CRITICAL INFORMATION REGARDING BOOM TRUCK OPERATOR CERTIFICATION

As you may know, the Occupational Safety & Health Administration (OSHA) plans to implement the certification of operators of truck-mounted cranes (often referred to as “boom trucks”) on its self-imposed deadline of November 10. There is a lot of rumor and misinformation, so we consulted with people at OSHA, IOSHA, and MIOSHA (Indiana and Michigan have their own programs, which mirror the federal rules), as well as independent consultants in this field. As in any convoluted and intertwined bureaucratic federal rule, everyone interprets them differently. I am reminded of the old axiom that states that if you have three bureaucrats in the room, you’ll get four different opinions!

Indiana and Michigan, as you know, have their own “state plans” for regulating and promoting occupational safety and health (“IOSHA” and “MIOSHA”, respectively.) Each state will mirror the federal standard in observing this date.

The deadline has been given a number of extensions over the past few years, but our research and interviews with professionals in the regulatory agencies indicate that the date will “stick” this time. As such, as your professional association, we need to help you be prepared for this looming deadline.

So, the question you want answered is, “Do my drivers who operated truck-mounted cranes need to be certified?” There are many, many variables and conditions that affect that answer. So, let’s take a shot at it the best we can.

Summary: OSHA’s proposal will require employers subject to the crane rule to provide specific training (both formal and practical instruction) to all operators and to evaluate operators’ ability to operate assigned equipment. OSHA would continue to require operator certification with the current November 10, 2018 deadline. The proposal does not alter the current material delivery exemption; therefore, this proposal will not affect any dealer who meets the requirements of the exemption. In general, dealers who set trusses or assist in the construction process are subject to the crane rule, while those who set material on the ground or hoist to an upper level as part of the delivery without holding material in place for construction workers are exempt under the material delivery exemption.

For employers who are subject to the crane rule: As originally conceived in 2010 when the current rule was promulgated, certification was going to be the single assurance employers needed for qualifying operators. Since then, OSHA and some stakeholders have questioned what certification can actually do in terms of providing assurances that operators can safely operate the equipment they use on the job. It should be noted that OSHA has delayed the original deadline for operator certification twice so it could work on this new proposal and that employers have in the meantime been required to ensure their operators are trained and able to use their equipment safely. The current compliance deadline for operator certification is November 10, 2018.
OSHA now believes certification cannot adequately qualify operators or provide assurances that operators can safely operate assigned equipment; therefore, in addition to certification, OSHA is proposing to require specific crane operator training and documented evaluation. These new requirements are intended to focus particularly on ensuring operators are trained and evaluated on the specific type, make and model they will use and specific hoists they will be required to make on the job. Under the proposal, the deadline for being certified remains November 10, 2018 and the new training and evaluation requirements would also kick in at that time. OSHA is assuming employers already provide training to their operators, so OSHA doesn’t think employers will need additional time to meet the new requirements.

As proposed, each operator will have to complete three steps before being allowed to operate equipment without direct supervision under the rule: 1) receive formal and practical instruction on the type of equipment to be used, 2) be certified as currently required, and 3) be evaluated by the employer on competence to operate the assigned equipment and perform the specific hoists required by the job. Until trained and certified, operators will be considered “operators-in-training” and must be under direct supervision when operating the equipment. OSHA seems to acknowledge that experienced operators will not need the same level of training that new employees might, but it is not clear that things will work as smoothly as OSHA thinks. Nor is it clear that the specific training requirements OSHA is imposing can be easily adopted by employers, particularly small businesses.

Material delivery exemption is not affected: It is important to note that the proposal does not affect the current material delivery exemption, established in the 2010 rule to relieve dealers who deliver material to construction sites under certain circumstances from the certification requirements. The exemption requires articulated boom cranes to be outfitted with overload protection devices and a fork assembly attached directly to the end of the boom and is limited to hoists of sheet goods or bundled or packaged material. The current rule also exempts deliveries that are placed directly on the ground without aiding the contractor with subsequent lifts.

So, let’s look at the certification process...

**GETTING CERTIFIED ON YOUR BOOM TRUCK**

1. **Determine exactly what type of equipment you have.** In our industry, it’s likely a **Boom Truck, or truck-mounted crane (fixed cab)** (The term “boom truck” and “truck-mounted crane” are fairly regularly interchangeable.) A boom truck (commercial truck-mounted crane) is defined as a crane consisting of a rotating superstructure (center post or turntable), a fixed or telescopic boom, operating machinery, and one or more operator’s stations mounted on a frame attached to a commercial truck chassis with a payload hauling capability whose power source powers the crane. Its function is to lift, lower, and swing loads at various radii, requiring the use of outriggers/stabilizers.
If you are unsure exactly the type you operate, an easy way to determine exactly what type of equipment you have is to use Google or Bing Images, and type into the search bar the type of truck/crane you think you have. A picture (or several) will come up; see if it looks like yours. Your owner’s manual for the vehicle should bear this information as well. Still in doubt? You can call NCCCO headquarters at 703-560-2391, and tell the person who answers your call that you need to determine which type of boom crane you have.

2. Visit the NCCCO web site. It is at www.nccco.org. This is the National Commission for the Certification of Crane Operators, recognized by OSHA and state safety programs (like MIOSHA and IOSHA) as the standard in testing and certification. Here you will see the list of certifications. These are broken down depending on what type of crane/boom you have. This site covers just about everything you need to know. A good starting point is the FAQ page. The “Requirements and Procedures” is also helpful.

3. Apply for and take the Certification Exam. The exams are physical (pencil and paper), or computer-based. The computer-based is taken on a computer, but is not online. Rather, the student still has to go to a recognized testing facility. However, there are more relaxed deadlines for the computer-based, so we recommend that. To find the location nearest you for testing using your ZIP code, go HERE. We also recommend downloading the Candidate Handbook.

4. Get training to prepare for the test. (Recommended) - Although training is not required for certification, NCCCO recognizes training as a key element in the certification process, and it encourages professional instruction in the knowledge and skills that define competency for those who work in and around cranes. Again, the Candidate Handbook will reveal all the domains tested, so that’s the place to start.

5. Take the practical exam. Please note that one can take the exams in any order; for example, the practical can be taken prior to the written/computer, and vice-versa. You just can’t allow more than 12 months to pass between tests.

   The practical exam is the final step in your certification. It is done using the truck you actually operate, as it is virtually impossible to pass the practical exam using a truck with which you are not extremely familiar.

   You’ll need a certified Practical Examiner. There is a list of these for hire HERE. This examiner will come to you (and in many cases you can go to him/her) so your skills in safe crane operation can be evaluated positively.

6. The NCCCO “FAQ” page has all info about test scoring, re-testing (if necessary), and certification cards.
Isn’t there a better way? This is a lot of running around!

You can take this multi-step, elongated and expensive process to achieve certification, or you can cut through all the minutiae and go about the business of selling product!

MBSA is proud to bring to you a custom, professionally-facilitated session to achieve certification. Rather than weeks of filing forms and other “running around”, you can be certified on your boom truck in 2 days! This rare course to the membership later on this year (early fall, in time for the November 10 deadline). The location(s) will be based on member demand and interest. To help us determine where these sessions should be performed, we ask you to fill out a brief survey (no obligation; we’re just trying to gauge general interest). While the per-student fee has not yet been exactly determined, the cost will be in the $1600.00 - $1800.00 range (depends on truck rental and insurance fees, which vary widely from region to region.) But we’ll keep this is affordable as possible.

Here’s the general schedule for our 2-day course:
- Day 1 – In-depth instruction - Begin 8:00 AM, and ends approximately 5 PM
- Day 2 – Q & A at 8:00 AM; Written test at 9:00 AM; 10:00AM to 6:00 PM is practical testing

Attendees will receive:
- Classroom education led by certified instructor
- Grooming on how to pass the practical test
- Student workbook and reference materials
- Mock-up written exams
- Load-chart questions and tips
- Certification evidence (written certificate, wallet ID card)

Attendees must bring:
- Government-issued ID
- Pencils, pens, highlighters
- notebook for note-taking
- high-visibility shirt or safety vest
- Long pants (not shorts) for practice course and practical exam
- Calculator (the calculator app on your smartphone is fine)
- Work boots and hard hat
- Any additional PPE required by your company
Additional Information:

This course is designed to address certification on the truck-mounted crane most commonly used by MBSA members, known as the “ABL”, or articulating boom lift. This is commonly called a “drywall lift” or “drywall crane”. The other type (less common) is the “ABC”, or articulating boom crane.

If a driver operates both types, and wishes to achieve the two separate certifications, the instruction and written test are virtually the same, and will be covered in this course. The difference will be in the ABC practical (“on the truck”) test, which will need to be tested separately, and will have an additional fee associated with it. If this condition applies to you, we’ll help you get that separate ABC practical test set up with our instructor and test administrator, Robert Clouse, CSP, CHST.

ADDITIONAL HELPFUL LINKS:

Here is the link for the MIOSHA General Industry Part 19 Crawler, Locomotive, and Truck Crane: http://www.michigan.gov/documents/CIS_WSH_part19_51245_7.pdf (Michigan’s standard differs slightly, but not much, from the federal)

Here is Federal OSHA’s standard for the same: (Indiana’s standard mirrors the federal) https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9831