

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 83-1910.27-4

Subject: Application of Subarticle 6, Section 1910.27, Fixed Ladders, to Fixed Ladders Used in Emergency Situations.

Standard: Subarticle 6, Section 1910.27, Rules and Regulations, Commission of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.27.

Background: The Division of Occupational Safety and Health (OSH) has historically established that the requirement of Subarticle 6, Section 1910.27 for cages, platforms, or similar fall prevention protection devices are not appropriate for fixed ladders on structures where the fixed ladders are used only as a means of access by firefighters, other emergency personnel, or escape for employees in fire or other emergency situations. Sometimes these ladders are not provided with employee protection as presently required in Section 1910.27, when they are intended to be used only in an emergency. In these circumstances, it is sometimes more hazardous to install a cage, well, landing platform or ladder safety device pursuant to the standard than it is not to comply. A cage or well, etc., may interfere with firefighting or other rescue equipment, or employee escape from fire or other emergency situations.

Interpretation: This instruction provides performance criteria for fixed ladders used only as a means of access for firefighters and other emergency personnel, or escape for employees in fire and other emergency situations.

- a) Employers must establish and implement adequate administrative controls such as barricades and signs to prevent nonemergency use of fixed ladders which are intended for firefighters' use and emergency escape only.
- b) In the event the employer does not provide adequate administrative controls such as barricades or signs, and employees use an emergency ladder for other than its intended purpose, the employer may be appropriately cited under Section 1910.27.

- c) Fixed ladders not equipped with cages, landing platforms, ladder safety devices, or other forms of employee protection, in some situations may be allowed as a means of access for firefighters and other emergency personnel, or escape for employees in fire and other emergency situations. These guidelines are provided because it may be more hazardous to comply with Section 1910.27 than not to comply.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand
December 6, 1983