



JAN 13, 2003

Mr. Michael J. Gilleran
McCausey Lumber Co.
32205 Little Mack Ave.
P.O. Box 545
Roseville, MI 48066-0545

Re: Whether Master Planking scaffold planking meets OSHA requirements; Subpart L;
1926.451(b); Appendix A

Dear Mr. Gilleran:

This is in response to your letter of November 27, 2002, to the Directorate of Construction in which you ask whether the laminated wood scaffold planking that you manufacture meets OSHA strength requirements.

OSHA is generally precluded from approving or endorsing specific products. The variable working conditions at job sites and possible alteration or misapplication of an otherwise safe piece of equipment could easily create a hazardous condition beyond the control of the equipment manufacturer. However, where appropriate, we try to give some guidance to help employers assess whether products are appropriate to use in light of OSHA requirements.

29 CFR 1926.451(a)(1) requires that, with certain exceptions,

[E]ach scaffold and scaffold component shall be capable of supporting, without failure, its own weight and at least 4 times the maximum intended load applied or transmitted to it.

Section 1926.451(f)(16) states that:

Platforms shall not deflect more than 1/60 of the span when loaded.

Under these provisions, the scaffold planking must be strong enough in relation to the maximum load to meet the 4:1 strength requirement, and must do so without deflecting more than 1/60 of the span when loaded. In addition, section 1926.451(a)(6) states:

Scaffolds shall be designed by a qualified person and shall be constructed and loaded in accordance with that design. Non-mandatory Appendix A to this subpart contains examples of criteria that will enable an employer to comply with paragraph (a) of this section.

Included in Appendix A are guidelines for setting capacity ratings of fabricated scaffold planking. Section 1(c) of the Appendix states:

Fabricated planks and platforms may be used in lieu of solid sawn wood planks. Maximum spans for such units shall be as recommended by the manufacturer based on the maximum intended load being calculated as follows:

RATED LOAD CAPACITY	INTENDED LOAD
Light-duty	25 pounds per square foot applied uniformly over the entire span area
Medium-duty	50 pounds per square foot applied uniformly over the entire span area
Heavy-duty	75 pounds per square foot applied uniformly over the entire span area
One-person	250 pounds placed at the center of the span (total 250 pounds)
Two-person	250 pounds placed 18 inches to the left and right of the center of the span (total 500 lbs)
Three-person	250 pounds placed at the center of the span and 250 pounds placed 18 inches to the left and right of the center of the span (total 750 pounds)

You have submitted tables showing the maximum loads for specified spans of various widths of your scaffold plank products. These are for medium duty, heavy duty, one-person, two-person and three-person. Also in your tables is a statement indicating that when loaded in accordance with the tables, the planks will meet the 1926.451(f)(16) requirement of not deflecting more than 1/60 of the span when loaded.

You have also submitted information indicating that in testing performed by an independent testing facility and signed by a registered professional engineer, the planks listed in the table will meet the specified capacities with a 4:1 safety factor and the maximum deflection requirement in 1926.451(f)(16).1

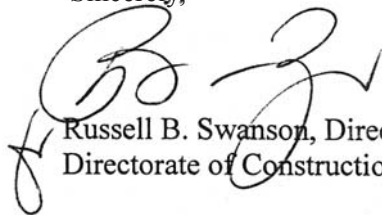
Based on the information you submitted, the Master Plank scaffold planking meets OSHA plank strength requirements when used in accordance with the capacities, limitations and instructions set out by the manufacturer.2

1 We do not attempt to verify testing results.

2 As stated in OSHA's December 3, 1991, letter to Mr. B. T. Dempsey with regard to your product, we recommend that you provide load tables to the users.

Please feel free to contact us again by fax at: U.S. Department of Labor, OSHA, Directorate of Construction, Office of Construction Standards and Guidance, fax # 202-639-1689. You can also contact us by mail at the above office, Room N3468, 200 Constitution Avenue, N.W., Washington, D.C. 20210, although there will be a delay in our receiving correspondence by mail.

Sincerely,



Russell B. Swanson, Director
Directorate of Construction

NOTE: OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such development, you can consult OSHA's website at <http://www.osha.gov>.