Non-Stop SCAFFOLDING

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SAFETY BULLETIN

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RE: TYING OFF TO TOWERS

It is permissible to tie off to the rungs on Non-Stop Heavy-Duty, Standard-Duty, and Workhorse scaffolding. Any rung can withstand more than a 5000-lb load.

The procedure for tying the scaffold to the wall as specified in the respective Assembly and Use Manuals must be followed.

Do not use the Access Landing on Heavy-Duty scaffolding when climbing with fall protection gear. The Access Landing can interfere with its operation.

If any questions arise, please don't hesitate to contact me.

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.