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From: Marilyn K. Schuster, Policy Manager
Subject: Fall protection for drivers working on top of loaded chip trailers, OAR 437-002-0134(5)

Issue: Most chip trucks are now using a ground operated roll-over tarp system which limits exposure to a fall from the top of a trailer. Occasionally, the ground operated roll-over tarp will not roll over mounded chips and the driver is required to go on top of loaded chip trailers to level out mounds or move the roll-over tarp past mounds. This may present a fall hazard if done in an unsafe manner since the chip trailers are 13 feet 6 inches high.

Conclusion: If done in a logical and safe manner, the intent of Oregon OSHA's fall protection rules can be met. If drivers work in the center of the loaded chip trailer and limit the distance from where they are working to the unguarded trailer sides (frame edges) or if working on top of chips next to the trailer sides where the distance from standing point to the top of the trailer side is 39 inches or more fall protection, would not be required.

Older style operations that require the driver to work from the top of chip trailer to hand-spread a tarp over the load require fall protection.