

# Walking-Working Surfaces Ladder Compliance Checklist

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# Walking-Working Surfaces Ladder Compliance Checklist

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## Background

Employees in the graphic arts industry will often access various work areas known as “walking-working surfaces” to perform their jobs. If these work areas, or the access to these work areas, are not kept in safe conditions, they can cause or contribute to serious injuries from slips, trips and falls. By taking measures to ensure safe walking-working surfaces, many of these injuries can be prevented and a safe workplace can be maintained for employees.

OSHA defines a walking-working surface as “any horizontal or vertical surface on or through which an employee walks, works or gains access to a work area or workplace location.” This definition includes ladders, both portable and fixed. To prevent injury, OSHA has developed standards for ladders under the regulations for Walking-Working Surfaces (29 CFR 1910.23).

PRINTING United Alliance has developed a compliance form that outlines the majority of the elements under the ladder regulations. This documentation covers compliance for all ladders, with exemptions for those used in emergency operations or designed into a piece of equipment, such as a printing press or other production equipment. This form aims to provide an organized and easy-to-read document to ensure your facility complies with OSHA’s regulations for all ladders. This checklist is not necessary for periodic inspections. Instead, use it as an informational guide for overall compliance with the standard.

It should be noted that several states operate their own OSHA programs (State Plans). The individual state plans can adopt the federal standards as written or they can develop additional requirements beyond the federal standards. Therefore, employers should investigate if their facilities are located in a state that operates an OSHA state plan and research the appropriate standard requirements.

Further, since there can be several variables in a company’s operation, configuration, and work sites some compliance aspects of the facility may not be addressed by the topics presented within this checklist. Therefore, additional regulations and requirements may apply and further assessments may be necessary.

This document does not constitute full compliance and does not cover the entire scope or detailed elements of specific regulations. In order to ensure full compliance, employers are encouraged to seek additional information or assistance if necessary. Contact PRINTING United Alliance’s Government Affairs department with any questions: [govtaffairs@printing.org](mailto:govtaffairs@printing.org) or 888-385-3588.

Area Completed: \_\_\_\_\_

Date Completed: \_\_\_\_\_

Conducted By: \_\_\_\_\_

General Ladder Compliance Requirements	Yes	No	N/A
Are ladder <b>rungs, steps, and cleats</b> parallel, level and uniformly spaced 10 - 14 inches apart? [29 CFR 1910.23(b)(1) and 1910.23(b)(2)]			
Are ladder rungs and steps in <b>elevator</b> spaced between 6 and 16.5 inches apart? [29 CFR 1910.23(b)(2)(i)]			
Are fixed ladder rungs and steps on <b>telecommunication towers</b> spaced no more than 18 inches apart? [29 CFR 1910.23(b)(2)(ii)]			
Are the steps on <b>stepstools</b> spaced 8 - 12 inches apart? [29 CFR 1910.23(b)(3)]			
Is there a minimum clear width of 11.5 inches for <b>portable ladders</b> and 16 inches for <b>fixed ladders</b> with exceptions? [29 CFR 1910.23(b)(4)]			
Did the employer ensure <b>wooden ladders</b> are <b>NOT</b> coated with any materials that obscure or hide structural defects? [29 CFR 1910.23(b)(5)]			
Are <b>metal ladders</b> protected against corrosion? [29 CFR 1910.23(b)(6)]			
Are ladder surfaces free of puncture and laceration hazards? [29 CFR 1910.23(b)(7)]			
Are ladders used only for the purposes for which they were designed? [29 CFR 1910.23(b)(8)]			
Are ladders inspected <b>before</b> initial use in <b>each</b> work shift? [29 CFR 1910.23(b)(9)]			
Did the employer ensure that any ladder with defects is immediately tagged <b>“Dangerous: Do Not Use”</b> or with similar language and <b>removed</b> from service until repaired? [29 CFR 1910.23(b)(10)]			
Is it ensured that each employee faces the ladder when ascending or descending? [29 CFR 1910.23(b)(11)]			
Is it ensured that each employee uses at least one hand to grasp the ladder when ascending or descending (three points of contact)? [29 CFR 1910.23(b)(12)]			
Is it ensured that no employee carries any object or load that could cause the employee to lose balance or fall? [29 CFR 1910.23(b)(12)]			

<sup>1</sup>Minimum clear width does not apply to ladders with narrow rungs that are not designed to be stepped on. Rungs and steps of **manhole entry ladders** that are supported by the manhole opening must have a minimum clear width of 9 inches. Rungs and steps on **rolling ladders** must have a minimum clear width of 8 inches. **Stepstools** have a minimum clear width of 10.5 inches

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Portable Ladder Compliance Requirements	Yes	No	N/A
Are rungs and steps designed or treated to minimize slipping? [29 CFR 1910.23(c)(1)]			
Are <b>stepladders</b> equipped with a metal spreader or locking device? [29 CFR 1910.23(c)(2)]			
Is it ensured that the ladder is not loaded beyond maximum intended load (total load of employee + all tools, equipment and materials being carried)? [29 CFR 1910.23(c)(3)]			
Is it ensured that ladders are used only on stable and level surfaces, unless they are secured or stabilized to prevent accidental displacement? [29 CFR 1910.23(c)(4)]			
Is it ensured that no portable single rail ladders are used? [29 CFR 1910.23(c)(5)]			
Is it ensured that no ladder is moved, shifted, or extended while an employee is on it? [29 CFR 1910.23(c)(6)]			
Are ladders in passageways, doorways, or driveways secured to prevent accidental displacement, guarded by temporary barricade (i.e. traffic cones or caution tape)? [29 CFR 1910.23(c)(7)]			
For step ladders, is it ensured that the top step is not used as a step? [29 CFR 1910.23(c)(8)]			
Are ladders on slippery surfaces secured and stabilized? [29 CFR 1910.23(c)(9)]			
Is the top of non-self-supporting ladder placed so that both side rails are supported? [29 CFR 1910.23(c)(10)]			
If an employee is climbing to an upper landing surface, does the portable ladder extend 3 feet above the structure? [29 CFR 1910.23(c)(11)]			
Is it ensured that ladders and ladder sections are <b>NOT</b> tied or fastened together to provide added length, unless specifically designed for such use? [29 CFR 1910.23(c)(12)]			
Is it ensured that ladders are not placed on boxes, barrels, or other unstable bases to obtain additional height? [29 CFR 1910.23(c)(13)]			

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Fixed Ladder Compliance Requirements	Yes	No	N/A
Are fixed ladders able to support their <b>maximum intended load</b> ? [29 CFR 1910.23(d)(1)]			
Is the minimum perpendicular distance from the center of the steps/rungs, grab bars, or both, to the nearest permanent object in the back of the ladder is 7 inches? [29 CFR 1910.23(d)(2)]			
Is it ensured that grab bars do not protrude on the climbing side beyond the rungs of the ladder? [29 CFR 1910.23(d)(3)]			
Do grab bars extend 42 inches above the access level/landing platform? [29 CFR 1910.23(d)(7)]			
Is the minimum size of the grab bar the same size as the rungs? [29 CFR 1910.23(d)(8)]			
Do side rails of <b>through</b> or <b>sidestep</b> ladders extend 42 inches above top of landing platforms? [29 CFR 1910.23(d)(4)]			
For <b>through ladders</b> , are steps/rungs omitted from the extensions? [29 CFR 1910.23(d)(5)]			
For <b>through ladders</b> , are side rails flared to provide 24-30 inches of clearance? [29 CFR 1910.23(d)(5)]			
For <b>through ladders</b> , is it ensured that the maximum clearance between side rails of the extension does not exceed 36 inches when a safety system is provided? [29 CFR 1910.23(d)(5)]			
Is the step-across distance from the center of steps/rungs to the nearest edge of the structure/access point 7 - 12 inches for <b>through ladders</b> and 15 - 20 inches for <b>side-step</b> ladders? [29 CFR 1910.23(d)(12)]			
For <b>side-step</b> ladders, are side rails, rungs, and steps continuous in the extension? [29 CFR 1910.23(d)(6)]			
When a fixed ladder ends at a <b>hatch</b> , does the <b>hatch cover</b> open with sufficient clearance from at least 70 degrees of the horizontal? [29 CFR 1910.23(d)(9)]			
Is it ensured that fixed ladders that have a pitch greater than 90 degrees from the horizontal are <b>NOT</b> used? [29 CFR 1910.23(d)(11)]			
Do fixed ladders without cages or wells have a clear width of at least 15 inches on each side of the ladder centerline to the nearest permanent object and a minimum perpendicular distance of 30 inches from the center of the steps/rungs to the nearest object on the climbing side? [29 CFR 1910.23(d)(13)]			

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Fixed Ladders > 24 feet Compliance Requirements	Yes	No	N/A
Are ladders installed before November 19, 2018, equipped with a personal fall arrest system, ladder safety system, cage, or well? [29 CFR 1910.28(b)(9)(i)(A)]			
Are ladders installed on or after November 19, 2018, equipped with a personal fall arrest system or ladder safety system? [29 CFR 1910.28(b)(9)(i)(B)]			
Does a personal fall arrest system or ladder safety system provide protection throughout the entire vertical distance of the ladder and have <b>landing platforms</b> been provided at maximum intervals of 150 feet? [29 CFR 1910.28(b)(9)(ii)]			
Are ladder sections with a cage or well offset from adjacent sections and have <b>landing platforms</b> provided at maximum intervals of 50 feet? [29 CFR 1910.28(b)(9)(iii)]			

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Cages, Wells, and Platforms Compliance Requirements for Fixed Ladders	Yes	No	N/A
Are cages and wells designed, constructed and maintained to permit easy access to and egress from the ladder that they enclose? [29 CFR 1910.29(g)(1)]			
Are cages and wells continuous throughout the length of the fixed ladder, except for access, egress and other transfer points? [29 CFR 1910.29(g)(2)]			
Are cages and wells designed, constructed, and maintained to contain employees in the event of a fall, and to direct them to a lower landing? [29 CFR 1910.29(g)(3)]			
Do platforms used with fixed ladders provide a horizontal surface of at least 24 inches by 30 inches? [29 CFR 1910.29(g)(4)]			

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Ladder Safety Systems Compliance Requirements	Yes	No	N/A
Does each ladder safety system allow the employee to climb up and down using both hands and does <b>NOT</b> require that the employee continuously hold, push, or pull any part of the system while climbing? [29 CFR 1910.29(i)(1)]			
Is it ensured that the connection between the carrier or lifeline and the point of attachment to the body harness or belt does <b>NOT</b> exceed 9 inches? [29 CFR 1910.29(i)(2)]			
Are mountings for rigid carriers attached at each end of the carrier, with intermediate mountings spaced, as necessary, along the entire length of the carrier so the system has the strength to stop employee falls? [29 CFR 1910.29(i)(3)]			
Are mountings for flexible carriers are attached at each end of the carrier and cable guides for flexible carriers are installed between 25 – 40 feet apart? [29 CFR 1910.29(i)(4)]			
Is it ensured that the design and installation of mountings and cable guides do not reduce the design strength of the ladder? [29 CFR 1910.29(i)(5)]			
Are ladder safety systems and their support systems capable of withstanding, without failure, a drop test consisting of an 18-inch drop of a 500-pound weight? [29 CFR 1910.29(i)(6)]			

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