## IM-92-12

## OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION TECHNICAL SERVICES SECTION

## RULE INTERPRETATION

Record No: IM-92-12

Date: January 29, 1992

<u>Index:</u>

OAR 437-02-221 (38)(a-c)

<u>Subject:</u>

Automotive Lift Hoists

<u>Discussion:</u>

Compliance officers have been enforcing this standard to require that auto lifts be locked in the fully upright position whenever an employee is under the elevated vehicle. This has generated considerable concern from the industry for several reasons, including the following:

- 1) Many lifts are not equipped with locks and the cost of retrofitting is significant.
- Not all mechanics are tall enough to reach the work when the lift is locked in the fully up position.
- 3) Industry history shows no accidents from catastrophic failure but does show accidents from vehicles falling off the lifts.
- 4) Lifts are equipped with orifices which limit descent to 20 feet per minute.

Also, there has been disagreement as to whether the section actually requires locking in the fully up position. The wording can be read either way.

Considerable consultation with industry officials and the Automotive Lift Institute has resulted in the acquisition of information which indicates that the ANSI Standard B153.1-1990 was not intended to require lifts to be locked in the fully up position only that they be manufactured with this capability. Page 2

In response to 7 specific questions sent to the Engineering Committee, Automotive Lift Institute, it was stated that it was not until 1974 that a construction standard for automotive lifts was adopted. They state, "The locking device was intended as a passive feature." Locking at the fully extended position was not recommended as a safety engineering consideration, but because they thought that height would be the one most likely used by most operators under the lift.

Further, ALI stated that it is not an operational requirement that the lift be lowered onto the locking device at each full-rise cycle. They went on to state again that the device was intended to be a passive lift support.

ALI said that in 35 years of using 350,000 lifts there has been only one known catastrophic failure. They emphasize that lifts are now equipped with an orifice restriction that limits the lowering speed to 20 feet per minute.

## <u>Conclusion:</u>

OAR 437-02-221 (38)(a-c) will <u>not</u> be interpreted to mean that automotive lifts must be locked in the fully upright position. However, when the lift is equipped with a safety device it must be used or some sort of external safety device such-as jack stands or manual lock legs must be in place regardless of the height at which the lift is stationed. These devices are primarily to prevent sudden short drops. Other engineering features are in place in lifts made after 1947, to prevent sudden full descent.

This section is scheduled for revision with Division 63 in the near future.

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