

*International Association of*

**BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS**

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August 14, 2002

**OSHA  
DOCKET OFFICER**

**DATE** AUG 15 2002

**TIME** \_\_\_\_\_

OSHA Docket Office  
Docket No. S-030  
U. S. Department of Labor  
200 Constitution Ave., NW, Room N-2625  
Washington, D.C. 20210

S-030  
EX. 2-5

To Whom It May Concern:

The International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, herein known as Iron Workers International, would like to nominate Frank Migliaccio for the Negotiated Rulemaking Committee on Subpart N-Cranes. Mr. Migliaccio is the Executive Director of Safety and Health for the Iron Workers International. He has held this position since November of 2000 and prior to that he was the Director of Safety and Health Training for the National Ironworkers and Employers Apprenticeship Training and Journeyman Upgrading Fund for 10 years. Mr. Migliaccio was recently appointed, to represent the employees, to the Advisory Committee on Construction Safety and Health (ACCSH) by Secretary of Labor Elaine L. Chao. At the present time, Mr. Migliaccio sits on the OSHA Advisory Group that is already at work on an update to the crane rule chairing a sub-committee on work site controls.

Mr. Migliaccio represents approximately 135,000 ironworkers along with the contractors they serve. The ties that bind ironworkers and crane operators on construction sites are well-established. The ironworkers assemble and disassemble the cranes used for lifting the materials that go into completing buildings, bridges, underground subway systems, towers, etc. Along with the assembly of the cranes, the ironworkers assist the operators in setting up the cranes to make lifts. They also rig the materials used at the above locations along with materials used for powerhouse construction and renovations and Department of Energy facilities. All the large automobile manufacturers use ironworkers to install and do maintenance on the conveyors and general construction on their plants. Ironworkers are used as signalmen on large job sites and where crucial picks and heavy rigging are necessary. At the Department of Energy Hanford Nuclear Site, Richland, Washington, the ironworkers are assigned to the cranes when they leave the yard to do all rigging including the nuclear vessels. When a tower crane is ready to be "jacked up" or raised to a new height, the ironworkers are the trade that is called to assist the operating engineers. It is usually the ironworkers that inspect the wire rope, synthetic rope, nylon slings and chairs for each lift made. The operating



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engineers and ironworkers have a long working relationship in structural steel assembly. It's vital that a raising gang and crane operator work in unison. The two trades need to trust each other when it comes to making a lift especially if it is a "blind pick". A blind pick is when the crane operator cannot see the item that the crane must lift.

In many local unions around the country, the ironworkers and the operating engineers train their members together when it comes to working around cranes. Just recently in Detroit, Michigan, the ironworkers and operating engineers began a training course that is 40 hours long and will do all the tasks necessary to erect structural steel under the watchful eyes of instructors.

The Iron Workers International will support Mr. Migliaccio's commitment to assist in the timely completion of the Negotiated Rulemaking for Subpart N-Cranes.

If I can be of further assistance in this matter, please don't hesitate to contact me at (202) 383-4810.

With best wishes and kind personal regards, I am

Sincerely yours,

  
GENERAL PRESIDENT

JJH;jh