

## Ladder Safety

***For the wine industry there are two main sections of the Washington Administrative Code (WAC) that apply. 296-307 for Agriculture and 296-800 for General Industry. Most wineries fall under General Industry so that is the focus of this outline.***

**Definition:** Ladders, both portable and fixed, are often used in wineries. Fixed ladders are permanently attached to a structure, building, or equipment. Portable ladders refer to ladders that can be readily moved or carried.

**Examples within a Winery:** Ladders (both portable and fixed) are often used for accessing the tops of tanks, stacked barrels, truck tankers, to reach stored materials, and for maintenance work. Hazards resulting in injury can occur when employees have not been trained on the proper use of ladders, including how to safely set a portable ladder.

### **Regulatory Summary (with emphasis on application for wineries covered under general industry):**

1. DOSH requires employers to be in compliance with the Washington Administrative Codes (WAC) related to ladder use (for agriculture, primarily portable ladders). Specifically, employers are required to meet the requirements in WAC 296-307-055, -05501, -05503, -05505, -05507, -060, and -061.
2. Wineries must have a written ladder safety plan and provide documented training. As long as the written ladder safety plan meets all of the requirements under the code, it can be a section or chapter within your written Accident Prevention Program (APP).
3. Ladders must be cared for and properly maintained at all times. Specifically:
  - Prior to use, ladders must be checked for defects and thoroughly inspected periodically
  - A ladder should be immediately inspected if it has tipped over, or if it is exposed to excessive heat
  - Defective ladders must be withdrawn from service and marked as 'Dangerous, Do Not Use'
  - Inspect steps, joints between steps, and that side rails are tight. All hardware and fittings must be securely attached and all movable parts operating correctly.
  - Avoid unnecessary dropping, jarring, or misuse of ladders
  - Store ladders properly when not in use
  - Transport ladders properly – do not allow them to sag or be damaged during transportation
4. Your written ladder safety training plan should include documented training on the following:
  - At the beginning of employment, provide employees with training on the proper use of ladders, including how to set a ladder, attach portable ladders securely, and how to properly mount and dismount a ladder when carrying items
  - Teach employees not to overreach when on a ladder
  - Employees should have clean shoes when climbing ladders, free of substances that could cause the employee to slip

- Teach employees to face the ladder when climbing or descending
- Do not climb up or down a ladder while carrying tools or materials that interfere with the free use of both hands
- Teach your employees to hold onto the ladder with three points of contact (at minimum two hands and one foot) –both hands are free to hold onto or slide along the ladder
- Ladders should not be placed on boxes, barrels, or other unstable bases to obtain additional height
- Ladders should be kept free of oil, grease, or other slippery materials
- When working from a ladder over 25 feet from the ground or floor, the ladder must be secured at both top and bottom. When work on a ladder over 25 feet from the ground or floor requires the use of both hands, a safety belt must be worn and the safety lanyard secured to the ladder.
- Portable ladders must be placed so that the side rails have a secure footing. The top rest for portable rung and cleat ladders must be reasonably rigid and strong enough to support the applied load. The top of the ladder must be placed with the two rails supported, unless equipped with a single support attachment. Such an attachment should be substantial and large enough to support the ladder under load.

### 5. Additional ladder safety requirements:

- Ladders made by fastening cleats across a single rail are prohibited
- Wooden ladders, when not in use, should be stored where they will not be exposed to the elements, but where there is good ventilation. They must be stored away from radiators, stoves, steam pipes, or other excessive heat or dampness.
- Wooden ladders should be kept coated with a suitable protective material
- A ladder must have feet that are appropriate for the surface on which it will be used. For example, a ladder used on a slippery surface must have steel points or other nonslip material on its feet.
- Ladders must not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded
- Ladder safety devices may be used on tower, water tank and chimney ladders over twenty feet long in place of cage protection. No landing platform is required in these cases. All ladder safety devices such as lifebelts, friction brakes, and a sliding attachment must meet the design requirements of the ladders that they serve.
- Employees should have clean shoes when climbing ladders, free of substances that could cause the employee to slip.
- Do not climb up or down a ladder while carrying tools or materials that interfere with the free use of both hands.
- Ladders should not be placed on boxes, barrels, or other unstable bases to obtain additional height.
- Best Management Practices for Ladders include:
  - Wooden ladders should be phased out (try not to use wooden ladders in a wet winery environment)

- When inspecting a ladder, use an inspection tag as documentation
- Don't share ladders or other winery equipment with contractors; require your contractors to provide their own equipment.
- Secure ladders when not in use
- Do not attempt to repair broken ladders – invest in a new one.

6. While DOSH does not have standards for an agricultural business for fixed ladders, below is a link to the OSHA web site that addresses safe use of fixed ladders.

7. Separate downloadable documents are provided at the following links and under the Winery Safety tab at [www.winerywise.com](http://www.winerywise.com):

- PPE Hazard Assessment: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-800-160>
- Safety and Health Core Rules: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-800>
- General Safety and Health Standards: <http://apps.leg.wa.gov/wac/default.aspx?cite=296-24>
- Link to WAC 296-307: <http://www.lni.wa.gov/wisha/rules/agriculture/HTML/part-d.htm>
- OSHA, Fixed Ladder Safety:  
[https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9719](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9719)