

## INFORMATION MEMORANDUM 87-X-72

TO: All Directors, Supervisors, and Field Personnel

FROM: William M. Lybrand, Director of OSH

SUBJECT: Citing for Reciprocating Vertical and Inclined Conveyors Known Under the Trade Name of "Multi-Lift" Units.

DATE: June 17, 1987

### Purpose.

This memorandum clarifies South Carolina Department of Labor, Division of Occupational Safety and Health's position on the citing of reciprocating vertical and inclined conveyors known as "Multi-Lift" units.

### Background.

Multi-Fab Products Corporation manufactures and installs certain reciprocating vertical and inclined conveyors known under the trade name of "Multi-Lifts" (see attachments). This equipment is designed and intended solely for material handling between two or more elevations or floors. As you will note from the attachments, the equipment was not designed nor is it intended to carry an operator or passengers. Based primarily on design and intended use of the equipment, both ASME and ANSI have recognized it as a conveyor as defined by the ANSI B20.1 standard rather than an elevator which would be subject to the ANSI A 17.1 standard.

### Interpretation.

It is the South Carolina Division of OSHA's position that given the information from ASME and ANSI, including the fact that the equipment is not designed to be either a passenger or freight elevator, the reciprocating vertical and inclined conveyors in question should be classified as a conveyor as defined by the standard B20.1, and the application of another set of standards to this equipment would be appropriate. Therefore, for South Carolina OSHA enforcement purposes the equipment should be considered a conveyor.

Since no specific OSHA standards pertain to this particular type of equipment, hazardous conditions involving the use of such equipment at any workplace will be regulated by the General Duty Clause, Section 71-1.12 of our OSHA Rules and Regulations. Reciprocating vertical and inclined conveyors meeting the applicable requirements of ANSI B20.1-1984, with Addenda a and b, would not be in violation of

the General Duty Clause. A copy of ANSI B20.1-1984 which includes addendas a and b is attached.

Effective Date.

This memorandum is effective upon receipt and will remain in effect until cancelled or superseded.