

Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA) 350 Winter Street NE, Room 430

> P.O. Box 14480 Salem, OR 97309-0405

> > Fax: (503) 947-7461 www.orosha.org

Salem, OR 97309-0405 Phone: (503) 378-3272 Toll Free: 1-800-922-2689

August 21, 1996

Robert Lishey
City of Portland Environmental Services
Columbia Blvd Wastewater Treatment Plant
5001 N Columbia Blvd
Portland OR 97203-2098

Dear Mr Lishey:

This is in response to your July 15, 1996 letter in which you ask if a ladder climbing bar may be used in lieu of a cage on a ladder. Federal OSHA, by letter of interpretation dated October 9, 1984, to Richard McClung, stated that when the use of a cage, or landing platform on fixed ladders is not feasible or it may be more hazardous, such as in a sewer manhole or vertical access tube in your case, a proper ladder safety device would be acceptable to protect employees from the hazard of falling. A copy of the full interpretation is enclosed.

If a tripod system is set up over the access hole, with a safety harness attached to a safety line cable which is part of an approved fall arrest system used by all who enter, there would be no need to have a ladder safety device.

If we can be of further assistance to you please call Jerry Hoard at 503-378-3272.

Sincerely,

Marilyn K. Schuster, Manager Standards & Technical Resources Section Oregon Occupational Safety & Health Division