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OSHA Compliance Requirements for Commercial Overhead Door Systems

Occupational Safety & Health Act of 1970

Overhead door systems are not specifically referenced in the *Act*¹; however, they are subject to the standards of **Section 5(a)(1) of the Act**, the General Duty Clause:

Section 5. Duties

(a) *Each employer —*

(1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;

Section 5(a)(1) has been used as the basis for overhead door-related OSHA citations and penalties, and OSHA enforcement has cited **improperly maintained and/or installed door systems** as well as the **absence of entrapment devices** as causing unacceptable exposure to “Crushing” or “Struck-by” hazards.

Below are several examples:

- “... overhead garage doors did not have a safety device edge, door stop sensors and proper signage.”²
- “... two 14 foot wide overhead garage doors did not have a safety device edge or door stop sensors.”³
- “... employer failed to ensure that the overhead door in Bay #3 was adequately constructed and adjusted to prevent it from coming off the track.”⁴
- “... garage doors #1 and #2 did not have a safety device edge or door stop sensors.”⁵

OSHA abatement typically instructs to “**hire a professional to install the safety devices and conduct periodic inspections.**”^{5,6,7}

State OSH Plans

State OSH Plans must, by federal OSHA law, be at least as effective as federal OSHA standards, but having satisfied that requirement, they are free to be more specific about overhead door safety standards and practices. For example, *Minnesota’s Clarification of Minnesota Rules 5205.0675, subp. 2⁸* aims to provide more specific instructions on acceptable overhead door safety options.

Conclusion

Improperly maintained or installed overhead doors, or those not equipped with safety devices, can be serious hazards^{9,10}. To mitigate safety and OSHA compliance risk, all overhead door systems should:

1. Receive regular inspections and maintenance in accordance with manufacturers’ specifications,
2. If motorized, have properly specified and functioning entrapment devices (photo-eyes or sensing edge).

¹ Letter published on the OSHA website, Richard E. Fairfax, Director, Directorate of Enforcement Programs, September 10, 2002. URL https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24460

² OSHA inspection #314223140, Shelburne Fire Department

³ OSHA inspection #314071929, Orland Dwelley & Sons, Inc.

⁴ OSHA inspection #313525404, Cema Corp.

⁵ OSHA inspection #314071838, Force Manufacturing, Inc.

⁶ OSHA inspection #313993313, Kelly Lumber Sales, Inc.

⁷ OSHA inspection #313993321, Timber Express, Inc.

⁸ Minnesota OSHA Fact Sheet, *Clarification of Minnesota Rules 5205.0675, subp. 2—Overhead Doors*

⁹ OSHA inspection #314365602, Employee dies when crushed beneath garage door.

¹⁰ OSHA inspection #316106731, Employee dies after being struck by door.