

April 13, 1999

Camilla Rice, Project manager  
Portland Public School District  
501 N. Dixon  
Portland, OR 97227

Dear Ms. Rice:

In a March 3, 1999 phone conversation you asked Bob Thiessen to clarify safety concerns related to roof access hatches discussed in item 6 of OR-OSHA Consultation report # 98-2059. The issues discussed below existed during an on site visit to view a sampling of hatch installations in late October, 1998. Pat Darby, an OR-OSHA consultant and Bob Thiessen safety technical specialist with the Standards and Technical Resources Section met with David Hotchkiss, Bond Program Director at these locations. The following conclusions were arrived at during that visit.

- ▶ An employee must be able to unlock and open the hatch with one hand while holding onto the ladder with the other hand. Because the hatches open downward, the employee must retreat down the ladder one or two steps to allow the hatch to open, watching for pinch points between the ladder and the lowering hatch.
- ▶ Hatch closing springs on individual hatches were not all uniformly tensioned. This allows each hatch to open at a different speed from other hatches. At the time of the onsite visit, opening speed ranged from almost a free fall to having to pull the hatch down.
- ▶ The hatch closing springs do not allow the hatch to remain open at 90 degrees without assistance. At any angle less than 90 degrees, the hatch will be hanging in front of the ladder side rails and rungs interfering with the climbers hands, feet and body movements.
- ▶ Care must be taken when closing the hatch to ensure that latches are secured. If the latches have not been fully engaged the hatch cover can open unexpectedly, possibly striking the employee who is still on the ladder.

The Oregon Safe Employment Act, ORS chapter 654.010 requires employers to provide a safe place of employment whether or not required by a specific rule. The above issues recognize the existence of such hazards.

For further information contact Bob Thiessen at 378-3272. You are also invited to see the OR-OSHA pages on the Internet at [www.cbs.state.or.us/external/osha/index.html](http://www.cbs.state.or.us/external/osha/index.html).

Sincerely,

Marilyn K. Schuster, Manager  
Standards & Technical Resources Section  
Oregon Occupational Safety & Health Division  
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cc Nancy Cody, Manager Consultation