



**INTEROFFICE MEMORANDUM**

**Oregon Occupational Safety & Health Division**

September 26, 2002

**TO:** OR-OSHA Staff

**FROM:** Barry Jones, Manager of Enforcement  
Michelle Cattanach, Consultation and Services Manager

**SUBJECT:** Delivery of Roofing Materials on Construction Sites

This memorandum supersedes the previous memorandum dated September 5, 2000, same subject.

The construction fall protection uniformity committee identified a uniformity issue regarding the delivery of roofing materials onto a construction site. In previous interpretations and memorandums, attempts were made to address what standard applies to vendors who deliver roofing materials onto a construction project. In the past, this activity was considered to fall under the scope of Division 2. This decision was based on the primary business of sales and delivery of the retail/wholesale outlet and not on the activity/process of hoisting and storing materials onto a roof.

**“Roofing Work”**, as defined in Division 3, subpart M, 437-003-1500(5), *means the hoisting, storage, application, and removal of roofing materials and equipment, including related insulation, sheet metal, and vapor barrier work, but not including the construction of the roof deck and leading edge work.*

It has been the policy of Oregon OSHA to apply the occupational safety and health standards according to the work activity and not the standard industrial classification of an employer. In order to be consistent with this policy, the following standards will apply when vendors deliver roofing materials onto a construction site:

**Division 2:** When materials are delivered onto the construction site at ground level the activity, process and equipment are subject to the safety and health standards for general industry.

**Division 3:** When materials are delivered onto a roof deck of the building the activity, process and equipment are subject to the safety and health standards for construction.

Any written or verbal guidance previously received which does not support this position is superseded by this memorandum and should be disregarded.