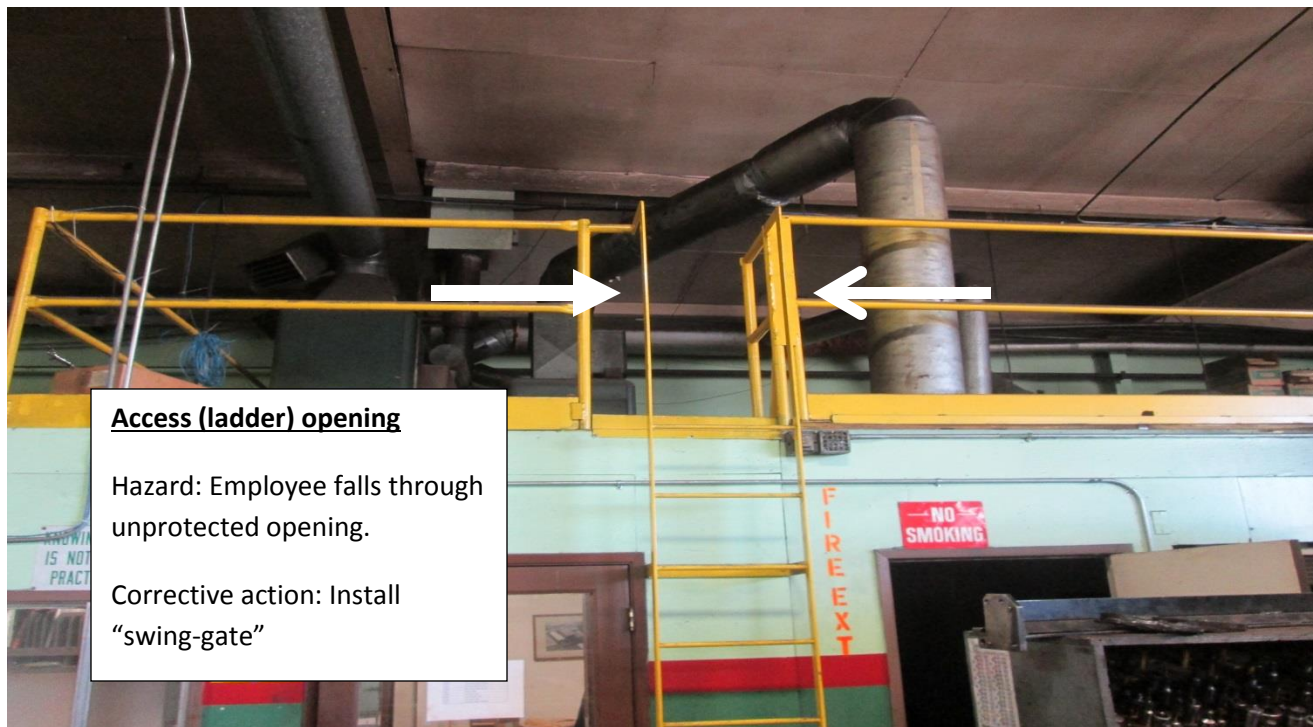
One thing to keep in mind is that these new requirements do not have the same long, drawn-out implementation schedule as the fixed-ladder fall protection changes previously mentioned. Because of cost, ladder cage changes are being phased in with various deadlines.

Chains, however, are being disallowed immediately. If you are still using chains for fall protection, you are out of compliance.

OSHA's intent in the new standard is clear, and the language is specific. Chains are no longer allowed in this capacity. Aside from the possibility of people getting hurt, chains that remain in a facility will be low-hanging fruit for OSHA compliance officers should they come to your facility. Don't wait until it's too late to bring your company into compliance.

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Ask yourself Are you compliant or complacent ?



Please see below the CalOSHA Standard.

§3212. Floor Openings, Floor Holes, Skylights and Roofs.

(a)(1) Every floor and roof opening shall be guarded by a cover, a guardrail, or equivalent on all open sides. While the cover is not in place, the openings shall be constantly attended by someone or shall be protected by guardrails. Toeboards shall be installed around the edges at openings where persons may pass below the opening.

EXCEPTION: Stairway entrances.

(2)(A) Every ladderway floor opening or platform with access provided by ladderway, including ship stairs (ship ladders), shall be protected by guardrails with toeboards meeting the requirements of General Industry Safety Orders, Section 3209, on all exposed sides except at entrance to the opening. The opening through the railing shall have either a swinging gate or equivalent protection, or the passageway to the opening shall be so offset that a person cannot walk directly into the opening.

EXCEPTION: Ladder openings for entrance/access at perimeter roof edges where guardrail protection is not required by subsection (d) of this section.

(B)1. The uppermost surface or railing member of the swinging gate or other equivalent protection required by subsection (a)(2)(A) shall have a vertical height from the platform or floor level of between 42 to 45 inches plus or minus one inch and;

2. The swinging gate or other equivalent protection shall be capable of withstanding a force of at least 200 pounds applied vertically downward to the uppermost surface or railing member and horizontally outward at any point on the exit side of the ladder opening.

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