

June 13, 2006

The following question was recently posed regarding the OSHA required inspections for two different types of powered cranes that a client of mine has. The two cranes in question are:

- 1) Overhead traveling crane with a pendant control. (30-ton capacity)
- 2) Several "manual-push" gantry cranes with an electric hoist. (Load capacity ratings between 1 and 5 tons)

Question 1:

My first question has to do with the person conducting the inspections. OAR 437-002-0228(1)(h) and (j) state that a "competent" person shall inspect the equipment. What must a person have to qualify as a competent person (Training certificate, general schooling, work experience)? From the way (j) reads, it appears that a company employee can conduct the inspections as long as they are "competent". Is the "competent" person found in these two references the same as found described in OAR 437-002-1910.179(a)(1)?

OAR 437-002-1910.179(j)(ii) has "Frequent" and "Periodic" inspections. Can all items listed under the "Frequent" and "Periodic" inspections be performed by an employee who is a "competent person"?

Answer 1:

In answer to your first question: A "competent person" (as used in OAR 437-002-0228(h)) is one who by knowledge, training and experience has demonstrated the ability to solve problems and perform functions related to the subject matter and work (refer to 1910.179(a)(1)). Documentation of training and experience is always good to have. Knowledge, of course, is the result of training and experience.

An employee of the company who meets the requirements of a "competent person" may conduct crane inspections. The definition located in 1910.179(a)(1) applies to both applications in OAR 437-002-0228.

Question 2:

My second question has to do with employers hiring an outside, independent "crane inspector" to inspect their various cranes. Periodically, an out of state company calls our client and attempts to set up a time for the "OSHA required annual professional inspection" of the client's overhead cranes. Could you direct me to the rule that requires an outside inspector?

Answer 2:

In answer to your second question: Oregon OSHA does not require that crane inspections be performed by outside inspectors. 1910.179(j) provides the requirements for inspections. A "competent person" may either be from within the company, or from outside.

Question 3:

Finally, a question about inspection documentation. 437-002-0228(1)(k) states: "The employer shall maintain a record of the dates and results of inspections for each hoisting machine and piece of equipment." It appears that the "Frequent Inspections" require hook and chain inspection documentation on a monthly basis. Rope inspections must also be conducted and documented at least once a month. Finally, alloy steel chain slings inspections must also be documented. Are there any other requirements for documentation? Basically, during an OSHA inspection, what inspection documentation would the employer need to produce to satisfy the OSHA inspector?

Answer 3:

In answer to your last question: Inspection and maintenance documentation needs to include names, dates, the condition of the part, and a description of any repairs or replacements. In short, documentation provides a history for the piece of equipment.