

LOCAL UNION NUMBER 34

PILE DRIVERS

DIVERS, CARPENTERS, BRIDGE, WHARF, & DOCK BUILDERS

55 HEGENBERGER PLACE
OAKLAND, CALIFORNIA 94621-1301
(510) 835-4227 FAX (510) 835-1234



Docket S030
Ex. 42-28

January 28, 2004

OSHA

Attn: Crane and Derrick Negotiated Rule Making Advisory Committee
Docket No. S-030, U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Re: Pile Driving safety rules

Dear Committee:

I am writing regarding rule 1926.603 (c) (5), which states, "When it is necessary to cut off the tops of driven piles, pile driving operations shall be suspended except where the cutting operations are located twice the length of the longest pile from the driver."

Pile Drivers Local 34 would like to have that rule amended. In our jurisdiction, which covers Northern California, Northern Nevada and the state of Utah, pile lengths run typically from sixty feet to one hundred forty feet in length. Taking into account that the actual footprint size of some of the buildings that our members work at twice the length would be outside the job site. The rule prohibits any cutoff work going on in the area. For instance, in downtown San Francisco I personally have worked on a site where the footprint of the building was 175 feet by 200 feet and the pile that were being driven were 120 feet in length. I needed at that time to have pile cutoff to keep the progression of the work going on while a nearby pile was being driven. The rule, as written, would prevent any other pile work from being performed. Also, when pile are being driven on bridge earthquake retrofit work, sometimes it is necessary to be burning and welding and driving pile in adjoining footings. Usually in low overhead pile driving operations it is impractical and very costly to stop pile driving operations where piles are being driven cutoff and welded at the same time. Pile Drivers Local 34 would like to propose that a rule similar to the one that is in the process of being adopted by Cal; OSHA be considered. Whereby a safety area around the pile being driven would be set up and there be no work going on in the immediate area other than personnel involved in the pile driving operations. That would allow work to continue on the piling already driven and keep the crews a safe distance from the actual pile driving operation.

Thank you for your consideration in this matter. I will be at the meetings next week.

Fraternally,


Pat Karinen
Pile Drivers Local Union No. 34
Financial Secretary-Treasurer and NCCRC Field Representative
opetu.29/sfl-cio

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Steve Buschmeyer
Tutor Saliba Koch Tidewater
999 Western Ave
Richmond Ca 94801

Re; Steward appointment

1/27/04

Dear Steve

This is to inform you that Steve Martinez has been voted crew steward for members of Pile Drivers Local #34 on the barge 1008-1009 Also known as the Liebherr Barge. Ray Fimby remains the Yard steward.
If you have any questions please feel free to call me the Union Hall.

Signed Pat Karinen


Pile Drivers Local #34
NCCRC Field Rep.

CC Dave Rhodes, Steve Martinez, Mike Green, Ray Fimby

LOCAL UNION NUMBER 54
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COVER SHEET

TO: (Name of Individual) : Steve Buchmeyer
 Firm Name : OSHA Docket Office
 Fax Number : (202) 693-1648
 Total number of pages including cover sheets : 2
 If you do not receive all pages, please call back as soon as possible to (510) 635-4227

Name of Sender : Pat Ramirez Date: 1-28-04

Comments:

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