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Ladder Safety Policy

Purpose

The purpose of this ladder safety policy is to establish procedures and guidelines to ensure proper use, ordering, selection, inspection, and maintenance of ladders provided in the Escanaba Mill. The program is designed for the protection of employees when engaged in activities where ladders can or must be used.

Responsibility

Responsibility for the ladder safety program is that of the Safety Department, appropriate area supervision and any team member using a ladder. The program will be reviewed annually by the Safety Department.

Extent

This policy applies to all employees, visitors, contractors, and emergency response teams.

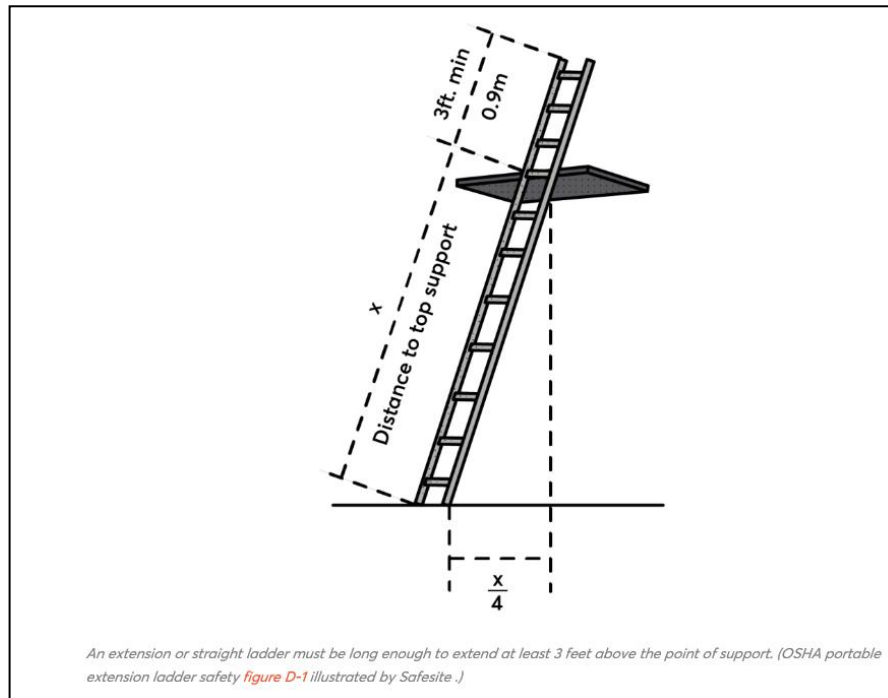
Execution

- 1) Use a ladder for its intended purposes only, ladders are not to be used as planks or skids.
- 2) All ladders brought into the mill shall be non-conductive fiberglass ladders.
- 3) Do not place ladders in front of doors that open toward the ladder unless the door is blocked open, locked, or protected by a barricade.
- 4) Do not place ladders on boxes, barrels, or other unstable bases.
- 5) Always face the ladder while ascending and descending.
- 6) A single ladder shall not be used by more than one person at a time.
- 7) Always maintain three points of contact with the ladder while climbing by either 2 feet 1 hand or 1 foot 2 hands.
- 8) Stepladders must be fully opened with their spreaders locked before use with each leg of the ladder in contact with solid footing.
- 9) When using a ladder to go from one landing to another, the ladder must extend at least 3 feet above the upper landing, the surface to which the ladder is used to gain access.
- 10) No employee shall stand or climb on the top three rungs of an extension ladder or the last rung and top of a step ladder. (Read ladder instructions)
- 11) Do not overreach when using ladders, if the ladder is too far from the work area to reach it safely; climb down, reposition the ladder, and then perform the work. If both shoulders or your belt buckle is outside the rails of the ladder, you are overreaching.

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- 12) A folded stepladder is not to be used as a straight ladder by leaning it against a wall or other support.
- 13) Place ladders on a firm, level surface. Where the surface is uneven; boards, planks, or leveling jacks may be used to create an even surface.
- 14) Ladder sections are to be fastened together only with hardware provided by the manufacturer. Fasten or combine sections of ladder only as prescribed by the manufacturer.
- 15) Engage extension ladder rung locks before use.
- 16) Never use a ladder to support a load heavier than the ladder's load rating or manufacturer's rated capacity.
- 17) Block off/Flag off the area where the ladder will be used, or use a spotter to direct traffic where appropriate.
- 18) For every 4 feet of ladder length, the base of the ladder should be 1 foot out from the supporting structure. For example: a 16-foot ladder's base would be four feet out from the supporting structure, while a 12-foot ladder's base would be 3 feet out from the wall or supporting structure. The ladder needs to be put at a 75-degree angle or simply a 4:1 ratio.



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- 19) Always secure ladders to prevent movement (tie off, outriggers, another person). Straight and extension ladders shall be secured as close to the support point as possible. If this is not possible, supervision will assign a second person to support the base.
- 20) All extension ladders shall have safety feet in good working condition.
- 21) Slip resistant, clean shoes are to be worn by all employees using ladders.
- 22) Ladders are not to be moved, extended, or shifted while in use.
- 23) When moving and using ladders near electrical wires, the wires shall be de-energized using standard lockout/tagout procedures. Care shall also be used when placing ladders near delicate or hazardous equipment where damage may occur.
- 24) Always read the instructions and load rating on the ladder before use.
- 25) Never climb up or down a ladder with a load that is too large to handle safely.
When handling materials, use a hand line or tool belt.
- 26) Use two people for carrying ladders whenever possible. When carrying a ladder by yourself, the front of the ladder should be slightly higher than the back. Use pads, straps, or dollies when moving ladders alone. Ladder racks are available for loading ladders on vehicles.
- 27) Never tie-off to a ladder.
- 28) Perform work while facing the ladder whenever possible.
- 29) When working from a ladder, be alert for people below you and obstructions above you.
- 30) Fixed ladders greater than 24 feet must use fall protection devices if available.
 - a.) Areas without fall protection devices will be working on an action plan to obtain the required equipment.

Procedures for Ladder Inspection

Ladders are to be inspected before each use and after they have fallen or been involved in an accident. We shall remove from service for repair or disposal and red tag a ladder if defects such as the following are found:

- 1) Splits, gouges, and dents in rails. Also, other damage to rails that may make the ladder unsafe for use.
- 2) Worn, crushed, cracked, splintered, or missing rungs, steps, or platforms.
- 3) Loose steps or rungs that result in 3/4-inch longitudinal play in the rails.
- 4) Broken or bent guide irons, spreaders, or locks.
- 5) Bent or twisted side rails or rungs.
- 6) Loose or broken fasteners such as rivets or bolts.
- 7) Rope frayed and pulley system not operating freely.

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- 8) Rungs are not clean and free of grease.
- 9) Safety feet not in good condition.
- 10) Rung locks not in place.
- 11) Labels missing or not readable.

Procedure for Ladder Maintenance

- 1) We shall not paint a ladder with an opaque material. We should coat ladders with a transparent protective material to retard splintering.
- 2) Side-rails and legs of a ladder shall be kept free from splinters. The joint between the side-rail and step shall be kept tight. Metal hardware and fittings shall be secure.
- 3) A ladder and its safety feet shall be kept free of oil, grease, mud, and other slippery surfaces.
- 4) Movable metal parts such as locks, pulleys, and spreader joints shall operate freely. Lubricate as required.
- 5) Ropes on ladders shall be free of burns and cuts, and shall not show signs of weakness from fraying, wear, mildew, or rot.

Procedure for Ladder Use

- 1) Select the right ladder for the job:
 - type: extension/step
 - load rating
 - height
- 2) Inspect the ladder before use:
 - rails, rungs, connections, safety feet, rope and pulley, spreader bar, rung locks, free of grease and dirt, etc.
- 3) Evaluate the site and set up properly:
 - flag off/block off area, use of spotters to direct traffic, warning signs, etc.
 - clear area
 - block or barricade doors that open into the ladder area
 - look overhead (most electrocutions occur during set up)
 - support ladder with a solid, level surface
 - for every 4 feet of ladder the base should be 1 foot out from the supporting structure or wall
 - step ladder fully opened
 - ladder leaning against a pole must use pole support or connector
- 4) Secure the ladder:
 - outrigger stabilizers
 - tie offs

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- use another person (use a hard hat, do not look up, place feet against ladder feet, both hands on the ladder)
- 5) Climb the ladder and work efficiently
- do not overreach
 - 3 contact points with ladder
 - climbing with reasonable loads, etc.
 - face the ladder when climbing and whenever possible when working

Procedure for Ship Ladder Use

A ship ladder is a steep angled device with angles between 50 and 70 degrees. This is much steeper than the typical angle of stairs of 45 degrees per OSHA. Due to these being so steep, ship ladders have much less usable tread depth than a standard OSHA stair design.

Inspect the ladder before use:

- rails, rungs, connections, safety feet, rope and pulley, spreader bar, rung locks, free of grease and dirt, etc.

Climb the ladder and work efficiently

- do not overreach
- 3 contact points with ladder
- When ascending or descending always use handrail and take one step at a time.
- climbing with reasonable loads, etc.
- Face the ladder when ascending or descending and whenever possible when working.

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Procedure and Requirements for Ladder Ordering

- 1) Contact Safety Department for job analysis or discussion
 - discuss height needed
 - tasks being performed
 - type of ladder (Extension, step, platform, etc.)
 - payload of intended use and ladder rating
- 2) Ladder Ordering Requirements
 - refer to the ANSI Ladder Color Code
 - a) orange or 300lb payload limit Type IA
 - b) yellow or 375lb payload limit Type IAA