



## Oregon Occupational Safety & Health Division Technical Guidance

**DATE:** November 26, 2002  
**REVISED:** August 3, 2016

**TO:** Craig Hamelund, Internal Trainer

**FROM:** Peggy Munsell, Standards & Appeals Manager

**SUBJECT:** Division 3, Subdivision R (3/R) Interpretations, including references to Division 2, Subdivision RR (2/RR), and Division 3, Subdivision CC (3/CC).

The following answers were provided in response to questions that were asked in your workshops for the Steel Erection standard in 2002. Due to changes in regulations, the questions and answers have been revised to keep them current:

- 1. Question:** Does Division 3, Subdivision R, Steel Erection apply to the erection of controlled lighting poles and towers (i.e. traffic control signals)? If not, is this covered in Oregon OSHA's Division 2, Subdivision RR, Electrical Power Generation, Transmission, and Control?

**Answer:** Yes, the installation of steel poles and towers used for traffic control signals falls under the scope of Division 3, Subdivision R, Steel Erection. The note under the scope for Subdivision R, immediately following 1926.750(a), lists light towers as an example of structures involving steel erection. The installation of such poles and towers does not fall under Division 2, Subdivision RR, Electrical Power Generation, Transmission, and Control because they are not part of an electrical transmission or distribution system. Steel poles or towers that are originally constructed to support electrical transmission and/or distribution lines and equipment, and then have traffic control signals attached to them, are covered by Division 2, Subdivision RR.

- 2. Question:** Oregon OSHA's site-specific erection plan (OAR 437-003-0752) in Division 3, Subdivision R, Steel Erection requires a description of the procedures that will be used to comply with structural stability (1926.754(a)). If a general contractor receives a site-specific erection plan from the steel erection subcontractor, with a cover letter, which includes the site address and signature of the "qualified person," stating that all procedures recommended by ANSI will be followed to maintain structural stability, does the simple referencing of the applicable ANSI standard for structural stability comply or must the plan be more specific such as the actual methods/devices used (flooring, bracing, etc.) on the particular structure? If so, does this include written specifications for beam connections and column anchorage?

**Answer:** No. Simply referencing the ANSI standard (even though it is a good standard to use as a guide) does not comply with OAR 437-003-0752. Part of the reason for requiring the plan to be on site is to have a working document, with specifics, available for review, if needed. If the beam connections and column anchorages are part of the stability plan, then their specifications need to be included in it.

- 3. Question:** All roof and floor holes and openings applying to steel erection (Oregon OSHA's Division 3, Subdivision R, 1926.754(e)(2)(ii)) are required to be decked over or covered regardless of fall distance, correct?

**Answer:** Yes. All roof and floor holes, regardless of potential fall distance, must be covered or otherwise protected. While the distance to a lower level does not affect the probability that someone might step, trip, or fall through an opening, or drop or kick something through it, the severity of a potential injury might be affected.

- 4. Question:** 1926.753(c)(4) in Division 3, Subdivision R, Steel Erection allows the use of crane-suspended personnel platforms provided all provisions of 1926.1431 (except 1926.1431(a)) are met. What is Oregon OSHA's position when the crane manufacturer specifically prohibits this practice in their operator's manual? If the crane manufacturer does not specifically address this practice in its literature, is Oregon OSHA compliance met when the contractor meets all existing provisions in Division 3, Subdivision CC, 1926.1431, except 1926.1431(a)?

**Answer:** 1926.1417(a) within Division 3, Subdivision CC, Cranes and Derricks in Construction requires compliance with the crane manufacturer's procedures applicable to the operational functions of equipment, including its use with attachments. Procedures are defined in Division 3, Subdivision CC, 1926.1401 to include, but are not limited to: instructions, diagrams, recommendations, warnings, specifications, protocols and limitations. Thus, if a manufacturer prohibits the use of their crane for lifting personnel, then in order to comply with the standard, the manufacturer's recommendations must be followed. 1926.1417(b) also says that when manufacturer's specifications are not available, then the employer must develop and ensure compliance with all procedures necessary for the safe operation of the equipment and attachments. Thus, if there are no manufacturer's limitations which prevent lifting of personnel, then an employer should follow all provisions of 1926.1431, except 1926.1431(a).

- 5. Question:** Oregon OSHA's Division 3, Subdivision R, Steel Erection defines qualified person but does not define qualified rigger. Can you define the qualifications of a rigger? Can demonstrated knowledge of the requirements found in Oregon OSHA's Division 3, Subdivision H, 1926.251 Rigging Equipment for Material Handling meet this expectation?

**Answer:** Based on 1926.753(c)(2), which defines a qualified rigger as someone who is also a qualified person, and 1926.751, which defines a qualified person, the following definition describes a qualified rigger for steel erection: one, who by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated the ability to solve or resolve problems relating to

rigging in steel erection. A qualified rigger must be knowledgeable of 1926.251. Other factors, such as training and experience, are also important qualities to possess.

- 6. Question:** What is Oregon OSHA's position on the use of tag lines for a multiple lift (Christmas Tree)?

**Answer:** OAR 437-003-0753 within Division 3, Subdivision R, Steel Erection requires use of tag lines to control loads except when it is determined, by a qualified rigger, that they create a hazard. Thus, multiple lift loads must have tag lines unless a qualified rigger determines they create a hazard. Since each component of a multiple lift is considered a load, the decision to use, or not use a tag line must be made for each component.