## OSHA STANDARD INTERPRETATIONS

OSHA requirements are set by statute, standards and regulations. Interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. Enforcement guidance may be affected by changes to OSHA rules.

## Regarding assembly/disassembly and set-up for cranes and derricks in construction

Standard: 1926.1403-1926.1406 Date of response: Oct. 15, 2014

**QUESTION #1:** The term "assembly/disassembly" is used in 1926.1403 through 1926.1406 for requirements particular to assembling and disassembling (A/D) the equipment. "Set-up" is used in 1926.1402 regarding requirements particular to ensuring adequate ground conditions beneath the equipment. I have encountered situations on jobsites when it was interpreted that that A/D includes when any part that requires a bolt or pin to connect, including pinning/bolting outrigger floats/pads and swing away extensions. Are activities like these covered by 1926.1403 through 1926.1406?

ANSWER: Generally, no. "Assembly/Disassembly" means the assembly and disassembly of equipment covered under this standard and the complexity of preparing and putting together sections and/or parts of a crane at a construction site may vary depending on the model of the crane. Some cranes come to the site fully assembled and A/D is not needed. Some models of truck cranes require relatively simple assembly of the boom. Other cranes require complex assembly such as adding counterweights or attachments, attaching outriggers/stabilizers, or using an assist crane to position the boom or jib for pinning/unpinning.

In contrast, OSHA considers "set-up" as involving the deployment of an assembled crane. For example, set-up includes activities like deploying and pinning outriggers, leveling the equipment, or unfolding and pinning a boom or swing-away jib and not assembly. As you note, the set-up requirements of the standard address the stability of the crane by ensuring adequate ground conditions. For example, 1926.1402(c)(2) requires that the user be informed of hazards beneath the set-up area, and 1926.1431(c) requires level ground conditions and use of any outriggers and/or stabilizers.

**QUESTION #2:** Does OSHA specify any further criteria, such as that of an annual inspection, for a post-assembly inspection other than the verification of the crane's configuration in accordance with the manufacturer's or qualified person's (when manufacturer's procedure are unavailable) equipment criteria?

ANSWER: No. The post-assembly inspection is only meant to ensure that the crane has been configured and assembled correctly before put into service.

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Excerpted from: www.osha.gov/pls/oshaweb/owadisp.show\_document? p\_table=INTERPRETATIONS&p\_id=29267

