



COCHISE COUNTY

WALKING AND WORKING SURFACES PROGRAM

OSHA 29 CFR 1910 SUBPART D

COCHISE COUNTY ADMINISTRATIVE PROCEDURE

Walking and Working Surfaces Program

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Richard G. Karwaczka

Richard Karwaczka, Cochise County Administrator

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1. Introduction

The purpose of this policy is to establish the minimum requirements and responsibilities for employees when on walking-working surfaces, including elevated work platforms and rooftops. This policy is designed to protect all employees engaged in work activities that expose them to risks as prescribed in the Occupational Safety and Health Administration's (OSHA's) Walking-Working Surfaces Standard - 29 CFR 1910 Subpart D.

2. Scope

This document applies to all employees and any contractors working on Cochise County property.

3. Responsibilities

3.1 Department Director/ Elected Official

- Oversee the departmental walking and working surfaces program ensuring that all program elements are fully implemented.
- Assign as Departmental Safety Coordinator, an employee(s) to be responsible for implementation of the safety program in that department.
- Provide the Departmental Safety Coordinator with adequate time and resources to implement the requirements of this program.
- Enforce compliance with this written program, including appropriate disciplinary action for any County employee failing to follow the requirements.

3.2 Program Administrator (County Risk & Safety Administrator)

- Establish the County's written walking and working surfaces program, review annually, and revise as necessary.
- Function as a resource for Department Safety Coordinators on walking and working surfaces topics.
- Annually evaluate the effectiveness of the written program.
- Review changes in operations and keep current with new processes and/or facilities within the county and identify new requirements, when needed.
- Ensure that hazard assessments have been completed to determine exposure potential and type of PPE, if any, to be used.
- Assessments will be maintained by the Department Safety Coordinator.

3.3 Departmental Safety Coordinator

- Undertake the investigation and administration of any walking and working surface-related incident.
- Ensure that supervised employees (including new hires) receive appropriate training.
- Work with department managers and Risk Management to coordinate efforts to analyze, minimize walking and working surface exposures.

3.4 Employees

- Take part in all mandatory training associated with walking and working surface familiarization to work in such a manner which reduces the possibility of having a walking and working surface incident.
- Use PPE as instructed and in accordance with training received.
- Maintain PPE and report any damage or loss to supervisor or manager.
- Maintain work areas free from slip, trip, and fall hazards.
- Correct or immediately report slip, trip, and fall hazards.
- Use proper ladders for assigned tasks.

4. Procedures

4.1 Housekeeping

- All work areas, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.
- The floor of every area shall be kept as clean and dry as practical.
- Where wet processes are used, drainage shall be maintained and platforms, mats or other dry standing places shall be provided.
- Every floor, work area and passageway shall be kept free from protruding nails, splinters, holes, or loose boards.

4.2 Aisles and Passageways

- Aisles and passageways shall be kept clear and in good repair with no obstruction across or in aisles that could create a hazard.
- Permanent aisles and passageways shall be appropriately marked.
- Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and wherever turns or passage must be made.

4.3 Floor Loading Protection

It shall be unlawful to place, or cause, or permit to be placed, on any floor or roof of a building or other structure, a load greater than that for which such floor or roof is approved.

4.4 Protection for Floor Openings

- Standard railings shall be provided on all exposed sides of a stairway opening, except at the stairway entrance. For infrequently used stairways, where traffic across the opening prevents the use of a fixed standard railing, the guard shall consist of a hinged floor opening cover of standard strength and construction along with removable standard railings on all exposed sides, except at the stairway entrance.
- A "standard railing" consists of top rail, midrail, and posts, and shall have a vertical height of 42 inches nominal from the upper surface of top rail to floor, platform, runway, or ramp level. Nominal height of midrail is 21 inches.
- A "standard toeboard" is 4 inches nominal in vertical height, with not more than ¼ inch clearance above floor level.
- Floor openings may be covered rather than guarded with rails. When the floor opening cover is removed, a temporary guardrail shall be in place, or an attendant shall be stationed at the opening to warn personnel.
- Every floor hole into which persons can accidentally walk shall be guarded by either:
 - A standard railing with toeboard.
 - A floor hole cover of standard strength and construction.
- While the cover is not in place, the floor hole shall be constantly attended by someone or shall be protected by a removable standard railing.

4.5 Protection of Open-Sided Floors, Platforms, and Runways

Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing on all open sides, except where there is an entrance to a ramp, stairway, or fixed ladder.

The railing shall be provided with a toeboard beneath the open sides, whenever:

- Persons can pass underneath;
- There is moving machinery underneath; or
- There is equipment with which falling materials could create a hazard.

Every runway shall be guarded by a standard railing, or the equivalent, on all sides 4 feet or more

above floor or ground level. Wherever tools, machine parts, or materials are likely to be used on the runway, a toeboard shall also be provided on each exposed side.

5. Stairway Railings and Guards

Every flight of stairs with four or more risers shall have standard stair railing or handrails as specified below. Stair width is measured clear of all obstructions except handrails.

- On stairways less than 44 inches wide having both sides enclosed, at least one handrail shall be affixed, preferably on the right-side descending.
- On stairways less than 44 inches wide with one open side, at least one stair rail shall be affixed on the open side.
- On stairways less than 44 inches wide having both sides open, two stair rails shall be provided, one for each side.
- On stairways more than 44 inches wide, by less than 88 inches, one handrail shall be provided on each enclosed side and one stair rail on each open side.
- On stairways 88 inches or more in width, one handrail shall be provided on each enclosed side, one stair rail on each open side, and one intermediate stair rail placed approximately in the middle of the stairs.
- A “standard stair railing” shall be of construction similar to a standard railing, but the vertical height shall be not more than 34 inches nor less than 30 inches from the upper surface of the top rail to the surface of the tread in line with the face of the riser at the forward edge of the tread.

5.1 Fixed Industrial Stairs

Fixed industrial stairs shall be provided for access to and from places of work where operations necessitate regular travel between levels. Requirements include:

- Fixed industrial stairs shall be strong enough to carry five times the normal anticipated live load.
- At the very minimum, any fixed stairway shall be able to carry safely a moving concentrated load of 1000 pounds.
- All fixed stairways shall have a minimum width of 22 inches.
- Fixed stairs shall be installed at angles to the horizontal of between 30 degrees and 50 degrees.
- Vertical clearance above any stair tread to an overhead obstruction shall be at least 7 feet measured from the leading edge of the tread.

6. Portable Ladders

The chief hazard when using a ladder is falling. A poorly designed, poorly maintained, damaged, or improperly used ladder may collapse under the load placed upon it and cause the employee to fall.

The various types of portable ladders include:

- Stepladder – A self-supporting portable ladder, non-adjustable in length, having flat steps and hinged back.
- Single Ladder – A non-self-supporting portable ladder, non-adjustable in length, consisting of but one section. Its size is designed by overall length of the side rail.
- Extension Ladder – A non-self-supporting portable ladder adjustable in length.
- Combination ladder – means a portable ladder that can be used as a stepladder, extension ladder, trestle ladder or stairway ladder. The components of a combination ladder also may be used separately as a single ladder.

6.1 Portable ladder requirements

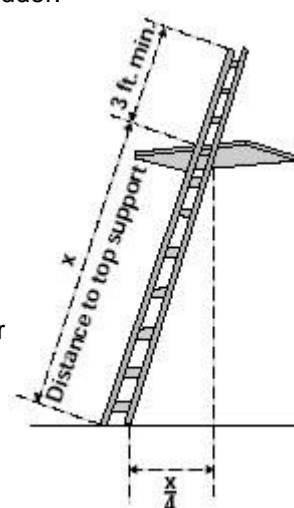
- Step Ladders shall be equipped with a spreader or locking device of sufficient size and

strength to securely hold the front and back sections in open position.

- Ladders shall be always maintained in good condition.
- Ladders shall be inspected before each use and those, which have developed defects, shall be withdrawn from service for repair or destruction and tagged or marked as “Dangerous, Do Not Use.”
- When discarding a ladder, it must be destroyed in such a manner as to render it useless. Another person must not be given the opportunity to use a ladder that has been deemed unsafe.

6.2 Portable ladder safety precautions:

- Read and follow all labels/markings on the ladder.
- Only Type 1 and Type 1A are acceptable for use
- Avoid electrical hazards! – Look for overhead power lines before handling a ladder. Never use a metal ladder near power lines or exposed energized electrical equipment.
- Always inspect the ladder prior to using it. If the ladder is damaged, it must be removed from service and tagged until repaired or discarded.
- Always maintain a 3-point (two hands and a foot, or two feet and a hand) contact on the ladder when climbing. Keep your body near the middle of the step and always face the ladder while climbing (see diagram).
- Only use ladders and appropriate accessories (ladder levelers, jacks, or hooks) for their designed purposes.
- Ladders must be free of any slippery material on the rungs, steps, or feet.
- Do not use a self-supporting ladder (e.g., step ladder) as a single ladder or in a partially closed position.
- Do not use the top step/rung of a ladder as a step/rung unless it was designed for that purpose.
- Use a ladder only on a stable and level surface unless it has been secured (top or bottom) to prevent displacement.
- Only use appropriate ladder levelers to level a ladder on uneven surfaces.
- Do not place a ladder on boxes, barrels, or other unstable bases to obtain additional height.
- Do not move or shift a ladder while a person or equipment is on the ladder.
- An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support (see diagram).
- Do not stand on the three top rungs of a straight, single or extension ladder.
- The proper angle for setting up a ladder is to place its base a quarter of the working length of the ladder from the wall or other vertical surface (see diagram).
- A ladder placed in any location where it can be displaced by other work activities must be secured to prevent displacement or a barricade must be erected to keep traffic away from the ladder.
- Secure doorways or use a coworker to warn when using a ladder in or near a doorway.
- Be sure that all locks on an extension ladder are properly engaged.
- Do not exceed the maximum load rating of a ladder. Be aware of the ladder’s load rating and of the weight it is supporting, including the weight of any tools or equipment.
- The worker shall always face the ladder when climbing up or down.
- Short ladders shall not be spliced together to make long ladders.
- Ladders shall never be used in the horizontal position as scaffolds or work platforms.



7. Fixed Ladders

A fixed ladder is a ladder permanently attached to a structure, building or equipment.

- Fixed ladders with a length of more than 20 feet to a maximum unbroken length of 30 feet shall be equipped with cages or a ladder safety device.

- A “cage” is a guard that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.
- Cages shall extend a minimum of 42 inches above the top of a landing unless other acceptable protection is provided.
- Cages shall extend down the ladder to a point not less than 7 feet nor more than 8 feet above the base of the ladder.

8. Fall Protection

Fall protection is required anytime an employee involved in maintenance activity is working on a level that has an unprotected side or edge that is 4 feet or more above a lower level. If the employee is involved in construction activity, the distance is 6 feet or more above a lower level.

Protection may be afforded by one of the following methods:

- Guardrail systems;
- Safety net systems; or
- Personal fall protection systems.

These requirements do not apply to:

- Portable Ladders;
- Activity that only includes inspection, investigating, or assessing work to be performed, prior to the start of work, or after the work has been completed.
- Aerial Lifts (separate fall protection requirement).

Training is required on Fall Protection. See the County Fall Protection Program for full detail.