

February 23, 2004

Mr. Cary Childers
Weyerhaeuser
P O Box 907
Albany, OR 97321

Dear Mr. Childers:

Oregon OSHA received your application for a variance to OAR 437-02-1910.265(c)(27)(iv) regarding stacking of lumber. A variance is unnecessary for the following reasons:

The standard says "Stickers. Unit packages of lumber shall be provided with stickers as needed to ensure stability under ordinary operating conditions."

The controlling words are "as needed" and "under ordinary operating conditions."

From this language it is clear that stickers are not mandatory for all circumstances. The determining test would be the stability of the stack.

Alternate methods such as offset stacking or other stabilizing techniques are acceptable and make the use of stickers unnecessarily redundant.

Because the rule applies to all of Oregon, this interpretation applies to all your Oregon locations.

For more information contact the OR-OSHA Technical Section at 503-378-3272 or see us on the web at www.orosha.org.

Sincerely,

Marilyn K.Schuster, Manager
Standards and Technical Resources