



# Oregon

Theodore R. Kulongoski, Governor

## Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

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August 15, 1997

Casey Jones, Fire Chief  
Salem Fire Department  
370 Trade St SE  
Salem OR 97301-3503

Dear Mr Jones:

This is in response to your July 29, 1996 letter in which you ask for a rule interpretation on the proper use of ladders and whether the top (fly section) of an extension ladder must be erected so the top section is always above and resting on the bottom section when being set up for use.

**QUESTION:** Is it OR-OSHA's intent to regulate the use of fire service ladders, with regard to the positioning of the fly section?

**ANSWER:** There are no specific OSHA requirements in the firefighter's standards addressing portable ladders. OR-OSHA's position on the use of ladders used by fire departments is that they may be used with the fly in front or behind the bottom section depending on the ladder design and recommendations of the ladder manufacturer. The employer must install and use all ladders in accordance with acceptable work practices for the fire services as recommended by the ladder manufacturer.

**QUESTION:** Does section 437-02-025 of the ladder standard, applying to wood ladders, apply equally to the use of fiberglass and metal ladders?

**ANSWER:** Rule 437-02-025 is in the wood ladder section and therefore applies only to wooden ladders. On wooden ladders the upper section is controlled and held in place by guide irons and any forces applied between the two sections is transmitted through the guide irons. The proper distribution of the forces depends on how the fly section is setup. In most cases the fly section is designed by the manufacturer to be on top.

Metal and fiberglass ladders are designed to ride inside the flange section of the lower part of the ladder thereby giving more surface area in the flange lip to transfer the loadforces over a greater area. If installed with the fly down you still have a greater surface area to transmit the load to the bottom section. Metal and fiberglass ladders, if approved by the manufacturer, can be used in either direction.

QUESTION: What specific OAR applies to the use of fire service fiberglass and aluminum extension ladders, with regard to positioning of the movable or fly section?

ANSWER: There is no specific requirement on the use of ladders used by fire departments. Under the general duty clause in Oregon's safe employment act (ORS 654.010) the employer must provide a safe place for workers at all times. This means all ladders must be installed, used, and maintained in a safe manner and used in accordance with the ladder manufacturer's safe operating procedures.

If we can be of further assistance to you, please call Jerry Hoard.

Sincerely,

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