

COMMENTS FROM JULY 2007 STATEWIDE CRANE MEETINGS

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COMMENT RECEIVED	DEPARTMENT RESPONSE
Are excavators or backhoes covered by the construction crane bill or rules when engaged in hoisting operations? Bellevue, Afternoon, Greg Habermann	Excavators aren't covered under the crane bill at all. Dan's Response
Are city water mains construction projects covered by the bill and the rules? Is maintenance work covered by the rules? Bellevue, Afternoon, Greg Habermann	You're under the construction standards and this crane bill. Dan's Response
The department should consider exempting operators currently third-party certified from the operator experience requirements. Bellevue, Afternoon, Jim Hopkins	
CRANE AND INSPECTOR CERTIFICATION	
For over 30 years we've had in place company policies which have required us to have non-destructive testing on our tower cranes, either company owned or third party, prior to each and every erection. We endorse the changes that are coming forth here in the state of Washington. Bellevue, Morning, Cam Langevin	
The department should allow employers/crane companies to inspect and certify their own cranes. Bellevue, Morning, Cam Langevin	
The department should not allow inspectors to issue temporary crane permits if, during the inspection, the inspector identifies deficiencies or issues the employer needs to fix. The department should require the employer to fix the deficiencies identified and the inspector to re-inspect	

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<p>before a temporary certificate can be issued. Bellevue, Morning, John Stelfox</p>	
<p>The department should require crane inspectors to obtain specialized training, such as the OSHA 10 certification, prior to certifying the inspector. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>The department should require crane inspectors to have specific training and experience working with the different types of cranes they will be inspecting (e.g., towers cranes versus Gantry cranes). The department should also require inspectors to have some basic metallurgy training or education since part of the inspection process needs to involve inspecting welds and steel deformation. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>The inspection worksheets that the state should get and be able to track, should include all repairs that are done to the crane even if it's just a weld repair. We need to know who did that weld repair and under what conditions. Those are important factors. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>The crane inspectors should have some basic metallurgy but we should require them to be metallurgists. The inspectors should have enough training to identify potential problems and then be required to bring in experts from various backgrounds, such as metallurgy, when appropriate. Bellevue, Morning, Jim Hopkins</p>	
<p>The department should implement a crane inspector certification</p>	

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<p>program similar to what Cal-OSHA has. Bellevue, Morning, George Jamison</p>	
<p>Regarding crane inspection work sheets, the inspectors should be required to document deficiencies or problems identified during the inspection on the inspection work sheet. Bellevue, Morning, George Jamison</p>	
<p>The department should include a continuing education requirement in the rules. The department should also require inspectors to re-certify after five years, possibly by a board review and not another exam or test. The department should also use the maritime crane inspectors such as Cal-OSHA did, with a one-year probationary period. Vancouver, Afternoon, Steve Jouwsma</p>	
<p>Is the department going to require all crane attachment pieces be inspected during the annual inspection in order for a crane to be certified? Vancouver, Afternoon, Bill Luisi</p>	
<p>The department should require a crane be inspected for all configurations and boom attachments during the annual inspection. Vancouver, Afternoon, Bill Luisi & Steve Jouwsma</p>	<p>Do you recommend it be recertified or cert -- the certification only be good for the configuration that it's initially tested in and approved tested in or should we once they stick the other main boom and the jib on should it be recertified? Dan's Question</p>
<p>Will the department recognize crane operator experience from other states and exempt or grandfather the operators like has been discussed with the crane inspectors? Vancouver, Afternoon, Robert Clarkson</p>	<p>We would accept the CCCO certification, yes, and they would also have to meet the other requirements that are included in the bill which would be hours of operation, experience. Dan's Response</p>

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<p>How current does the operator experience need to be in order to count? If someone had 1,000 hours of experience 10 years ago, would the experience still be valid and count towards the rule requirements? How long would that experience be good for? Vancouver, Afternoon, Robert Clarkson</p>	<p>The bill specifically says that at five years CCCO needs to retest after five. Dan's Response.</p>
<p>The rules should not allow inspectors who certify cranes to repair the crane they certified or inspect a crane that they have repaired. Tumwater, Afternoon, Randy Loomans</p>	
<p>The department should identify by rule all major events that require a crane to be re-certified. The list should include overloading, electrical contact, a reported unusual event and a base or structural event. Tumwater, Afternoon, Robert Fuller</p>	
<p>Is the Department considering enacting a third-party certification program, meaning that a contractor or a crane owner wouldn't be able to certify his own cranes? Sea-Tac, Afternoon, James Mainard</p>	<p>It has come up. The bill, as it was initially introduced, did have a third-party requirement in it. As a compromise with stakeholders, the third party was a big issue with several of the employers in the state of Washington; for instance, I'll pick on Lampson Crane. They build a monster that they understand. They're the only ones that know about it and they're saying you're going to require me to go out and get an accredited inspector from the Department to come certify this crane. And there's a lot of validity to their argument. Their engineers design and build this and through negotiations with both labor, business, and everybody at the table, the third party was removed from the legislation. We've gotten comment on it at the first meeting, I expect to hear comment on it at every meeting. Will third party go into a rule? My personal opinion, I'd love to see it there because of the integrity of the program. Whether it will, I -- that's yet to be seen. I appreciate your comment on the third party.</p>

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	Dan's Response
<p>Third party crane inspections should not be required and do not ensure the integrity of an inspection or of the program. Sea-Tac, Afternoon, James Mainard</p>	<p>Well, we currently have 80 recognized crane inspectors that are certified or accredited through the Department for our maritime crane program, so there are currently 80 inspectors in that route, and that's when we get into -- that was another issue that I was going to bring up. What do we do with the maritime inspectors? Do we grandfather them in for the duration or do we set a limit and say that they need to step up to the plate and meet the criteria after one year? We believe we're going to need help to ensure that we have enough inspectors to get this program to succeed the first year. So that's an issue that we are looking at. California recognized their maritime inspectors, crane inspectors, for one year after they passed their legislation, and then those inspectors had to meet the criteria of the new construction crane inspectors.</p> <p align="center">Dan's Response</p>
<p>For non-standard tower crane bases does "independent" mean third party? The department's rules should require crane inspectors to review all engineering documents for tower crane bases. Sea-Tac, Afternoon, James Mainard</p>	<p>I believe that is the intent of that piece of legislation. Dan's Response In other words, that engineer would not be connected or associated with the engineering firm that developed the base. Beth's Response</p>
<p>Crane inspectors need to be able to recognize the hazard or deficiency; not necessarily be a metallurgist or that sort of thing. There are points where the inspectors should take items of concern or items of issue, such as cracks in metal, and address those to other qualified people who would then address those concerns and report back in writing. The department should also consider reciprocity for inspectors certified by OSHA or in other states. Sea-Tac, Afternoon, Thom Sickelsteel</p>	
<p>The department should consider using a crane inspector approval system similar to the maritime process, with a board of management and labor</p>	

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representatives. Sea-Tac, Afternoon, Thom Sicklesteel	
Crane inspectors should be required to have the same experience and certification as the crane operators, including CCO certification. Sea-Tac, Afternoon, Thom Sicklesteel	
Crane manufacturers should be allowed to inspect and certify cranes they manufacture but not cranes they own but didn't manufacture. Sea-Tac, Afternoon, Thom Sicklesteel	
Crane owners should be allowed to certify inspectors and inspect their own cranes. Sea-Tac, Afternoon, Derek Reece	
If the department decides to create its own crane inspector certification program and test, it should use psychometricians to validate the written examination. Sea-Tac, Afternoon, Danny Thiemans	
The department should adopt a code of ethics for crane inspectors which will assist the department in revoking an accreditation. Sea-Tac, Afternoon, Danny Thiemans	
Crane operators need to have the authority and ability to overrule a crane certification if the operator believes the crane is not safe to operate. Sea-Tac, Afternoon, Randy Loomans	
The department should not allow reciprocity for crane inspectors	

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certified by OSHA or other states. Sea-Tac, Afternoon, Randy Loomans	
Crane manufacturers and owners should be allowed to inspect and certify their own cranes. Spokane, Afternoon, Wayne Gibson	
Crane manufacturers and owners should be allowed to inspect and certify their own cranes. Spokane, Afternoon, Wayne Gibson	
The department should not grandfather maritime crane inspectors into the construction crane industry. Spokane, Afternoon, Greg Teslia	
The department should require a pre-erection and post-erection inspection of tower crane components. Spokane, Afternoon, Greg Teslia	
How frequently will the department require tower cranes to be inspected? Every 2 months, every 3 months? (not sure if he's talking about daily or annual inspections) Spokane, Afternoon, Greg Teslia	
The department should adopt an appeal process for the crane inspection process where an employer/contractor can challenge or request reconsideration of crane certificate denial. Spokane, Afternoon, Greg Teslia	
The department needs to require that crane inspectors have a certain	

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<p>amount of experience. The rules should also require continued education and recertification every five years. Tumwater, Morning, Steve Jouwsma</p>	
<p>The department should require continuing education for crane inspectors. Vancouver, Morning, Brian Clarke</p>	
<p>As a contractor would want an outside consultant like this to have an insurance coverage of errors and omissions, and I've talked to insurance companies about getting insurance for these inspectors and their concern was the detail of the inspection and what the insurance would have to cover. And in talking to two different insurance carriers who write insurance in the state of Washington, neither one of them would be interested in providing the coverage for this type of inspector. And that is of concern. Vancouver, Morning, Brain Clarke</p>	
<p>Crane manufacturers should be allowed to inspect their own cranes. Manufacturers should also be allowed to certify a new crane for the first year it's put into operation. Vancouver , Morning, Larry Zaback</p>	
<p>The department should not require third party inspections. Vancouver, Morning, Brian Silbernagel</p>	
<p>The department should not allow inspectors who have repaired a crane to certify it, or repair a crane the inspector has certified. Vancouver, Morning, Randy Loomans</p>	

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<p>The department should consider reciprocity for inspectors if the other states allow it for our inspectors. On the independent professional engineer requirement, the engineer should have experience or specialize in structural engineering. Kennewick, Morning, Paul Parish</p>	
<p>The department should grandfather inspectors who have been doing inspections for at least three years. The crane inspectors need to know how to take a crane apart and put it together. The inspectors should have some operator experience and experience in setup and tear down of the cranes. Kennewick, Morning, Paul Parish</p>	
<p>The department should not require third party inspections. Kennewick, Morning, Dana Morgan</p>	
<p>The department needs to ensure the rules have significant penalty provisions for violations of these rules. Kennewick, Morning, Jim Arnett</p>	
<p>The crane inspectors should be allowed to issue temporary certificates after they approve a crane so it can be operated during the time the department is issuing the permanent certificate. Kennewick, Morning, Jeff Abersfeller</p>	
<p>The rules need to include an appeal process if a crane is not approved for certification. Also the department should not require annual load testing of mobile cranes. Kennewick, Morning, Dana Morgan</p>	

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<p>Annual load testing is a disservice to cranes and will be a burden of the employer/owner. Kennewick, Morning, Dana Morgan</p>	<p>Let me point that out, that's one thing that's -- it's in the bill, and obviously we can't change the bill without a point of action, but it does state that crane owners must ensure the cranes are inspected and load proof tested by a certified crane inspector at least annually, and after any significant modification issues that you're talking.</p>
<p>Also the department should not require annual load testing of mobile cranes, so long as the crane is operated according to manufacturer recommendations. Annual load testing is a disservice to cranes and will be a burden of the employer/owner; even Cal OSHA only requires load testing every 4 years. Kennewick, Morning, Jeff Abersfeller</p>	
<p>Also the department should not require annual load testing of mobile cranes, or only load when you change or you alter a main component like you will on a boom, or you take a hoist out, or whatever, rebuild brakes, then you load test it, but other than that, you don't Kennewick, Morning, Paul Parrish</p>	
<p>The department should require crane inspectors to inspect a certain number of cranes (at least 1/month) to retain certification. Kennewick, Morning, Dana Morgan Go at least 1 a month -- 10 or 1 a month, or something. Kennewick, Morning, Jeff Abersfeller</p>	<p>Okay. And one follow-up question to that comment. Do you have a recommendation on a minimum number of inspections?</p>
<p>The department should require third party inspections. The inspector must have a minimum of 5 years work experience in the hoisting industry, and 2 of the 5 years need to be documented work experience inspecting cranes. They have to have a minimum of one-million-dollar</p>	

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liability of one million of errors and omissions. Spokane, Morning, Greg Teslia	
The department should incorporate standards from ASME B30.3 series in addition to CDAC. Spokane, Morning, Greg Teslia	
The inspector cannot have erected, top climbed, or performed any maintenance on the tower crane that's being inspected Spokane, Morning, Greg Teslia	
My biggest concern with the certification is how it's going to be scheduled, am I'm going to have to have this scheduled 6 months in advance so you'll have an inspector at a specific location for me to get that inspection. Spokane, Morning, Kevin Buzzell	
If a defect is identified with something that's not a critical operational component of the crane, there has to be a way to keep it in service for production and not cause downtime on the job. Spokane, Morning, Kevin Buzzell	Can I address the one issue. I think you're under the impression that the state was going to be scheduling these certification inspections, and that is going to be up to you to schedule and make sure that they're done before the expiration of the prior -- That shouldn't change at all, and hopefully the inspectors who you're currently using will be ones to become accredited by the department. So that would be the only change in that. Dan's Response
We just have to be very careful when we start using the term ownership, you can't have ownership when we're defining third party. Spokane, Morning, Jim Hopkins	
The rules need to hold inspectors accountable.	

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Spokane, Morning, Jim Arnett	
The rules need to require engineers to have experience in the hoisting and rigging world. Spokane, Morning, Dana Morgan	
Will there be a requirement to inspect a certain number of cranes over a period of time to retain certification for -- to inspecting of that crane. Sea Tac, Morning, Leroy Lamar	
What kind of inspector training will the rules require? Also if an inspector repairs a crane, he shouldn't be allowed to inspect and certify the crane. Sea Tac, Morning, Leroy Lamar	
I think presently, if I'm correct, if you want to be an OSHA inspector to be a maritime person then you have to have a degree in engineering. Will that still be a requirement or -- or not? Sea Tac, Morning, Harvey Mueller	
What authority will the crane inspector have to require the crane owner to permit load testing? Sea Tac, Morning, Harvey Mueller	
Hopefully these laws are not just duplicating the others and just making it a little bit clearer, but they include steps for the enforcement of it. That's my biggest concern is that once they've been passed that the manpower is in there to enforce these things; there needs to be criteria in there that they need to be recertified, that they need to be held accountable for it, and the same with the operators.	I'd like a follow up question with you. The enforcement for a crane inspector, once they're certified, what would you recommend to the Department that we put into this rule for being able to decertified or take the accreditation away from an inspector? That's where federal OSHA has had the problem. They don't have anything in rule to be able to pull somebody's certificate once they certify somebody. So what the

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Sea Tac, Morning, Myron Lee	Department would like is what criteria should we set for being able to pull somebody's certification once they're accredited by the Department? Dan's Response
We all know that just having these new laws and regulations will not change anything unless people are held responsible for, you know, not complying one hundred percent. Sea Tac, Morning, Myron Lee	
Where are we going to get the crane inspector certification, and how frequently are we required to be recertified. Another concern of mine is that we don't migrate to a system where it requires a third-party inspection of assets. Sea Tac, Morning, Ken Bailey	
How is the department going to ensure that quality, thorough crane inspections are conducted? Also, are the inspectors going to only be required to take a test or will there be an experience or apprenticeship requirement as well? Sea Tac, Morning, Jeff Williams	
The department should require third party inspections. Sea Tac, Morning, Eric Bellamy	I'll go ahead and answer that one question, how maritime inspectors or crane certifiers are accredited through the State of Washington. The individual submits an application to the Department with an attached resume and an outline of his past experience, for the types of crane that he's interested in working on. The maritime is also including weight handling equipment; in other words, the spreader bars they would have to certify, these types of things, so it's not just cranes in the maritime industry. Now, once we review the applicant and he identifies and we see that he meets the minimum criteria as far as experience level and education, that have to deal with cranes, then we convene a board. We

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	<p>have a six-member board that meets twice a year to review these applicants. We have two members from management and two members from labor and then myself, and then also we have one crane expert. We meet, we go over the applicant's resume, we call their references, we check on the past work, and if we deem that he has shown that he has enough talent, then we go ahead and accredit that individual for the areas that he wanted to be accredited for.</p> <p>They have to show that they already know how to do this. It's not something that they come into the maritime industry and learn it later, it's something that they already have to have.</p> <p>Chuck's Response</p>
<p>The crane inspectors should be required to be certified in and have experience with all the types of cranes they will inspect. Sea Tac, Morning, Gaytor Rasmussen</p>	
<p>Crane inspectors need to have the practical side, being able to get to those positions, but also to understand the stresses in a crane and the specific type of crack propagation and how to identify it and how to identify some of these defects in cranes. Sea Tac, Morning, Randy Kent</p>	
<p>In the maritime industry, which we do quite a bit of work there, it is a conflict of interest, and if you inspect it, you can't repair it, and if you repair it, you can't inspect it; that should be required here. Sea Tac, Morning, Lance Gyldenege</p>	
<p>Decertifying inspectors. As far as policing, let me give you an instance with fed-OSHA. Fed-OSHA did a few years ago via Steve Butler, who's the head of fed-OSHA at the present time, they went out and actually audited virtually every person that has a fed-OSHA ticket</p>	

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<p>paperwork-wise, and they found a lot of problems. I can't remember the exact amount of people that they decertified, but there was an extensive amount. I think we cut something like 20 or 25 percent of the people out in there. So there is a method and a way to do that and I would encourage you to talk to Steve about that. He's very passionate about that type of thing. Sea Tac, Morning, Lance Gyldenega</p>	
<p>Engineers that work on or with cranes need to have experience in crane engineering. Sea Tac, Morning, Lance Gyldenega</p>	
<p>It seems that there are some existing programs across the country that could be used as a model. Perhaps what we want to consider doing here is what we've done here with CCO, is bring together a team of subject-matter experts in this area, take a look at some of the written exams that are out there, have a psychometrician look at them, and make sure that we can use those as a model to build a fair and reliable, valid test that could be used in the state of Washington. And to bring some credibility to it, like we've done at CCO is to write a code of ethics that the inspector would sign off on which would be developed by those same subject-matter experts. So those are some things that you might consider as we go through the development. CCO certainly is interested in helping in that regard, of course, those decisions would be made by our board of commissioners and our board of directors. It's certainly -- a request of help in this area could be brought to us. Sea Tac, Morning, Danny Thiemens</p>	
<p>The crane inspector should be able to give the certificate the day of the inspection and it's presumptive valid with the right to be overruled by</p>	<p>That's built into the bill already. Dan's Response</p>

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<p>the Department. Sea Tac, Morning, Jim Hopkins</p>	
<p>I think you should look at a certification for the tower cranes stand-alone from the rest of them. Sea Tac, Morning, Doug Smith</p>	
<p>We propose or have been talking about amongst ourselves, a lifting height limit of, say, 6 feet to be exempt or a lifting load limit below 3,000 pounds, something along those lines, to get these small service trucks off our daily, weekly inspections. We'd also like to see some standardization in manufacturer requirements and inspections and for forms. Sea Tac, Morning, Mike Vincent</p>	
<p>Any electrical crane contact should require re-certification. Bellevue, Morning, John Stelfox</p>	
<p>More frequent accidents occur with mobile cranes so the operators of these cranes need to be certified and have continuing education. Spokane, Afternoon, Greg Teslia</p>	
<p>The department needs to ensure it has sufficient number of inspectors to police the industry and should consider using city and county inspectors to help with this. Bellevue, Morning, John Stelfox</p>	
<p>I would like to see consideration of passing strong whistleblower legislation with financial incentives and preferential job retraining at no cost to the whistleblower.</p>	

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Bellevue, Morning, John Stelfox	
If employers rent or lease cranes, the rules should require them to see the current annual inspection and sign off that they have seen it before the crane is put into operation. Bellevue, Morning, John Stelfox	
Crane inspectors load testing tower cranes need to observe this from inside the cab. Bellevue, Morning, Gaytor Rasmussen	
A lot of accidents with cranes happen during climbs. Bellevue, Morning, Gaytor Rasmussen	
Crane inspectors need to have authority to require cranes to be brought into compliance with US standards. Also, engineers working on cranes need to have experience working with cranes. Bellevue, Morning, Gaytor Rasmussen	
I guess I'd like to suggest that the committee look at the A to Z rule, and that is that first and foremost we'd like to suggest that tower crane components be a third-party particle mag test on the structural components and that there be ultrasonic testing done on the bolts and pins. Bellevue, Morning, Cam Langevin	
If the base is going to be designed and incorporated as part of the structure then it's important to recognize that the structural engineer of record needs to be a stakeholder in that and should review the design and sign-off on it.	

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Bellevue, Morning, Cam Langevin	
As far as annual inspection goes, I'd like to suggest that an annual inspection should suffice, could be performed, we'd like to suggest as part of the certified crane tech's role, and/or a third-party agency. Bellevue, Morning, Cam Langevin	
A daily routine of the crane operator must be a visual inspection of that tower crane, the operator must perform a daily inspection on that tower crane prior to commencement of work, and more importantly, that inspection should be documented and signed off by the operator. Bellevue, Morning, Cam Langevin	
An annual inspection is good for one minute. If you have daily inspections and you have the teeth to bite into somebody from ignoring daily inspections, you have nothing. Bellevue, Morning, Gary Neil	
The rules need to require that employers give operators sufficient time (paid) to inspect the crane before operating it. Bellevue, Morning, John Stelfox	
After an accident or after something happens -- isn't that what you asked about in the first place? What's the criteria for re-inspection on the crane? Well, all of these guys out here, Sicklesteel, Best Cranes, Coast Cranes, everybody has a criteria for that, and all the rental companies, if you bend a lattice or break one or bend a boom, it's immediately we're going to re-inspect the whole crane, we're going to replace that lattice, replace that boom section and start all over again with a new certification.	

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Bellevue, Morning, George Jamison	
Employers/owners need to be required to show inspectors the daily and weekly crane inspections. Bellevue, Morning, George Jamison	
The department should develop standardized daily crane inspection forms. Bellevue, Morning, John Stelfox	
One of my suggestions is that maybe what we need is just like we have a pilots association, we need a professional crane operators association and police ourselves and if a crane operator is found to be negligent time and time again, they no longer belong to the association. Bellevue, Morning, John Stelfox	
Who actually physically certifies that nonstandard base after it's erected? Vancouver, Afternoon, Bruce Poinsette	
If crane inspectors notice a deficiency in the crane, the employer should be required to fix the deficiencies before the crane is issued a temporary certificate. The permanent certificates should be like a car tab. Vancouver, Afternoon, Steve Jouwsma	
The inspection process, and the question that came to mind was, when you're inspecting the machine is there going to be a criteria of it being done prior to the job, or while it's at the job, after it gets to the job, can inspecting it prior to getting to the job suffice? Moses Lake, Afternoon, Jeff Abersfeller	Now you got to remember that the annual inspection by this bill is a certification inspection, it's good for 1 year. And it needs to be, when it's inspected for that certification, all configurations of the crane can be put in and need to be inspected, so if it shows up at a job site and all the boom that's available for that crane is not there, I don't think

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	<p>certification is going to be good. If they bring other parts in after that were not inspected for the annual certification it would -- the other rules that come into play that we're going to have to look at are if cranes are modified, maybe put different booms, or, you know, knocked out, or different boom sections are knocked out, or additional put in, if all those components were available for the certification, the certification should still be good, but you got to remember the ASME requires an additional inspection of that crane, which would not be the certifying inspection, but you would still have to inspect that crane. Your dailies, your frequents are still going to come into play, and when booms and cranes are modified the periodics would still come into play when required by these national recognized standards. They would not be certifying inspections. Does that make sense to you? Dan's Response</p>
<p>If a crane is inspected for that year, is it good to go to any job and go to work without another inspection?</p> <p>Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>It's never allowed to go to work without an inspection if the crane's been dismantled and put back together at another work site. I mean right now currently we have rules that require that crane to be inspected, the ANSI and the ASME require the inspections to be conducted when it's put together. Dan's Response</p> <p>The accredited inspectors would only have to do the annual required certification inspection. The other competent and qualified person, whichever the ANSI or the ASME addresses to do the other inspections that are required throughout the year. Dan's Response</p> <p>I think it's important that if you -- you know, if you pull a crane onto a job site and you're going to -- you have all the components there that you're going to need at that job site, and it gets it's certification right then and there when you first put the crane together, but I'm leaving 60-foot of boom out of it because I've got some major picks to make at the</p>

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	<p>beginning of this job site, but those components, those boom sections and pennant lines were inspected by the accredited crane inspector, that crane should be good to go for the certification as it goes beyond that. But after you put in and -- you know, modify that and put some more boom sections in, somebody has to do the inspection of that crane, and that would be the competent person at the job site that put those booms in.</p> <p>Dan's Response</p>
<p>How will the inspection process for big cranes (multi-component cranes) work? Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>Again, and I believe that the way that the department is looking at that right now is that the certification is good for an annual so long as -- and then this is important -- all components and configurations of that crane that the parts were all inspected. They may not have been all installed when it was inspected for it, and load tested, or proof tested for its certification, but when it's erected at a new job, you put a Manitowoc together at a job site, you're still required to proof test that on your own, you're not required to bring in a certified or accredited crane inspector to do that if it still has its annual certification that's valid.</p> <p>Dan's Response</p>
<p>So then are we saying then that if you set up a large crawler crane with a -- say 150 feet of boom in it, and then that's what he got inspected for that, while it's on the job they want to put 40 more feet of boom in there, does the accredited state inspector have to come out and re-inspect that? Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>Only if those boom sections were not inspected during the certification - - the initial certification inspection. If those boom sections were sitting on the ground next to the crane when you got your initial certification inspection the accredited inspector would not need to come back out and re-inspect the crane just because you installed those boom sections.</p> <p>Dan's Response</p>
<p>Well, it's not very practical, but I guess it makes sense, and that's what I'm trying to understand here. Because these cranes, these booms change frequently on the jobs, and there isn't going to be a way that -- I mean very seldom are you going to be able to inspect it on an annual basis with the max boom and jib combinations, and then throughout the</p>	<p>Well, one thing we haven't addressed, I think, is -- and you make a good point about not having all the pieces available to the accredited certifier at the time during the certification, and we might want to look at it, as a department, a way to give a partial certification, in other words, identify what configurations that it can be put into during the inspection of this</p>

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<p>year have it maintained, because these parts interchange with several machines.</p> <p>How are you going to track what particular sections have been inspected and what haven't? Because they're really all the same.</p> <p>Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>accredited individual, and then later on let's say you want to add your luffing boom, or whatever, components that was never looked at by this accredited inspector, then you would key in and say, okay, now we're going to have to use these other things, it's never been inspected, or, leastwise, hasn't been inspected during this year, so we have to get that guy back here to do that. It's an issue that hasn't come up before, but it does make a good point. In answer to your question, how would the department track this now that we -- it's easy to track a specific crane, but when you start talking about specific components for that crane, that's a good thing that we need to discuss internally I would say with our computer people that's going to put a database together on how we can -- if there are these partial inspections or certifications, if you will, because when it goes into -- when you add those other components, that it hasn't been certified this year, how can that key in and tell somebody, the employer, preferably, that we need to get this thing certified now on this new configuration that we haven't had previously, or at leastwise, not previously this year.</p> <p>Chuck's Response</p>
<p>Serializing, perhaps they can go with their 6 sections for their 4100, they go to their yard there, all the boom sections are serialized, the document, what configurations they want for a certain job, or future jobs, you take it to the job, 200 feet, you want to add another section of boom in there, it's already serialized with a competent person on the job, can inspect it in that new configuration, but the main boom section itself has already been inspected by your inspector. And they need to segregate it, too, from the lattice boom, the hydraulic cranes, which you're not touching on that.</p> <p>Moses Lake, Afternoon, Ray Peif</p>	
<p>If you could develop that inspection of those components, because</p>	<p>I think the easiest way for the department to handle this internally, and</p>

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<p>normally just that boom is what's going to change out -- the rest of the crane is going to pretty much stay the same. So if you had a base inspection of all the booms, then when it gets to the job then the guy can do it, then we don't have to worry about it, you know, calling a state guy out, or retesting, you know, from the standpoint of lifting. Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>also for the accredited inspectors is to have a place on the worksheet to indicate that either it's a full inspection, the complete inspection of the crane, or it's a partial inspection, and if he does check off that this is only a partial inspection, and what configuration is he in, and which components are missing. And that would be easy for us to develop on a worksheet. The accredited inspector would also have to have access to that users manual, the operator's manual in which it basically shows all the configurations this particular crane -- model of crane can go into, so he ought to be able to figure that out. Chuck's Response</p>
<p>You were talking about the tower crane bases and the inspection, is that relative then to the sufficiency of the base itself, or the adequacy of the base? Or is it the connection of the tower to the base, or is it both of those, or all of that?</p> <p>Of the base itself, okay. And then when you talk about towers, we're talking about -- what's the actual definition, are we talking about just anything that's vertical that has a horizontal top to it?</p> <p>So then if we're talking about say portable towers, or any tower that's attached to anything that's mobile, that would not be relative to this rule. Moses Lake, Afternoon, Jeff Abersfeller</p>	<p>It's the sufficiency of the base, not the actual connection, the manufacturer has the type of connections and how the tower is connected to either structural members or concrete, but it's the adequacy of the base itself. Dan's Response</p> <p>All hammerheads, and we need to, in a rule, we have been talking about that internally, these new quick towers that are out there, they come in on the trailer, and they go to work basically in 15 minutes, are not truly part of that, so this is the hammerheads and luffing towers that are set on a foundation that's basically constructed at the job site. Dan's Response</p> <p>Well, it's going to be relative to the rule, we just need to have to -- we need to figure out a way to address those and make them different. These quick towers are not the same breed as a hammerhead or a -- and we need to definitely bring definition to the rule about that. I understand that ANSI is separating quick towers out from their hammerhead and luffing towers, and they're going to have their own separate ANSI or ASME, probably the committee. So they will have their own separate standard. And we need to find a way to define those in the rule. Dan's Response</p>

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<p>As a suggestion, and maybe you could consider some wording that would be fixed base tower as opposed to mobile tower. Moses Lake, Afternoon, Jeff Abersfeller</p>	
<p>Cranes today are being manufactured structurally versus tipping, and just to briefly address that, in the old days it used to be that a crane would tip before it would ever fail, before it would break, and most of the charts are actually built that way and there was a tipping line that was pretty high up in the chart. Nowadays, the newer cranes that are being made are made so that they'll actually break before they tip. That has brought on a lot of -- a lot of consternation about LMI systems, safety systems, whether they're functional, whether they're working, that kind of thing, as well as whether they're in front of the operator controls or a readout from what the -- the load cells and those kind of things are telling you. And the C-DAC document I think did a very good job in dealing with that -- that very explosive, highly argued area. The exception that they have in dealing with that is the quantity of days for a safety system to be back up and functional. And the reason that they're having issue with that is because they're finding that some of the safety systems out there are no longer supported by the manufacturer. And so you can't -- in some of these the timeline to get a part and what trips that event in the C-DAC is what's getting reviewed. And it's likely -- the discussions that I've been hearing is it's likely that it's going to come down to what is the crane owner doing at that point? Are they actively trying to do that? How are they documenting that? Have they ordered the part? Sea Tac, Afternoon, Thom Sickelsteel</p>	
<p>I would encourage the inspection criteria to be similar to C-DAC and</p>	

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<p>ANSI, to use those two as the basis. We don't want to teach every new person who comes into this business in Washington State that there's a whole new different kind of thing, especially when the C-DAC is sitting out there. Sea Tac, Afternoon, Thom Sicklesteel</p>	
<p>As far as the recertification process, I think that there is pretty good -- I'm not sure exactly if it's the maritime section, but I think there is some stuff that addresses like major repairs to structural elements, whether it's been in an accident, power line definitely, and there's points where those certifications should be renewed. There's also a question of machines not in use and whether or not their certification would be maintained if they sat for six months or so and needed to be reestablished. I think under the ANSI standard it says that the periodic inspection has to be redone, which, in essence, is the certification. Sea Tac, Afternoon, Thom Sicklesteel</p>	
<p>Who will be conducting the crane inspections and how expensive will that be for a business? Spokane, Afternoon, Wayne Gibson</p>	
<p>Crane inspectors should be required to list every piece/part of the crane they inspected in detail. The inspectors should be required to send the list electronically to the entity requesting the inspection, and they can forward it to the department. The employer/owner should be required to repair deficiencies that don't meet manufacturer specifications and should be given a time frame within which to correct the defects. The certificate should have an inspection and the crane serial number on it. Spokane, Afternoon, Greg Tesla</p>	

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<p>Mobile cranes or the tower cranes, they need to be inspected after any major incident or accident, whether that be a power line contact or other, you can determine that, or a very high wind storm, for the tower crane especially. Spokane, Afternoon, Greg Tesla</p>	
<p>The rules need to contain enforcement criteria to penalize crane inspectors who certify cranes that are worthy of certification. Also, crane operators need to have the ability/authority to over ride a crane certification if the operator does not believe the crane is safe. Tumwater, Morning, Randy Loomans</p>	
<p>With the increase in construction in Washington, there will be a potential for cranes to be put back into service before they're ready or have been properly inspected. The rules need to include criteria for re-inspecting cranes that are moved frequently from job to job. Vancouver, Randy Loomans</p>	
<p>The rules should require inspection to the ANSI/ASME in place at the time the crane was manufactured. Kennewick, Morning, Paul Parish</p>	
<p>The department needs to develop standardized inspection criteria based on manufacturer requirements, ASME, and OSHA. Accountability will be important and the department needs to look at willful and criminal violations. Kennewick, Morning, Dana Morgan</p>	
<p>The department needs to develop and give the inspector written and performance tests and it needs to be a tough program.</p>	

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Kennewick, Morning, Dana Morgan	
The out of service thing, when a crane is deemed out of service, I agree with Dana's comment on the inspection criteria, maybe we want to look at a little window there just by way of impacting the industry, you know, like days or something, get that backup instead of just stop the cement pouring out, you know what I'm saying, that sort of scenario. Kennewick, Morning, Michael Francis	
I think you really need to look at how we load test these cranes. Do we just go to the chart with a minimum weight, in the boom configuration you're in, and go with that? Okay? Because it will be a huge impact on the industry. Kennewick, Morning, Paul Parish	
Part of the tower crane certification process needs to include engineering of the tower crane, including the base. The department also needs to consider whether to require the crane inspector to be present and observe the erection of the crane. Also the standards for the design of the crane base needs to take into consideration the different geographical areas within the state, especially the wind loading. Spokane, Morning, Greg Tesla	
The rules need to include inspection criteria that if there is a deficiency that poses an immediate threat to life or limb, the inspector shuts the crane down. If it's a deficiency that doesn't require the crane to be shut down, there is a time frame in which the owner has to repair the deficiencies or else someone's going to come back and shut down that crane. CDAC covers this well. Spokane, Morning, Greg Tesla	

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<p>We have a number of different cranes. Each one has its peculiar component that needs to be inspected. As an inspector becomes more knowledgeable, he focuses in on these key areas that are the achilles heel of various types of cranes. Whatever we do adopt, it has to be robust enough to cover the subject, but not detailed enough that it ends up being just a simple checklist and we then overlook the overall scheme of the crane and how it's being used. Sea Tac, Morning, Leroy Lamar</p>	
<p>The crane inspection criteria needs to include inspection of things like the pennant cables. Sea Tac, Morning, Harvey Mueller</p>	
<p>These rules need to include the requirement to do daily and the pre-job inspections. There's already supposed to be, pre-shift and pre-job inspections daily and monthly, but we need to have some rules in there that hold people accountable for them. The rules also need to address more frequent inspections for cranes that are moved from job to job. Sea Tac, Morning, Myron Lee</p>	
<p>The inspectors need to have the ability to red tag a crane and what criteria would there be in place to say that this crane needs to be red tagged and how long are the companies going to be given to rectify these problems before their certification is pulled. Sea Tac, Morning, Eric Bellamy</p>	
<p>The ASMEB 30.3 covers pre and post-erection and you need to look at these things while they're apart and the tower cranes I believe that they need quarterly inspections. The rules also need to consider the life of a</p>	

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<p>crane because eventually the metal is going to fail. Also, Cal-OSHA certifies the bolts and the crane and the bolts need to have the same mark on them to be approved. Also, if the inspector says the welds need to be repaired, the inspector should be required to go back to inspect the welds again after they're repaired. Sea Tac, Morning, Gaytor Rasmussen</p>	
<p>I will clarify one thing that Gaytor said, that the finite element analysis is a stress analysis of the entire crane to show what I talked about earlier about stress risers. Sea Tac, Morning, Randy Kent</p>	
<p>The crane inspection criteria needs to include inspection of things like the pennant cables, boom cables and pins. The crane inspections also need to address boom configuration and the sections of the boom that were inspected, whether all sections need to be addressed during the annual inspections. Any welding on booms needs to be done by qualified people who know how to weld on cranes. Mag particle or die pentin testing should be done, especially on tower cranes. Sea Tac, Morning, Lance Gyldenege</p>	
<p>The daily crane inspection forms need to be standardized. Sea Tac, Morning, Dan Madden</p>	
<p>Crane inspectors should be required to review the service that has been performed on a piece of equipment. Sea Tac, Morning, Rob Scherbarth</p>	
<p>Some record keeping clarification would be helpful, particularly for cranes that are leased or rented. Some requirements for notification of</p>	

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<p>when the crane was last inspected, what was found, was it red tagged. Sea Tac, Morning, Mike Vincent</p>	
ISSUANCE OF CERTIFICATES	
<p>In the tower cranes what we do is we have a little printer that I take with me and you print up the sticker that has the certification number, serial number of the crane and the date that you inspected it, and your name. And the nice thing about that is that guys can't change it. If it's a handwritten one you hand out, a person could change some things in it and that can be problematic. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>Have the ability to pull that temporary sticker before the state, I mean, if it's something critical. And that's what I think about the certification process. You need to be able to pull it back and protect yourself from whether it's your engineering degree or your professional certification ability. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>On where the crane certification should be placed, I think it might be a better idea if we looked at some kind of waterproof container that would be outside of the cab, maybe on the cab door for most of the cranes, where everybody can see that you have a crane certification. Now, for tower cranes maybe it could be at the base of the tower crane. I would like to see that not only it have the annual crane inspection in there, but also the certification for the wire rope, because the crane operator sometimes does not have that available to them. They need to know and be able to check when they are looking at denigration of the wire rope, what wire rope they originally had to be able to check that. Also to</p>	

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check on the capacity. Bellevue, Morning, John Stelfox	
I agree whole-heartedly with the sticker and it has to be visible for the operator to see when they walk up so it can be, you know, seen at night, because a lot of these work, but on the crane service side we have to have a written document also, because when we go on the jobsites we have to provide something to verify, and a picture of the sticker is not going to work. So we just got to keep that in mind. Bellevue, Morning, Jim Hopkins	
Previously we used to have a three-page piece. It printed all the way through and the white copy went to the State, pink copy goes on the crane, the yellow gets sent in with the billing. And also, the sticker, are we going to make that into a law? Because at this point they're of dubious integrity, they're a good advertising ploy, but do they really hallmark that the fact that this is the certification right there? Has that been thrashed out yet? Bellevue, Morning, George Jamison	Well, I think the permanent certification that's issued is a Department certification, not one from a certified crane inspector. It will be issued by the Department. It wouldn't advertise anybody's company, it would just say this is a certified crane by the Department of Labor & Industries. Dan's Response
And then us, as certified crane inspectors, would have a package of those and we would write the crane number on those so we could put it on there the day we inspected it? Bellevue, Morning, George Jamison	No. That would be something that will come out after -- the Department was going to reserve the right to review worksheets that come in and that permit would not be issued until after the Department makes a determination after the review. Dan's Response
You don't think 90 days would be a reasonable period of time? Bellevue, Morning, Unidentified Speaker	90 days may be reasonable. That's something that we can discuss. We've talked about 60 days, we've talked about 90 days, 30 days, as low as 30 days. I don't think 30 days is reasonable. Dan's Response
The inspectors should provide the employer/owner with written	

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documentation at the time of the inspection, which lists deficiencies, if any that have to be corrected before the crane goes into service. The 60-90 days later we get the permanent operation placard with the crane serial number and date of inspection. The placard goes in the crane cab and the written document to the home office. Bellevue, Morning, Cam Langevin	
The inspection stickers should be reflective, something you can see 50 ft away with the date of the inspection; like the vehicle tabs. Vancouver, Afternoon, Bill Luisi	
The paper documentation for certification, such as when we do critical lifts, is still important in addition to the sticker for certification. Sea Tac, Afternoon, Thom Sickelsteel	
It's got to have some kind of uniformity so that your inspectors will go out and they know it's going to be left, right-hand side of the windshield or something so they can see that it's worthy. Sea Tac, Afternoon, Randy Loomans	
The certification has to be visible enough so crane operators can see a crane has been certified to operate. Tumwater, Morning, Randy Loomans	
What time frame is the department looking at for issuance of the permanent certificate? Tumwater, Morning, Steve Jouwsma	On that issuance, and that may be something we may need to look at, are we going to require crane inspectors to submit that within a timeline. Right now sometimes crane inspectors are on the road, and we've experienced this in our maritime program, they issue a temporary certificate as well to the operator or to the user of the crane or owner of the crane and we may not get the worksheet for 30 days. Do we want to

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	consider putting a tighter time line from crane inspectors for submitting this information to the department. Dan's Response
The department should set up a system so inspectors can submit the inspections/certifications electronically. Tumwater, Morning, Randy Loomans	
I guess I take issue to the Department being the overbearing provider of a certificate. If you're going to go to the extent of spelling out in harry detail what an inspector must have for qualifications, why is he or she not authorized to issue that certificate? Vancouver, Morning, Andrew Lundgren	Would you like a response? Because the legislature told us to do that. Dan's Response
Is the certification going to have a month and year to reflect when it was certified? Vancouver, Morning, Eric Bellemy	There hasn't been any thought to that, whether there will be an expiration date on -- on the sticker that's placed on there or do we use the expiration date or the date of inspection. And the bill says they're valid for one year. So, that's -- that's one of the issues that need to be worked out. Good point. Thank you. Dan's Response
I want to also clarify why, as somebody that worked on this piece of legislature intimately in Olympia, I want to clarify why we wanted the temporary sticker and why we wanted the permanent sticker for the audience so they understand. The negotiators didn't want to shut down any businesses, so we opted for a temporary certificate. But we also wanted Labor & Industries to be able to house the inspection records so that if we could go back if there's an accident later, we could say this thing was certified and inspected on such and such a date, that you would be the housing mechanism to hold that and to also authorize the permanent one once all the paperwork was satisfied. I think it was absolutely a crucial piece of the legislation and a part that was agreed to	

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both by business and labor. Vancouver, Morning, Randy Loomans	
The certification stickers should go in a window where it's easily accessible. Also, the sticker should have the inspector signature and the date should reflect when the crane is due to be re-certified. And the inspection reports need to be sent to the state. Kennewick, Morning, Dana Morgan	
The process shouldn't deviate from the ASME and OSHA standards. The sticker certification plus the written certification is a good idea and should be kept together. Kennewick, Morning, Paul Parrish	
Stickers will be easy to duplicate unless they are accompanied by the inspection worksheet. They can be kept in the crane log book holders. Spokane, Morning, Greg Tesla	
The documentation could be easily duplicated but a tab similar to car tabs would suffice. Spokane, Morning, Dan Houk	
It's important to make sure cranes have current frequent inspections. Spokane, Morning, Dana Morgan	
The department should develop a system like car fax to track what is done on a crane. There should also be severe fines if a crane is put into operation without a certification. Sea Tac, Morning, Eric Bellamy	

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<p>There should be a standardized sticker or label that goes along with the temporary paperwork issued by the inspector. Sea Tac, Morning, Leroy Lamar</p>	
<p>The employer/owner should be required to keep a container in the crane that has the manual and inspection paperwork so it's easily accessible. Also, there needs to be follow-up on identified deficiencies before a permanent certificate is issued. Sea Tac, Morning, Harvey Mueller</p>	
<p>The employer/owner needs to be required to certify that deficiencies were taken care of. Also, on re-inspection, the inspector should be required to review the prior list of deficiencies and make sure they were corrected. The inspector should also be able to require the employer to provide purchase orders and other proof that the deficiencies were corrected. Sea Tac, Morning, Lance Gyldenege</p>	
OPERATOR EXPERIENCE	
<p>Employers need to have the ability to get operators certified in a timely manner. The definition of "seat time" needs to be clarified as to what that entails. Bellevue, Morning, Dave Houchin</p>	
<p>Operator experience needs to include the time spent as an oiler and time spent just observing the crane operate. Bellevue, Morning, Doug Sellers</p>	

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<p>And also, that's one -- does this include the certification and -- for the cranes and the operators, is this included on private construction? Now -- because boom trucks was mentioned -- and I agree, boom trucks can be very tricky. They don't -- you don't run those like a bigger crane and they don't set up the same and they don't have the same controls, always, as a more expensive crane does and you can get yourself into instances where if you don't have enough knowledge, you can get in trouble. Bellevue, Morning, Doug Sellers</p>	
<p>So when there was a question about seat time, my interpretation of seat time is not driving the truck. Seat time is actually operating the crane. Bellevue, Morning, John Stelfox</p>	
<p>Operator experience needs to include the instruction received from an experienced operator. The journeyman operator should oversee the training and be required to determine when an apprentice is ready to move to journeyman status. Bellevue, Morning, John Stelfox</p>	
<p>Do operators performing maintenance work need to satisfy the operator experience requirements? Bellevue, Afternoon, Greg Habermann</p>	<p>Well, once he becomes certified, we would require it for changing a light bulb would that fall under the construction standard and construction requirements? Is that your question? Or would that be a routine maintenance? I want to be real careful. You know, the scope of it in the definition maintenance of a facility or repair work that restoring it to its original condition or changing of a light bulb we do not -- can put it under the construction standards. If you wanted to split hairs, you could say yes, we're restoring it to its original condition; but in other words, every store that changed its light bulb, every retail establishment that changed a light bulb, that would all</p>

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	fall under the construction standard and I don't believe that's the intent. Boom lifts, scissor lifts, if it's a JLG-type design, a boom elevated platform, they are exempt from this bill. Scissor lifts are exempt from this bill. Rotating aerial devices are exempt from this bill. Dan's Response
I would like to see forklifts included and I'll explain why. The reason for my question is it is my understanding that the highest ratio of incidents and accidents come from forklifts and boom trucks, as was discussed yesterday. Bellevue, Morning, John Stelfox	
Experienced operators should be required to operate boom trucks. Bellevue, Morning, John Stelfox	
The journeyman operator should oversee the training and be required to determine when an apprentice is ready to move to more difficult picks. Bellevue, Morning, John Stelfox	
An English competency test in reading and writing be required before taking any crane certification written exams. Bellevue, Morning, John Stelfox	
I agree that bellmen and signal men or riggers should be CCO certified. Bellevue, Morning, John Stelfox	
There should be operator experience requirements for each type of crane to be worked on. There should be a separate requirement for time actually operating the crane (seat time) and one for time spent around the crane doing set up, leveling off, seeing how it works. Bellevue, Morning, John Stelfox	

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<p>Thirdly, a journeyman crane operator needs to see and check off that the apprentice has met minimum hourly requirements and sign off that the apprentice is capable of reasonably safely operating the crane with an NCCCO certification. Bellevue, Morning, John Stelfox</p>	
<p>Level 5 should be at least 100 hours of seat time. Level 4, 80 hours. Level 3 80 hours. Level 2, especially for boom trucks, should be 500 hours. Bellevue, Morning, John Stelfox</p>	
<p>Most accidents on tower cranes occur during erecting, dismantling, climbing, or any modification. There should be some operator training requirement on these issues, which is not currently covered. Bellevue, Morning, Gaytor Rasmussen</p>	
<p>500 hours for boom truck operator experience is too high and will increase costs for the employer. Bellevue, Morning, Unidentified Speaker</p>	
<p>Level 1 should require some seat time, maybe 40 hours. Level 2, requiring 50 hours is pretty accurate. What you have for level 3 is overkill; 250 to 500 hours are more than adequate (?). Boom trucks between 5 to 40 tons operate the same and you need as much experience for the 5 ton as you do for the 40 ton. For level 5, 500 to 750 hours is more than adequate. UNIDENTIFIED SPEAKER – Is that seat time? Yes. (Gary) And are we still -- a question to the panel. Are we still looking at</p>	

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<p>having a certified operator monitoring this person to get the seat time? Bellevue, Morning, Gary Neil</p>	<p>The answer's yes. That's written into the bill. That would be the way that the seat time would be accrued. Dan's Response</p>
<p>Has the department determined how many certified operators will be needed in the industry going forward? Bellevue, Morning, Gary Neil</p>	<p>That is what we're all here for, and how do we move forward? The question's come up what do we do about operators that have been in the field for the last 20 years. We need to address that and what kind of qualifications do they have in their seat time. We have a whole work force of qualified operators out there right now. We have some that don't belong on the seat. Upgrades, that's where we need to get. Which ones are we going to recognize as qualified operators now? And my recommendation to the industry has been begin documenting any crane experience. You know, employers begin documenting crane experience, operators begin keeping a journal or a daily log of your seat time and what you do with these cranes, because that may become very important when this rule -- when these rules finally come out and the bill goes into effect January 1, 2010.</p>
<p>The department needs to consider that it will be difficult for employers to provide rough terrain crane or boom truck crane operators enough</p>	

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<p>time to get the required hours of experience, because these operators are not operating these cranes 8 hours per day. Bellevue, Morning, Gary Neil</p>	
<p>Sometimes with the rough-terrain cranes you're only actually operating it for an hour or two hours a day, but if you are training somebody, basically what that means is you've got a lot of time that you can be making virtual picks. That is time, you know, during those seven, six hours a day that they can be practicing, and that would qualify for seat time. It's not just when they're actually doing a pick for the crew, but practicing. Bellevue, Morning, John Stelfox</p>	
<p>I wanted to point out that there is a difference between exposure hours and seat time experience. If the experience requirement only considers seat time, it will be difficult for employers to ensure operators get the required amount. The standards need to specifically define requirements for seat time and requirements for exposure. In California, trucks under 5 tons are exempt and, at the national level, testing or certification doesn't exist for articulated boom trucks. Bellevue, Morning, Rob Scherbarth</p>	
<p>There's a statement that says that an operator must pass a drug test. Is that a one-time deal? Is that subjected to random testing? Is that consistent with other standards out there, DOT standards, or just a one-time drug test? Bellevue, Morning, Rob Scherbarth</p>	
<p>The department can't allow cost to dictate whether experience hours are required for certification.</p>	

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Bellevue, Morning, Eric Bellamy	
Experience requirements should include the time spent training or practicing on a crane; it's not just time spent working on a job site. It should also include time spent setting up and breaking down the crane, time spent being around the crane, including as an oiler. Bellevue, Morning, Unidentified Speaker	
Job superintendents or foremen also need training and experience and this should be required in the rules. Bellevue, Morning, Gary Neil	
Just to clarify is that the comment on the knuckle booms in California is in the early days there was a problem there -- not an existing practical exam because they are a different animal, and it has been found that our practical exams will work with the knuckle booms and we are working with the State of California to provide those examinations. Bellevue, Morning, Danny Thiemans	
There should be certification requirements for riggers and signalmen. Also, after the rules are adopted, the department needs to set up consultation services to help employers comply with these rules. Vancouver, Afternoon, Steve Jouwsma	
The department needs to consider that it will be difficult for employers to ensure that crane operators who don't operate cranes 8 hours per day can meet the experience requirements, even of 50 hours. Also, for current operators who have been doing this for a long time, how do we get their past hours considered? Vancouver, Afternoon, Don Guillot	

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<p>Many states have started to move to being exempt from the hour requirement if they have CCO. So if you have CCO, they exempt the hour requirement and that takes the place. Where does CCO fall in this because they no longer have a tonnage capacity requirement? Vancouver, Afternoon, Carry Camacho</p>	
<p>On the operator drug testing, is the department going to require a specific test from a specific entity? Tumwater, Afternoon, Ward Andrews</p>	<p>I believe that right now is the Federal Motor Carrier CDL physical that has to -- that they have to provide at the CCO level before they would be considered. I believe so, yes. And that question could be directed specifically to a representative of CCCO who is here today, Danny Thiemens. Dan's Response.</p>
<p>Operator experience needs to include time on the ground as oilers, riggers, the set up, etc. Tumwater, Afternoon, Ward Andrews</p>	
<p>The lower levels need to be expanded. Also, the entire time spent around cranes, not just operating, needs to be considered as experience time. Tumwater, Afternoon, Greg Milne</p>	
<p>We would also like to see these levels expanded. Such as area of maybe level three could be the 17.5 to maybe 40-ton. On the experience, looking at some of the classroom time that we have as far as our apprentices, maybe that could be considered also as towards their hours. We follow the other comments in that it's not just seat time, it's setup and other experience that they have because that definitely for our workers is not their main job. Tumwater Afternoon, Tracy Harness</p>	

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<p>I represent the International Brotherhood of Electrical Workers, Locals 46, 48, 73, 76, 112, 190, and 970, approximately 10,000 workers, many of whom have used boom trucks that they consider a tool of doing their work. We hope that whatever rules are developed, it would be reasonable ones that recognize the experience that people have had already but also give people an opportunity to get the amount of training and that training can be readily obtainable either through apprenticeship programs or community or technical colleges or schools and at a reasonable cost. Tumwater, Afternoon, Richard King</p>	
<p>Simple hours of experience do not produce a qualified operator. I want to know that that person can navigate a crane load through an obstacle course, that they know how to set up the equipment safely and soundly, and that they're going to have a good safety attitude on the job, and those are the things that are demonstrated through the skills testing and then the qualification period with trained people. This kind of training and experience needs to be considered towards the experience requirements, especially for employers who have training programs that provide this. Moses Lake, Morning, Tom Treat</p>	
<p>The department should consider calling this "crane time," not just seat time. In other words, being there setting it up, being there being in the cab moving it, you know, under the direction of an operator. Moses Lake, Morning, Jim Hopkins</p>	
<p>The crane-related time should be counted towards experience. The NCCCO certification covers the written and practical, and it's a basic</p>	

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<p>starting point, but you still need an hours of experience requirement, which is not zero for any crane. Moses Lake, Morning, Jim Arnett</p>	
<p>We would like to see nothing that says zero hours or no hours; you need to have more than that. Along that same line, we think you have to have more than that to be able to pass the practical exam of the CCO. The standards need to include requirements for riggers, signalmen, site superintendents, lift coordinators, and lift planners. Sea Tac, Afternoon, Thom Sicklesteel</p>	
<p>I agree that signalmen and riggers should be trained. I just don't know if it requires a certification. And maybe we can come up with some graded standard; if you're doing this type of work, you can be qualified by the employer. If you're doing this type of work, yeah, you have to have certification. Sea Tac, Afternoon, Michael Quattro</p>	
<p>One question I have is on a recognized laboratory for drug testing. We're a company that does instacups, so I would like to know if we would be able to keep doing those for crane operators. Sea Tac, Afternoon, Michael Quattro</p>	
<p>We are going to have problems initially trying to get certified operators so we're going to need some kind of roll-out period to give us time to get operators certified. It's going to be difficult to meet this requirement. Sea Tac, Afternoon, Michael Quattro</p>	
<p>As far as operators go for certification, one of the things California does that I like is they have to have a picture ID that they've been through</p>	

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<p>some kind of training. They have to be able to present that when they're ready to operate to their employer, which I think is very useful for us, so I'd like to see something to that effect in our standard also. Sea Tac, Afternoon, Michael Quattro</p>	
<p>Even after an operator is certified, the rules still need to require some sort of site-specific, crane-specific evaluation at the job. Sea Tac, Afternoon, Danny Thiemans</p>	
<p>Just a follow-up question on that because my understanding is this -- we already have to do that; is that correct? I mean, when we put someone in a piece of equipment, legally we're supposed to evaluate their performance on this piece of equipment. Does this standard change that in any way? I'm just wondering why we need to add that to this standard when it's already covered in another standard. Sea Tac, Afternoon, Michael Quattro</p>	
<p>How are we going to document hours of experience that operators already have? The department also needs to ensure that department inspectors are certified and trained to these requirements. Sea Tac, Afternoon, Rene LaRocque</p>	<p>I'll address both of those. I'll start at grandfathering. That's one of the dilemmas and one of the issues that we need to talk about, about how -- we know there's been operators in this industry for years. What do we do about that? If they're members of the union, it's pretty easy. They keep track of hours at the union. This bill also covers non-union, so what do we do in that? Our recommendation to industry right now is get your operators to start keeping a log, keeping a daily journal of what they do, and they can start that now. That's my recommendation. The Department is not going to be keeping a database of operator hours. That is going to be up to the employer and up to the operator or -- to ensure that those hours are documented and that they have something to show that, but the Department -- we made it very clear during the litigation that there's not enough money in this bill for the Department to</p>

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	<p>implement a tracking system of operator hours which would make it basically a licensing organization much like we have for our electricians right now to become licensed, where we track electricians' hours to become a journey level electrician. So if we are not going to do that, how do we do that? That's -- a lot of that is what we need to know. What are we going to require? Now, the other issues on the certified inspector, what -- training our staff. We do send staff to external training. We don't provide the crane training. We've gone over to Local 370. We sent 40 of our safety staff to -- really it's a two-week intensive training on crane theory and then we go back for a six-day training hands-on experience for cranes. So a lot of our staff have been through that. They're all going down to Morrow Crane to do tower crane inspections, both level one and level two at Morrow. So we have looked at our own staff needs and we are addressing that and our staff will be up to speed January 1, 2010, when this bill goes into effect. Dan's Response</p>
<p>I just want to address the issue of grandfathering. And I think Thom will agree with me we looked at this issue very closely in the legislation because we had concerns, too, about our old-timer operators. But then we come to realize that the federal C-DAC document does not grandfather. Sea Tac, Afternoon, Randy Loomans</p>	
<p>So if we've got a crane operator that isn't in the Operating Engineers and they've got 20 years of experience, how are you going to document that? Sea Tac, Afternoon, Rene LaRocque</p>	<p>It will be like having to develop a resume, you know. They need to be able to document the hours and the experience that they've had, the jobs they've had, et cetera and so forth. The manner -- part of what you're getting at, I think, is the manner in which we require the employer to document that experience. So that's -- and we don't know that answer yet. Beth's Response</p>
<p>The rules need to require operators read their operators manual, that</p>	

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<p>supervision makes sure that they do so; the company needs to ensure that happens. Sea Tac, Afternoon, James Mainard</p>	
<p>The rules need to state that for the site-specific, crane-specific testing, that the operator demonstrates the ability to operate the equipment without any assistance or coaching. Operators also need to be able to read. Zero time for boom trucks is preposterous. Sea Tac, Afternoon, James Mainard</p>	
<p>The comment about operators having the final word on a certification, I agree halfway that that's appropriate because the operator has the onus to make sure that he's operating a safe piece of machinery but it needs to be reasonable so we're not stopping production because the cigarette lighter or the windshield wiper doesn't work. Sea Tac, Afternoon, James Mainard</p>	
<p>Boom trucks should not be exempt from the hour requirements. Sea Tac, Afternoon, Randy Loomans</p>	
<p>I am astounded at the number of people in the industry in the seat, even, and in charge of people who are in the seat that don't know the difference between a lift and a critical lift. And I'd like to see some type of address made to that somewhere in this bill. Sea Tac, Afternoon, James Mainard</p>	
<p>I would think the most complicated cranes, the cranes that require a tremendous amount of knowledge is where you should really set your experience levels. A boom truck is pretty fail-safe if you set it up properly.</p>	

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Spokane, Afternoon, Wayne Gibson	
Very few operators operate a crane all day long and it will be problematic for these employers to meet a large hour requirement. The department should consider expanding the various levels to break them down to even a smaller degree, and then to make sure that each of those is matched with certification requirements, and, more importantly, experience requirements that are commensurate with the size of the crane, or the boom truck, and the degree of difficulty in operating that safely. Spokane, Afternoon, Kate McCaslin	
It is going to be critically important that the department figure out a way to capture hours that have already been worked, figure out how to do a short grandfathering time for people who already have hundreds of hours of operating experience. Spokane, Afternoon, Kate McCaslin	
It could likely take 2 to 3 years for an operator to get 2000 hours of experience. So, with our ever shrinking workforce I think a competency-based testing certification is going to be far more important than any hour requirements. Spokane, Afternoon, Shane Miller	
Performance-based testing and certification should be more of a trigger than time in the seat or time operating. It should be up to an employer to determine if an operator is not able to perform the tasks. Spokane, Afternoon, Shane Miller	
Operators already in the industry should be grandfathered from the	

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<p>hours of experience if they can provide proof of meeting the experience requirements through a resume or a letter from their employer/prior employers. Spokane, Afternoon, Greg Teslia</p>	
<p>Our cranes fall somewhere between the level one and level two, or level two and level three. The responsible people at our company, for instance, have always insisted on crane certification but realize that experience goes beyond certification. You know, our investment is huge. Our liability is huge. Tumwater, Morning, Stan Dickhoff</p>	
<p>Our truck drivers that are also the boom operators may get two to three hours a day. When you hear hours of level three of 500 seat hours to become certified, this could take two years to satisfy. We want to make sure that our present drivers are given credit for experience they already have and how do we do that? We agree with the level one, zero hours. Level two, 50 hours seems reasonable. Level three, though, 500 hours seems excessive. We're thinking more of 80 to 100 hours of seat time. Experience time also needs to include setup and tear down and time spent practicing in the yard. Tumwater, Morning, Dave Houchin</p>	
<p>We need to look at what other people have done in the industry to train boom truck operators to find out what it is these people need to know and be able to do to safely operate the equipment. But for them to just be able to go out and show up and think they can operate a piece of equipment in ideal conditions is not good enough. Tumwater, Morning, Randy Loomans</p>	

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<p>I do not recommend zero time for level 1, and even the hours of level two should go up, just that fact that 50 hours, just about a 40-hour workweek, that really doesn't say much for experience Tumwater, Morning, Todd Mickleson</p>	
<p>I think that the Department really needs to speed up the operator certification piece. To put that out to this late in the rule making process is going to give very little time for these owners and operators out there to ensure that their folks will be ready. So putting this out another year, it might be too long. Tumwater, Morning, Randy Loomans</p>	
<p>Does the department have proof that most of the accidents happen on boom trucks? Tumwater, Morning, Dave Houchin</p>	<p>Only anecdotally. And we don't track the crane by size. In fact, it's probably just a material handling device is how it would be coded in our system here so we would have a real difficult time to identify the capacity. Coming out of the industry, you know, construction industry, booms trucks were on the ground, you know, my own experience, a lot more tipovers on the boom trucks than larger cranes and those type. But we have a lot more boom trucks operating out there than we have big cranes. So it would make sense if we have more of them operating there may be more. Plus, they're operating closer to their capacity with every pick than the larger cranes so there's a lot less room for error on your small boom trucks than there are with the larger -- larger cranes. Dan's Response</p>
<p>So the thinking is since we -- it's more of a seat of the pants type of feel that we feel that there's this problem with truck-mounted boom trucks, not a quantitative number. Tumwater, Morning, Dave Houchin</p>	<p>It's a very difficult number to get a quantified exact number of the accidents. I don't know if there's any other organization out there that tracks them. I have a gentleman behind you shaking his head there is. Dan's Response</p>
<p>The National Institute of Occupational Safety and Health, the Spokane</p>	

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<p>laboratory, conducted a study that was broken down by crane type that looked at all the crane accidents nationwide. And a copy of that study would be available through the Spokane office of NIOSH and anybody can call and request that. The study was conducted by Dr. Kittusamy, K-i-t-t-u-s-a-m-y. And I believe if you contact the laboratory over there they would be able to provide you with the study. It's very comprehensive, it's pretty large, but it breaks it down overhead cranes, power cranes, mobile cranes, that sort of thing. Tumwater, Morning, Danny Thiemens</p>	
<p>How are the hours accumulated? Is it just seat time? Only observation time? Or does it include classroom time? Would it include exposure to oiler and/or riggings? There's quite a few questions and again, the suggestion is having an ad hoc committee so these type of questions can be ironed out. Vancouver, Morning, Brian Clarke</p>	
<p>On multiple crane job sites the communication is huge and it should be established that between the apprentice and the journeyman operator that a single radio line be established between the two. If you have six cranes on a job site, there's a lot of overtalk and the communication gets cluttered. And another thing is where is that operator going to be located to actually give input to the trainee? Vancouver, Morning, Brian Silbernagel</p>	
<p>I applaud the State for taking this action. I think it's long overdue. I appreciate that you're doing this. I would question the ongoing certification. Will it be required on an annual basis for operators? Will there be some ongoing education requirements? And will they have to retest to the NCCO?</p>	

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Vancouver, Morning, Larry Zaback	
I guess the first questions I have is -- or comments, is on the levels and hours, and it is in the bill that you have to have 2000 hours, I mean that's mandatory. So on this list you have your Level 1, 2, 3, the way I read the bill everyone has to have 2000 hours, irregardless, right? Kennewick, Morning, Paul Parish	There was -- let me clarify that. Initially when that bill was drafted it was -- it did say just like you said, 2000 hours across the board for anything. There was negotiation amongst the committee members that we're working with the legislature to put the words "up to 2000 hours." Chuck's Response
I think this is upside down, and you're exactly right on your comment before, that most of your accidents are in smaller cranes, especially boom trucks. Kennewick, Morning, Paul Parish	
When it comes to documenting the experience and saying what experience counts, it's a difficult thing. I think we make that experience available to the people who hire those operators and let them determine whether they think that level of experience for someone who is past the state certification test is acceptable to them. Kennewick, Morning, Dana Morgan	
We should also have some form that those people can update their experience annually within the system, and the state should have a standardized employee evaluation. Kennewick, Morning, Dana Morgan	
There may be some instances we want to consider adding an on-the-job equipment-specific, on-the-job evaluation. Kennewick, Morning, Michael Francis	
Mr. Hyatt wanted me to go on the record as if he is in support of the bill	

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<p>with the understanding as with the experience area the operator needs to be visited very closely, and along with the load testing requirement, he concurs with the testimony you've heard this afternoon, but he will be available to work on the bill, and will support it in its entirety. Kennewick, Morning, Danny Thiemens</p>	
<p>How are we going to document hours of experience for operators who have time running different types of cranes? Also, how are we going to document experience hours for the mechanics that service the cranes? Spokane, Morning, Kevin Buzzell</p>	
<p>The experience levels should be expanded. The Level 3 time should be reduced to 200 hours. Then there's a big jump from a 17-and-a-half-ton in Level 2 with 50 hours, and then a 25-ton with 500 hours when there's not much difference in operation between the two. Experience should include setup, not just seat time. Also, it's going to be difficult for us to document the hours of experience. Spokane, Morning, Kirk Hayfield</p>	
<p>"Must demonstrate ability to operate equipment." My question is to who? Who do you demonstrate that to? Spokane, Morning, Dan Houk</p>	<p>I'll go ahead and address that. That was one of the issues that was left off that document, and we apologize for that. In our e-mail it also said that not only is the certification required, plus the hours of experience, but an employer would also be required to ensure that the operator is competent and capable of operating that type of equipment they're assigned to operate on. Dan's Response</p>
<p>The difference between going from a Level 2 to a Level 3, from 50 hours to 500 hours, is a big jump. I was thinking 16 hours would be about enough time along with that two-day certification course where</p>	

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<p>you learn the rigging, learn the load charts, and those kinds of things, and that might be a two or three-day program, after that the actual hands-on 16 hours seems adequate. The jump between level 2 and 3 is too big. Spokane, Morning, Dan Houk</p>	
<p>People who have been in the industry should be grandfathered. Spokane, Morning, Dan Houk</p>	<p>I want to follow up on that, and that's like the second comment that we've heard today about the grandfathering in all our experienced operators on the job. Something that I've been saying at each one of these hearings is my recommendation that you as employers, you as operators begin to keep a log today of hours of experience that these operators are getting. The department is not going to be tracking the hours of experience, that's going to be up to the operator employer to ensure that those hours of experience have been tracked, and although there is no requirement in the current rule to do that, it will definitely help the transition as we move into the requirement where we are going to require that if that documentation is already done. Documentation requirements do not start after the bill goes into effect, we need to document those hours of experience now. Dan's Response</p>
<p>Whatever type of equipment he has, his job description is to drive that truck and operate that crane that's on that piece of equipment, so the total time he's employed by that employer should count. I just say follow what the NCCCO has, they have great qualifications. Spokane, Morning, Greg Teslia</p>	
<p>We hire a lot of operators out of the Hall, and the question I've got is how are we going to track their hours? And I hear somebody say, "Well, they already keep track of them." In all honesty, operators are not great bookkeepers, to say the least, so I'm concerned about that. Spokane, Morning, Tom Landwehr</p>	

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<p>75, 80 percent of the accidents involve small cranes. So I would think common sense would dictate that they have more hours before they get certified. Spokane, Morning, Jim Arnett</p>	
<p>The hour service is a difficult thing to track and document and, you know, really I think we need to put that back on to the company that's hiring that individual to establish an acceptable crew and evaluate the operator to determine if his experience is acceptable. Spokane, Morning, Dana Morgan</p>	
<p>Maybe rather than worry about the tonnage of the crane, you need to more address the type of the crane. Spokane, Morning, Kevin Buzzell</p>	
<p>NCCCO has a good breakdown of what they use now for the categories of crane, because there's so many different models, the basic categories they do a great job on, I think that would be a great acceptance for the state to take that stance. Spokane, Morning, Dana Morgan</p>	
<p>I don't see physical requirements that we already have under OSHA, you know, that you have to have a certain eyesight requirements, and can't have a history of heart problems or seizures, I mean would that still apply with this? Kennewick, Afternoon, Mike Mitchell</p>	<p>I can answer some of the questions on the medical requirements. One of the things that Danny Theimans gave me, a member of the NCCCO gave me, is about the certification card, and it says right on here, since they're the only game in town to get certified, currently, I can tell you what they're saying. It says that this certification card is valid only in conjunction with the current DOT or an NCCCO medical certificate. There is a form that they have to fill out, and they have the medical requirements on their web site you can check out. That's in reference to</p>

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	the medical questions that you were asking about. Chuck's Response
I don't think you need as many levels as you have in there. Kennewick, Afternoon, Mike Mitchell	
Some provision needs to be placed in rule so that folks inspecting or doing repairs on a crane do not have to meet the experience/certification requirements. Sea Tac, Morning, Myron Lee	
Level 1 needs to have some experience requirement. Sea Tac, Morning, Harvey Mueller	
I think the table is quite reasonable for most of our use, municipal government. I am curious about how training equates with experience. Hands on training should count. Sea Tac, Morning, Ken Bailey	That's a boom truck with standard controls on the side of the truck. That's correct. Dan's Response
The non-rotating, articulating boom trucks should definitely be excluded. Under 6 tons, 5 ton, they're under 6,000 pound capacity. Boom trucks, level two, there are many 21-ton boom trucks out there that systematically physically are not different than a 17-ton boom truck, a National 800 D versus a 600 D, and there's no difference, sort of an arbitrary number; a boom truck non-rotating is a boom truck non-rotating. The chart also doesn't address self-erecting tower cranes and 2000 hours experience for these is economically unfeasible. Also, who monitors the hours and who is going to validate the experience? Sea Tac, Morning, Rob Scherbarth	
No time for level one is ridiculous. Also, what constitutes operator	

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<p>experience, there's more than just seat time such as site prep, that needs to be considered. Sea Tac, Morning, Jeff Peterson</p>	
<p>There are ways to get valid experience besides operating a crane such as being a bellman. This experience should count towards the requirement. Sea Tac, Morning, Gaytor Rasmussen</p>	
<p>We'd like to see all cranes and boom trucks up to 17.5 tons have 500 hours of experience. And then the second one we'd like to see our level two would be 17.5 to 50 tons and quick towers have a thousand hours of experience, and then 50 to a hundred tons 1,500 hours, and over 100 tons, all crawler cranes, all truck cranes, and all the rest of the towers 2,000 hours. We'd like to certification requirements for riggers also. Sea Tac, Morning, Eric Bellamy</p>	
<p>I don't see here is a delineation between the types of cranes. The training needs to be from somebody who's had time on that machine who can catch swing. Sea Tac, Morning, Dan Madden</p>	
<p>I'd like to see some type of mandatory retraining or class or recertification of that operator after an accident and a clear definition of what an accident includes. Sea Tac, Morning, Ben Randazzo</p>	
<p>Under these crane operators I think that there should be an educational requirement, so many things could go wrong and with no education and if you couldn't read or write, I don't think you should be running a crane, especially if you don't know anything about math,</p>	

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Sea Tac, Morning, Harvey Mueller	
The other thing, is there going to be some kind of health criterion? Sea Tac, Morning, Harvey Mueller	
No hours for level 1 is ludicrous. Whether it's apprenticeship, self-training, in-house training, whatever the case may be, there needs to be some training. Sea Tac, Morning, Mark Wagar	
We've come to the conclusion the proof is in the practical exam. But certainly does that make it the end all, and that CCO certification card, does that make him an expert on every crane that he's ever going to go out and be on in his occupation, certainly not. So some of this, I think that we have to realize has to be passed on to the employer and there needs to be site-specific, crane-specific examinations or -- by the employer or evaluations at the very least in the field. Sea Tac, Morning, Danny Thiemens	
There needs to be certification or experience requirements for the riggers. Sea Tac, Morning, Dan Madden	
We're talking about the size of cranes as well. So the size of the crane is not relevant to its stability -- well, it is, but, I mean, not in terms of operator experience. That experience is critical. You can't put a carpenter in a crane or laborer just because it's a small self-erector. And that's what happens. Sea Tac, Morning, Gaytor Rasmussen	

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<p>As we get into the certification requirement, we are going to have to be very careful that a lot of people will be sending people to do this test that aren't experienced enough to operate a crane. Sea Tac, Morning, Randy Loomans</p>	
<p>Is the department going to grandfather the journeyman level operators? Sea Tac, Morning, Jeff Peterson</p>	
<p>OPEN FORUM</p>	
<p>Cranes have come a long way, of course, from the old days 30 years ago. We're looking at a lot of new alloys and we are told that they can't -- they're not overbuilt so they can't do the same things as they used to. However, there are still crane operators that are side loading cranes, some crews and companies are pushing them to side load and/or overload the cranes, or to disable or override the crane computers using guitar pics or other tools to hold the overload or the override buttons in the "on" position. Bellevue, Morning, John Stelfox</p>	
<p>The department should include certification/experience requirements for the riggers, bellmen, and signalmen. My interpretation of reading Z is that a rough-terrain crane that is capable of picking a hundred tons should not be exempt and I would like to see that clarified. Bellevue, Morning, John Stelfox</p>	
<p>Our primary issue and a concern here is not necessarily with the details in these rules and regulations, but one of scope. In particular, on page 2 in the definition of "construction" the final sentence reads, "Construction does not include manufacturing facilities or powerhouses." That seems</p>	

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to be a little bit vague and nonspecific. Bellevue, Morning, Steve Johnson	
Our concern there is that we would really like to see the terms "occasional" and "routine" maintenance defined very, very specifically so we can distinguish that directly from the definition of "construction." Bellevue, Morning, Steve Johnson	
I would like to make sure that in the rules that there is a clear definition and that the rules are written so that they reflect the difference between self-erecting tower cranes and conventional hammer head tower cranes. Bellevue, Morning, Mike Heacock	
The adoption of C-DAC into our program I think would be an exceptional way to go as we agreed that we were going to do. But I also assumed that we were going to have ANSI and ASME standards involved in this, not just sections or parts of it to fill in the bits and pieces where C-DAC is lacking but maybe the adoption of both -- or all three parameters together. Another avenue, as has been discussed, is to look into how Cal/OSHA has implemented their program. Vancouver, Afternoon, Steve Jouwsma	
I'm not sure if you're aware. The CCO has created a task force for signal person and for riggers. Vancouver, Afternoon, Carrie Camacho	
I'm the training director with Northwest Line Apprenticeship -- I checked with my counterpart in -- runs the Cal-Nevada program, Armando Mendez, and they have been working under the California plan. And I asked him today on the way up, I said, "I'm going to a	

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<p>hearing on the new proposed Washington rule. And if you could change anything, what would you change?" And he said, well, one of the things is working with the NCCO when we're going to put on a class -- I mean a test is that we have to have all the information about the people that are going to take the test within 30 days and so there's quite a bit of information collecting that goes on from the individuals and getting them to fill out the paperwork and getting it on time and then scheduling the tests. And then he also mentioned the cost. He's spending about \$1,500 a person to get people through the training, through first they provide a week-long class for the test and then providing the testing, setting up the test and all that type of stuff. So there's -- they're bringing in an instructor from outside the state and quite a few -- there's quite a bit of cost in that also. It's so rigid, it's very inflexible if somebody can't make the test so. . .</p> <p>Tumwater, Afternoon, Bill Stone</p>	
<p>We may have to look at the issue of load testing. There are some real concern taking these cranes over capacity, to have them load tested when we've come to find out that when a crane's been in use for a long time, they actually declassify it, bring it down to a smaller load because they don't want it to be overtested.</p> <p>Tumwater, Afternoon, Randy Loomans</p>	
<p>Just a clarification, you were talking in September that you were wanting a draft on the maintenance inspection part of the deal on that -- and that's going to be an open forum similar to what this is once it's out?</p>	<p>That's correct. It will be an open forum, so once we have the rule drafted we'll send it out to the stakeholders, and we have a pretty extensive list of interested parties, to the extent that your names are not on our stakeholder list, and you signed in today, we will add them to our list, so you will receive notification, and the draft rule will be sent out via e-mail for everyone to review. Once we know the exact schedule or dates for the additional stakeholder meetings we'll also send an e-mail</p>

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<p>Just what kind of ideas are you guys talking about on that? Is there anything that's kind of out there right now as far as guidelines for that, or -- I mean what we got here is kind of what the legislature is talking about, it is kind of -- maybe this is more of the word part --which I probably should have spoke up sooner -- what kind of guidelines are being thrown around out there? I mean, just different ideas.</p> <p>Moses Lake, Morning, Jeff Abersfeller</p>	<p>out and post that information on our web site as well.</p> <p>Beth's Response</p> <p>Well, we have taken a look at California OSHA -- the California OSHA rule, the certification rule for their inspectors. Is there one in CDAC? Not for the certification of -- or accrediting of inspectors, it's not in CDAC, so -- we're looking around the country to see what other states have done for accrediting inspectors, setting up the program, there are some -- Cal OSHA has got some great stuff on the accrediting of inspectors, we may be looking at that as a starting point for drafting our rule, but we don't have pen and paper -- we have not put pen to paper yet on any draft rule, that's -- I mean we wanted to get all of these stakeholder meetings in before we began that.</p> <p>Dan and Beth's Response</p>
<p>When the bill first came out there was some language in there about being an outside inspection, and obviously that's been turned around, so the consensus is now that being a utility, or a business, or whatever, if you had something that met the certification criteria you could do your own annual inspections on your cranes, is that still the intent?</p> <p>Moses Lake, Morning, Jeff Abersfeller</p>	<p>That's correct. There was a section in the bill initially written that required a third party certification, and through the negotiation with business and labor during the implementation or the writing of this bill they actually removed the third party because there were some manufacturers like Lampson that do look at their cranes, and they feel that they ought to be able to certify themselves, but they still have to follow the accreditation process, right.</p> <p>And I'd like to say, too, just because third party was removed from the bill does not mean that we would not be looking at some other aspects like, for instance, if you make a repair to the crane you would not be able to do the certification process and vice-versa.</p> <p>Dan and Chuck's Response</p>
<p>There needs to be some kind quality control trigger.</p> <p>Moses Lake, Morning, Gary Lynch</p>	<p>We need to do something, we won't writing third party into the rule, but I think we need to look at some parameters so that it would provide some control and some protection to the employees working around, and the public working around these cranes, or being around these</p>

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	cranes. Dan's Response
<p>Just a suggestion to throw out there --A lot of the talk with some of the events that's happened here recently with a bucket truck on the utility rule was maintenance programs and maintenance policies. Moses Lake, Morning, Gary Lynch</p>	
<p>At the conclusion of all your meetings will anything be coming out that says this is what we heard from the group? Moses Lake, Morning, Tom Treat</p>	<p>We will be making or creating a document that outlines the comments we've heard on the four topic areas, and then general comments during the open forum, and we haven't discussed specifically whether we'll send that out to stakeholders, or would it be available to those who requested it. I mean certainly it will be able available to those that request the document, and we'll consider whether we should just simply send it out to the full list of stakeholders.</p>
<p>I guess one of my concerns along this whole process is how do we get from point A to point B. What I'm really concerned about is the industry impact and how we educate. The department will need to be prepared to provide some consultation to help employers comply with these rules. Sea Tac, Afternoon, Thom Sicklesteel</p>	
<p>Is the department going to impose requirements for the erection crews? A lot of accidents and fatalities happen during erection. When tower cranes are jumped up, there should be a factory technician present at that time. Spokane, Afternoon, Greg Teslia</p>	
<p>There needs to be NDT testing for equipment 20 years or older, by the employer, and the inspector needs to look at this documentation during</p>	

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<p>the inspection. Spokane, Afternoon, Greg Teslia</p>	
<p>If you ask any crane operator in the industry across the nation what the biggest problem is, he's going to tell you it's a signal man on the job site. You need to have qualified personnel flagging that crane. They also need to have proper training. Spokane, Afternoon, Greg Teslia</p>	
<p>There's no question that you need to incorporate the ASME B30.3 and the B30.5, and use the most current up-to-date standard. The CDAC is a wonderful thing, but it doesn't have everything in it. It has a lot of great verbiage on what to and what not to do, but still isn't the answer to everything. Spokane, Afternoon, Greg Teslia</p>	
<p>We do accept NCCO as being previously qualified. But even after they come on site they must do an on-site evaluation on the exact equipment to be operated. We need to track experience but we need to allow for the owner of that equipment or the employer to determine whether that level of experience is sufficient for the activity. Our operators and our riggers are all qualified inspectors on site and they perform those inspections; they have to pass written performance tests just as our crane operators did to be a qualified inspector. If an inspector finds that crane out of service, it's out of service until that issue is resolved one way or the other, either repaired or reviewed by a technical authority to determine that it was indeed. We require in the Hanford site you can be a licensed engineer but you better have experience in the hoist and rigging industry before you make those decisions. Tumwater, Morning, Dana Morgan</p>	

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<p>We need to include certification/experience requirements for riggers and signalmen. Tumwater, Morning, Steve Jouwsma</p>	
<p>I strongly encourage the Department to develop or have a consultation service similar to what Cal/OSHA uses for employers or individual operators if they need to call and ask for some guidance, because everything is open up to interpretation at times and needs some clarification, so we have some type of department that we can go to for this. It would be a great help. Tumwater, Morning, Steve Jouwsma</p>	
<p>Are we going to require -- as far as the crane inspector certification, are we going to require our mechanics and/or inspectors to be crane operator certified? Maybe not have the practical side but at least pass the written test using, if we could, the CCO test. Tumwater, Morning, Steve Jouwsma</p>	
<p>The department needs to put together an ad hoc committee to assist with development of these rules. Vancouver, Morning, Brian Clarke</p>	
<p>I represent the electric utility. It's a water utility as well. And although there's an exemption in the bill for electric utilities, it is extremely narrow. The exemption as described was much better than the bill describes it. Water utilities are not mentioned at all in the bill and will an exemption for this be included in the rules. Most of the states that have crane certification and operator certifications in place set some size threshold in their definition of cranes, whether it's 14 tons or 17 tons or</p>	<p>The ANSIs and ASMEs don't apply to most of your booms set at 1 ton or less. This bill and the C-DAC document does not have a weight or capacity written into it. Whether we can put that in the rule, that -- when it's not in the scope of the bill, that we're not sure of so -- and that takes a little wiggle of interpretation. Dan's Response</p>

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<p>whatever. And that is absent from the bill. Will that be in the rule making down the road. Vancouver, Morning, Andy Huck</p>	
<p>You know the language for utilities as far as the poles and equipment, is that specific to the C-DAC document? What about the -- any comment on the water utilities? Have you heard comment in the process from them? Vancouver, Morning, Andy Huck</p>	<p>When the work of performing with these specially designed cranes is -- falls under Chapter 45, which is the high voltage, that we would not be applying it. But if the work they were doing falls under the construction standard it would apply. Well, all excavation is considered construction so if they're digging in the ground and they're putting stuff in that hole with a crane it's covered. Dan's Response</p>
<p>As we all know, these meetings are held all around the state. At the end of all of these sessions are you going to compile a list with all of the ideas that have been brought up so that everyone here can hear what was brought up at the other meetings? Because there was a question by one of the people here that was asking about the hour requirements for the different tiers of cranes and the Operating Engineers have a very specific guideline that they would like to see and I'd just like everyone there to see that too. Vancouver, Morning, Eric Bellemy</p>	<p>Yes. The intent at this point, what we normally do after we hold public meetings or receive comment on rule making and what we're intending to do with this process is compile a document that outlines comments received on, you know, each particular area and that would be available to the public, yes. Beth's Response</p>
<p>The department will need to define what constitutes a nonstandard base because to us in the crane industry, there are many support systems that are not considered nonstandard. There needs to be some criteria for the qualification and selection of the plan peer reviewer. We need to identify whom the review acceptance report will be submitted to. And the rules will need to clarify who is responsible for the selection of the engineer, the employer or the crane owner? It will also be helpful to have some criteria which states the objective and the extent of the plan peer review and there needs to be a mechanism for resolution of the plan</p>	

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<p>peer review disputes. Engineers will also need education and training on tower cranes and tower crane bases. Vancouver, Morning, Michael Quinn</p>	
<p>How much research has been done on a national basis or even international to determine from a root cause analysis exactly what caused crane accidents to occur. Knowing from a root cause standpoint what has caused crane incidents to occur, if that data is collected, then we have more of an ability to direct our concerns and even our rule making in this state toward the specifics that can prevent these accidents from occurring. Vancouver, Morning, Randy Lovell</p>	
<p>I'm just curious about the time frame, is it pretty well established that it will in fact take 2 years to get to the final rule for the crane -- crane rule, construction crane rule? Kennewick, Morning, Michael Francis</p>	<p>It's not unusual for rulemaking to take that long, particularly when we have as many stakeholder meetings included in the process as we have planned for these rules. It's not at all a small undertaking to draft a set of rules, and from the time we file our rule proposal, which is on the draft timeline, it's the CR102 filing, that process typically takes 6 months. So, yeah, it's unlikely that he would be able to move the rulemaking process along anymore quickly than what's said here on paper. Beth's Response</p>
<p>Being an engineer does not necessarily qualify you in the rigging world, and so we need something to have accountability there, too. I'm also not in favor of grandfathering; just because you've been in the industry for 20 years doesn't mean you've been doing things correctly. Kennewick, Morning, Dana Morgan</p>	
<p>I own 50 cranes, do I train the crane inspector and he works for me, or does he have to be independent from my company, the same as we do in the industry now? I mean a lawyer will tear you apart on the stand in</p>	<p>During the negotiation of the writing of the bill they did initially have the requirement in there that it be a third party inspector, but through negotiation they took that out, and at this point we're not anticipating</p>

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<p>that situation, but what is the state's take on that? Kennewick, Morning, Paul Parrish</p>	<p>making that a requirement in rule, so it would -- an employer would be authorized, or a crane manufacturer would be authorized to employ an in-house inspector. Now, in terms of accountability we might want to look at something along the lines of having a rule that the inspector that inspects the crane cannot be in any way involved in the repairs, if any are identified, something like that for accountability, and some separation. Beth's Response</p>
<p>The one thing that the state has going for them is that there are several crane companies in the state that have been around for years and years and years, and that tells you that they're doing things right, and they're doing things responsibly, so, you know, call on them to, you know, find out what they do, investigate it, and I think you'll find that will make the whole road a lot easier to get to where you want to be in the end. Kennewick, Morning, Jeff Abersfeller</p>	
<p>And just to let you guys know, that Fluor, and the Hanford site, and DOE is available to support in any manner, you know, without any cost to the state, in the development of any of those standards, including the documentation that we use, and some of our documentation that is adopted by the Department of Navy, and other things, so, you know, we spent a lot of federal dollars in the development of some of these programs, and not that they should mirror ours, but certainly like any of the other requirements out there, use them as a basis for development, if we can provide you any of that that we currently use, that's available to you. Kennewick, Morning, Dana Morgan</p>	
<p>Could we also have a compilation of the considerations that the state or L & I is going through on each of these subject matters? Kennewick, Morning, Jeff Abersfeller</p>	<p>What we typically do when we are going through a rulemaking process is we develop what's called an analysis document that compares to the extent there are standards that currently exist, it sets out what those</p>

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	<p>standards are, you know, on an item-by-item basis, the proposal that we're looking at and any recommendations that have been made whether it's internal or external on changes or amendments. So what I can envision possibly occurring, for example, would be we would take our current crane rules, I'm not sure we're going to do that, but we would take, for example, the CDAC document and line that out, have a comparison with, perhaps, ANSI and ASME, that's lined out, and then additional recommendations so that there is -- you could see the thought process going into what we end up developing.</p> <p>Beth's Response</p>
<p>How is the department going to ensure that the standards adopted in WA will meet the OSHA requirements ultimately adopted? Spokane, Morning, Kirk Hayfield</p>	
<p>There needs to be some experience required for level 1. Kennewick, Afternoon, Mike Mitchell</p>	
<p>Are they going to -- excavators do a lot of lifting, too, there's a lot more accidents probably in excavators, if you kept track, so are they going to do something with the excavators? Are they training operators there, or regulations, if it's craning? Kennewick, Afternoon, Dennis Poland</p>	<p>If you notice there in the exemptions of that bill it actually exempts the earthmoving type of equipment, excavators, et cetera. I know that in the current rule we actually cover them, we have a section in the 155 that talks about them when they're being used like a crane when they tie a sling up to it. In this bill here, it tells us that they are exempt.</p> <p>Chuck's Response</p>
<p>It's very sad that a knee-jerk reaction creates a law that -- it's going to create a lot more enforcement that's unnecessary. If you want to crack down you got to start cracking down at the rental yards first. Kennewick, Afternoon, Dennis Poland</p>	
<p>A quick question. Well, these minutes be posted on the L & I web site? Kennewick, Afternoon, Frost</p>	<p>Yes, we're going to compile the comments that we've received throughout the state, and we'll put it in one document, and we'll either</p>

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	<p>post it to the web or e-mail it out. There was a mention about wishing these documents had been available earlier, and I do want to point out that on our web site we do have a number of documents posted to that web site in the crane safety link, and it includes the legislation that we talked about here today. So I just wanted to point that out, and, again, thank you for coming out today, we really appreciate it.</p> <p>Beth's Response</p>
<p>Mag particle testing or die pennant testing are useful tools. But most of these cranes have stress fractures which are not into the metallic cracking so they're not relevant. So it's important that if you're going to use those tests that they're used properly; you remove all the paint and you're not going to be able to remove all the paint without having corrosion, the crane's up, and it becomes a problem. So requiring certain NET tests is not necessarily going to be the way to go. I think you need a materials engineer to tell you if it's good or not.</p> <p>Sea Tac, Morning, Gaytor Rasmussen</p>	
<p>We run articulating cranes, mobile cranes. All of ours have been converted to remotes now, so is that considered under level one because it's non-rotating, the operator is not on a fixed, you know, where does that fall into? Level one, level two? He has the option to get up on the seat and move around, but we are operating from a fixed point, I guess.</p> <p>Sea Tac, Morning, James Singleton</p>	
<p>Will the rules require English proficiency and the ability to read and write? We have many Hispanic operators that do not read or write (we do oral testing) but they can operate the cranes proficiently.</p> <p>Sea Tac, Morning, James Singleton</p>	
<p>I think it's a good idea to require certification/experience for riggers and</p>	

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<p>signalmen. Sea Tac, Morning, Mark Wagar</p>	
<p>All of you want to keep an eye on C-DAC, which is your OSHA standard that was put together by that committee, Cranes and Derricks Advisory Committee, and they did have a scope of that. And in that particular document it does call out for rigger experience. I think the word's going to end up being certification. I think as you move forward, you want to make sure what you do has validity and reliability; that what you do, whether it's the inspection end of it or it's in the crane operator side of it is that you're not just taking a look at CCO, but you're looking at an exam that is valid and fair for everybody that takes it for both the written and the practical exam. Sea Tac, Morning, Danny Thiemens</p>	
<p>Isn't there any type of way that it could be put in that to within so many years that this can be revisited and corrections made to it, because we will make mistakes in doing this, not everybody will be satisfied, and we will learn things as we go along, and the industry will change. Sea Tac, Morning, Lee w/Arcxis</p>	
<p>The rules need to address training for the site competent person. Sea Tac, Morning, Doug Smith</p>	
<p>The rules need to address airlift telescopic booms, which are being used a lot now in lieu of boom trucks. Sea Tac, Morning, Mark Wager</p>	
<p>The training, whether in-house or third party, needs to be specific to the</p>	

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types of cranes that will be operated. Sea Tac, Morning, James Singleton	
The rules have to have enough teeth so if a crane is approved and certified by inspectors and it proves to be defective, there are severe consequences. Sea Tac, Morning, Randy Loomans	
It would be helpful to require in rule the use of signal decals on the sides of cranes. Sea Tac, Morning, Harvey Mueller	
On the level 1 training, we should require the employer to certify that the operator is qualified to operate along with the required certification test. Sea Tac, Morning, Greg Milne	