



## **INTEROFFICE MEMORANDUM**

### **Oregon Occupational Safety & Health Division**

April 8, 2003

**TO:** All Enforcement Staff  
**FROM:** Barry Jones, Manager of Enforcement  
**SUBJECT:** Scaffold Base Plates and Mud Sills (1926.451(c)(2))

The language in rule 1926.451(c)(2) is not clearly stated and has led employers to mistakenly believe that base plates are not required at all times for supported scaffolds. The rule states:

1. 1926.451(c)(2): Supported scaffold poles, lets, posts, frames and uprights shall bear on base plates and mud sills or other adequate firm foundation.

The intent of the rule is:

1. Base plates are always required.
2. Mud sills are required, in addition to base plates, when the base plates are not on firm support - mud, unfirm ground, easily perforated material such as asphalt.

In those cases where there is no base plate and in the mind of the Compliance Officer and their supervisor, no hazard exists by the absence of a base plate, a minimal violation will be used to address the situation. When making this determination the Compliance Officer must consider the height, weight, stability and overall condition of the scaffold.

The requirement for base plates is addressed in paragraph (7)(c)2 of PD A-218. If you have any questions contact your Manager.

This memo supercedes the previous memo dated September 27, 2000 on the same subject.