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Occupational Safety & Health Administration

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Standard Interpretations

06/11/1992 - Slings used in conjunction with other material handling equipment for the movement of materials by hoisting in the workplace.

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• **Standard Number:** 1910.184

June 11, 1992

Mr. Ray A. Slovak
Commercial Products
Sales Manager
Peerless Chain Company
P.O. Box 349
Winona, Minnesota 55987-0349

Dear Mr. Slovak:

This is in response to your letter of March 12, requesting compliance guidelines with respect to the Occupational Safety and Health Administration (OSHA) standard at 29 CFR 1910.184 on slings used in conjunction with other material handling equipment for the movement of materials by hoisting in the workplace. In your letter you asked the following questions.

1. May an end-user use other (than alloy) grades of proof-tested steel chain when suggested by a chain manufacturer or equivalent entity for lifting applications?
2. Given the following scenario, may an end-user use lifting fixtures manufactured in-house? The end-user's "registered professional engineer designed a specific lifting fixture, drafted a print with all specifications as to design criteria, the fixture was made to same, in-house welded, then properly heat-treated with documentation, proof-tested in accordance with paragraph 5.2 of the American Society of Testing and Materials Specifications A391 (ANSI G 61.1-1968) and this also documented."

The particular alloy steel chain slings detailed in 1910.184 are made from alloy steel specified in the National Association of Chain Manufacturers (NACM) Welded Steel Chain Specifications-1990 as grade 80 alloy steel chain. Any other alloy steel chain sling falling within the scope of 1910.184(a) is still governed by [1910.184(e)(5)] which states in part:

"Slings not included in this table shall be used only in accordance with the manufacturer's recommendations."

As the chain manufacturer, it is in your best interest to provide your customers with information, comments and suggestions on the terms and limitations under which your product should be used. If an employer does not follow the manufacturer's recommendation, than the employer could be cited under the 1910.184 standard.

In your letter, you detailed that the employer making the lifting fixture had proof-tested his lifting fixture in accordance with the American Society of Testing and Materials (ASTM) Specification A391 (ANSI G61.1-1968). This specification details the composition and other details (including proof-testing) of grade 80 alloy steel chain. Also, you could point out to your customer that use of this ASTM specifications may be inappropriate for other alloy steel chain.

Employers may use chain slings made of metal other than alloy steel in the workplace. In consideration of employee safety in the workplace, proof coil steel chain, also known as common or hardware chain and other chain not recommended by the chain manufacturer shall not be used for hoisting purposes. Except as noted otherwise, chain slings made from other than alloy steel, designed, constructed, repaired and proof-tested for safe use, in accordance with National Consensus Standards, component manufacturer recommendations and otherwise good engineering practice of the industry, under the supervision of a qualified person, and used to support loads up to but not to exceed their rated capacity (working load limit) would be considered favorably with respect to employer compliance. A "qualified person" is defined as one with a recognized degree or professional certificate and extensive knowledge and experience in the subject field who is capable of design, analysis, evaluation and specifications in the subject work, project or product.

Thank you for your interest in occupational safety and health. If we can be of further assistance, please contact us.

Sincerely,

Patricia K. Clark, Director
Directorate of Compliance Programs

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