SUBJECT: Enforcement of the Overhead Door Protection Standard

Purpose:
To clarify and standardize enforcement of the overhead door standard

Scope:
This instruction applies MNOSHA-wide.

References:

1. Minn. Rules 5205.0675, subp. 2, "Overhead Doors".
2. UL 325 (1987) "Standard for Door, Drapery, Gate, Louver, Window Operators and Systems", is referenced by Minn. Rules 5205.0675. Section 29.1 deals with protection from entrapment and section 47.29 deals with placard information. Other sections of the UL Standard deal with installation and manufacturing instructions which are beyond the scope of OSHA enforcement.
3. UL 325 (2010) “Standard for Door, Drapery, Gate, Louver, Window Operators and Systems”. This standard is not enforceable by MNOSHA under 5205.0675, subp. 2. Citations will not be proposed if the employer is in compliance with UL 325 (2010).

Cancellation:
This instruction supersedes MNOSHA Instruction STD 5-1.6, dated May 1, 2012.

ACTION:

We will accept overhead doors incorporating any of the three following safety options:
A constant pressure closing switch. This switch must be located in sight of the door so that it can be released and manually reversed if in the event that an obstruction could potentially be or is contacted.

B. Installation of a reversing edge switch. This option would allow an automatic closing control out of sight of the door but would immediately reverse the direction of the door upon striking or recognizing an obstruction. Variations of this option would include: the use of photo-electric cells that would reverse the door when an obstruction could be contacted and was recognized by the beam, an air-pressure contact reversing mechanism, or other mechanical reversing mechanisms.

C. A three-button control switch. A three-button control switch is allowable only if the following conditions are met:

1. It is provided with a permanent placard adjacent to the switch with the following warning written in letters at least 1/4" high:

   - WARNING -
   
   TO PREVENT ENTRAPMENT
   DO NOT START DOOR DOWNWARD
   UNLESS DOORWAY IS CLEAR

2. The control station and placard are located within sight of the doorway.
3. Automatic closing controls are not also installed.
4. The operator must remain at the control station and observe the door until the door is fully closed.

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for the OSHA Management Team

Distribution: MNOSHA Compliance and WSC Director

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