MODEL OF AN APPLICATION FOR VARIANCE FROM STANDARDS

Assistant Secretary for Occupational Safety and Health
U S Department of Labor
Washington, D C. 20210

Dear Sir

Pursuant to Section 6(d) of the Williams-Steiger Occupational Safety and Health Act of 1970 (84 Stat 1596 29 U S C 655), XYZ Company respectfully requests a permanent variance from the requirements of 29 C F R 1910 179 (b) (4), concerning wind indicator on the outdoor bridge of a gantry crane

(1) Applicant—XYZ Company (address)

(2) Place of employment—Same as (1)

(3) XYZ Company has a gantry crane which operates beside a slip for unloading shallow draft barges It currently is used only for unloading salt barges, usually about twice a year Because of the location of our operation and the experience we have had with high wind conditions, XYZ Company recognizes the importance for monitoring wind conditions As a result, our plant has two wind-indicating devices with visual and automatic recording devices We have a well established plan for monitoring Federal Weather Bureau reports and emergency plans of action for pending high winds The key wind indicating device is located in the shift superintendent's office A shift superintendent is on duty around the clock, seven days a week and is responsible for the plant He keeps a close watch on the wind conditions and also monitors weather forecasts at least three times during each eight-hour period A written record is kept of the weather conditions If there are any changes in wind conditions or anticipated changes due to approaching bad weather, the wind indicators and weather forecast are monitored continuously Because of these well established policies and the limited use of the gantry, we feel that our plan would offer a safer operation In addition, we feel that the installation of a wind indicating device on the gantry crane would not be feasible because of conditions which tend to cause malfunction Our past experience has verified this consistently The gantry crane is very close to the molten sulfur pits and salt water The close proximity to these agents creates a corrosive condition which would make the wind indicator inoperative soon after installation We feel our monitoring and early warning system is more effective and safe than is the use of an infrequently used and difficult to maintain wind velocity instrument on the crane

(4) Due to the corrosive conditions present around the gantry crane, XYZ Company feels that its established procedures would give more reliable information than an indicator on the crane Therefore, we feel that this would ensure the safety of the crane and operator better than standard procedures

Respectfully submitted,

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Manager

(5) This is to certify that a copy of the variance from Standard 1910 179(b) (4) requested by XYZ Company has been posted in an appropriate place for employees to examine. Also, an explanation of their right to send comments or petition for a hearing