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## Crane and Rigging Policy FCX-HS32 Leadership Talking Points and Guidance

July 2024

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The following information is provided for discussions with your employees about the revisions to the Crane and Rigging Policy FCX-HS32 and supporting documentation. For more details, please refer to the full policy.

Some crane related events are provided for review:

[Corporate Safety Portal - PFE-2024-3 Advisory Safford Crane Truck Tips Over.pdf - Year \(sharepoint.com\)](#)

[HR-2023-June 29-Sierrita Crane Tip Over.pptx](#)

[HR-2023 May 4 Sierrita Crusher Suspended Load Bin Drop.pptx](#)

[Corporate Safety Portal - PFE-2023-36 Advisory Chino Crane Incident.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - BAG BallMill Spiral Insert.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - PFE Follow-Up - Oil.Gas Barge Crane.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - Fatal Event Advisory - AC Crane Driver.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - PFE - Sierrita Fall of Material – 47 Shovel.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - FS - PTFI Mine.pdf - Year \(sharepoint.com\)](#)

[Corporate Safety Portal - Potential Fatal Event - OG.GOM - Miss Canyon 84 - 01.09.15.pdf - Year \(sharepoint.com\)](#)

### Overview

- In 2019-2020 the Crane and Rigging policy documents were developed with the involvement of crane operators, SMEs, maintenance team members and H&S Professionals throughout the organization.
- Occasionally various H&S policies are updated after improved operating methods are identified through collaboration with SMEs, internal/external investigations, industry regulation changes, etc.. This document is intended to provide the specific changes to the Crane and Rigging documents.
- This policy update includes talking points for the following documents:
  - FCX-HS32 Crane and Rigging Policy
  - FCX-HS32 Rigging Requirements Technical Supplement
  - FCX-HS32 Operator, Rigger, and Signalperson Qualification Technical Supplement
  - FCX-HS32 Critical Lift Technical Supplement

Revisions are highlighted below to help clarify major changes to the policy and supporting documents.

### **HS-32 Crane and Rigging Policy**

- The Critical Controls list has been updated.
- **Actions to stay safe**
  - The 4<sup>th</sup> bullet includes the requirement to identify the lifting radius.
- **Suspended Loads**
  - The 4<sup>th</sup> bullet has the additional requirement to use nonconductive materials for push/pull or taglines while working near powerlines.
- **Operator Expectations**
  - **Mobile Cranes**
    - The 8<sup>th</sup> bullet requires the **use of a spotter when traveling a crane within 20ft (9m)** of an overhead power line **while the boom and hoist can be operated from the driver's cab**. The intent of this is to ensure that the operator has a partner to navigate through some of our unique operating areas and prevent inadvertent contact with a power line that could result in a fatality. See OSHA [1926.1411\(b\)\(4\)](#) standard for further details.
    - The 9<sup>th</sup> bullet states to never use a rubber tire crane for pick and carry unless designed for this activity. The intent is that you follow manufacturers' recommendations. Carry deck cranes are an example of a crane that can be used for this activity since they are designed for this type of work.
    - The 11<sup>th</sup> bullet states that an Override/bypass keys or system shall not be used as operating controls with the exception of critical and/or emergency situations. If used, the activity will be documented and shared with the employee's supervisor.
    - Table A and Table T have been added to provide clarity for maintaining minimum safe distances from overhead power lines following the encroachment procedures.
    - The 15<sup>th</sup> bullet has requirements if wind is present during lifting activities.
      - Measure wind speed prior to making a pick.
      - Max Speed is 15mph (24kph) for personnel lifting.
      - Max Speed is 30 mph (48kph) for all other operations unless manufacturer's recommendations are more stringent.
      - Crane Operator has the right to suspend all operations due to wind conditions based on load and placement of load.
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### **FCX-HS32 Rigging Requirements Technical Supplement**

- **Locally Installed Lifting Points**
  - Bullets 6 and 7 modified to provide guidance on lifting points. Operators need to verify that the lifting points are designed to handle the load and are designed for the lifting activities.
  - There was a question presented about the Come-alongs, pulleys, snatch blocks, etc..
    - If monthly/annually inspected, how does that differ from the prior to use inspection? How are come-alongs, etc tagged and tracked if this is the

requirement? Prior to use inspection should drive removing/replacing items from use.

**Answer:** Regulations/Standards have specific requirements for Pre-operation, Frequent(monthly), and Periodic(annual) Inspections. Consecutively these inspections have additional items to be inspected and additional procedures to be followed. For instance Frequent(monthly) inspections required each and every link to be physically moved aside to inspect for wear at the contact points of the intersecting links. information on what when and how to inspect items is taught to the employees in the associated training classes for the tasks they are being trained on

### **FCX-HS32 Operator, Rigger and Signalperson Qualification Technical Supplement**

- Overview updates have been included with the intent of clarifying training requirements of those operating cranes rated for 2,000lbs/907kg and above and they shall have qualified training that is documented by a nationally recognized certification.
- Qualification by definition means you are qualified by training, degree and/or experience. As a qualified trainee, means a person has completed the classroom material but will need to complete the field testing, which is demonstration under the watchful eye of a qualified trainer or operator. National certification means that someone holds a certified document that is accredited by a certain accreditation. Operators will attend training to the level of cranes they operate (i.e. mechanic that only operates a service truck mounted 2000lb capacity crane will only need to attend the training for that crane and not larger) Employee training will be certified by NCCCO and those certified by a different accreditation will be able to operate under their current accreditation until the expiration date, at which point they will need to receive NCCCO certification. Contractor crane operators must be NCCCO certified or equivalent.
- A question was raised about the need to have in-depth certification for those operating the smaller cranes for maintenance and repair activities.
  - Answer: Service truck crane operators that are using them exclusively for maintenance/repair activities are not required to be NCCCO certified. They are required to successfully complete the training requirements and qualification requirements for each make and model, they will operate. Operators of service trucks that are used for any purpose other than maintenance and repair activities, will require a nationally certified mobile crane operator.
- A site representative asked if we could utilize another source such as CIA instead of NCCCO.
  - Answer: Crane Institute of America does not Certify Operators and Crane Institute Certification has lost their Accreditation. The intent is to be exclusive to NCCCO in the interest of standardization throughout our properties and allow Written and Practical testing to occur on our sites. There are provisions written in the policy for currently certified operators to continue operating under their current accreditation until expiration at which time they would transition to NCCCO. If NCCCO certification is not available, the site shall have equivalent certification available in their area as referenced throughout the policy.
- **Qualification of Mobile Crane Operators**
  - 2) Operator requirements
    - 1<sup>st</sup> bullet- Evidence of successfully passing a physical examination- must be completed by all operators and attend physical every three years (this is a legal requirement).

- **Crane Operator Development Process**
  - In general a lot of this section has been modified to clarify the development process as it was redundant on the previous policy.
  - 3. Additional Guidance
    - 1<sup>st</sup> bullet- If an operator hasn't operated a crane for which they are certified to operate within the past twelve months, they must have a field assessment (task training checklist) completed prior to operating the crane.
    - 2<sup>nd</sup> bullet Operators shall be evaluated by a qualified individual to determine if training is needed. They will attend remedial training if deemed necessary.
      - When deemed necessary, operators will complete remedial training prior to resuming crane and/or rigging activities.
  - 3<sup>rd</sup> bullet Operators involved in an incident shall be subject to reevaluation and/or retraining.
- **Qualification of Overhead Crane Operators**
  - Overhead crane operators will be trained in handling and moving the load.
  - Will successfully complete the Overhead Operator Training (CRN FCX1002C)
  - Will successfully complete Technical Rigging class (RIGFCX1001C).
  - Operators shall be evaluated annually by a qualified individual to determine if remedial training is needed.
  - Attending remedial training is necessary prior to resuming overhead crane and rigging activities.
  - Operators will attend refresher training every two years (CRN FCX1002C)
  - Operators will have until the end of the month to complete refresher that the last refresher (or initial training) was completed the prior year. If unable to complete refresher in this time frame, employee will attend the initial training (CRN FCX1002C) prior to resuming crane and/or rigging activities.
- **Qualification of Riggers**
  - Riggers will attend Computer based Training (CBT) refresher annually. If not successful in passing this course, they shall attend the initial Technical Rigging Training Course (RIG FCX1001C)
  - It was asked if this is the same as the NCCCO Rigger certification?
    - Answer: This is the internal training and qualification, not the NCCCO Rigger Certification.
- **Qualifications of Lift Director**
  - Lift directors are utilized in mobile crane operations and will have successfully completed the same training as a mobile equipment operator. The director can be the same person as the rigger.
- **Qualification of Supervisors**
  - Supervisors with employees performing crane and rigging activities will be required to attend Mobile Crane/Rigging/Signal person Spv awareness class or have attended the same training required of a Mobile Crane Operator. The intent is for leaders in the field to have the fundamental knowledge of crane operations so they can plan work and verify practices in the field.

## FCX-HS32 Critical Lift Technical Supplement

- **Criteria for Mobile Cranes**
  - 8<sup>th</sup> bullet- Further clarifies that a critical lift permit is not required for Pick and Carry activities while operating a carry deck crane.
- **Criteria for Overhead Cranes**
  - 2<sup>nd</sup> bullet- Clarifies that Smelter Converter aisle cranes and tank house cranes, while operating in production lifts, can operate without a critical lift permit.
  - 5<sup>th</sup> bullet- Is intended to clarify that a permit is required for hoisting personnel with a crane and while lifting personnel (i.e., utilizing a forklift).
- **Critical Lift Plan and Permit**
  - 3<sup>rd</sup> bullet requires a lift director be appointed.

### Questions and Guidance

**Q:** It is often asked why I have to follow an OSHA regulation (i.e., 1910 or 1926) when I work in a US mine that is under the jurisdiction of MSHA. 1910 is General Industry and 1926 are construction, we aren't in the construction business. Is there cross over between OSHA and MSHA regulations, do they refer to each other?

**A:** The Crane and Rigging Policy FCX-HS32 and its supporting documentation have been revised to integrate and incorporate by reference overall best industry practices, being applicable to mining operations by means of the Memorandum of Cooperation between the Occupational Safety and Health Administration (OSHA) and the Mine Safety and Health Administration (MSHA). These revisions aim to align with OSHA crane and hoisting standards which are a baseline best practice and referenced as such within MSHA regulatory policy.

**Q:** Can an FMI NCCCO certified instructor provide the training or does the certification need to be through a third party?

**A:** If the site has people that have NCCCO written proctors and NCCCO practical examiners, they can do this internally.

**Q:** Why did you choose NCCCO and not CIA (crane institute of America)?

**A:** CIA does not certify operators and CIA has lost their accreditation. The intent is to be exclusive to NCCCO in the interest of standardization throughout the properties and allow written and practical testing to occur on our sites. There are provisions written in the policy for currently certified operators to continue operating under their current accreditation until expiration at which time they would transition to NCCCO.

## Moving forward

- The policies are developed to establish the 'what' and the sites are requested to develop the 'how.' Below are action items for the sites to initiate:
  - Site H&S Team facilitate site gap analysis and implementation plan development with site leadership team.
  - Develop a site-specific rollout and implementation plan, including milestones.
    - Ensure applicable leadership team members, trainers, employees, etc.. review and understand the intent of the policy.
    - Target site implementation plan in place by **October 1, 2024**. The actual implementation may take longer but a plan shall be developed and managed by the site leadership team.
    - Employees currently internally qualified on mobile cranes shall be approved to continue operating until national certification can occur with a developed timeline.
  - Update or develop a training plan(s) where applicable.
  - Update Standard Operating Procedures
- DOHS will follow up with site leadership in approximately 2-3 months to review progress and major hurdles (if any) with the policy and identify any further best practices during rollout.