



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

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Dave Black
TOC Management Services
895 Country Club Rd #A-160
Eugene, OR 97401

Dear Mr. Black:

This is in response to your letter of April 26, 2001 seeking clarification on our standards for the height to which materials can be safely stacked. You are correct that [OAR 437-002-0221\(7\)\(b\)](#) refers to the dimensions of a single unit of lumber not to the dimensions of a stack of lumber.

You also question whether Oregon OSHA has adopted through incorporation by reference the Composite Panel Association (CPA) recommendations for the height of stacks. The CPA has recommended that stacks of composite panels should be limited to five units in height. This is an industry recommendation contained in a Technical Bulletin not a consensus standard incorporated by reference in Oregon OSHA's standard.

Having said that, an industry recommendation such as this could be used as the basis of a general duty violation since it constitutes industry knowledge of a hazard. As you also correctly note, the appropriate height of stacks of composite materials should be based on a number of factors including lifting equipment capacity, floor load bearing capacity, material handling flow, available space, size of the units themselves and others.

I am not aware of an interpretive letter on cross-tying lumber stacks. It may have been a letter which is no longer in our files.

If you have additional questions please call Oregon OSHA's Technical Section at (503) 378-3272.

Sincerely,

Peggy Munsell, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division