

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS**

CALIFORNIA CODE OF REGULATIONS

TITLE 8: Chapter 4, Subchapter 7, Article 91, Section 4885
of the General Industry Safety OrdersDefinition of Trolley Suspended Hoists

There are no modifications to the information contained in the Initial Statement of Reasons except for the following sufficiently related modifications, which are the result of public comments and/or Board staff evaluation.

Section 4885. Definitions.

A revision is proposed to change "Monorail Hoist" to "Monorail Crane" and delete the definition which stated, "A trolley suspension crane hoist, whose trolley is suspended from a single rail. This type of crane hoist, when used to move a load horizontally, is subject to Group 13 Regulations." and replace it with, "A crane whose hoisting mechanism is suspended from, and is an integral part of, one or more trolleys mounted on a single track." This change is necessary to be consistent with currently published definitions of cranes and to eliminate inconsistent language.

Additionally, a change is proposed to delete the definitions of "Trolley Suspension Hoist" in the proposed Section 4885 Crane (X) and Hoist (G), thereby eliminating unnecessary wording because the term "Trolley Suspension Hoist" is not used in the revised definition of "Monorail Crane" or in any other safety order in Title 8, Chapter 4.

As a result of the deletion of the definition of "Trolley Suspension Hoist" from Crane and Hoist, Hoist (D) "Monorail Hoist" has been changed from, "A trolley suspension hoist whose trolley is suspended from a single rail. When the monorail hoist is used to move a load horizontally, it shall be considered a crane and subject to Group 13 Regulations." to "A hoist whose hoisting mechanism is suspended from one or more trolleys mounted on a single track." Additionally, a change will include adding the definition for "Track," which states, "Track. A structural member that supports the trolley or crane wheels." This change will clarify the use of the word "track" as used in the proposed definition for "Monorail Crane" and "Monorail Hoist" in Section 4885 Crane (I) and Hoist (D).

The proposed modifications are necessary to clarify to the employer that when a hoisting mechanism is an integral part of one or more trolleys suspended from a single track, it is a crane for the purposes of the regulations and is therefore subject to crane regulations.

SUMMARY AND RESPONSE TO ORAL AND WRITTEN COMMENTS

I. Written Comments

Mr. Bradley D. Closson, Executive Vice-President, North American Crane Bureau, by letter dated September 4, 2001.

Comment:

Mr. Closson states that the proposed definitions and changes will add to the confusion that this rulemaking was intended to address and contradict current published definitions. Mr. Closson's issues are as follows:

Issue #1: Mr. Closson expressed concern that using the word "Hoist" in "Monorail Hoist" and "Trolley Suspension Hoist" under the subsection defining cranes would create confusion between the two equipment categories.

Issue #2: Mr. Closson states that because this proposal does not clearly indicate that the hoist mechanism needs to be by definition an integral part of the crane this proposed language would blur and possibly contradict currently published definitions of cranes.

Issue #3: Mr. Closson states that the use of the word "runways" in the proposed definitions would restrict the application of monorail hoists and trolley suspension hoists only to installations in or on buildings and exclude commonly used applications existing outdoors with no building as support.

Issue #4: Mr. Closson notes that the addition of the reference that the hoist is subject to Group 13 regulations, when used to move a load horizontally, is redundant and not useful since it does not direct the reader to specific applicable sections within Group 13.

Issue #5: Mr. Closson states that federal regulations do not address the crane configurations addressed by the proposed amendment and that all of the "underhung" equipment addressed in ASME B30 11, 16 and 17 is addressed only under the federal "General Duty Clause."

Issue #6: Mr. Closson agrees that the proposed amendments do not change regulatory requirements and only constitute a clarification of existing requirements.

As a side issue, Mr. Closson notes that there are currently defined "cranes" such as jib cranes, pillar cranes, and wall cranes that can be defined as monorail cranes, and that defined overhead crane configurations can be manufactured as a monorail system.

Mr. Closson makes the following recommendations:

1) Change "Monorail Hoist" to "Monorail Crane" to reflect the current equipment category.

- 2) Change the definition of the “monorail (hoist) crane” to read “Monorail Crane – A crane whose hoist mechanism is suspended from, and integral to, one or more trolleys that are supported by a single track.”
- 3) Delete the phrase, “It may be either floor or cage-operated.” in the definition for “Trolley Suspension Hoist” because the methods of control do not uniformly affect the safety issues for cranes.
- 4) Add a new definition for the term “Track” as used in the monorail definition.
- 5) Delete the proposed wording “When used to move a load horizontally the hoist shall be considered a crane and subject to Group 13 regulations” under both “Crane” and “Hoist” equipment groups.
- 6) Delete the proposed “crane” definition for “Trolley Suspension Hoist” as the term is not used in the revised definition of a “monorail crane.”
- 7) If additional clarification is desired a “note” could be added after the definitions of “Monorail Crane” and “Monorail Hoist” clarifying that the basic criteria in the definitions of “Crane and Hoist” should be reviewed when determining which requirements in Group 13 are applicable.

Response:

Recommendations #1 and 2: The Board agrees with Mr. Closson that his recommendations will clarify that when a monorail system is used to lift and lower a load and move it horizontally the monorail system is defined as a crane and subject to crane regulations. The Board agrees to change the phrase “Monorail Hoist” to “Monorail Crane” under the crane subsection for Crane, and to define it as “a crane whose hoist mechanism is suspended from, and integral to, one or more trolleys that are supported by a single track.”

Recommendations #3 and 6: The Board further agrees to delete the definition for “Trolley Suspension Hoist” since the term is not used in the revised definition of a “monorail crane” or in any other safety orders in Title 8, Chapter 4. By deleting the definition for trolley suspension hoist, Mr. Closson’s third recommendation to delete the phrase “It may be either floor or cage-operated.” in the definition for “Trolley Suspension Hoist” is no longer an issue.

Recommendation #4: The Board agrees with Mr. Closson to add the definition for the term “Track” as used in the monorail definition for clarification.

Recommendation #5: The Board agrees to delete the proposed wording, “When used to move a load horizontally the hoist shall be considered a crane and subject to Group 13 Regulations,” under both “Crane” and “Hoist” equipment groups as it does not add specific regulatory reference.

Recommendation #7: The Board does not consider it necessary to add a “note” after the definitions of “Monorail Crane” and “Monorail Hoist” clarifying that the basic criteria in the definitions of “Crane and Hoist” should be reviewed when determining the

applicability of requirements under Group 13, because such review is fundamental to the use and application of the GISO, and is implied in “Section 3200. Purpose,” which states, “Every employer should provide their supervisory staff with a copy of these orders and assure that each supervisor is familiar with those sections pertaining to the operations under their supervision.”

The Board thanks Mr. Closson for his comments and for his participation in the Board’s rulemaking process.

II. Oral Comments

No oral comments were received at the October 18, 2001 Public Hearing held in Oakland, California.

DETERMINATION OF MANDATE

These regulations do not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed regulation. No alternative considered by the Board would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the adopted action.