

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH  
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*Juliann Sum, Chief*

Date: October 15, 2018

To: Kevin Prosch  
Area Safety Manager  
McClone Construction  
4340 Product Drive  
Shingle Springs, CA 95682

Re: Reinforcing Steel and Post-Tensioning in Concrete Construction

Mr. Prosch,

I write to you in response to your letter dated August 27, 2018 for clarification of California Code of Regulations, title 8 section 1711, Reinforcing Steel and Post-Tensioning in Concrete Construction.

**Question #1:**

Section 1711(h)(5) states, *"Ensure there is an adequate safe work platform of a minimum of three feet measured from the end of the floor slab to the platform toeboard, such as an extension of the formwork, for stressing tendons, cutting tendon tails, and grouting where tensioning operations are above grade."*

Would an aerial boom lift or scissor lift meet the requirement of an "adequate safe work platform" provided it could meet the 3-foot minimum size requirement and be equipped with necessary guardrail and toe board?

**Response:**

No, the platform of an aerial device (boom lift) or elevating work platform (scissor lift) would not meet the work platform requirements of title 8 section 1711(h)(5). The Occupational Safety and Health Standards Board stated that the use of scissor lifts, scaffolding and aerial lifts are not an acceptable means to meet the requirements of 1711(h)(5) in the Final Statement of Reasons<sup>1</sup> when the regulation was adopted, as follows:

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<sup>1</sup> The Final Statement of Reasons for section 1711 Reinforcing Steel Concrete Construction and Post-Tensioning Operations is available at <https://www.dir.ca.gov/OSHSB/documents/Reinforcing-Steel-Concrete-Construction-And-Post-Tensioning-Operations-FSOR.pdf>

Comment No. 13:

The CEA [Construction Employers Association] suggested adding language to subsection (h)(5) to require the RC [reinforcing steel contractor], while stressing beams during the construction of a parking garage, to provide access to the cables below the elevated slabs of the Cunningham beams by mobile equipment such as aerial boom lifts, scissor lifts or scaffolding.

Response:

The Board finds this suggested revision by the CEA to be unacceptable. The use of scissor lifts, scaffolding and aerial device platforms do not provide the same level of safety provided by platform extensions. Problems could arise with cost, stability and sufficient space for aerial devices and aerial booms to safely articulate. The CC [Controlling Contractor] has the responsibility to design in and plan for the needed safe platform space required by proposed subsection (h)(5).

**Question #2:**

Section 1711(d) states, *“Written Notifications Prior to Commencement of and Immediately Following Reinforcing Steel Installation and Concrete Placement. The controlling contractor shall ensure that the reinforcing steel contractor on the project is provided with the following written notifications at the times indicated:*

*(1) Prior to commencement of reinforcing steel installation, that formwork and falsework have been inspected and determined to meet the design requirements by a competent person of the installing formwork/falsework contractor as indicated in subsections (d)(2) and (3) below and immediately after the installation of reinforcing steel and placement of the concrete.*

Are three written notifications required at the following times?

1. After formwork is complete but prior to reinforcing steel installation.
2. After reinforcing steel installations is complete but prior to concrete placement.
3. After concrete placement.

**Response:**

Yes, written notification by the controlling contractor to the reinforcing contractor is required by section 1711(d)(1) at the 3 times you identified in question #2.

Thank you for your interest in occupational safety and health. Please feel free to contact me if you have any further questions.

Sincerely,



Eric Berg  
Deputy Chief, Research and Standards

Cc: Jason Denning, Yancy Yap, File: 1711