



Oregon

Kate Brown, Governor

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Subject: Power line tree trimmers wearing chaps

The following was our response to an e-mail from an employer. Please note that the original question has been rephrased.

Question: When an employee is climbing for line clearance tree trimming purposes, they normally make cuts away from the body and use the tree to guard from saw contact. Normally for this process leg protection such as chaps create a climbing hazard hindering the climber. They also become dirty and create an electrical hazard for climbers in close proximity to power lines. Are chaps necessary for this work activity?

Answer: Not necessarily.

The rules regarding line clearance tree trimming are found in Division 2/RR. Line clearance tree trimmers must follow 437-002-2306, Personal Protective Equipment, that requires the user to follow the requirements of Division 2/I. In turn, Subdivision I rules, OAR 437-002-0134(11) states:

“Employees using chain saws must wear chaps or leg protectors that cover the leg from the upper thigh to mid-calf. The protector must be material designed to resist cuts from the chain saw.”

Background: When the Oregon Rules for Tree and Shrub Services were developed, there was discussion among committee members about chaps interfering with climbing. It was questioned whether chaps were really needed when proper cutting techniques are used, and proper positioning employed. The same questions apply to climbing while wearing chaps for powerline tree trimming operations.

The aforementioned committee agreed that chaps are difficult to climb in and often hang up on small branches and projections. Climbing without the use of spurs is often required to prevent damage to trees. The potential for cutting the legs is minimal when using a smaller saw for pruning, when cutting is done above the waist, and when the tree is used for protection. The potential for cuts to the legs is increased when the larger saws are used, especially when drop-started. 437-002-2317(5)(d) prohibits drop starting of chainsaws.

When climbing (with or without spurs) or working aloft in a tree and when a smaller saw is used, cuts are made above the waist, and the tree is used (when possible) for protection, a violation

could be considered minimal or de minimis and the work procedures would be allowed to continue.

You will need to evaluate if the hazard of falling during climbing while wearing chaps is greater than the hazard of cutting a leg. If it is determined that other conditions exist that increase the potential for cutting the legs, then those conditions need to be documented and action taken to ensure compliance with the standards.

If we can be of further assistance, call Oregon OSHA's Technical Section at 503-378-3272. You are also invited to visit Oregon OSHA's website at www.osha.oregon.gov

Sincerely,

A handwritten signature in black ink that reads "Trena VanDeHey". The signature is written in a cursive style with a large initial 'T' and 'V'.

Trena VanDeHey, Standards & Technical Resources Manager
Oregon Occupational Safety & Health Division