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SAFETY BULLETIN

August 23, 2013

RE: ACCESSING THE WORK PLATFORM

Climb The Tower

We recommend that workers climb Non-Stop towers to access the work platform, provided they do so on the ends of the scaffold, rather than in the middle of a run. They must maintain 3-point contact at all times when climbing. Workers should climb up past the work platform, move around to the platform side of the tower, and then step down on the platform.

When the work platform is too close to the top of the tower to climb past it, another tower section can be added. This section, to be used for climbing only, does not require cross-bracing. Do not rest the pulley on a climbing section. When there is not enough overhead clearance to add a tower section, workers can use the Non-Stop Access Landing accessory to transition from the tower directly to the masons' walk boards.

Do Not Use Extension Ladders

When extension ladders are used with Non-Stop, the ladder will eventually separate when the scaffold is cranked up. We are aware of at least two deaths and numerous serious injuries that have occurred while workers were using extension ladders to access adjustable masonry scaffolding. Do not use extension ladders on Non-Stop.

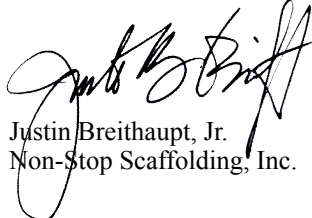
OSHA Letter of Interpretation

There has been much confusion around a letter of interpretation issued by OSHA dated **3-14-2002**. It said that Non-Stop towers did not meet the OSHA integral climbing ladder standard, 1926.451(e)(6) (this standard addresses scaffold towers used as ladders, and must **not** be confused with the 1926.1053 or 1926.10 standards for portable ladders). We reached an agreement with OSHA whereby we modified our towers in **December 2004**, and OSHA grandfathered all existing towers. **All Non-stop towers are legal to climb.** (See page 2 of this bulletin for the details of our agreement.)

Stair Towers

Stair towers are not recommended for access. The gap necessary between the stair tower and the Non-Stop platform exceeds the maximum allowable dimensions mandated by OSHA, ANSI, and EM385. In addition, the stair landings only match up with the platform every 6 and a half feet vertically. We believe they create an unsafe condition.

For any additional information, clarification, or any other safety questions, please call 1-800-845-0845.



Justin Breithaupt, Jr.
Non-Stop Scaffolding, Inc.

Supplemental Information

On 3-14-2002, OSHA issued a letter of interpretation saying that our towers did not meet the letter of the integral climbing ladder standard, 1926.451(e)(6). This standard lays out the requirements for scaffold frames with a ladder built in. It basically says you must have:

- min. 8-inch long rungs
- adequate handhold and foot space
- no more than 16-1/2 inch rung spacing
- even rung spacing except where frames join together.

We entered into discussions with OSHA to resolve the situation, with the assistance of a structural engineer on staff with the Mason Contractors Association of America. Two voices, one of them an industry spokesman, are better than one.

OSHA's main complaint was that one of our 12-inch rungs is bisected by the bolt that locks the frames together. That only allows a 6-inch-wide handhold and foot space on that rung. The minimum rung length is 8 inches. To step over that rung to avoid the "hazard" would result in an 18-inch rung spacing. The maximum allowed is 16-1/2 inches.

We asserted that 6 inches was an adequate handhold and foot space, citing examples from other standards. For example, think about the pegs you've seen on telephone poles and cell phone towers. They would not agree to that.

Our engineer, the MCAA engineer, and the OSHA staff soon reached an agreement based on facts we could all agree on:

- Extension ladders are the worst way to access the platform, for all the reasons above.
- Stair towers are hazardous for the reasons above.
- Statistically, climbing the tower IS the safest way to access the platform. Since we started in 1976, there have been ZERO accidents.

The agreement was that we would modify future towers to meet the letter of the standard, and OSHA would grandfather **all pre-2004 towers** as legal to climb.

OSHA cannot just rescind a letter of interpretation without approval from their Public Policy Board. That is a bureaucratic process that takes years and years. So, on **9-30-04**, the director of OSHA's Construction division, Bruce Swanson, issued a field directive to NOT cite for climbing of Non-Stop towers. It is a memorandum on OSHA's intranet (not internet). We put new towers in circulation 6 weeks later in **December 2004**.

The Bottom Line

If you are asked about climbing the towers, and they were made before December 2004 (or if you have a mixture of old and new), ask the OSHA compliance officer to check the memorandum dated 9-30-04 on OSHA's intranet. They can search on Non-Stop Scaffolding. It is still in force.

If you have scaffolding made after December 2004, your towers meet the standard for climbing and no further action is necessary.