



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (Oregon OSHA)

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Mark Dvorscak
Safety Coordinator
Lone Rock Timber/Lone Rock Logging
2323 Old Highway 99 S
Roseburg, OR 97470

Dear Mr. Dvorscak,

Request:

In your request to Oregon OSHA you stated:

The requirements of 437-007-0800(4) are often impossible to comply with in conjunction with 437-007-0800(3) [which states that] the minimum distance between any worker(s) manually falling trees and any other personnel must be twice the height of the trees being felled.

Our cutters maintain radio communication with each other at all times which is an option that wasn't available to us when I was cutting and when these rules were formulated. This allows them the ability to check on each other when topography makes it impossible to speak with each other without assistance. Cutting road right of ways is another operation in which it is not possible most of the time to see or speak with each other without a radio.

Maybe we could add an exception that allows for radio communication or otherwise edit these rules to address the realities workers face in the woods.

Background:

Your request was submitted to Oregon OSHA's Forest Activities Advisory Committee (FAAC) for discussion on June 8, 2017. The committee agreed that a request to Oregon OSHA should allow the use of radios as an acceptable method of communication for workers who are single jacking.

The standard that applies to the above request:

437-007-0800(4) Workers who are single jacking must be positioned so they are close enough to render assistance to each other in case of an emergency. They must be:

- (a) Within sight of each other, or*
- (b) Able to talk to each other by natural unassisted voice communication.*

Answer:

Oregon OSHA's policy group considered your request and the recommendations from the FAAC, and we agreed to allow workers who are single jacking to use radio communication to meet the intent of 437-007-0800(4) when all of the following provisions are being met:

1. Radio checks must be performed at the beginning of the workday and periodically to verify battery life, operation, and correct channel.
2. Each worker must keep a functioning radio on them at a volume level loud enough to hear calls.
3. Workers must be positioned close enough to ensure walking distances still allow them to render assistance to each other in case of an emergency.
4. Workers must coordinate their individual activities and approximate locations with each other to expedite any need to receive or render assistance in case of an emergency.
5. Workers must regularly check in with each other at intervals appropriate for their circumstances, e.g., saw heard not running or idling for prolonged period, refueling.
6. If one worker does not respond during an attempt to check in, the other worker must go check on them.

Failure to comply with 437-007-0800(4) *or* all the above provisions (1-6) may be considered a violation with penalties assessed.

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,



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