

# DOSH DIRECTIVE

Department of Labor and Industries  
Division of Occupational Safety and Health  
*Keeping Washington safe and working*

## 20.55

# Log Sorting Yards in Marine Terminals or Sawmills

**Updated: February 15, 2019**

### **I. Purpose**

This Directive establishes inspection procedures and enforcement policies to be used when evaluating dry land yards, wherever they are located.

### **II. Scope and Application**

This Directive applies to all DOSH operations statewide, and replaces all previous instructions on this issue, whether formal or informal. This Directive provides guidance on the appropriate application of DOSH standards related to log sorting yards adjacent to marine terminals, including those connected with sawmills, pulp mills, or similar activities.

This Directive has been reviewed for applicability, and remains effective with a new issue date of February 15, 2019.

### **III. References**

- Chapter 296-56 WAC, Longshore, Stevedore, and Waterfront Related Operations
- Chapter 296-78 WAC, Sawmills and Woodworking Operations
- Chapter 296-79 WAC, Pulp, Paper, and Paperboard Mills and Converters
- Chapter 296-54 WAC, Safety Standards for Logging Operations

### **IV. Background**

Several industry-specific standards have potential application to log sorting yards attached to marine terminals or sawmills.

Chapter 296-56 WAC applies “to all longshore, stevedore and waterfront operations,” including marine terminals (WAC 296-56-60001(2)). “Marine terminals” include “adjacent storage or contiguous areas” associated with the primary movement of cargo (WAC 296-56-60005).

Chapter 296-78 WAC applies to sawmills and woodworking, including log handling (WAC 296-78-500(1)), while Chapter 296-79 WAC applies to pulp and paper mills, including “all buildings, machinery, and equipment” (WAC 296-79-010).

Finally, Chapter 296-54 WAC applies to logging activities, including log handling, although it excludes “log handling at sawmills, plywood mills, pulp mills or other manufacturing operations governed by specific safety standards.” (WAC 296-54-501). WAC 296-54-593 applies specifically to “dry land sorting and storage.”

**V. Enforcement Policy**

**A. Log Sorting Operations Adjacent to Marine Terminals.**

Although such activity falls under the scope of Chapter 296-56 WAC, the most specific applicable requirements are those found in **WAC 296-54-59340**. Therefore, the logging standard governs such activity. After logs have been processed (scaled, graded and sorted) and placed in a “staging area” where the next handling process would put the logs onto a ship, the requirements of Chapter 296-56 WAC apply.

**B. Log Sorting Operations Directly Connected with a Sawmill, Pulp Mill or Similar Activity.**

Only WAC 296-54-593 provides specific safety standards for log scaling, grading and sorting. Therefore, the logging standard governs such activity until the logs have been processed (scaled, graded and sorted) and placed in a “staging area” where the next handling process would place the logs into a mill (or into a millpond for storage and/or staging). Beyond that point, either Chapter 296-78 WAC or Chapter 296-79 WAC would apply to the activity.

**VI. Who to Contact**

If DOSH staff have questions or need additional guidance or interpretive assistance, they are encouraged to contact the Logging Industry Technical Specialist or the Maritime Supervisor.

**VII. Review and Cancellation**

**This DOSH Directive will be reviewed for applicability two years from the issue date, and will remain effective unless superseded or canceled.**

Approved:   
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