

NEW ENGLAND REGIONAL COUNCIL OF CARPENTERS, AFL-CIO

United Brotherhood of Carpenters and Joiners of America

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Crane and Derrick Advisory Committee  
OSHA Docket Office  
Docket No. S-030  
U. S. Department of Labor  
200 Constitution Avenue N.W.  
Washington, D.C. 20210

OSHA  
DOCKET OFFICER  
JUN 29 2004  
DATE \_\_\_\_\_  
Docket S030  
Ex. 69-1

Dear Committee Members,

I am providing this written testimony for the July 6<sup>th</sup> through July 9<sup>th</sup> meeting regarding:

**1) Dedicated self-erecting pile drivers.**

Dedicated pile drivers have the same capacities, limitations and safety concerns as any type of crane in a pile driving operation.

They have the ability to hoist with the main or auxiliary hoist, ability to travel, to boom, and swing with a load.

The dedicated pile driver presents the same safety issues/concerns as a lattice or hydraulic boom crane when working on unstable ground, near power lines or mounted on a barge. As with any piece of pile driving equipment they are always working at or near capacity under extreme conditions and should be subject to the same inspection standards as any hoisting equipment.

For these reasons it is important that the dedicated pile driver be included in all revisions of the Crane and Derrick Standard 29 CFR 1926.550

## 2) Cranes on Barges

Must be positively secured to prevent unintended movement in any hoisting, pile driving/extraction, dredging operation or when anyone is working in close proximity to the hook.

Movement can be caused by:

- List\Trim of Barge – Improper load storage, crane not properly centered
- Wave motion i.e. natural and boat traffic
- Weather conditions – Ice, Snow, Wind
- Movement of free water in the Bilge
- Tidal influence/currents

Include proposed - 1433 (H) **Working with a diver** (enclosed) in the final revision of the Crane and Derrick Standard

Cranes not positively secured with chains, turnbuckles, etc. but that are “corralled or blocked” should have that system designed by a competent person with Mechanical/Engineering Knowledge of the capacity of the corraling system.

**Any unintended movement of the load can cause the crane to tip or slide resulting in critical or fatal injuries.**

## 3) Third party testing and oversight

Third party testing with governmental oversight would provide a means of standardizing the level of training that all State and City licensing should require.

Standardize testing should include the following.

- Standardize substance abuse policy/testing (i.e. D.O.T. CDL License with D.O.T. oversight)
- Physical Qualifications
- Written exam to test knowledge of
  1. Operation
  2. Mechanical /Technical Knowledge
  3. Math Skills – ability to calculate weights, use load charts
  4. Test should be unbiased to ethnicity.

### **Practical Exams**

The operator of a multi drum machine must demonstrate the ability to perform all the operations that are required of them (i.e. use of Auxiliary and Main hoist to trip a load, and drive a pile)

**All third party testing must be done with governmental oversight to monitor the material being taught and to insure that the practical aspect of the exam is being performed. This would eliminate the possibility of web-based companies selling certification over the Internet.**

### **In conclusion**

I would like to thank the committee, for their diligence and the tenacity they have shown in the revision of the crane standards, They will improve our industries leadership in Safety and Productivity and will reflect current knowledge and experience gained since these standards were first written . These revised standards will directly affect the safety and well-being of the members I represent for the next several decades.

Sincerely,

A handwritten signature in black ink, appearing to read 'DK', with a long horizontal line extending to the right.

Dan Kuhs, Business Manager  
Pile Drivers Local Union 56

(h) *Working with a diver.* The following additional requirements apply when working with a diver:

(1) If a crane/derrick is used to get a diver into and out of the water, it shall not be used for any other purpose until the diver is back on board. When used for more than one diver, it shall not be used for any other purpose until all divers are back on board.

(2) The operator shall remain at the controls of the crane/derrick at all times.

(3) In addition to the requirements in Sections \_\_\_ (Signals), either:

(i) A clear line of sight shall be maintained between the operator and tender [definition?], or

(ii) The signals between the operator and tender shall be transmitted electronically.

(i) [Reserved]

( ) The barge, pontoons, vessel or other means of floatation shall be capable of withstanding imposed environmental, operational and in-transit loads under conditions specified by its manufacturer.

(j) *Floating cranes/derricks.* For equipment designed by the manufacturer (or employer) for marine use by permanent attachment to barges, pontoons, vessels or other means of floatation:

(1) The manufacturer load charts applicable to operations on water shall not be exceeded. When using these charts, the employer shall comply with all parameters and limitations (such as dynamic/environmental parameters) applicable to the use of the charts.

(2) The requirements for maximum allowable list and maximum allowable trim as specified in Table M1 shall be met.

TABLE M1		
<i>Equipment designed for marine use by permanent attachment (other than derricks):</i>		
Rated Capacity	Maximum Allowable List	Maximum Allowable Trim
25 tons or less	5 degrees	5 degrees
Over 25 tons	7 degrees	7 degrees
<i>Derricks designed for marine use by permanent attachment:</i>		
Any rated capacity	10 degrees	10 degrees