



Jbarrye@aol.com
05/29/2002 11:14:52 AM

Record Type: Record

To: See the distribution list at the bottom of this message

cc:

Subject: OSHA SLING STANDARD

Mr. John Morrall

Office of Information and Regulatory

Affairs

Office of Management and Budget

NEOB, Room 10235

725 17th Street NW

Washington, DC 20503

Dear Mr. Morrall:

On behalf of the Associated Wire Rope Fabricators (AWRF), I am submitting the following comment for Nomination for Regulatory Reform Improvement and Guidance Document Improvement. Please address any questions to Barry Epperson, AWRF General Counsel, 201 West Fifth Street, Suite 501, Tulsa, Oklahoma 74103, Phone (918) 585-5641, Fax (918) 585-2758, Email jbarrye@aol.com.

OSHA SLING STANDARD

REGULATING AGENCY: Department of Labor (DOL), Occupational Safety and Health Administration (OSHA)

CITATION: 29 CFR 1910.184

AUTHORITY: 29 U.S.C. Section 655(b)(1)-(5)

DESCRIPTION OF THE PROBLEM:

Companies in the lifting, rigging and load securement industry typically use slings made of wire rope, chain or synthetics to lift objects by crane or secure cargo. The current OSHA standard, nearly 30 years old, is considered

by many in the industry to be dangerously outmoded, especially when compared to an applicable consensus standard ("B30.9") promulgated by the American Society of Mechanical Engineers (ASME). OSHA inspectors continue to issue citations to companies for failure to meet the outmoded OSHA sling standard even though they meet the requirements of the B30.9 standard. Companies in the industry have made numerous requests of OSHA to issue an updated sling standard. OSHA has not honored this request. The companies, through their trade associations, AWRF and the National Association of Chain Manufacturers (NACM)) have recently asked the House of Representatives Science Committee, Subcommittee on Environment, Technology & Standards to conduct an oversight investigation of this matter.

Proposed Solution:

Request OSHA to a) explain why a rulemaking procedure on a new standard has not been started, b) promptly commence the rulemaking process to develop a new sling standard, and c) issue a public enforcement notice citing the ASME B30.9 standard as the sole basis for OSHA citations regarding sling safety until the revised OSHA sling standard is implemented.

Estimate of Economic Impact:

The affected companies and their employees will no longer be required to adhere to a dangerously outmoded standard, thus saving noticeable sums in OSHA-inflicted penalties and, more importantly, enhancing the inestimable value of the affected employees' safety. Considering lost time, citations, lawsuits and confusion between the ASME Standard and the OSHA Standard, it is estimated that the economic losses to the industry and its consumers, attributable to the OSHA Standard, range in the millions of dollars each year.

BARRY EPPERSON



- att1.htm

Message Sent To:

John F. Morrall III/OMB/EOP@EOP
Awrf@aol.com
info@bairstow.com
fpbecker@awrsling.com
david.bishop@lifting.com
jeff.bishop@lifting.com
knut@unirope.com
CascadeRigging@aol.com
padrig@aaais.net
jfletch@americansling.com
dilligaf@thecommgrrp.com
hamilton@ptd.net
mikehughes@wrca.com
david.johnston@cmworks.com
frank@carpenterrigging.com
ascindustries@worldnet.att.net
garlandj@kwrs.com
lkraus@wiscolift.com
ned.librock@cmworks.com
LSummars@fmmafco.com
chas.lucas@cox.net
bernie@carpenterrigging.com
contact@mazzellalifting.com
larrymeans@wrca.com
rocky@yarcable.com
MARKISSLLC@aol.com
marcal@midwest.net
bobm@gjcorp.com
pat@obertmarine.com
service@strider-resource.com
DPellow@aol.com
kpetrick@samselsupply.com
kulkoni@kulkonihouston.com
info@rasmussenco.com
crmsjax@bellsouth.net
SLING99@aol.com
edrichter@thecrosbygroup.com
joe@robertstesting.com
bsakash@johnsakash.com
Dsayenga@aol.com
kens@gjcorp.com
hilari@iandisling.com
kwr@kellywirerope.com
info@siingmax.com
mike@loosco.com
rweiskircher@accochain.com
contact@caldwellinc.com
certifiedslings@mindspring.com