Background:

Over the past several years, the MIOSHA Construction Safety and Health Division has granted a variance from Part 32 Aerial Work Platforms, Rules 3216 (3) and 3216 (4) that allowed employers to firmly secure scaffold planks to the intermediate rail of the guardrail system of a self-propelled elevating work platform (scissor lifts only) for use in areas where the aerial lift could not reach due to overhead obstructions, provided several stipulations were adhered to.

**Rule 3216 (3)** states: “The guardrail system of the platform shall not be used to support any of the following:

(a) Materials.
(b) Other work platforms.
(c) Employees.

**Rule 3216 (4)** states: “Employees shall maintain firm footing on the platform while working on the platform. The use of railings, planks, ladders, or any other devices on the platform for achieving additional height is prohibited.”

**Acceptable Alternatives for Complying with Rules 3216 (3) & 3216 (4):**

**Alternative #1:** The aerial work platform manufacturers have designed many new attachments and made significant changes to equipment that are now available to employers for accessing those “hard to reach” areas. A variance of Rules 3216 (3) and 3216 (4) is not required if using approved manufacturer’s attachments and equipment.

**Alternative #2:** Compliance with the stipulations listed below would be considered a “de minimis” violation of Rules 3216 (3) and 3216 (4) when using planks to gain additional height in a self-propelled elevating work platform. A variance is not required and no citations will be issued if adhering to all of the following stipulations:

1. Only self-propelled elevating work platforms as defined in ANSI standard A92.6-1999 (scissor lifts) shall be used.

2. The scissor lift shall be of the type that is designed to withstand the vertical and lateral loads caused by an arrested fall with a personal fall arrest system.

3. Scaffold planks shall not be supported or used on the extension portion of a scissor lift.

4. A minimum of two (2) scaffold planks shall be secured side by side, cleated on both sides of the mid-rail, extend a maximum of four (4) inches beyond the bearer, and secured to the mid-rail of the aerial lift on
the narrowest dimension of the work platform. The planks shall be so arranged or supported to be capable of supporting (4) times the intended load.

5. The two scaffold grade planks shall be supported to the floor of the aerial lift by a box made of a minimum of 2 X 10 nominal lumber positioned between the mid-rails, along the bottom of the work planks, and the floor of the platform. A 2 x 4 diagonal bracing system may be used in lieu of the boxed 2 x 10 bracing system; provided it is capable of supporting four (4) times the intended load.

6. Limit the use of the planked platform to one (1) employee who shall use a **personal fall arrest system** affixed to a designated attachment point provided by the manufacturer within the platform.

7. The planked platform and the lift controls shall be so configured that the controls cannot be operated from any position on the planked platform.

8. The elevated employees shall stand on the floor of the lift before moving the lift either vertically or horizontally.

9. The scaffold planks shall not to be used to exit the scissor lift.

10. All floor holes and openings in the lift use area shall be either covered so as to support the load imposed by the lift, or guarded with guardrails and stop blocks to prevent the lift tires from dropping below the floor level.

11. Affected employees shall be trained and instructed in the above requirements.

For additional assistance, please contact the Construction Safety and Health Division at 517-322-1856 or the Consultation Education and Training Division at 517-322-1809. Construction Safety Standards and other information can be viewed on the MIOSHA website at [www.michigan.gov/miosha](http://www.michigan.gov/miosha).