

**SUBJECT:** Fixed Ladders Used on Outdoor Advertising Structures/Billboards in the Outdoor Advertising Industry.

**Purpose:** This instruction establishes policies and provides guidelines to ensure appropriate enforcement of certain requirements pertaining to the OSHA General Industry standards for fixed ladders, 29 CFR **1910.27(d)(1)(ii), and 1910.27(d)(2)**. It extends to other employers the terms of a variance granted to the Gannett Outdoor Companies.

**Scope:** This instruction applies OSHA-wide.

**Reference:** 1. Federal Register, Vol. 56, No. 41, pages 8801-8804, March 1, 1991, Gannett Outdoor Companies, Grant of Variance  
2. "Gannett outdoor Apprenticeship Program for Climbers" and "Introduction for General Billposting Procedures." (See Appendix A.)

**Cancellation:** This instruction supersedes STD 1-1.14, "Ladders on Advertising," dated December 21, 2004.

**Background:**

The Gannett Outdoor Advertising Companies received a permanent variance from the OSHA General Industry safety standards concerning fixed ladders on billboards, 1910.27(d)(1)(ii) requiring cages or wells, and 1910.27(d)(2) requiring landing platform ladder safety devices. The variance provided that Gannett Companies would comply with the following six conditions:

1. Each employee who climbs combination ladders (combinations of a portable and a fixed ladder) shall wear a safety belt or body harness equipped with appropriate 18-inch rest lanyard as a means to tie off to the fixed ladder on lengths of climbs on the fixed ladder of up to 50 feet or heights of up to 65 feet from grade.
2. Each employee shall have both hands free of tools or material when ascending or descending a ladder.
3. Each employee who climbs combination ladders where the length of the fixed ladder climb exceeds 50 feet or where the ladder ascends to heights exceeding 65 feet from grade shall be protected through the installation of appropriate ladder safety devices for the entire length of the fixed ladder climb.
4. Each employee who climbs fixed ladders equipped with ladder safety devices shall use those devices properly and shall follow appropriate procedures for inspection and maintenance of those devices.
5. Each employee who routinely climbs fixed ladders shall undergo training and demonstrate the physical capacity to perform the necessary climbs safely. These employees shall satisfy the "qualified climber" requirements in proposed 1910.32(b)(5), (proposed Subpart D), as follows:

- a. Qualified climbers shall be physically capable (demonstrated through observations of actual climbing activities or by a physical examination) of performing the duties which may be assigned to them;
  - b. Qualified climbers shall have successfully completed a training or apprenticeship program that covered hands-on training for the safe climbing of ladders or step bolts and shall be retrained as necessary to ensure the necessary skills are maintained;
  - c. The employer shall ensure through performance observations and formal classroom or on-the-job training that the qualified climber has the skill to safely perform the climbing;
  - d. Qualified climbers shall have climbing duties as one of their routine work activities; and
  - e. Qualified climbers, when reaching their work positions, shall be protected by an appropriate fall protection system.
6. All ladder safety devices that are currently installed on fixed ladders less than 50 feet in length of climb or which ascend to heights less than 65 feet above grade shall be properly maintained and used by employees. An employee shall be considered a qualified climber on billboard ladders if the following criteria are met:
- a. The qualified climber's physical condition shall be such that climbing exercise will not impair health and safety. This ability can be determined by physical performance tests. A physical examination by a physician who is aware of the duties that the employee is expected to perform is acceptable. Successful completion of a training program for the type of structures that are to be climbed will also be considered as proof of the climber's physical capabilities.
  - b. The training program for qualified climbers shall consist of classroom training and actual climbing training. The classroom training shall consist of information on structural characteristics, the types and significance of using safety equipment, and the procedures for safe climbing. It shall also include discussions of the risks involved with climbing structures and the activities to be performed on the structures, as well as discussions of emergency procedures, accident causes, and factors such as bad weather that tend to increase the risks involved in climbing.
  - c. Climbing training should consist of classroom instruction followed by the individual observing an experienced climber performing one or more climbs on the type of structure which the individual is being trained to climb. Actual climbing during training shall be initiated under close supervision and with the use of redundant safety equipment.
  - d. The rate of reduction for supervision and the use of safety equipment will be a matter of subjective judgment by the trainer. Climbers shall be permitted to work without fall protection only after the employee has demonstrated the necessary ability and skill in climbing structures.

Action:

The terms of the Gannett Outdoor Companies' variance are being extended to all employers engaged in outdoor advertising using billboards. OSHIs inspecting a worksite where the employer is engaged in outdoor advertising using a billboard shall not issue a citation for violation of 1910.27(d)(1)(ii) and 1910.27(d)(2) when it has been established that the following applies:

1. The employer is found to be engaged in outdoor advertising using billboards;
2. The employer observes the six conditions listed above; and
3. The employer provides the training that includes the criteria for a qualified climber on billboard ladders as described in Item 6 of the Background section.
  - a. The Gannett Outdoor Companies' Apprenticeship Program for Climbers and Introduction for General Billposting Procedures are considered acceptable programs to use as a baseline when evaluating other billposting companies' programs. (See Appendix A.)
  - b. These guidelines will remain in effect until the effective date of the final rules resulting from the Proposed Rulemaking, "Walking and Working Surfaces and Personal Protective Equipment (Fall Protection Systems)", published in the Federal Register on April 10, 1990.

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For the OSHA Management Team

Distribution: OSHA Compliance and WSC Director

Attachments: Appendix A - Apprenticeship Program for Climbers

NOTICE: Minnesota OSHA Directives are used exclusively by MNOSHA personnel to assist in the administration of the OSHA program and in the proper interpretation and application of occupational safety and health statutes, regulations, and standards. They are not legally binding declarations and they are subject to revision or deletion at any time without notice

## Appendix A

### **APPRENTICESHIP PROGRAM FOR CLIMBERS**

Prior to employment, please see enclosed application for physical details required. Also prior to employment, applicant is required to take a physical, of which a report will be sent directly to the Company.

The first thirty (30) days of employment, the new employee will be the fourth man on a three-man crew. He will not be allowed to climb for the first thirty (30) days, but will have on-the-job training regarding climbing on ladders and structures with the crew chief and other members of the crew.

After thirty (30) days, the new employee will be allowed to work on the platform only as a member of the crew. (This does not include the upper part of the structure of a sign.) After sixty (60) days, he will be assessed by the crew chief who will verify that he has served his apprenticeship and is now approved to climb on any and all structures.

### **INTRODUCTION FOR GENERAL BILLPOSTING PROCEDURES**

These guidelines provide written explanation for the typical billposting process. The guidelines also, very importantly, outline safe work procedures. Not all billposting situations are covered, however, the majority are and these guidelines will be followed. The posting locations which require some deviation from these guidelines still always require the job to be performed in a safe manner.

Any questions regarding not following safe work procedures as outlined due to individual location difference must be directed to the billposting Supervisor. If a safe method of posting the location cannot be achieved, the location will be brought to the attention of the Operations Manager and the Safety Manager for evaluation.

The safety of everyone, employees & non-employees as well as private property - is part of your responsibility as an employee. If you see paper or loose structure material coming off of a sign, you must either stop and remove the same or call your supervisor & report the problem immediately.

If you pass a sign where the copy has been washed or blown off, you must stop & pick it up, paper laying on a walkway or street can be a serious tripping hazard or extremely slippery if wet, thus a potential injury for anyone. Report all locations where you have removed or picked up copies to the posting supervisor.

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Remember, safety on the job is a joint effort. If you are in doubt about how to handle a situation safely, call your supervisor prior to attempting the job. You will then be advised how to do the job or instructed to go on to the next location.

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### I. EQUIPMENT

A. The list to follow, represents standard required equipment for each Billposter.

1. One 14' Hook Ladder (tapered top)
2. One 16' or 18' Straight Ladder
3. One 28' Extension Ladder
4. One 50' Rope with snaps on each end (pull line)
5. One 5' Lanyard
6. One Safety Work Belt
7. One Back Pack Bag
8. One Pouch
9. One Brush
10. One Bastard File
11. One 3' Rope (Ladder Securing Line)
12. One 25' Rope (Catenary) where required
13. One number one scraper - wood handle only
14. One Wood Handle Straw Broom
15. One Wood Handle Grass Rake
16. Three Safety Cones
17. One putty knife sharpened one edge
18. One 5-gallon Bucket and Sponge
19. One Hard Hat
20. One Alpine style Lanyard - "Ladder Man" gear

### II. GENERAL POSTING SAFETY PROCEDURE

A Billposter must at all times wear & use a Safety Belt & 5' Lanyard when working on a sign or off of a ladder.

If at any time a Billposter feels the board's condition is unsafe to work on, the board will not be posted. The person observing the problem will attach a red tag to the structure access ladder or in a place where any one working the sign will see it.

The red tag must contain a written description of the condition. A duplicate red tag will be attached to the posting card, or on a work repair order. This tag will be returned to the posting director with a verbal explanation of what the problem is, along with the written work order to repair. The posting director will give the repair order and the red tag to the Operations Department Supervisor.

He will send a copy to the charting department and keep one for himself. The work order and the red tag must be signed off by the person doing the repair and the operating supervisor before the sign can be posted. Copies of the signed off red tag and work orders will be sent to the posting supervisor and the charting department.

### **HAZARDS TO LOOK FOR**

- \* Bent, broken or loose access ladders
- \* Dry rotted, rusted, broken or loose decks
- \* Rotted, broken or loose top rails
- \* Unsecured face panels
- \* Wood structures needing stubbing
- \* Boards leaning
- \* Loose or hanging light fixtures
- \* Unsecured mouldings
- \* Overhead power lines
- \* Incoming power service drops
- \* Broken or damaged electrical conduits

### **A. PANEL ACCESS**

#### **1. ACCESS TO PANELS WITH DECKS 10'- 0" OR LESS FROM GRADE**

Place the 14' hook ladder over the deck corner. The 14' hook ladder must be placed in such a fashion as to insure that only the straight portion of the ladder touches the deck. The tapered portion of the hook ladder must extend above the deck at least 3'- 0". This condition also applies if the deck must be accessed from the front.

#### **2. ACCESS TO PANELS WITH DECKS LESS THAN 14'-0" FROM GRADE**

Place the 16' or 18' straight ladder over deck corner. If for any reason, deck access must be over the deck front, the 16' or 18' straight ladder must protrude above the deck to the extent (at least

3'- 0") that the top of that ladder can be used as a grab rail. Secure the 16' or 18' straight ladder to the deck with the 3' section of rope.

### **3. ACCESS TO PANELS WITH DECKS OVER 14'-0" BUT NOT OVER 20'- 0" FROM GRADE WITHOUT PERMANENT ACCESS LADDERS**

Place the 28' extension ladder over the deck corner - or the deck front, the 28' extension ladder must protrude above the deck to the extent (at least 3'-0") that the top of that ladder can be used as a grab rail. Secure the 28' extension ladder to the deck with the 3' section of rope.

### **4. ACCESS TO PANELS WITH PERMANENT ACCESS LADDERS AT HEIGHTS OF 15'- 0" AND ABOVE**

Ladder selection will be governed by permanent approaches and accessibilities. An 18' straight hook ladder could be used to reach permanent access ladder rungs at 16' to 17' heights. If a straight ladder is used for that purpose, the straight ladder must be hooked to the permanent access ladder rung. The 28' extension ladder could be utilized in cases where the base of the permanent ladder is at 16' or 17' above grade and must be utilized in all cases where the base of the permanent access ladder is 17' or more above grade. The 28' extension ladder shall be placed between permanent access rails where the permanent access ladder rail width exceeds extension ladder width. The 28' extension ladder will be placed on the outside of the permanent ladder where the permanent rail width is narrower than extension ladder rails. All ladders must be leveled at the ground contact point. All straight and extension ladders must be secured to the permanent access ladder using the 3' section of rope.

### **5. ACCESS TO ROOF MOUNTED PANELS**

Extreme caution should be used in accessing roof panels regardless of the size or style of the ladder. Care should be focused on placing the ladder base on a level surface or to modifying (see Ladder & Equipment section for details) the surface to simulate a flat or level condition. When possible, secure the ladder to any permanent part of the structure with a rope or chain.

## **B. PROCEDURES FOR WORKING ON DECKS**

### **1. WORK PREPARATION**

The employee would assemble all equipment and material in the vicinity of the pick up truck. At that time, the safety work belts with attached Lanyards would be secured to the employee's waist. The employee would then climb the straight or extension ladder previously secured to the permanent access or deck depending on the structure height.

### **2. INITIAL DECK ACTIVITIES**

Upon reaching the deck level, the lanyard would be attached to either the safety eye or catenary line, after attachment proceed to access the deck. If the panel is equipped with both a safety eye and a catenary line, the initial hook up would be to the catenary line.

### **3. LAND PAPER AND EQUIPMENT**

Paper would normally be transported to the deck using the backpack. If the stands on the panel are to be scraped, paper and a scraper would be roped to the deck with the posting paper contained in the paper lift bag. When possible, the paper must be placed in either the back pack or paper lift bag to prevent spillage of paste or loss of paper on surrounding property. If a hook ladder has not been stored on the deck, one must be roped up while the employee is hooked to the catenary line or safety eye.

### **4. SETTING THE HOOK LADDER**

Without unhooking the lanyard snap from the catenary line or safety eye, the hook ladder stored on the deck would be unlocked and raised, with the hook landing firmly over the top of the panel. Placing the hook ladder in position for posting will be done while hooked to the catenary line or safety eye. The lanyard snap would then be removed from the catenary line or safety eye and snapped to a position 3' above the employee's waist on the hook ladder. The panel would be posted in the regular manner (top to bottom, left to right) with the employee secured to the hook ladder at all times. Caution must be used in placing hook ladder away from the corner radius of round moulding boards

The employee must remain "hooked up" at all times while working on the deck, regardless of decking arrangements. Upon completion of posting sections, the employee would remain "hooked up" to the ladder and with both hands, slide the hook ladder along the poster top to the opposite end (access end) of the panel. At that point, the lanyard would be disconnected from the hook ladder and secured to the catenary line or safety eye.

#### **\*\*NOTE\*\*:**

Procedures for ladder handling and hook-up while working back-to-back structures are contained in the final section of the procedures entitled "Summary of Mandatories and Guidelines". Items 7, 8, & 9.

### **5. LOCKING HOOK LADDER TO DECK**

Remain "hooked up" to the catenary line or safety eye, the hooks to the ladder are to be placed over the deck edge, (this is not possible when there is no catenary and deck edge cannot be reached using safety eye). The bottom or foot of the ladder would be positioned toward the permanent access ladder. (The foot of the ladder would then be chained and locked thus resulting in the hook ladder being secured to the deck in a manner convenient for the next posting cycle).

### **6. DESCENDING THE PANEL**

Still "hooked up" to the catenary line or safety eye, all equipment and remaining materials would be gathered, secured and where practical roped to grade. After clearing the deck (except for the secured hook ladder) the lanyard would remain connected to the catenary line or safety eye and the ladder descent would be initiated with both hands free. After securing firm footing on the

first step of the ladder, the lanyard would be unhooked from the catenary line or safety eye. All secured ladders would be untied and the descent completed. All equipment and materials would be returned to the pick up truck and secured. Paste must be removed from any vehicles, equipment or structures under the board.

**\*\*NOTE\*\*:**

When scraping work is performed, that work would be done while the employee is secured to a catenary line, a safety eye or if necessary, to a properly mounted hook ladder. When posting or scraping a sign in an area where people could be present under the sign, caution men working signs and safety cones must be placed. In conditions described above, scrapes should be lowered with a rope.

### **III. GENERAL LITHO BULLETIN POSTING PROCEDURE**

#### **A. PANEL ACCESS**

##### **1. PERMANENT ACCESS LADDER TO REAR OF BULLETIN STRUCTURE**

Apply steps listed in the General Panel Posting Procedure

##### **2. BULLETINS NOT EQUIPPED WITH A PERMANENT ACCESS LADDER**

Apply steps listed in the General Panel Posting Procedure, Section II., A.3.

#### **B. PROCEDURES FOR WORKING FROM DECKS**

1. "Ladder Person": Rope leads for subsequent lifts along with the secondary lanyard would be transported to the landing or front deck. Rope leads would be tied-off to the rail. The employee would then access the rear top deck of the structure and hook both the secondary lanyard and the 5' lanyard to the top back deck catenary line. The secondary line with counter weight & rope grab or "ascending device" would be hung over the face of the board at the point you are going to commence posting. Then proceed to inspect section attachments, extension attachments and the general worthiness of the unit for safe work conduct. Upon completion of inspection actions, the "Ladder Person" would remain hooked to the catenary line until returning to the original inspection start point. The 5' lanyard would be unhooked and the employee would descend to the front deck and hook-up to that catenary line. If the unit was judged to be in an unsatisfactory condition, the "Red Tag" procedure would be invoked as described in the General Posting Safety Procedure. If the unit was judged satisfactory the "Ladder Person" would begin Step 2 action.

2. **LAND PAPER AND EQUIPMENT** "Ground Person" would have assembled and tied-off paper, ropes, ladder and any other materials/equipment required to perform the work while the "Ladder Person" performs the inspection work listed in Step 1 above. The "Ground Person" would assist the "Ladder Person" (on the deck secured to the catenary line) with remaining grade

level actions and in turn gain access to the deck and secure lanyard in the manner previously described.

3. **SETTING HOOK LADDER** "Ladder Person" with their 5' lanyard hooked to the catenary line will raise-the hook ladder with the hooks being landed over the top of the board. The hook ladder would be slid to an appropriate starting position. The secondary lanyard would be secured to the life belt. The 5' lanyard would be detached from the catenary line. The ascending device must be kept at waist level or above. Top paper will be carried up the ladder and posting actions are initiated. The "Deck Person" after attaching the 5' lanyard to the catenary line, will perform activities to assist the "Ladder Person" as required, including handling paper, pulling paper, unwrapping "Vac Pac" and the like. "Ladder Person", during the progress of posting, the ladder will be descended and ascended several times. The following measures would be observed each time:

- \* upon reaching deck attach 5' lanyard to catenary line.
- \* detach from secondary lanyard.
- \* slide ladder to next appropriate position.
- \* move secondary lanyard and rehook to same.
- \* detach 5' lanyard from catenary line.
- \* mount ladder and re-initiate the cycle described above.

4. **REMOVING EQUIPMENT FROM STRUCTURE** Upon completing ladder oriented posting work, the ladder would be descended for the final time in the posting cycle. Removal of the secondary lanyard, still connected to the top back or guard rail would be disconnected by ascending the rear deck and lowering the secondary lanyard to the front deck or rolling up the lanyard, securing it to your safety belt and descending to the front deck. If the structure is not equipped with "walkarounds" on both ends and the final ladder posting actions conclude away from the single walkaround, connect and disconnect the 5' lanyard as required to the deck catenary line for transferring the deck and passing the "Deck Person". The "Ladder Person" would secure any permanently assigned hook ladders and subsequently descend the structure. The "Deck Person" would assemble all tools and materials and prepare to lower same to the waiting person below at grade. The "Deck Person" would descend the ladder once all equipment and materials have been lowered.

#### SUMMARY OF MANDATORIES & GUIDELINES

1. Wear approved safety belt.
2. Wear hard hat when working two men crew.
3. Use backpack where and when possible.
4. Use short line (Lanyard) 5'.
5. Use long line (Catenary rope) where required.

6. Use cable catenary when installed at location.
7. You must hook into eyebolt when using walkaround.
8. Using walkaround, you must carry ladder at balance point and below waist, with ladder away from the structure.
9. When on deck carry ladder on outside and away from panel.
10. Where and when possible, rope up and down scrapes.
11. Where and when possible, rope up and down ladder, equipment, & Material.
12. Use all general posting procedures as you post given locations.
13. If it is necessary to deviate from the Safety Procedures outlined in the posting manual, you should call the posting Supervisor for instructions.
14. You must turn in all unsafe locations, equipment, as you come across them. (Refer to General Posting Safety Procedures.)
15. You are responsible for turning in All unsafe conditions observed in the outdoor plant to the posting Supervisor, no matter what route you may work.
16. You must be hooked up at all times when working on posters or Litho.
17. Both hands must be kept free of tools or material when climbing or descending a ladder.
18. Be aware of any overhead, or service power line.
19. Check for broken or damaged electrical conduits.

## **V. LADDER & EQUIPMENT INSTRUCTIONS**

If you use a ladder, these simple rules will help you avoid a serious injury.

### **SETTING UP YOUR LADDER**

- \* Chose the right length of ladder so you can work without undue leaning.
- \* Check for damaged rungs and side rails and for loose, broken or bent hardware. If you thing the ladder may be defective, **STAY OFF OF IT**, and check with your supervisor.
- \* If the rungs are wet or slippery, clean them before you climb. **DO NOT** let paste build up on the ladder rails.
- \* When setting up the ladder, adjust it to the proper slope by holding the ladder with arms straight out, and with your toes at the ladder base.
- \* Place the ladder base on a firm footing and parallel with the wall, or board.
- \* Protect the base from traffic. If you place the ladder in front of a doorway, make sure the door is locked or guarded, and safety cones are put out.
- \* If you intend to step off at a higher level, the top of the ladder should extend 36 inches above that level and should be lashed.
- \* Fasten the ladder to the top with a rope.
- \* Level the base of the ladder with ladder levelers or a suitable material to accomplish a good stable foundation.

\* Make sure you have a good 3 point connection for the base & the rails of the ladder when you lean it against any structure.

#### CLIMBING LADDERS

- \* The ladder base is most likely to slip out as you near the top of the ladder. This means you can't check this hazard from the bottom, so if you have any doubt, **HAVE SOMEONE HOLD THE BASE.**
- \* If your shoes are muddy, icy or greasy, clean them before you climb.
- \* Always face the ladder and use both hands while climbing up or down. (Carry tools in your pockets or belt, or hoist them on a rope.)
- \* Keep your eyes on the ladder and watch where you put your hands and feet.
- \* Stay off the top two rungs of a straight or extension ladder or top step and cap of a stepladder.
- \* Climb stepladders only on the steps. Never climb the bracing on the back of a stepladder.
- \* Be aware of any electrical lines overhead.
- \* **DO NOT RISK OVER-BALANCE** by reaching too far, take the time to come down and move the ladder to a new location. Follow the simple rule of keeping your belly button between the side rails.
- \* **DO NOT** tie the ladders together to make longer ones.
- \* **DO NOT** throw or drop your ladders, lower them with a rope.

#### SECONDARY LANYARD

(Alpine style "LADDER MAN" gear)

To be used when working on the ladder while posting LITHO