

-----Original Message-----

From: LCB5392 <LCB5392@aol.com>

To: MHart <MHart@dir.ca.gov>; dcrumbaugh <dcrumbaugh@standfastusa.com>; rstarr <rstarr@standfastusa.com>

Cc: OSHSB <OSHSB@dir.ca.gov>; EBerg <EBerg@dir.ca.gov>

Sent: Mon, Feb 22, 2016 1:07 pm

Subject: Re: FW: Petition for repeal, amendments of a Occupational Safety and Health S...

In a message dated 2/22/2016 9:45:04 A.M. Pacific Standard Time, MHart@dir.ca.gov writes:

The Standards Board has received your preliminary request for a Petition to delete Section 3210(b) exception 9. Upon receipt of your forthcoming supporting documentation, we will docket the petition for evaluation.

When submitting further information, please include your name and contact information. The correct zip code for the Occupational Safety and Health Standards Board is 95833.

Thank you,

Marley Hart
Executive Officer
Standards Board

From: LCB5392@aol.com [<mailto:LCB5392@aol.com>]

Sent: Saturday, February 20, 2016 4:45 PM

To: DIR OSHSB; mmanieri@dirl.ca.gov

Cc: Berg, Eric@DIR

Subject: Petition for repeal, amendments of a Occupational Safety and Health Standard

Occupational Safety & Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, California 95833

Petition for repeal, adoption, amendments of a Occupational Safety and Health Standard.

(1) the substance or nature of the standard, amendment, or repeal requested.

Petition the Standards Board to change a Title 8 regulation and delete section 3210 (b) exception 9

"On mobile vehicles/equipment, where the design or work processes make guardrails impracticable, the use of sufficient steps and attached handholds or structural members which allow the user to have a secure hand grasp shall be permitted. Work from the decks, permanent/stationary platforms, runways, or walkways of mobile vehicles/equipment shall be excluded from the requirements of subsection (b) where it can be shown that guardrail or handholds are impracticable by the design or work processes."

(2) the reason for the request. Supporting documentation such as technical or engineering studies are also being submitted.

Perimeter guarding is feasible and practical on mobile vehicles i.e. tank trucks, etc.

As an example of perimeter guarding I have asked Tram to send to the board under separate package there material care of Morley Hart 916 274 5721

Hart, Marley@DIR

From: David N. Crumbaugh <dcrumbaugh@standfastusa.com>
Sent: Tuesday, March 08, 2016 6:42 AM
To: Hart, Marley@DIR
Cc: Berg, Eric@DIR; DIR OSHSB; LCB5392@aol.com
Subject: Lew Barbe Follow Up Information - Fall Protection for Tank Trucks/TRAM System
Attachments: Water Truck Cut Sheet v1.pdf; Transportation Cut Sheet 110615.pdf; Asphalt Tanker Cut Sheet.pdf; Side Ladder Cut Sheet1.pdf; Standard TRAM Fact Sheet.pdf; MSHA tanker fallprotect.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mary,

In follow up to your conversation with Lew Barbe, I am sending you information on a ANSI Rated/OSHA Approved fall protection system for tank trucks and other mobile equipment. If you have any questions, my contact information is below.

The TRAM (Total Restraint Access Module) system is used when drivers need to access the tops of the tank trucks when they do not have the ability to hook into a traditional overhead fall arrest system. The TRAM is a fall restraint system that prevents the fall from ever occurring, while providing complete protection while on top of the tank truck and during the access and egress from the ladder.

The TRAM fall Protection system keeps drivers/workers safe when working on or walking on top of tank trucks. The ANSI rated, OSHA compliant system is easy to use and prevents a fall from ever occurring while providing protection during the access and egress of the tank trailer ladder – where 70% plus of falls occur.



Primary Benefits of a TRAM fall protection system:

- **Fall Restraint/Prevents the Fall from ever occurring**
- **All Mechanical - No Power, No Pneumatics, No Hydraulics.**
- **Works in all types of weather environment**
- **Flexible, durable and easy to use**
- **Only system that keeps operator tethered to the equipment – preventing the fall even if driver should become unconscious or incapacitated**
- **Low profile- folds out of the way when not in use**
- **Protects the driver during access and egress of the ladder**
- **Light weight**
- **Fixed Base, Rotating Arm, Rotating Base available – depending on application for end ladder and side ladder tank trailers.**
- **ANSI RATED/OSHA Approved**
- **Cost Effective**

If time allows, please watch these short videos for a better understanding of how a TRAM system operates:

<https://www.youtube.com/watch?v=xDqgjuR6teQ>

<https://www.youtube.com/watch?v=JPI2t8T5Bog>

Website: www.standfastusa.com

I am also attaching a few brochures that show some installations we have in service, as well as some product details.

Regards,

David N. Crumbaugh
Executive Vice President
Standfast USA/TRAM Fall Protection
314 616 6580
dcrumbaugh@standfastusa.com

STANDFAST HEIGHT SAFETY SOLUTIONS



The proven TRAM Fall Protection System, with thousands of units installed worldwide, is now available for Dome Tankers. The TRAM system provides fall restraint or arrested protection as well as an integrated, adjustable handhold for both stability and confidence.

Safety

- **Protects** both operators and mechanics while working at height.
- **Secures** user during dangerous access/egress at the ladder-to-platform transition.
- **Handhold at height** provides a feeling of safety and stability.

Performance

- **Exceeds fall protection standards worldwide.**
- **Flexible solution** - the TRAM system has many different variants that allow it to be configured to meet your specific needs.
- **All weather durability** allows for installation and usage in climates around the world.

Installation

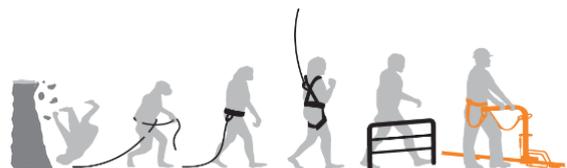
- **Flexible installation Methods** - TRAM systems can be installed using bolted or welded solutions.
- **Installation assistance available** - We can install your system or can train your personnel to install.

Certification and Testing

The TRAM range of products has been tested to and conforms with the relevant fall restraint and fall arrest testing requirements of:

- ANSI/ASSE Z359.1
- EN795
- AS/NZS 1891.1
- A10.17
- A10.27

Additional information is available upon request.





MSHA's Accident Prevention Program Innovative Products

Safety
and
Health
are
Values!

" A Tanker Truck Fall Protection System"

An innovative moveable fall protection safety restraint system provides safe access for drivers and miners working on top of tanker trucks and stationary tanks. The new approach ensures workers are firmly attached to the system at all times. Personnel can safely move from the tanker access ladder to the tanker top then along the top of the tanker to any point along its length. The system provides a safety restraint belt/harness with a handhold and solid anchor that moves along a rail with the user.

Professionally engineered systems have been designed with the following features:

- A stand alone system that operates independently of air or electrical systems.
- Easy for drivers/miners to use.
- Constructed of strong, lightweight, corrosion resistant materials.
- Ease of installation on existing or new tankers.
- Simple to clean and maintain.
- Drivers/miners can perform work with minimal equipment interference.



For information on manufacturers that are known to MSHA to have such products available, contact MSHA's Applied Engineering Division at 304-547-0400 or e-mail InnovativeProducts@dol.gov.

Issued:	02/10/2005
Tag #	AP2005-T010

STANDFAST HEIGHT SAFETY SOLUTIONS



The proven TRAM Fall Protection System, with thousands of units installed worldwide, is now available for Refueler Trucks. The TRAM system provides fall restraint or arrested protection as well as an integrated, adjustable handhold for both stability and confidence.

Safety

- **Protects** both operators and mechanics while working at height.
- **Secures** user during dangerous access/egress at the ladder-to-platform transition.
- **Handhold at height** provides a feeling of safety and stability.

Performance

- **Exceeds fall protection standards worldwide.**
- **Flexible solution** - the TRAM system has many different variants that allow it to be configured to meet your specific needs.
- **All weather durability** allows for installation and usage in climates around the world.

Installation

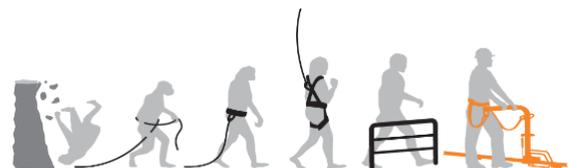
- **Flexible installation Methods** - TRAM systems can be installed using bolted or welded solutions.
- **Installation assistance available** - We can install your system or can train your personnel to install.

Certification and Testing

The TRAM range of products has been tested to and conforms with the relevant fall restraint and fall arrest testing requirements of:

- ANSI/ASSE Z359.1
- EN795
- AS/NZS 1891.1

Additional information is available upon request.



STANDFAST HEIGHT SAFETY SOLUTIONS



The proven TRAM Fall Protection System, with thousands of units installed worldwide, is now available for Side Ladder Access Trucks. The TRAM system provides fall restraint or arrested protection as well as an integrated, adjustable handhold for both stability and confidence.

Safety

- **Protects** both operators and mechanics while working at height.
- **Secures** user during dangerous access/egress at the ladder-to-platform transition.
- **Handhold at height** provides a feeling of safety and stability.

Performance

- **Exceeds fall protection standards worldwide.**
- **Flexible solution** - the TRAM system has many different variants that allow it to be configured to meet your specific needs.
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Installation

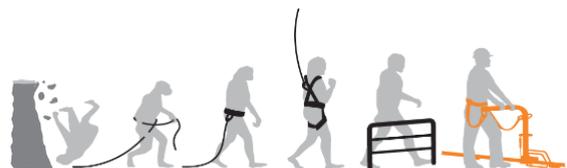
- **Flexible installation Methods** - TRAM systems can be installed using bolted or welded solutions.
- **Installation assistance available** - We can install your system or can train your personnel to install.

Certification and Testing

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- ANSI/ASSE Z359.1
- EN795
- AS/NZS 1891.1

Additional information is available upon request.



DESCRIPTION

The Standard TRAM is designed to be used as part of the TRAM system which consists of a TRAM Unit, TRAM Rail, and Belt or Harness (depending on application). It is intended to allow a user to move along the rail while remaining connected to the fall protection system and to protect the operator during access and egress, when applicable.

MATERIALS AND SPECIFICATIONS

TRAM Base (casting)	2205 Duplex Stainless Steel
TRAM Handhold	Grade 316 Stainless Steel
TRAM Rotator (cast)	2205 Duplex Stainless Steel
TRAM Brakes and Other Components	Various Grades of Stainless Steel and Brass or Teflon Bushings
TRAM Rail	2x2x11ga or 50x50x3mm Welded Box Tubing, Grade 304 Stainless Steel
Weight	TRAM Unit - 35-50 lbs. (18-23 kg) TRAM Rail - 4 lbs. /ft. (4.5 kg/m)

CERTIFICATIONS

TRAM Unit

ANSI/ASSE Z359.1-2007 Safety Requirements for Personal Fall Arrest Systems, Subsystems and Components

EN795:1997 Protection against falls from a height — Anchor devices — Requirements and testing

AS/NZS 1891.2:2001 Industrial fall-arrest systems and devices, Part 2: Horizontal lifeline and rail systems

SABS EN 795:1996 Protection against falls from a height

TRAM Harness/Belt

Varies, please contact TRAM representative for further information.

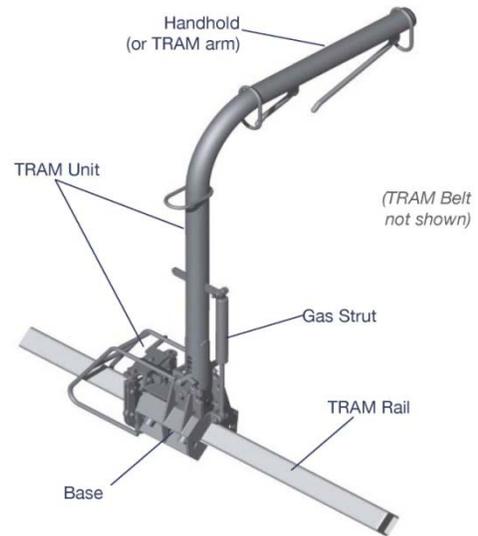


Figure 1: TR-01-01 Standard TRAM w/ Standard Arm Shown

FALL RESTRAINT VS. FALL ARREST

The TRAM can be used as either a fall arrest or fall restraint system.

Fall restraint or total restraint is where a person is connected to an anchorage and physically prevented from reaching any position where there is a risk of a fall. Total restraint systems are likely to be permanently installed and maintained.

A full body harness must be used whenever the TRAM is part of a fall arrest system. When the TRAM is installed so that the operator cannot reach a position where there is a risk of fall – that is, as a fall restraint or total restraint system - it may be permissible to use a restraint belt.

Please consult TRAM distributor or Standfast USA for installation methods and procedures.





The proven TRAM Fall Protection System, with thousands of units installed worldwide, is now available for transportation vehicles. The TRAM system provides fall restraint or arrested protection as well as an integrated, adjustable handhold for both stability and confidence.

Safety

- **Protects** both operators and mechanics while working at height.
- **Secures** user during dangerous access/egress at the ladder-to-platform transition.
- **Handhold at height** provides a feeling of safety and stability.

Performance

- **Exceeds fall protection standards worldwide.**
- **Flexible solution** – the TRAM system has many different variants that allow it to be configured to meet your specific needs.
- **All weather durability** allows for installation and usage in climates around the world.

Installation

- **Flexible installation Methods** - TRAM systems can be installed using bolted or welded.
- **Installation assistance available** - We can install your system or can train your personnel to install.

Certification and Testing

The TRAM range of products has been tested to and conforms with the relevant fall restraint and fall arrest testing requirements of:

- ANSI/ASSE Z359.1
- EN795
- AS/NZS 1891.1

Additional information is available upon request.



STANDFAST HEIGHT SAFETY SOLUTIONS



The proven TRAM Fall Protection System, with thousands of units installed worldwide, is now available for Water Trucks. The TRAM system provides fall restraint or arrested protection as well as an integrated, adjustable handhold for both stability and confidence.

Safety

- **Protects** both operators and mechanics while working at height.
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- AS/NZS 1891.1

Additional information is available upon request.

