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Cranes and Derricks Negotiated Rulemaking Advisory Committee
Meeting Seven
Francis Perkins building, 200 Constitution Ave, NW
Washington, DC
February 4-6, 2004

RE: Written "Public Comment" for Day Three, February 6, 2004

VIA Email Correspondence to agensberg@podziba.com

Ms. Podziba,

I wish to thank you on behalf of the ADSC: International Association of Foundation Drilling, for allowing me to forward our public comments in written form as opposed to speaking at the February 6, 2004. A mix up in protocol on my part at the meeting, kept me from placing my name of the list of public comment speakers.

We wish to remind the committee that defining a Self Contained Pile Driving rig as a "crane" may in effect allow the user to intentionally operate the equipment as a material handling device, as opposed to using the auxiliary hoist to locate a foundation element (pipe, h-beam, sheet, or pre-cast piling) under the driving hammer. We believe that if the user of this type of equipment operates it within the manufacturer's specifications and requirements for safe operation, employee safety will be protected.

Mr. Dan Kuhs and Mr. Pat Karinen indicated that it is their experience that if "a hook is available, a piledriver will use it to move something". A photo of an overturned self-contained pile driving rig was shown. I believe they speculated the equipment was being used to move pile cut-offs, but the machine could have just as easily turned over from walking on either soft soils, frozen clods of soil, or some other like condition in the work environment. I am sure the manufacturer indicates in the operator's manual to use caution when walking or swinging the machine with the mast in the vertical position, and to operate the unit on firm, stable, and level ground.

Perhaps the operator was traveling the machine without someone to guide him or her. Many situations could be a contributor to this accident, including simply using it as an "available hook".

If a crane with a set of swinging or fixed leads is used to hoist piling in position under the hammer or to hoist scrap cut-offs, this could very well be an acceptable practice. The crane has a load chart to govern safe lifts. Once the operator deducts the weight of the leads, hammer, pile, and or other attachments, they can determine what lifting capacity the crane has in reserve to make such a lift.

One could argue that another crane, track hoe, or perhaps a loader should be used in conjunction with a self-contained pile driving rig, to handle the piling material and scrap cut-offs. Others may argue that on small projects, the cost of additional equipment and an operator would create a loss of profit for the piling contractor, therefore they use the pile driving rig's auxiliary hoist to move material. My guess is that this may contradict the manufacturer's warnings in the operator's manual. In either case, this accident negated the contractor's profits.

It is likely that despite increased inspections, operator certification and other requirements of a "crane", equipment accidents will occur, for this type of equipment has a limited lifting capacity and in many cases little or no load chart information to guide the operator to perform a safe lift. If this type of equipment was defined as a crane, would that then require all manufacturers to engineer "load chart" information on all new equipment beginning (effective date) or perhaps require the manufacturers to retrofit existing equipment in use today?

The representatives from Junttan and the Piledrivers locals did hit on one important item that all can agree upon; operator training. However a fully NCCCO certified (all categories) crane operator may not be adequately trained to operate a self-contained pile driving or drill rig. This equipment requires specialized training either from the manufacturers or from entities such as union or non-union apprenticeship training schools or from associations such as AGC (Associated General Contractors) or the ADSC Drill Rig Operators School (for drill rigs only).

If the committee elects to include self-contained pile driving and drill rigs in the new crane standard, it would be our hope to have them included as Mr. Noah Connell indicated during this meeting. As we understood, Mr. Connell suggested including this type of equipment in the standard, but not define it as a crane. The standard could define parameters of safe operation such as operator training, inspection, environment (stable, level ground), swing radius protection where applicable, and adherence to the manufacturer's operation manual. If this were to be the case, we (the ADSC) would like to offer our assistance in creating language for this part of the standard, especially if the committee includes self-contained drill rigs.

Thank you,

Richard Marshall
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