

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH  
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*Juliann Sum, Chief*

April 12, 2017

Trina Panaqua  
430 South Pine Street  
San Gabriel, CA 91776  
[trina4garvey@hotmail.com](mailto:trina4garvey@hotmail.com)

Re: Bottom feed stop bars on wood chippers

Dear Ms. Panaqua:

This letter is being provided in response to your request dated March 30, 2017 for information on bottom feed stop bars on wood chippers. The content and conclusions of this letter are based only on the facts described below and responsive only to the original requestor. They may not be construed as a statement of general Cal/OSHA policy or a new set of rules to be applied in other situations or to other types of activities.

Your inquiry is prefaced with background information about a request from the Department of General Services (DGS) that was included in a bid from Garvey Equipment Company for wood chipping equipment. The specific request was that a bottom feed stop bar "be strategically located to make it possible for the operator's leg to strike the bar and shut off the feed either intentionally or automatically in an emergency situation".

You also state in your inquiry that, in the opinion of Garvey Equipment Company, a bottom feed stop bar does not operate automatically due to the 34-pound force required to activate the device. Additionally, the letter expresses your company's opinion that the location of the bottom feed stop bar being "strategic" would depend on the circumstances of its activation. Based on this information you have posed the following questions:

Question #1

*Does the bottom feed stop bar activate automatically?*

Answer #1

The term *automatically* is not defined in Cal/OSHA regulations. In the absence of a regulatory definition, it is prudent for a common definition to be utilized. *Automatic* as it pertains to a machine or device is defined by Merriam-Webster as "having controls that allow something to

work or happen without being directly controlled by a person.” Similarly, the Cambridge English Dictionary defines *automatic* as “able to operate independently without human control.” Because the bottom feed stop bar of a wood chipper requires activation by the operator either intentionally or unintentionally, it would not be considered to operate automatically.

Question #2

*Do you support a “bottom feed stop bar” or a “passive” device on a wood chipper?*

Answer #2

As a regulatory agency, Cal/OSHA cannot support, endorse or exhibit preference for any specific design, type or manufacture of safety devices or equipment and may only mandate the installation or use of devices required by Cal/OSHA standards. There is currently no requirement in Title 8 regulations for wood chippers to be equipped with a bottom feed stop bar or passive safety device. The Occupational Safety and Health Standards Board, however, has granted a petition for a new regulation regarding passive safety devices for wood chippers. This petition was granted to the extent that an advisory committee be convened to explore alternative technologies including passive safety devices for the safeguarding of wood chippers.

Thank you for your interest in occupational safety and health. Please feel free to contact me if you have any further questions.

Sincerely,



Eric Berg  
Deputy Chief  
Research and Standards