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From: Norman Hargreaves [mailto:nhargreaves@terexconway.com]
Sent: Friday, August 13, 2004 2:16 PM
To: swanson.bruce@dol.gov
Cc: Richard Dressler; efidler@groveworldwide
Subject: C-DAC Committee Consensus Document

Mr Swanson,

I am the Director of Product Safety for a major crane manufacturer. The new proposal generated by the committee will result in a reduction in workplace safety rather than enhancing it, which I thought was the goal of OSHA. I would ask that you review section 1410 (c) 2 and 1410 (d)4 (ii). You will note that this refers to the Table in 1926.950. This standard to the construction electrical transmission and distribution lines. People doing this work are qualified linemen working on distribution lines with mechanical and protective equipment designed for that type of work. This does not apply to cranes working around powerlines. 1410(d)4 (ii) permits to work within inches of the line if you have an insulated link which means that you can take a boom within inches of a line up to 765 kilovolts. If the boom touches the line how is a person on the ground protected ? additionally neither line covers or insulated links are rated up to these voltages. This section as written is in conflict with the current OSHA standard 1910.180 which references 1910.333 as well as the current OSHA Standard, for Cranes 1926.550. I am extremely concerned that this new standard, as proposed, will result in more workplace injuries and fatalities rather than reducing them.

Norman C Hargreaves