

November 30, 2009

Mr. Carven Blanck
Muza Sheet Metal Company, LLC
51 W. Fernau Avenue
Oshkosh, WI 54901

Dear Carven:

On Friday, November 20, 2009, Integrated Risk Management Associates, LLC did a field inspection at the Muza job-site in New London, Wisconsin. Our report and recommendations follow:

Emanuel Lutheran Church, 200 East Quincy Street, New London, WI 54916

Two Muza employees, both journeymen, were working on low slope/flat roof on the rear of the church. Scaffolding was installed on the upper level---the level on which we were working---and on the eastside of the building. The scaffolding had been installed by Great Lakes Roofing and appeared to be fully assembled. Muza employees will not be using the scaffolding on the eastside of the building.

Although there were no discrepancies at the site, there were some interesting challenges. The employees had to climb a ladder to a low sloped roof, then physically scale a short wall to gain access to the flat roof from which they were installing gutters.

The question arose: At what point does OSHA require that we use a ladder rather than scaling or stepping over an elevation?

The definitive answer is only to be found in OSHA pamphlet 3124-12R 2003:

Stairways and Ladders: A Guide to OSHA Rules

General Requirements

These rules specify when employers must provide stairways and ladders. In general, the standards require the following:

When there is a break in elevation of 19 inches (48 cm) or more and no ramp, runway, embankment or personnel hoist is available, employers must provide a stairway or ladder at all worker points of access.

It's an interesting conundrum!

As a precaution, I also reminded the employees of 1926.1053(b)(22):

An employee shall not carry any object or load that could cause the employee to lose balance and fall.

Shoulder carrying materials to the roof from a ladder is not allowed.

Sincerely,



Charles P. Howes
Senior Safety Engineer
Integrated Risk Management Associates, LLC

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