

South Carolina Department of Labor, Licensing and Regulation  
Division of Labor  
Office of Occupational Safety and Health  
Columbia, South Carolina 29211

**OSH Program Directive Number 78-1928.51-1**

**Subject:** Low Profile Tractor.

**Standard:** Article VIII, Section 1928.51 (a) and (b), Rules and Regulations, Commissioner of Labor, State of South Carolina.

**Cross Reference to Federal Standards:** 29 CFR 1928.51 (a) and (b).

**Background:** The purpose of this directive is to clarify citing of Roll-Over Protective Structures (ROPS) for tractors used in agricultural operations. The “low profile tractor” is presently defined as wheeled tractors only, but in reality may also be tracked tractors. Article VIII, Section 1928.51 (a) defines a “low profile tractor” as a wheeled tractor possessing the four characteristics listed in the standard. Track vehicles meeting the essential characteristics contained in Article VIII, Section 1928.51 (a) shall also be defined as “low profile tractors”.

**Interpretation:** Article VIII, Section 1928.51 (b) (1) and (2) shall not be cited when the requirements of Article VIII, Section 1928.51 (b) (5) (i) or (ii) “low profile tractor” are met by an “agriculture tractor” that is a track vehicle meeting the requirements of Article VIII, Section 1928.51 (a) (2) (3) and (4).

**Effective Date:** This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand, Director  
May 31, 1978