

# **Proof of Training**

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Ladders		
<u>Purpose</u>		
To establish expectations for	working with portable ladders on U	nger Construction Companies projects.
<u>Scope</u>		
including, but not limited to,	ork performed by Unger Construction the following activities: construction esting, and servicing or maintenance	n, installation, demolition, remodeling,

## **Objective**

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This policy is intended to protect workers from fall hazards associated with ladder use. Each worker must be familiar with Unger Construction's requirements for the safe use of ladders prior to commencing work.

### Responsibilities

## Management (Board of Directors and Project Managers)

other times when portable ladders are required.

Management is responsible for ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

### **Program Manager**

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

## Supervisors (Superintendents and Foreman)

Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed. Supervisors are responsible for ensuring Unger Construction employees and subcontractors are following expectations. Supervisors will be held accountable for enforcing the requirements of this



program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

### Workers (Employees and Subcontractors)

Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner. Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

#### Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA's as our means of hazard assessment and establishing a safe work plan. JHA's are performed by supervisors and/or workers. Our library of hazard assessments is maintained on the "S" drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA's on the "S" drive are organized by work area and job description. JHA's include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

## **Training**

Before any employee is allowed to perform work in areas requiring ladders, they must first receive training.

The training will include the following subjects: capacity, pre-use inspection, types of ladders, general rules, alterations, modifications, servicing, repairing, ladder accessories and storage.

Proof of training is available on the "S" drive. The training data base can be sorted by employee name or by subject. This ensures supervisors and employees are able to confirm they have the necessary training and if they don't which employees do. Employees that need training should contact their project manager or superintendent to make arrangements for them to be trained.



#### Retraining

The need for retraining will be indicated when: An employee's work habits or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use ladders, New equipment is installed that requires new or different procedures, Changes in the workplace make previous training obsolete, Changes in the types of ladders to be used make previous training obsolete or Upon a supervisor request.

### **Alteration or Modification**

All ladders will be used in accordance to the manufacturers intended design and function and per their written instructions. Ladders cannot be modified or altered in any way without written approval from the manufacturer or formal approval from a Professional Engineer registered in the State of California. Additionally, approval shall be received from Unger Constructions Director of Safety, Director of Risk Management and the Vice President of Operations.

Read and heed all instructions provided by the manufacturer on use, maintenance, care, warnings and limitations.

#### Capacity

Ladders are constructed to safely hold a specific amount of weight. These weight limits consist of users, their clothing, tools, and materials. Extra allowance should be made for stress exerted by the worker while performing the job. The heavy-duty ladder is best suited for construction use because it holds up against frequent and rigorous demands. Unger Construction will not allow operation or loading of ladders above 80 percent of the units documented capacity as specified by the manufacturer.

## Pre-use Inspection:

Ladders shall be inspected for visible defects which could cause injury before each use. The inspection shall include looking for structural defects, broken or missing: rungs, cleats, steps, rails, spreader bars, corroded components, damaged or missing slip resistant feet. Ladder rungs must be uniformly spaced and meet OSHA/ANSI specifications. Faulty, defective or questionable ladders shall be taken out of service and red tagged. Report any improper or unsafe ladders to your supervisor.

Ladders must also be inspected for legible safety warnings, decals and placards. Ladders with worn, damaged, missing or covered safety warnings, decals and placards shall be taken out of service, red tagged, until the labels can be replaced. When labels are replaced they must be the exact same decal that was provided by the original manufacture.

### Servicing and Repairing

Ladders with structural defects cannot be repaired. Defective ladders must be destroyed in a manner that would guarantee they could not be used again and then disposed of.



### Types of Ladders

Generally speaking only two styles of ladders are allowed on an Unger Construction project; A-Frame and Extension ladders. The general rules will apply to both ladder styles however these ladders cannot be used interchangeably they each have their own design and purpose. For example an A-Frame ladder cannot be closed up and used as if it were an extension ladder. In situations where a normal ladder will not work contact Unger Constructions Safety Director. Extension ladders have some unique requirements that are included in their own section below.

### General Rules

Use only well-built, undamaged ladders of the proper size and category suited for your work. Ladders shall be used only on stable and level surfaces. Ladders are not to be placed upon unstable objects such as boxes, or loose lumber. All ladders must have slip resistant feet.

A ladder should not be placed at a blind corner or a doorway where it could be struck. If it is necessary to use a ladder in such places, the area is to be blocked off. Ladders placed in any location where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or drive aisles, shall be secured to prevent accidental displacement or a barricade shall be encompass the work area to keep the workers, pedestrians or vehicles away from the ladder. Ladders must never be placed on or against movable objects.

Always face the ladder. When going up or down and keep hands free of tools or materials. Workers must use two hands for climbing (up or down). Workers must face the ladder at all times Workers must keep their body centered between the side rails (belly button rule). Properly position your ladder to avoid overreaching. Workers must not use the top cap or the first step down from the top cap of ladder for standing or sitting. Only one worker is allowed on the ladder at a time, no exceptions.

The area around the top and bottom of ladder shall be kept clear and shall not be used for storage or staging of materials.

Step-ladders must be fully opened to permit the spreader lever to catch. Step-ladders are not to be used in the closed position.

Generally speaking the ladders on an Unger Construction site will be made of fiberglass however, metal (aluminum) ladders are allowed and in some situations they are the ladder of choice. With that said metal ladders are not to be used for electrical work or within four (4) feet of open electrical apparatus, wiring, or other live electrical equipment.

If proper ladder protocol is followed, working with personal fall arrest equipment is not required. Ladder use that is not consistent with ladder protocol will require proper use of personal fall arrest equipment. Any situation not in compliance must be evaluated by Unger Construction prior to the commencement of work.



## **Extension Ladders**

Extension ladders should be long enough so that side rails extend three (3) feet above the landing.

Extension ladders have an inherent risk of slipping or unintentional displacement. To eliminate this concern Unger Construction requires extension ladders to either be backed (held in place by a coworker), staked (staked into the earth and tied at the inside area of the bottom of the ladder) secured (tied to a structural support) or stabilized (stabilized by a ladder accessory) Extension ladders cannot be used unless one or more of these practices are followed.

The angle of the ladder should be 4:1. The base of the ladder shall be positioned one foot out for every 4 feet up. When ascending or descending a ladder, employees will use the three point system, e.g. one hand and two feet or two hands and one foot must be in contact with ladder at all times which means they cannot climb the ladder with tools or materials in their hands.

Due to their typical working height extension ladders prohibit simple hand-to-hand transfers of tools or materials. In these situations ropes or pulleys can be used to hoist tools or materials to the workers location. When transporting materials up a ladder, a barricade or spotter should be used to protect the area at the foot of the ladder.

#### **Ladder Accessories**

In many situations ladder accessories are the best option. Ladder accessories such as walk through extensions are a far better means of achieving the 3 foot extension rule for elevated platforms. Ladder stabilizers are very effective at preventing accidental displacement. Leg extenders allow ladders to be used on surfaces that are not level. All accessories shall be used as designed by the manufacturer.

# **Ladder Storage**

Ladders shall be stored when not in use. Use horizontal or vertical ladder racks or to secure ladders against walls or columns chained or tethered such that they will not shift unexpectedly. Ladders cannot be stored in travel paths or exit corridors.