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COMMENTS OF THE
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH
ON THE
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION'S
PROPOSED RULEMAKING ON REVISION OF
CONSTRUCTION INDUSTRY TEST AND INSPECTION RECORDS

29 CFR Part 1926
Docket No. S-020A

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Centers for Disease Control
National Institute for Occupational Safety and Health

June 15, 1987

The National Institute for Occupational Safety and Health (NIOSH) has reviewed the Occupational Safety and Health Administration's (OSHA's) proposed revisions to the Construction Industry Test and Inspection Records and offers the following comments.

NIOSH concurs with OSHA and the Advisory Committee on Construction Safety and Health that current recordkeeping provisions of this standard can be replaced with a written, signed, and dated certification record that the required testing and inspections have been performed.

OSHA proposes that the testing and inspection certifications be kept on file until the next time a test or inspection is conducted. NIOSH suggests that OSHA require certifications be kept on file for twelve months from the time the test or inspection was conducted. By maintaining certification records for one year, the employer and OSHA will have access to information that will allow more reasoned decision making.

NIOSH also recommends that:

- The proposed certification records contain a pass/fail notification for each item that has been inspected or tested.
- Subpart N, 1926.550(b)(2) be modified to read: "...the signature of the person who inspected the 'critical' crane items...".
- Both 1926.550(b)(2) and 1926.903(e) contain the requirement found in 1926.552(c)(15) that the person performing the inspections be a "competent person" as defined in 1926.32.