

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF OCCUPATIONAL SAFETY & HEALTH  
RESEARCH & STANDARDS DEVELOPMENT UNIT, SOUTH  
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September 18, 2000

Mr. Robert Ripoyla  
**GRIP SYSTEM**  
2421 Vail Ave.  
Stockton, CA. 95205

Re: Division Evaluation/Acceptance **Grip System**

Dear Mr. Ripoyla:

The Division reviewed your undated letter and attachments including a brochure and a video tape demonstrating the use of the **Grip System**. The purpose of the submittal was to obtain the Division's "seal of approval or acceptance" regarding the use of the **Grip System's** compliance with the Title 8, General Industry Safety Orders (GISO). This is in response to your request:

Machinery and equipment safety requirements are found in Title 8, GISO Section 3328 which reads as follows:

- (a) Machinery and equipment shall be of adequate design and shall not be used or operated under conditions of speeds, stresses, or loads which endanger employees.
- (b) Machinery and equipment in service shall be inspected and maintained as recommended by the manufacturer where such recommendations are available.
- (c) Machinery and equipment with defective parts which create a hazard shall not be used.
- (d) Machinery and equipment designed for a fixed location shall be restrained so as to prevent walking or moving from its location.
- (e) Machinery and equipment components shall be designed, secured, or covered to minimize hazards caused by breakage, release of mechanical energy (e.g. broken springs), or loosening and falling.
- (f) Any modifications shall be in accordance with (a) and with good engineering practice.
- (g) Machinery and equipment in service shall be maintained in a safe operating condition.

In addition, portable tools and equipment must comply with GISO Section 3556 which reads as follows:

- (a) Each employer shall be responsible for the safe condition of tools and equipment used by employees, including tools and equipment which may be furnished by employees.
- (b) All tools shall be restricted to the use for which they may be intended.
- (c) Unsafe hand tools shall not be used.

Division staff noted that the submitted video demonstrated the use of the **Grip System** with two workers moving various types of furniture. The workers' feet may be in close proximity to the bottom of heavy furniture while moving is in progress. GISO Section 3385(a) regarding employees foot protection reads as follows:

- (a) Appropriate foot protection shall be required for employees who are exposed to foot injuries for electrical hazards, hot, corrosive, poisonous substances, fallen objects, crushing or penetrating actions, which may cause injuries or who are exposed to work in abnormal wet locations.