Richard H. Holmes Holmes Tree Preservation, Inc. P.O. Box 3004-#405 Corvallis, OR 97339

Dear Mr. Holmes:

Thank you for contacting us regarding clarification of safety issues that affect you and your employees in the tree care and removal business. Bob Thiessen and Bob Bryant appreciated meeting you and your employees on June 11 to view first hand how you do your work. The questions in your letter of April 22, 1997 relate to main stem tree topping and removals, primarily larger Douglas fir in the two to three foot diameter sizes. As you demonstrated to us, this type of work is significantly different from what is involved in shaping trees that are species with lots of limbs.

Both the ANSI standard and OAR 437-002-0308(2)(d)&(e) require that when power saws weighing over 15 pounds are used in trees that they be supported by a separate line attached to a false crotch. Attaching a line to the tree to support the chain saw can create some serious challenges for the climber doing main stem removal of large trees. A discussion with a member of the ANSI Z133.1-1994 committee on July 1, 1997 confirmed that when climbers are performing main stem removal operations on larger trees, the existing standards may not be applicable. A revision of the ANSI standard is being planned that would in part address the unique issues related to main stem topping and removal of larger trees.

Until such time as ANSI Z133.1 is revised we will consider it a deminimus violation if a power saw over 15 pounds is attached to the climber rather than a false crotch. The saw and lanyard can be attached to the climber if the lanyard is long enough to hang the saw below the climbers feet. In this case the climbers harness, with safety lines around the tree, serve the same function as a false crotch.

You also asked about the appropriate procedures for starting a saw over 15 pounds when in the tree. Holding the saw in one hand and pulling on the starting rope with the other is not considered drop starting. Drop starting the saw consists of pushing the saw away from the operator as the starting cord is being pulled.

For further information contact Bob Thiessen at 378-3272. You are also invited to see the OR-OSHA pages on the Internet at www.cbs.state.or.us/external/osha/index.html.

Sincerely,

Marilyn K. Schuster, Manager Standards & Technical Resources Section Oregon Occupational Safety & Health Division

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