

Manieri, Mike@DIR

From: Berg, Eric@DIR
: Monday, May 04, 2015 4:34 PM
To: Manieri, Mike@DIR
Cc: Kernazitskas, David@DIR
Subject: RE: 2015-BS-03

Mike, below is my suggested language. My correct contact info is below. I changed my info on outlook, but they are very slow in getting it implemented.

(3) In unfinished attics and other ceiling spaces where access is not routine and of a short duration, a catwalk shall not be required if 1) there are ceiling joists or similar structural members at 2 feet or closer centers, 2) planks or solid platforms at least 12 inches in width are provided and supported by at least two ceiling joists or similar structural members, 3) a qualified person has determined that the ceiling structure and any planks or platforms used can bear all intended loads and 4) employees are supported by the planks or platforms at all times when in the attic or ceiling space.

Eric Berg

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From: Manieri, Mike@DIR
Sent: Friday, May 01, 2015 12:39 PM
To: Berg, Eric@DIR
Cc: Kernazitskas, David@DIR
Subject: RE: 2015-BS-03

I am having Nai Saechao send you the scanned information you requested.... If once, you've reviewed the information you still believe this rm project has some validity, feel free in your own strike out and underline format, mold or shape the proposed text that Joel developed into something better in your mind and share it with us. Thanks and have a great weekend.

MJm

P.s. can you provide your correct mailing address and office phone number?

From: Berg, Eric@DIR
Sent: Thursday, April 30, 2015 4:12 PM
To: Manieri, Mike@DIR
Cc: Kernazitskas, David@DIR; McCune, Larry@DIR
Subject: RE: 2015-BS-03

I am not aware of any form 9s regarding 3273. I vaguely remember the case. I'll try and look at the decision today. Can you send me the email from Joel Foss as well? Thanks

Do the platforms/planks in question have to span between and be supported by at least two joists or structural members? That should be specified in the language in addition to the 12 inch minimum width. The platforms/planks should also be determined to be capable of supporting all intended loads by a qualified person (not just the ceiling structure).

Eric

From: Manieri, Mike@DIR
Sent: Thursday, April 30, 2015 3:39 PM
To: Berg, Eric@DIR
Cc: Kernazitskas, David@DIR; McCune, Larry@DIR
Subject: 2015-BS-03

Eric, Board staff is about to move on to their next rulemaking (RM) projects; the above briefing sheet applies to one project that David Kernazitskas has been assigned. You will notice it requires staff to ascertain first whether DOSH would propose such a proposal. Has there been any effort by DOSH to address this issue with a Form 9? The briefing sheet indicates that this has been circulating at DOSH since September 2011. If you support the concept which would propose to amend GISO Section 3273(d) to add a new exception No. to read (believed to be J. Foss's language):

Exceptions:

(3) In unfinished attics and other ceiling spaces where access is not routine and of a short duration, a catwalk shall not be required if 1) there are ceiling joists or similar members at 2 feet or closer centers, 2) a qualified person has determined that the ceiling structure can bear the intended loads, and 3) planks or similar solid platforms are provided to rest on these members, to form a plank platform 12 inches wide.

Your consideration and feedback on this is needed before we start to delve into this issue further and start RM in Section 3273(d). See also OSHAB Decision in the matter of DISH Network, California Service Corporation, Docket No. 12-R4D3-045, dated 6/25/13.

Looking forward to your thoughts on this.

Mjm