



VOSH PROGRAM DIRECTIVE: 06-009

ISSUED: May 15, 2000

SUBJECT: Applicability of the Logging Standard, §1910.266, to Arborists.

A. Purpose.

This directive transmits to field personnel an interpretation of the applicability to tree trimmers of the General Industry Logging Standard.

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

B. Scope.

This directive applies to all VOSH personnel.

C. Reference.

Not Applicable.

D. Cancellation.

Not Applicable.

E. Action.

The Commissioner, Directors and Managers shall ensure that field personnel understand and comply with the interpretation and application of the standard as detailed in this directive.

F. Effective Date.

June 1, 2000

G. Expiration Date.

Not Applicable.

H. Background.

The VOSH Program adopted the current Logging Standard, §1910.266, effective June 1, 1995. By letter to VOSH staff dated August 26, 1998, the Deputy Commissioner issued an interpretation of this Logging Standard applying it to all arborist operations which fall within the definition of “Logging Operations.” The purpose of this interpretation was to insure continued protection of persons involved in the use of chain saws and other hazardous equipment in **the process of felling and limbing trees.** “Logging operations” is defined in §1910.266(c) as follows:

“Logging operations.” Operations associated with felling and moving trees and logs from the stump to the point of delivery, such as, but not to be cut to length, felling, limbing, bucking, debarking, chipping, yarding, loading, unloading, storing, and transporting machines, equipment and personnel to, from and between logging sites.

I. Interpretation and Applicability.

The logging standard will only apply to arborist activities where one or more trees is felled (i.e., cut down).

[NOTE: Day laborers working in a logging operation for an arborist do not have to be trained in first aid if they are not using machines and are doing clean-up work.]

When trees are only being trimmed and not felled, CSHOs shall look to other applicable General Industry Standards and statutes, including but not limited to:

1910.269(r)	Line Clearance Tree Trimming Operations
1910.132	Personal Protective Equipment (for leg protection)
1910.133	Eye and Face Protection
1910.135	Head Protection
1910.136	Foot Protection
1910.151	Medical Services and First Aid
1910.67	Vehicle Mounted Elevating and Rotating Work Platforms
1910.68	Manlifts
1910.180	Crawler Locomotive and Truck Cranes
1910.212	Machine Guarding,

and the Code of Virginia:

§59.1-406-414 Overhead High Voltage Line Safety Act.

In the absence of a General Industry Standard to address a serious hazard during the trimming, CSHOs may rely on ANSI Z133 as a National Consensus Standard that addresses recognized hazards in the tree trimming industry.

Jeffrey D. Brown

Commissioner

Attachment: None.

Distribution: Commissioner of Labor and Industry
Chief Deputy Commissioner
Directors and Managers
VOSH Compliance Staff
Cooperative Programs Staff
Legal Support Staff
OSHA Regional Administrator, Region III