

MAST CLIMBING WORK PLATFORMS

REGULATIONS AFFECTING MAST CLIMBING WORK PLATFORMS



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MAST CLIMBING WORK PLATFORMS



Regulations Updates (US updates)

- Material lifting devices in MCWP's
- Silca Rule



THE USE OF CRANE ARMS ON MAST CLIMBING WORK PLATFORMS

HISTORY:

OSHA's FINAL RULE ON CRANES ISSUED 2010

OSHA LETTER OF INTERPRETATION ISSUED 2011 DETERMINING THAT ALL MCWP CRANE ARMS CAPABLE OF LIFTING OVER 2000 LBS, AND MOVING THE LOAD HORIZONTALLY UNDER POWER WAS 'A CRANE'

AFTER LOBBYING BY CONCERNED STAKEHOLDER INDUSTRIES (e.g. IPAF, SAIA) OSHA DEFERRED THE NECESSITY FOR CRANE OPERATOR CERTIFICATION TO NOVEMBER 2017



THE USE OF CRANE ARMS ON MAST CLIMBING WORK PLATFORMS

IMPACT OF THE LETTER OF INTERPRETATION:

- ALL MCWP MATERIAL HOIST OWNERS, USERS WILL REQUIRE TO BE TRAINED AS 'CRANE OPERATORS'
- CRANE OPERATORS REQUIRE TO BE CERTIFIED TO A NATIONALLY RECOGNIZED LEVEL, e.g. NCCCO CERTIFICATION (National Commission for the Certification of Crane Operators). THIS MEANS THAT INDUSTRY TRAINING, MANUFACTURER TRAINING WOULD NOT BE AN ACCEPTABLE FORM OF QUALIFICATION/CERTIFICATION.
- KEVIN OSHEA CALLED THREE NCCCO TRAINING CENTERS TO REQUEST OPERATOR TRAINING FOR AN MCWP MATERIAL HOIST OR 'CRANE'. ALL THREE TRAINING CENTERS RESPONDED 'THAT'S NOT A CRANE'
- THIS LEFT OUR INDUSTRY WITH A MAJOR PROBLEM – NOVEMBER 2017 WOULD LEAVE OUR INDUSTRY WITH THE REQUIREMENT TO BE CERTIFIED AS OPERATORS TO USE OUR MATERIAL HOISTS ON MAST CLIMBERS, BUT WITH NO CONCEIVABLE WAY TO GET CERTIFICATION.

THE USE OF CRANE ARMS ON MAST CLIMBING WORK PLATFORMS

FOR THE LAST 5 YEARS OUR INDUSTRY HAS BEEN WORKING WITH OSHA TO DO TWO THINGS;

1. GET OSHA TO RECOGNIZE THE PROBLEM, TO RECOGNIZE THE INDIVIDUAL NATURE OF THE MCWP HOIST ISSUE AND TO SEE IT AS A SIGNIFICANT ISSUE. ONE WHICH WOULD PROMPT THEM TO WANT TO HELP US.
2. FIND A WAY TO EXEMPT OUR PRODUCTS FROM THE REQUIREMENTS OF THE CRANE REGULATIONS.

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July 2017

OSHA announces policy change on monorail hoists in construction

WASHINGTON – The U.S. Department of Labor’s Occupational Safety and Health Administration has announced a new enforcement policy that excludes monorail hoists from the requirements of Subpart CC – Cranes and Derricks in Construction, as long as employers meet other OSHA requirements.

The policy change was made in response to comments from stakeholders and in recognition that a monorail hoist – which is attached to a fixed monorail mounted on equipment such as trucks, trailers, or scaffolding systems – is significantly different from other cranes and derricks in construction.

Some monorail hoists can be extended and contracted in only a fixed horizontal direction. They do not rotate, swing on a hinge, or boom out much farther than the equipment on which they are mounted. They are often used in construction to hoist precast concrete components, storage tanks, and mechanical equipment.

Under the new policy, the agency will not cite employers for failing to meet the requirements of Subpart CC if they meet the requirements of the overhead hoists and general training standards. The general industry requirements for monorail hoists remain intact.

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OSHA POLICY CHANGE – WHAT DOES IT MEAN?

IT MEANS THAT MCWP HOISTS MOUNTED ON I-BEAMS ARE EXEMPT FROM THE CRANE REGULATIONS, IF THEY FOLLOW AS BELOW:

For Construction Applications

- (1) Compliance with 29 CFR 1926.554 (Overhead hoists). OSHA notes that its Overhead Hoist standard requires the use of outriggers and other supports whenever prescribed by the manufacturer.
- (2) Operators of this equipment are trained in accordance with 29 CFR 1926.21.
- (3) The employer has determined that each operator is qualified to safely operate that hoisting system per 29 CFR 1926.20(b)(4).
- (4) When monorail hoists are mounted on equipment such as work vehicles, utility trailers, scaffolding systems (including mast climbing), and various other mobile or stationary support systems, the employer must also comply with all other OSHA construction requirements that are applicable to each supporting vehicle, equipment, and structure.

Should an employer operating such equipment fail to comply fully with all of the requirements described, the requirements of the cranes standard would apply.

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29 CFR 1926.554 (overhead hoists)

1926.554(a)(1)

The safe working load of the overhead hoist, as determined by the manufacturer, shall be indicated on the hoist, and this safe working load shall not be exceeded.

1926.554(a)(2)

The supporting structure to which the hoist is attached shall have a safe working load equal to that of the hoist.

1926.554(a)(3)

The support shall be arranged so as to provide for free movement of the hoist and shall not restrict the hoist from lining itself up with the load.

1926.554(a)(4)

The hoist shall be installed only in locations that will permit the operator to stand clear of the load at all times.

1926.554(a)(6)

All overhead hoists in use shall meet the applicable requirements for construction, design, installation, testing, inspection, maintenance, and operation, as prescribed by the manufacturer.

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1926.21

General requirements. The Secretary shall, pursuant to section 107(f) of the Act, establish and supervise programs for the education and training of employers and employees in the recognition, avoidance and prevention of unsafe conditions in employments covered by the act.

The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury

1926.20(b)(4)

The employer shall permit only those employees qualified by training or experience to operate equipment and machinery.

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PICTURE TAKEN FROM OSHA'S POLICY CHANGE DOCUMENT

Photo 9: Mast Climber with Non-Swinging Mounted Monorail Hoist



TYPICAL I-BEAM
HOIST

NOW EXEMPT
FROM CRANE
REGULATIONS

ALSO ANYTHING
WITH LIFTS
UNDER 2000 LBS
CONTINUES TO
BE EXEMPT.

THE USE OF CRANE ARMS ON MAST CLIMBING WORK PLATFORMS

WORK STILL TO DO:

CONTINUE TO LOBBY FOR EXEMPTION FOR MATERIAL HOISTS WHICH CAN 'SWING LOADS' INTO THE PLATFORM



TYPICAL 'SWING' HOIST

OSHA, IN RECOGNITION THAT THERE ARE STILL STAKEHOLDER ISSUES TO BE RESOLVED, HAVE EXTENDED THE DEADLINE FOR OPERATOR CERTIFICATION TO NOVEMBER 2018.

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SILCA RULE



To better protect workers exposed to respirable crystalline silica, OSHA has issued two new respirable crystalline silica standards: one for construction, and the other for general industry and maritime. OSHA will begin enforcing most provisions of the standard for construction on September 23, 2017, and will begin enforcing most provisions of the standard for general industry and maritime on June 23, 2018.

Workers who inhale these very small crystalline silica particles are at increased risk of developing serious silica-related diseases, including:
Silicosis, an incurable lung disease that can lead to disability and death;
Lung cancer;
Chronic obstructive pulmonary disease (COPD); and
Kidney disease.



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SILCA RULE



EMPLOYERS RESPONSIBILITY:

IDENTIFY SILCA-PRESENT WORK PRACTICES

QUANTIFY CRYSTALIZED SILCA CONTENT/EXPOSURE PRESENT IN WORK PRACTICE
(QUALIFIED PERSON FUNCTION)

FORMULATE AN ABATEMENT PLAN TO REDUCE EXPOSURE TO ACCEPTABLE LEVELS.

INTRODUCE EQUIPMENT/TRAINING/ANY OTHER ABATEMENT METHODS IDENTIFIED

EMPLOYERS NEED ASSISTANCE WITH THESE REQUIREMENTS



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SILCA RULE



OSHA TABLE 1 – VACUUM DUST COLLECTION SYSTEM



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OSHA[®] FactSheet

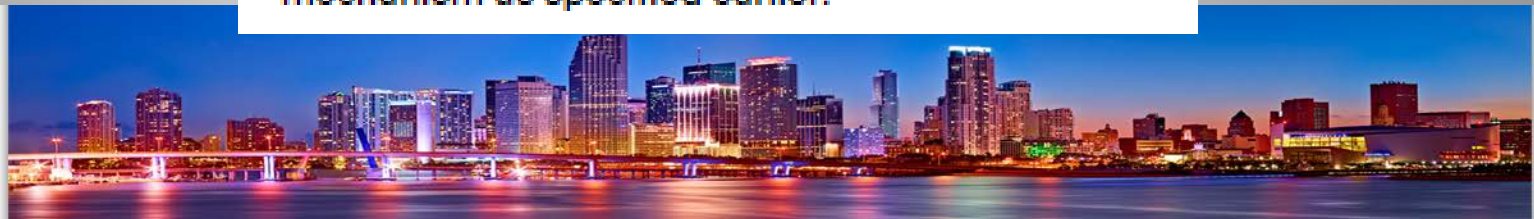


CONTROL OF SILICA DUST IN CONSTRUCTION **Handheld and Stand-Mounted Drills**

The use of handheld and stand-mounted drills, impact and rotary hammer drills, and similar tools used to drill holes in concrete, masonry, or other silica-containing materials can generate *respirable crystalline silica* dust. When inhaled over time, the small particles of silica can irreversibly damage the lungs. This fact sheet describes dust controls that can be used to minimize the amount of airborne dust when using handheld and stand-mounted drills as listed in Table 1 of the Respirable Crystalline Sili

Respiratory Protection

When properly used, a VDCS can reduce airborne dust levels to below the permissible exposure limit (PEL) of $50 \mu\text{g}/\text{m}^3$, calculated as an 8-hour time-weighted average. Therefore, respiratory protection is not required when using drills equipped with a VDCS and a filter cleaning mechanism as specified earlier.



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Coming in the agenda:

CANADIAN OVERVIEW – SONY TRUDEL

ANY QUESTIONS ?

