

## 1 PURPOSE

This standard establishes the minimum requirements for employees working on all ground-level working surfaces, elevated work platforms, stairways, rooftops, and ladders. In addition, all employees must follow mandatory local, state, and federal statutory rules and regulations.

## 2 SCOPE

This standard is applicable to all personnel employed by Chesapeake Energy Corporation, performing work on Chesapeake properties and/or on the company's behalf. This standard encompasses OSHA's walking-working surface minimum requirements covered by OSHA 29 CRF 1910 – Subpart D. Contractors **shall** have their own Standard that meets or exceeds regulatory requirements.

## 3 DEFINITIONS

**Cage** - an enclosure mounted on the side rails of a fixed ladder or fastened to a structure behind the fixed ladder that is designed to surround the climbing space of the ladder.

**Competent Person** – One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

**Dockboard** - a portable or fixed device that spans a gap or compensates for a difference in elevation between a loading platform and a transport vehicle.

**Employee** – Any person that works as an employee of Chesapeake.

**Fall Protection** – Any equipment, device, or system that prevents an employee from falling from an elevation or mitigates the effect of such a fall.

**Fixed Ladder** – A ladder with rails or individual rungs that is permanently attached to a structure, building, or equipment.

**Guardrail System** – A barrier erected along an unprotected or exposed side, edge, or other area of a walking-working surface to prevent employees from falling to a lower level.

**Handrail** - A rail used to provide employees with a handhold for support.

**Hoist Area** - Any elevated access opening to a walking-working surface through which equipment or materials are loaded or received.

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**Hole** - A gap or open space in a floor, roof, horizontal walking-working surface, or similar surface that is at least 2 inches (5 cm) in its least dimension.

**Ladder Safety System** – A system designed to eliminate or reduce the possibility of falling from a ladder; usually consisting of a carrier, safety sleeve, lanyard, connectors, and body harness.

**Lower Level** - A surface or area to which an employee could fall such as ground levels, floors, roofs, ramps, runways, excavations, pits, tanks, materials, water, equipment, and similar surfaces and structures.

**Opening** - A gap or open space in a wall, partition, vertical walking-working surface, or similar surface that is at least 30 inches (76 cm) high and at least 18 inches (46 cm) wide, through which an employee can fall to a lower level.

**Personal Fall Arrest System** - A system used to arrest an employee in a fall from a walking-working surface consisting of a harness, anchorage, and connector.

**Positioning System** - A system of equipment and connectors that, when used with a body harness or body belt, allows an employee to be supported on an elevated vertical surface,

**Portable Ladder** – A ladder that can readily be moved or carried, and usually consists of side rails joined at intervals by steps, rungs, or cleats.

**Qualified Person** - A person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work, or the project.

**Rope Descent System** - A suspension system that allows an employee to descend in a controlled manner and, as needed, stop at any point during the descent.

**Scaffold** – Any temporary elevated or suspended platform and its supporting structure, including anchorage points, used to support employees, equipment, materials, and other items.

**Shall** – Denotes a minimum requirement to conform to the Standard. Any deviation from a minimum requirement must be approved via the Standard Exception Form.

**Should** – Denotes a recommendation, or that which is advised, but not required to conform to the Standard.

**Stair Rail System** – A barrier erected along the exposed or open side of stairways to prevent employees from falling to a lower level.

**Stairway** - Risers and treads that connect one level with another and includes any landings and platforms in between those levels.

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**Walking-working Surface** - Any horizontal or vertical surface on or through which an employee walks, works, or gains access to a work area or workplace location.

**Workplace** – An establishment, location, job site, or project, that contains one or more work areas.

## 4 RESPONSIBILITIES

### 4.1 HSER DEPARTMENT

- Provide training to all affected employees.
- Assist with creating inspection forms.
- Assist with activities necessary to comply with this standard.
- Review and update the standard as needed.

### 4.2 SUPERVISORS

- Be knowledgeable of this standard and ensure implementation within their area of responsibility.
- Ensure employees are properly trained.
- Ensure personnel understand the potential hazards of the work to be performed.
- Ensure walkways, working surfaces, work platforms, and guardrails are maintained properly.
- Ensure inspection of equipment prior to use. Ensure ladders deemed defective are repaired or replaced prior to use.
- Identify competent person as defined in this standard.

### 4.3 EMPLOYEES

- Be familiar with the standard and its requirements.
- Complete required training.

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- Inspect equipment prior to use and report defects to supervisor.
- Identify and mitigate potential hazards associated with walking and working surfaces.
- Communicate uncorrected defects to supervisor.

## 5 REQUIREMENTS

### 5.1 GENERAL REQUIREMENTS - OSHA 29 CFR - 1910.22

- All employees are responsible for maintaining their immediate work areas in a clean and orderly condition free from hazards that may contribute to a slip, trip, or fall.
- Areas left unattended for any period shall be made safe for those who may pass through.
- Aisles and passageways shall be kept clear and in good repair, with no obstructions (protruding objects, loose boards, snow/ice, etc.) that can create a hazard across or in aisles.
- Safe means of access and egress shall be provided for and must be used by employees to and from walking-working surfaces.
- If hazardous conditions arise on any walking-working surface that condition shall be corrected/repared immediately, or the area shall be guarded to prevent employees from accessing the walking-working surface until the hazard is corrected.
- Where mechanical handling equipment is used, sufficient safe clearances shall be maintained for aisles, at loading docks, through doorways and wherever turns or passage must be made.
- Aisles and passageways shall be appropriately marked.

### 5.2 LADDERS – OSHA 29 CFR - 1910.23

- **General usage and construction requirements - 1910.23(b)**
- Ladders shall be maintained in good condition and inspected before each use.
- Ladders appropriate for the job shall be selected and used in accordance with the manufacturer's recommendations and only used for the purposes for what they were designed.
- Employees shall face the ladder when ascending or descending.

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- Employees shall use a three-point contact method where possible (i.e., two feet & one hand, or two hands & one foot).
- Employees should use caution when carrying tools and equipment up or down the ladder and look for other options where possible.
- At a minimum, ladders must meet American National Standards Institute – **ASC A14 – Ladder standards requirements.**
- Ladders shall be visually inspected by a competent person trained to recognize hazards associated with ladders; looking for structural defects, such as but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, or corrosion.
- Ladders shall be inspected by the user before each use and after any occurrence that could affect the ladder's safe use.
- Metal Ladders must have a warning label for electrical caution.
- The ends/feet must be fitted with insulated non-slip material.
- Steps and rungs must be intact and not wobbly.
- Must be free of any loose screws, bolts, or other metal parts.
- Must not be damaged or worn out.
- Extension ladders must have free and unrestricted movable parts.
- Extension ladder ropes must be in good condition and a minimum diameter of 5/16 inch.
- Ladders with defects must be immediately removed from service and tagged as defective. Defective ladders shall be removed from the work site immediately and repaired or destroyed.
- **Portable ladder requirements – 1910.23(c)**
- Portable ladders shall be constructed with nonconductive siderails if used near electrical equipment, meet applicable standards for ladders, and be used in accordance with the manufacturer's recommendations.
- All ladders are to be secure before climbing.
- Ladders must extend at least three feet (3') above an upper access landing.
- Ladders shall only be used on stable surfaces and shall not be moved or adjusted while an employee is on them. Ladders shall be supported on both side rails unless the ladder is equipped with a single support attachment.
- Site ("Job" or wooden) built ladders are not permitted.

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- Manufacturer's labels shall be easily identified on all portable ladders.
- Ladders that can be displaced by workplace activities or traffic shall be secured or barricaded to prevent accidental movement.
- Ladders shall not be tied or fastened together to increase the length.
- When working from a ladder, a worker should keep his/her torso between the vertical sides of the ladder, to prevent falling or causing the ladder to shift.
- The horizontal distance from the base of the ladder to the top support should be one-fourth (1/4) of the working length of the ladder. The working length is the length of the ladder from the bottom to the point where it contacts the top support. (i.e., a ladder that is 12 feet from its bottom to the top support, should have its bottom 3 feet from the wall.  $3/12 = 1/4$ )
- Portable ladders should be stored in an area that protects from the weather (wood ladders), and direct sunlight (fiberglass ladders).
- **Fixed ladder requirements – 1910.23(d)**
- Fixed ladders shall be designed, constructed, and used in accordance with applicable local, state, and federal standards for fixed ladders.
- Safety cages or fall protection devices shall be provided on fixed ladders exceeding twenty-four feet (24') in length. Cages must completely encircle the ladder and be free of projections inside the cage. Cages shall be designed in accordance with applicable local, state, and federal standards.
- Metal fixed ladders shall be painted or otherwise treated to resist corrosion when necessary.
- Fixed ladder inspection shall evaluate the integrity (cracks, splits, broken uprights, or braces), and should be free of any loose parts and oil/grease.
- **Mobile ladder stand and platform requirements – 1910.23(e)**
- Mobile ladder stand steps and platforms must be used and constructed in accordance with state and federal requirements.
- Must be capable of supporting four times the intended load.
- Mobile ladder stands with a top step or platform four feet (4') or above must have handrails or other means of protection. (i.e., removable gates or chains)
- Must be designed with a system to prevent ladder movement when an employee is on the ladder or platform.

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- **Design requirements – 1910.23(e)(2) & 1910.23(e)(3)**

### 5.3 STEP BOLTS AND MANHOLE STEPS – OSHA 29 CFR – 1910.24

- Step bolts and manhole steps are not commonplace on CHK worksites. However, should a CHK job task or worksite require the use of or the installation of step bolts or manhole steps, please refer to OSHA's guidance for construction and usage requirements.

### 5.4 STAIRWAYS – OSHA 29 CFR – 1910.25

- **General usage and construction requirements - 1910.25(b)**
- Flights of stairs having four or more risers shall be equipped with stair railings or handrails and provided in accordance with **OSHA 1910.28(b)(11)**
- All stair treads shall be slip-resistant, and the nosing shall be of a nonslip finish.
- Rise height and tread width shall be uniform throughout any flight of stairs.
- Each stair must support at least 5 times the intended load but never less than 1000 lbs.
- Stairway landings and platforms must be at least 30" in depth.
- Standard stairs shall be used to access one walking surface to another when regular and routine travel between levels is necessary, including operating platforms for equipment.
- **Standard stair requirements – 1910.25(c)**
  - Must be installed between 30 & 50 degrees from the horizontal, must have a maximum riser height of 9.5 inches. must have a minimum tread depth of 9.5 inches and have a minimum width of 22 inches between vertical barriers.
- **Spiral stair requirements – 1910.25(d)**
  - Not commonplace on CHK sites but may be affixed to some tanks.
- **Alternating tread-type stair requirements – 1910.25(f)**
  - Not commonplace on CHK sites but may be necessary for some installations.

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### 5.5 DOCKBOARDS – OSHA 29 CFR – 1910.26

- Dockboards are not commonplace on CHK worksites. However, some CHK warehouses or offloading sites may utilize dockboards. Please refer to OSHA's guidance for construction and usage requirements.

### 5.6 SCAFFOLDS AND ROPE DESCENT SYSTEMS – OSHA 29 CFR – 1910.27

- **1910.27(a) refers to OSHA 29 CFR – 1926 subpart L for scaffolding requirements.**
  - Scaffolding shall be erected, used, maintained, and dismantled in accordance with the manufacturer's recommendations as well as all applicable local, state, and federal regulations.
  - A competent person shall supervise all scaffolds being erected, moved, dismantled, or altered and ensure the work is performed only by qualified personnel.
  - Scaffolding shall be inspected for visible defects by a competent person before each work shift, and after any occurrence which could affect a scaffold's structural integrity.
  - Any damaged scaffold or scaffold components shall immediately be removed from service.
  - Scaffolds shall not be altered by welding, cutting, drilling, or bending.
- **Rope descent system requirements – 1910.27(b)**
  - Chesapeake employees are not authorized to use rope descent systems.

### 5.7 DUTY TO HAVE FALL PROTECTION AND FALLING OBJECT PROTECTION – CRITERIA AND PRACTICES – OSHA 29 CFR – 1910.28 & 1910.29

- Height four feet (4') or more above a lower level:

All walking-working surfaces with an unprotected side or edge, hoist areas, dockboards, runways, work platforms above dangerous equipment, floor openings (including manholes, trap doors, pits, cellars, ladder-ways, and chute openings), fixed ladders that extend more than 24 feet above floor level, and stairways (except entrance to stairways) must be protected from falling by one or more of the following:

- **Guardrail systems – 1910.29(b)**

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- Safety net systems – **1910.29(c) - [1926 Subpart M]**
  - Handrails / Stair rail systems – **1910.29(f)**
  - Personal fall arrest systems – **1910.29(j) - [1910.140]**
  - Travel restraint systems – **1910.29(j) - [1910.140]**
  - Positioning systems – **1910.29(j) - [1910.140]**
  - Ladder safety systems – **1910.29(l)**
  - Cages, wells, platforms – **1910.29(g)**
  - Covers – **1910.29(b)**
- Any hole that is less than four feet above a lower level must be protected by covers or a guardrail system.
  - Employees shall be protected from falling into or onto dangerous equipment, regardless of height, by a guardrail system or travel restraint system unless the equipment is covered or guarded from the hazard.
  - When an opening is not covered or blocked from access, a person must be assigned for constant attendance to the opening until the cover or guarding is replaced.
  - Covers must be sound, solid, and when feasible, hinges, handles, bolts, or other parts of floor opening covers should set flush with the floor or cover surface so as not to create a tripping hazard.
  - Every ladder way, floor opening, or platform shall be guarded on all exposed sides (except at the entrance to opening), by a guardrail system with passage through the railing either provided with a gate or so offset that an employee cannot walk directly into the opening.
  - Walkways used exclusively for special purposes (such as on tank batteries) may have railing on one side omitted where operating conditions necessitate such omission, providing that the runway is at least 18 inches wide, and employees use a personal fall arrest system or travel restraint system.
  - Employees shall be protected from falling objects by wearing head protection in accordance with OSHA 1910.135.
  - Additionally, employees shall be protected from falling objects by toe boards, or other means to prevent objects from falling to a lower level or by barricading the hazard area and preventing employees from entering that area. - **1910.29(k)**

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## 6 TRAINING

Affected CHK employees shall receive initial training on the requirements of this standard. Refresher training shall be given in the event the standard is revised

## 7 AUDIT REQUIREMENTS

Regular audits of this program and associated procedures may be conducted by HSER Compliance Assurance. Audits will be documented, and corrective actions monitored until they are implemented.

## 8 DOCUMENT STORAGE AND RETENTION

Documents shall be retained in accordance with the Records Retention Schedule, Document Control Program and applicable laws or regulations.

## 9 REFERENCES

### 9.1 INTERNAL

- HSER-SAF-CHK-STD-019 – Fall Protection

### 9.2 EXTERNAL

- OSHA Regulation 29 CFR 1910 Subpart D – Walking-Working Surfaces
- OSHA Regulation 29 CFR 1910.140 – Personal Fall Protection Systems
- OSHA Regulation 29 CFR 1926 Subpart L – Scaffolds
- OSHA Regulation 29 CFR 1926 Subpart M – Fall Protection
- ANSI ASC A14

## 10 APPENDIX

Not Applicable

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## 11 DOCUMENT CONTROL TABLE

<b>Title:</b> Walking/Working Surfaces Standard		<b>Document Number:</b> HSER-SAF-CHK-STD-015		
<b>Next Review Date:</b> 07/05/26				
<b>Originating Dept.:</b> HSE - Safety				
<b>Version History</b>				
Ver. #	Effective Date	Description	Author	Approved By
1.0	01/27/17	Issued	Chad Workman	Jason Kelly
1.1	07/18/19	Updated logo. Revised document number to DSG numbering convention (formerly CHK-EHS-SAF-STD-010); updated EHS & Regulatory to HSER throughout document; updated Document Control Table to DSG format.	Kelly Trice	NA
2.0	08/04/20	Change EHS to HSER. Added identify competent person to supervisor roles. Added initial training. Made 3-points of contact optional where possible.	Blake Record	Jason Martin
3.0	07/05/23	Added Cage, Dockboard, Portable Ladder, Handrail, Hoist Area, Hole, Opening, Personal Fall Arrest System, Positioning System, Qualified person, Rope Descent System, Shall, Should, and Stairway Definitions. Added reference to OSHA Standard number to 5.3, Added General use and construction requirements to 5.4, added requirements to 5.5,5.6 and 5.7. Added Fall protection Standard to 9.1 References. Added OSHA Reg 29 CFR 1910 subpart D to External References.	Tim Streeter	Operations Governance Board
3.1	11/27/23	5.2 - Clarification of portable ladder construction: "shall be constructed with nonconductive materials if used near electrical equipment".	Harris Marcom	Harris Marcom