

WISHA REGIONAL DIRECTIVE

WISHA Services

Department of Labor and Industries

29.65 Fixed Ladders Used in Emergency Situations Date: April 21, 2005

I. Background

WISHA has established that the requirements of WAC 296-24-810 for cages, platforms, or similar fall prevention protection devices are not appropriate for fixed ladders on structures where the fixed ladders are used only as a means of access by fire fighters, other emergency personnel, or escape for employees in fire and other emergency situations. Sometimes these ladders are not provided with employee protection as presently required in WAC 296-24-810 when they are intended to be used only in an emergency. In these circumstances, it is sometimes more hazardous to install a cage, well, landing platform or ladder safety device pursuant to the standard than it is not to comply. A cage or well, etc., may interfere with fire fighting or other rescue equipment, or employee escape from fire or other emergency situations.

II. Scope and application

This WISHA Regional Directive (WRD), which will remain in effect indefinitely, provides guidance to WISHA enforcement staff initiating inspections for any reason. It is substantively identical to the original WRD 83-15 issued on November 28th 1983, which it replaces and rescinds.

III. Interpretive Guidance

- A. Employers must establish and implement adequate administrative controls such as barricades and signs to prevent nonemergency use of fixed ladders which are meant for fire fighter use and emergency escape only
- B. In the event the employer does not provide adequate administrative controls such as barricades or signs and employees use an emergency ladder for other than its intended purpose, the employer may be appropriately cited under WAC 296-24-810.

- C. Fixed ladders not equipped with cages, landing platforms, ladder safety devices, or other forms of employee protection, in some situations may be allowed as a means of access for fire fighters and other emergency personnel, or escape for employees in fire and other emergency situations. These guidelines are provided because it may be more hazardous to comply with WAC 296-24-810 than not to comply.

IV. Special Inspection Protocols

WISHA Compliance Officers shall ensure the application section is addressed when inspecting sites with fixed ladders used only during fire and other emergency situations.

OSHA Instruction STD 1-1.12, dated June 20, 1983, was used in the preparation of this WISHA Regional Directive.

Approved: _____
Mel James, Acting Senior Program Manager
WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 -- or by telephone at (360)902-5503. You also may review policy information on the WISHA Website (<http://www.lni.wa.gov/Safety-health/>).