

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



Reply to the Attention of:

JUN 2 1998

Mr. Gregory C. Clements
Roofmaster Products Company
O.P. Box 6339
Los Angeles, CA 90063-0309

Re: 1926.500-503; 1926.552; 1926.1053

Dear Mr. Clements:

This is in response to your letter dated October 4, 1995, requesting an interpretation of the Occupational Safety and Health Administration (OSHA) standards addressing ladders used to support a hoisting wheel. Your letter references the use of a Ladder Master Hoisting Wheel, and the need to adhere to the regulations for ladder use while involved in lifting materials with this device.

Ladders are required to be secured to prevent accidental displacement when employees are using them on unstable, slippery or non level surfaces. However, when using a ladder to lift materials with a hoisting wheel, employees would not be using the ladder for climbing and therefore would not be subjected to ladder use requirements.

When involved in this lifting activity, the ladder would not be considered a hoist for the purposes of OSHA's hoisting regulations and would therefore not be subject to the provisions of Subpart N-Cranes, Derricks, Hoists, Elevators, and Conveyors. However, those employees exposed to fall hazards during lifting activities must comply with the applicable fall protection requirements in accordance with 29 CFR 1926.500-503, (e.g. safety monitor for low sloped roofs).

We agree, if used properly and within manufacturer's guidelines, this ladder hoisting wheel could reduce or eliminate injuries from lifting heavy loads while climbing ladders.

Thank you for your interest in job site safety and health issues and if we can be of any further assistance, please write to:

Directorate of Construction-OSHA
Office of Construction Standards and
Compliance Assistance, Rm. N3621
200 Constitution Avenue, N.W.- Rm. N3621
Washington, D.C. 20210

Sincerely,

A handwritten signature in black ink, appearing to read "Russell B. Swanson". The signature is fluid and cursive, with the first name "Russell" being the most prominent.

Russell B. Swanson, Director
Directorate of Construction