

September 23, 2007

Mr. Ron Nieuwstraten
R Tex Inc.
R.R. #2, Baltimore
Ontario, Canada K0K 1C0

RE: Scaffold Equipment Review

Dear Mr. Nieuwstraten:

This is my report concerning the compliance of the Gladder Fixed Ladder, Access Door and Guardrail with the United States Federal Occupational Safety & Health (OSHA) Construction Standards, 29 CFR 1926, Subpart L.

Applicable Standards

The Gladder Fixed Ladder, Access Door and Guardrail are scaffolding components, purpose built for use with other scaffold components. Therefore, these products must comply with the standards specified in Subpart L of 29 CFR 1926, Construction Standards. Specifically, the ladder shall comply with 29 CFR 1926.451(e)(2), the guardrail shall comply with 29 CFR 1926.451(g)(4) while the access door has no specific standards that address its application other than the previously mentioned strength requirements although it could be argued that the door should also comply with the platform requirements found at 29 CFR 1926.451(b). In addition, all components shall comply with 29 CFR 1926.451(a)(1) which addresses the strength of scaffold components.

Gladder Ladder

The OSHA standards, 29 CFR 1926.451(e)(2), require:

- That the ladder be positioned so as not to tip the scaffold;
- That the maximum first step of the ladder be 24 inches;
- That the ladder shall have a rest platform at least every 35 feet;
- That the ladder shall be specifically designed for use with scaffolds;
- That the ladder shall have a minimum rung length of 11-1/2 inches, and;
- That the ladder shall have uniformly spaced rungs with a maximum spacing between rungs of 16-3/4 inches.

Ladder Strength:

The ladder must also comply with the strength requirements as specified in Federal OSHA 29 CFR 1926.451(a)(1). This standard requires that all components be rated with a factor of safety of 4. This means that the ladder failure load must be at least four times the allowable ladder load rating. Therefore, once the ultimate or failure load of the ladder is determined, divide that value by 4 to determine the allowable load rating. This then will put the ladder in compliance with 29 CFR 1926.451(a)(1).

The Gladder Ladder complies with the applicable US OSHA Standards

Gladder Access Door

The access door has to comply with the strength requirements and more specifically the standard that requires a safety factor of 4. However, it could be argued that the door, when closed, is part of the platform, and therefore should comply with the platform requirements, 29 CFR 1926.451(b). A review of these standards indicates that the door does indeed comply with the applicable standards of the platform section. These applicable standards are limited to the overlap on adjacent platform units and securing the hinge to the platform. These requirements occur in the field and therefore are up to the user of the product. This is not to say that guidelines should not be supplied so the user can correctly comply with the standards. Specifying that the door is to bear on three of the four sides and the door be secured to the hinge meets those requirements.

Similar to the ladder, the allowable load on the hinge shall have a safety factor of 4 against failure. It is recommended that consideration be given to specifying either the strength of the plywood/wood or dimension of wood that should be used for the door itself.

The Gladder Access Door complies with the applicable US OSHA Standards

Gladder Guardrail

The OSHA standards, 29 CFR 1926.451(g)(4), require the user to:

- Install a guardrail system on all open sides and ends of platforms;
- Install the guardrail system so the toprail is between 38 and 45 inches above the platform and install the midrail approximately halfway between the platform and the toprail;

The OSHA standards, 29 CFR 1926.451(g)(4), require the manufacturer to:

- Design and manufacture the toprail to be capable of withstanding, without failure, a force applied in any downward or horizontal direction at any point along its top edge of at least 200 pounds. *Note: The toprail load does not require a safety factor of 4;*
- Design and manufacture the midrail to be capable of withstanding, without failure, a force applied in any downward or horizontal direction at any point along its top edge of at least 150 pounds. *Note: The midrail load does not require a safety factor of 4;*
- Design and manufacture the rails so they are surfaced to prevent injury to an employee from punctures or lacerations and to prevent snagging or clothing;
- Design and manufacture the rails such that the overhang does not constitute a projection hazard to employees.

The Gladder Guardrail complies with the applicable US OSHA Standards

Based on my education, training, experience and background, I certify this report to be accurate within a reasonable degree of engineering certainty.

Respectfully Submitted,
DH GLABE & ASSOCIATES, INC.

David H. Glabe, P.E.
President