

JPIASource

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ACWA JPIA RISK MANAGEMENT FOR THE WATER INDUSTRY



Should fixed ladders
be inspected?

YES!





Fixed ladders are very common in the water industry. Examples of uses for fixed ladders include accessing the tops of water tanks and climbing down vaults. Some agencies climb these fixed ladders regularly, while others use them only a few times per year. In any case, when using a fixed ladder, employees are at risk of falling. Due to this danger, fixed ladders must be inspected, and employees must be protected against falls. OSHA defines a permanently attached ladder as a fixed ladder. Although these ladders are built to be durable, they are often exposed to harsh environmental conditions and can experience significant wear over time, making it important to ensure they remain safe and reliable. In fact, [Cal/OSHA § 3277](#) (i) currently states, “all ladders shall be maintained in a safe condition. All ladders shall be inspected regularly, with inspection intervals determined by use and exposure.” Cal/OSHA is proposing changes to this standard, including ladders shall be inspected before initial use at the start of each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury.

To meet requirements, agencies should ensure that the fixed ladders employees climb are in good working order.

Injuries from the use of fixed ladders do occur. These injuries may result from incidents involving slipping off a ladder or using a ladder that is deteriorated (broken rungs, loose bolts, or rust). To help prevent these problems, fixed ladders should be included in the agency’s regular evaluation and maintenance process. This process should be documented so

any issues found can be tracked and corrected. To help members with developing inspections, **Section 15** of the [Risk Control Manual](#) on the JPIA’s website provides examples of checklists that can be used to update or develop agency procedures.

Fixed ladders have specific design and installation requirements. Per [Cal/OSHA § 3277\(d\)](#), specific features must be met. For example, in (d)(4), it states that “rungs, cleats, and steps shall be free of splinters, sharp edges, burrs, or projections that cause a hazard.” Periodic ladder inspections would catch these hazards and others before they injure an employee. OSHA provides a [sample checklist](#) with specific items to inspect fixed ladders.

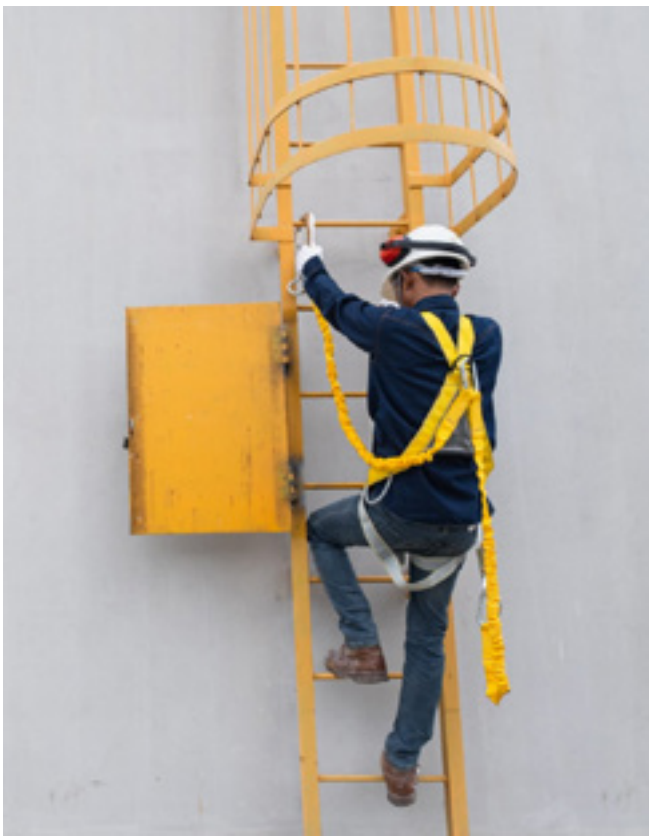


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In addition to ensuring that fixed ladders are in good working order, OSHA has updated its fixed ladder standard to eliminate the use of cages and wells for fall protection. Starting in 2018, ladders exceeding 24 feet must be equipped with a personal fall-protection system or a ladder safety system. Typical replacements include personal fall arrest systems (PFAS), ladder safety systems, or stairways. Agencies have until November 2036, to comply with the new standard. Although Cal/OSHA has not adopted the federal standard, its current standard requires fall protection on fixed ladders above 20 feet. Please read the JPIA's *Splash Alert*, [OSHA Revises Its Fixed Ladder Standard](#), published in November 2025, for more information on the revision.

To best determine the proper fall protection for your fixed ladders, a job hazard analysis (JHA) should be conducted. This allows for identifying specific hazards in the use of fixed ladders and determining the best control for each hazard. **Section 19** of the [JPIA's Risk Control Manual](#) provides several sample forms for conducting a JHA. As with inspecting the ladder in general, any fall-protection system must be inspected periodically. [Cal/OSHA § 1670](#) requires that, at a minimum, fall protection be inspected before each use. For fall arrest systems, the equipment must be inspected at least twice annually, and the inspections must be documented.

As we can see, both OSHA and Cal/OSHA provide extensive guidance on fixed ladders. It is the employer's responsibility to provide a safe work environment. To do this, we need to ensure that proper inspections are conducted on the equipment employees use. When it comes to fixed ladders, it is important to ensure that both the ladder and the protective systems are in good working order.



For more information on fixed ladders, please visit:

[Cal/OSHA § 3277 Fixed Ladders](#)

[OSHA 1910.28 Duty to Have Fall Protection and Falling Object Protection](#)

[Walking-Working Surfaces – §3277 Amend Standards Presentation](#)

[OSHA Fact Sheet - Walking-Working Surfaces and Fall Protection Standards](#)



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The JPIASource is not intended to be exhaustive. The discussion and best practices suggested herein should not be regarded as legal advice. Readers should pursue legal counsel or contact their insurance providers to gain more exhaustive advice.

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