



August 19, 2002

OSHA Docket Office
 Docket No. S-030
 U.S. Department of Labor
 200 Constitution Avenue, NW Room N-2625
 Washington, DC 20210
 Phone: 202-693-2350
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OSHA
 DOCKET OFFICER
 DATE AUG 18 2002

TIME _____
 S-030
 EX. 2-7

RE: United Brotherhood of Carpenters and Joiners of America
 Written Comments and Request for Membership - OSHA Cranes and Derricks
 Negotiated Rulemaking Advisory Committee (C-DAC)
Docket No. S-030

Dear Agency Representative,

In response to OSHA Docket No. S-030, the United Brotherhood of Carpenters and Joiners of America (UBC) submits the following comments and requests for membership:

Comments:

As one of the largest labor organizations involved with the use of cranes and derricks, the UBC is pleased to hear about OSHA's intent to establish a Cranes and Derricks Negotiated Rulemaking Advisory Committee. We agree the current standards need revision to ensure the safe and efficient operation of equipment for all affected workers.

Requests for Membership:

Since approximately half of the 550,000 members of the UBC are currently engaged in crane and derrick related work, the UBC should be part of this rulemaking committee. Many of the "key issues for negotiation" listed on page 46614 Section I paragraph E cover duties performed by UBC members. Specifically, UBC members will be "significantly affected" by decisions in the following areas:

- E 2) Qualifications of individuals who operate, maintain, repair, assemble, and disassemble cranes and derricks. UBC Millwrights and Piledrivers perform all of these functions.



- E 5) Qualifications of signal-persons and communication systems and requirements.
This involves rigger qualification requirements. UBC Carpenter, Millwright and Piledriver Riggers will be directly affected by any decisions in this area.

- E 9) Rigging procedures.
This is also a rigger qualification requirement. UBC Carpenter, Millwright and Piledriver Riggers will be directly affected by any decisions in this area.

- E 12) Stability testing requirements.
UBC Millwrights and Piledrivers perform all of these functions.

- E 13) Blind pick requirements.
This is also a rigger qualification requirement. UBC Carpenter, Millwright and Piledriver Riggers will be directly affected by any decisions in this area.

Additionally, the UBC should be identified as an organization “significantly affected” by actions resulting from this committee since we are a training organization responsible for the qualification and training of more than 1,500 instructors and 200,000 workers nationwide.

Nomination for Membership – Mr. Dale Shoemaker:

We respectfully nominate Mr. Dale Shoemaker as the UBC’s representative for the OSHA Cranes and Derricks Negotiated Rulemaking Advisory Committee. Mr. Shoemaker brings nearly 30 years experience in the industry including hands-on operations, supervision, logistics, training, training development, and the development of rules, regulations and procedures governing these activities. His major rigging and crane related accomplishments include:

- 1973 Air Force Certified Crane Operator (15-ton truck-mounted hydraulic)
- 1977 Millwright Rigger, placed eight 500-ton generators
- 1984 Overhead Crane Operator, Grand Coulee Dam, multiple lifts over 100 tons
- 1985 Rigging Supervisor, McNary Dam, 750 ton lift
- 1986-1987 Superintendent, Coulee City Headworks Dam, Multiple lifts over 100 tons
- 1986-1992 Eastern Washington/Northern Idaho Apprenticeship & Rigging Instructor
- 1991 Millwright Shift Supervisor, WNP #2 nuclear power directed placement of two 125-ton Westinghouse super rotors
- 1992 Millwright Rigger/Crane Operator, Lower Monumental Dam, several lifts over 250 tons
- 1993-1998 UBC representative on ANSI A10.42 Qualified Rigger Subcommittee
- 1994 Developed UBC Qualified Rigger Train-The-Trainer and Member Programs
- 1994-Present UBC Master Rigging Train-The-Trainer Instructor

We look forward to the opportunity to participate in the Cranes and Derricks Negotiated Rulemaking Advisory Committee. Please feel free to call me at 702-938-1111 x 2006 if you have any questions or need further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dudley Light", with a long horizontal flourish extending to the right.

Dudley Light
Executive Director

Cc: Douglas McCarron, UBC International
Chris Hines, UBC International
Dale Shoemaker, Carpenters International Training Center