

## OSHA 1926 Proposed Rules - HBR Comments

### Section 1926.1401 Definitions

It is observed there is a definition for Qualified Rigger. It is also observed there are sections that address Operator Qualification and Certification and a section that addresses Signal Person Qualification.

*Comment: There is no section that addresses Rigger qualification/certification by level. Many crane accidents are associated with bad rigging practices and should be included in the document.*

### Section 1926.1410 (d)(4) Insulating Link/Device

Section (d) states "At a minimum, these procedures shall include:

(4)(i) An insulating link/device installed at a point between the end of the load line (or below) and the load.

*Comment: Due to limitations of insulator links, i.e. voltage rating capacity (33 kv max), WLL capacity (60 tons), size/overhead clearance restrictions, we recommend that, in circumstances where compliance becomes an issue, the owner should be allowed to develop a specific procedure by qualified person(s) so work can be performed safely without the use of an insulator link (suggest reference ASME B30.5 2007, 5-3.4.5.4(a)).*

### Section 1926.1413 (a)(4)(iii)(E) Alternative measures for a Category II deficiency

Section (4)(E) currently states "The workers who will conduct shift inspections are informed of this deficiency and the measures taken under this paragraph."

*Comment: We recommend the following rewording: "The **competent person** who will conduct the shift inspections **shall** be informed **in writing** of this deficiency and the measures taken under this paragraph."*

**HBR, page 2 (cont'd.)**

**Section 1926.1416 (d) (3)(ii)(C) Exception**

*Comment: Recommend removing “concrete bucket” from the exception verbiage.*

*We agree with exception verbiage as exists for pile driving operations, etc. (too broad – needs clarification).*

**Section 1926.1417 (j) Operation**

*Comment: Recommend the following:*

*“The operator shall be familiar with the equipment and its proper operation. If adjustments or repairs are necessary, the operator shall promptly inform the person designated by the employer to receive such information **by written communication** and, where there are successive shifts, to the next operator. “*

**Section 1926.1427 (j)(1)(i)(E) Certification Criteria**

*Comment: Recommend the following:*

*Technical knowledge **from a qualified person** applicable to:*

