To Whom It May Concern:

My name is Ryan Burton; I'm the General Manager of Eagle West Tower Cranes Inc. Our headquarters are located in Abbotsford B.C. I can be contacted in the following manners:
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The following amendments to section 14.77 (4) is an area of concern for our organization. The proposed additions read as follows:

(4) A self erecting tower crane must be

- ***a) Inspected visually by a qualified person each time it is erected, and***
- ***b) Inspected and certified under subsection (1) after each third erection cycle and in any event at least once every 12 months***

As stated in the explanatory note section on page 55 the following is used for reasoning to the above mentioned proposal:

"The proposed new section 14.77 (4) recognizes a self-erecting tower crane may be erected numerous times in a one year time period"
Our records show that this statement is true and we agree that a self-erecting tower crane may be erected numerous times in a one year period, but may also be erected for lengths of one year without being moved or disassembled

"There is no need to have the structural components nondestructively (NDT) inspected each time the self-erecting crane is erected"
We agree with this statement as a crane could be on site for lengths of time of one month and immediately be moved to another job site. Testing of the crane so frequently would most likely not catch faults or defects and would prove to be overly costly

"However this equipment needs to be structurally inspected and certified at reasonable intervals"
We strongly agree with this statement but feel the current method of a yearly NDT inspection has proven to show that this is sufficient as our findings will show a low percentage of repairs needing to be completed after a yearly NDT.

"The current industry practice in BC is to do an engineer supervised inspection, including NDT inspection of structural components, and certification of the equipment on an annual basis. Generally the NDT inspections being done on an annual basis are not finding defects frequently enough to warrant mandating NDT inspection and certification, based only on time in service, more frequent than once a year.

This statement is true as mentioned. Previously our findings show that defects are not occurring in our yearly NDT inspections that we are currently performing. A majority of our cranes pass without repairs being required.

"However, self-erecting tower cranes are frequently relocated and the erection and lowering process for these cranes subjects them to significant stress, so it is felt an engineer supervised inspection, NDT, and engineering certification should be done after three erection cycles if the crane is raised and lowered that many times in less than a one year period"

This ruling would not be acceptable in that many of the self erecting cranes, especially the smaller ones are often relocated every week or two. This would require the crane owners to have a NDT done every month. The manufacturers of these cranes certainly do not require the testing to be done at this frequency. This ruling will impose unjust costs on the industry and it is not necessary.

"Normally these cranes are erected and used at one location for periods of four to six months or more, so generally the once a year criteria will govern the frequency of structural NDT inspection and engineering certification. Dates of use and cycles of erection and lowering of the self-erecting tower crane must be recorded in the equipment records"

We agree that accurate record keeping in the equipment log must be kept but the average erection cycle on these cranes is certainly not four to six months. The average set up time is entirely dependant on the size and type of crane as well as the type of project it is on. Many projects require that these cranes are relocated on sites several times each month.

"Self-erecting tower cranes may be damaged during transport between locations, or during the erection/lowering process but the damage occurring at these times is generally bent or dented members and such damage is visible without the use of NDT techniques. Damage of this type requires immediate repair and certification under the direction of a professional engineer. Therefore it is recommended that a provision be included to require a visual inspection each time the crane is erected, which is the intent of proposed section 14.77 (4) a"

We agree that the cranes should be visually inspected by a qualified person before every erection.

Yours Truly,

Ryan Burton,
General Manager
Eagle West Tower Cranes Inc.