



INTEROFFICE MEMORANDUM

Oregon Occupational Safety & Health Division

November 26, 2002

TO: Craig Hamelund, External Trainer
FROM: Mike Mitchell, Technical Specialist
SUBJECT: Division 3, Subdivision R Interpretations

The following answers are provided in response to the questions that were asked in your workshops for the new Steel Erection Standard:

1. Question: Does OR-OSHA's Division 3, Subpart R apply to the erection of controlled lighting poles and towers (i.e. traffic control signals)? If not, is this covered in OR-OSHA's Division 3, Subpart V?

Answer: Yes, the installation of steel poles and towers used for traffic control signals falls under the scope of Division 3, Subpart R. The "note" that is located under the Scope for Subdivision R, immediately following 1926.750(a), lists light towers as an example of structures involving steel erection. The installation of such poles and towers does not fall under Division 3, Subpart V because they are not part of an electrical transmission or distribution system. Steel poles or towers that are originally constructed to support electrical transmission and/or distribution lines and equipment, and then have traffic control signals attached to them, are covered by Division 3, Subpart V.

2. Question: OR-OSHA's site-specific erection plan (OAR 437-003-0752) requires a description of the procedures that will be used to comply with structural stability (29 CFR 1926.754(a)). Recently, a general contractor received a site-specific erection plan from the steel erection subcontractor. The cover letter, which included the site address and signature of the "qualified person", stated that all procedures recommended by ANSI will be followed to maintain structural stability. Does the simple referencing of the applicable ANSI standard for structural stability comply or must the plan be more specific such as the actual methods/devices used (flooring, bracing, etc.) on the particular structure? If so, does this include written specifications for beam connections and column anchorage?

Answer: No. Simply referencing the ANSI standard (even though it is a good

standard to use as a guide) does not comply with OAR437-003-0752. Part of the reason for requiring the plan to be on site is to have a working document, with specifics, available for review, if needed. If the beam connections and column anchorages are part of the stability plan, then their specifications need to be included in it.

3. Question: All roof and floor holes and openings applying to steel erection (OR-OSHA's Division 3, Subpart R 29 CFR 1926.754(e)(2)(ii)) are required to be decked over or covered regardless of fall distance, correct?

Answer: Yes. All roof and floor holes, regardless of potential fall distance, must be covered or otherwise protected. While the distance to a lower level does not affect the probability that someone might step, trip, or fall through an opening, or drop or kick something through it, the severity of a potential injury might be affected.

4. Question: OR-OSHA's Division 3, Subpart R allows the use of crane-suspended personnel platforms. What is OR-OSHA's position when the crane manufacturer specifically prohibits this practice in their operator's manual? If the crane manufacturer does not specifically address this practice in its literature, is OR-OSHA compliance met when the contractor meets all existing provisions in Division 3, Subpart N, 1926.550(g)?

Answer: 1926.550(a)(1) requires compliance with the crane manufacturer's specifications and limitations for equipment and operations. Thus, if a manufacturer prohibits the use of their crane for lifting personnel, then in order to comply with the standard, the manufacturer's recommendations must be followed. 1926.550(a)(1) also says that when manufacturer's specifications are not available, then any limitations to equipment use must be determined by a qualified engineer. Thus, if there are no manufacturer's limitations which prevent lifting of personnel, then an employer should follow all provisions of 1926.550, excluding 1926.550(g)(2).

5. Question: OR-OSHA's Division 3, Subpart R defines qualified person but does not define qualified rigger. Can you define the qualifications of a rigger? Can demonstrated knowledge of the requirements found in OR-OSHA's Division 3, Subpart H, 29 CFR 1926.251 Rigging Equipment for Material Handling meet this expectation?

Answer: Based on 1926.753(c)(2), which defines a qualified rigger as someone who is also a qualified person, and 1926.751, which defines a qualified person, the following definition describes a qualified rigger for steel erection: one, 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 rigging in steel erection. A qualified rigger must be knowledgeable of 1926.251. Other factors, such as training and experience, are also important qualities to possess.

6. Question: What is OR-OSHA's position on the use of tag lines for a multiple lift (Christmas Tree)?

Answer: OAR437-003-0753 requires use of tag lines to control loads except when it is determined, by a qualified rigger, that they create a hazard. Thus, multiple lift loads must have tag lines unless a qualified rigger determines they create a hazard. Since each component of a multiple lift is considered a load, the decision to use, or not use a tag line must be made for each component.