

From: [Charlesworth, Tanya](#)
To: [DIR OSHSB](#)
Cc: [Mckelvey, Mark](#); [Oshea, Kevin](#)
Subject: Petition Regarding 8 CCR 1604.21 Capacity and Loading
Date: Tuesday, September 26, 2023 11:52:41 AM
Attachments: [image001.png](#)

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Dear Occupational Safety and Health Standards Board,

I am writing to file a petition regarding CCE Title 8, Section 1604.21. It has come to my attention that the Table 4 [Rated Load to Inside Net Platform] shown in the California code no longer applies if the hoist car is equipped with an overload detection device and the rated load to inside net platform area is 82psf or higher. This provision is clearly outlined in the ANSI 10.4-2016.

However, California is currently following the 1973 version of ANSI, which poses a challenge for Brand Safway. We have a large hoist fleet that is equipped with an overload detection device that cannot be extended due to this restriction. This limitation hinders our ability to efficiently utilize our equipment and provide optimal services to our clients.

I kindly request your consideration in adopting the ANSI 10.4-2016 standards. Not only would this alleviate the challenges faced by Brand Safway and all other elevator companies, but it would also ensure the safety of our operations. The updated code aligns with current safety standards, providing a higher level of protection for workers and equipment.

I appreciate your attention to this matter and your commitment to promoting safety and efficiency within our industry. Please let me know if there is any further information or clarification required regarding this petition.

Thank you for your time and consideration.

Sincerely,

Tanya Charlesworth, PE
Director of Product Management
Member: ANSI A10.4

Brand Access Solutions | 700 Commercial Ave. | Carlstadt, NJ 07072

BRAND SAFWAY

C: 201 988 0049

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