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OSHA RULES AND SAFE FORKLIFT OPERATIONS

By SeaBright Insurance Loss Control

Federal and State OSHA regulations have long required that only trained and authorized operators be allowed to run industrial trucks, a term that includes forklifts. The type and extent of training was not specified until December 1st 1998 when OSHA published the Final Rule for Powered Industrial Truck Operator Training [29 CFR 1910.178(l)], which became effective March 1, 1999. The standard requires operator training and licensing as well as periodic evaluations of operator performance. The standard also addresses specific training requirements for truck operation, loading, seat belts, overhead protective structures, alarms, and maintenance of industrial trucks. Refresher training is required if the operator is observed operating the truck in an unsafe manner, is involved in an accident or near miss, or is assigned a different type of truck.

How Important Is Training?

Data compiled by the Bureau of Labor Statistics estimated 100 fatalities involving industrial trucks annually. As many as 34,000 people were treated in hospital emergency rooms for accidents related to forklifts. It is estimated that approximately 20% to 25% of these accidents are due, at least in part, to inadequate training.

Scientific studies have shown that good training programs can result in 60% improvement in operator performance scores. This is significant. Although an increase in performance scores does not guarantee fewer accidents, it does indicate that with training, the operators committed fewer *errors*, which could lead to accidents or fatalities.

WHAT THE STANDARD REQUIRES:

1. Select the Right Person

The standard begins by requiring you to be sure the potential operator is capable of performing the duties of the job. How do you make this determination? Study the job, to identify the specific physical needs of the position. The following factors should be evaluated when selecting a candidate for training:

- **Vision** — it is safe to assume that all candidates must have normal depth perception and corrected vision. Operators, who are required to wear glasses to drive a car, must be required to wear glasses when operating the truck. The ability to identify colors could also be an issue at some worksites. If color is an important element in your operations, keep in mind that many color blind people may not be aware of their limitation unless they have been tested using the medically accepted procedure.
- **Hearing** — the candidate will need to hear reasonably well. Although not specifically covered in the standard, this also applies to people working around forklifts. Being able to hear back-up alarms and warning blasts of the horn could make the difference between life and death. One study found that 46% of industrial truck related incidents have involved someone being struck by the vehicle.
- **Environmental Concerns** — At times, industrial truck operators may have to work under extreme environmental conditions. Some people have a hard time dealing with heat or cold. For example, a person who is intolerant of cold may find it difficult to concentrate when working in a cold storage warehouse.
- **Physical Limitations** — The existence of a physical limitation should not automatically disqualify a candidate, but the ability to handle controls safely is important. You may have a duty under the Americans with Disabilities Act (ADA) to accommodate a

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candidate with physical limitations if they otherwise qualify for the position and if accommodations do not mean undue financial hardship for your firm.

2. Provide Comprehensive Training

According to the standard, "All training and evaluation shall be conducted by a designated person who has the requisite knowledge, training and experience to train powered industrial truck operators and judge their competency."

The days of showing a videotape and considering viewers to be "trained" are over. Classroom sessions are called for which can include lectures, discussions, and the use of audio-visual materials. Accompanying this must be practical (hands-on) training, which includes exercises and demonstrations completed by the trainee.

3. Certify and Document Training

Prior to certification, you must make a determination that the trainee is indeed qualified to safely operate the industrial truck. How are you going to do this? Keep in mind that you may be called on to defend your decision. Successful completion of a written examination and proficiency test is probably the best method.

These activities should not be geared toward passing or failing. Instead, tests can serve as tools to assess the trainees' understanding, retention of knowledge, and development and application of skills. No one need fail. If the trainee fails to answer a question properly or cannot complete a task successfully, the instructor should work with that person until he or she understands what was missed and demonstrates skill development. Remember, the fault may not be in the student; it may be a weakness in the training approach.

Certification is done after trainees have received the training and demonstrated their knowledge and skill. Written documentation must show:

1. the name of the operator,
2. the date of training,
3. the signature of the person who performs the training and evaluation.

Included with this documentation must be a copy of the written course outline or, if an outside agency is used for training, the name and address of that individual must be recorded.

If an existing or newly hired employee has considerable past experience in forklift operation, re-training in truck-related or workplace-related topics is not necessary, but he or she must pass the written test, demonstrate operating proficiency, and be certified. Remember that the current employer must certify that employee is qualified to operate the equipment safely.

4. Provide Refresher Training

Over time, even the most conscientious forklift operator can develop bad habits or even forget some of their earlier training. For this reason, the standard requires that a periodic re-evaluation be done by the "designated person." This does not necessarily mean the entire training course must be repeated but lift truck operators should be called upon to once again demonstrate adequate knowledge and skills.

Remedial training will need to be provided if there has been an unsafe operation, when an accident or near miss occurs, or when an evaluation shows that the operator is not capable of doing the assigned work safely.

With its goal of producing professional, knowledgeable operators, the OSHA standard is comprehensive regarding subjects that must be covered during training. These subjects have been divided into truck-related topics and workplace-related topics.

REQUIRED TRAINING PROGRAM CONTENT

Truck-Related Review Topics Include:

- All operating instructions, warnings, and precautions for the types of trucks the operator will be authorized to use. Not all trucks share the same characteristics.
- The similarities and differences between the truck and the more common automobile.
- The purpose and function of the controls and instrumentation.
- Operation and maintenance.
- Steering and maneuvering limitations.
- Visibility, including sight restrictions due to the load.
- Fork and attachment devices (if used) and their operation and limitations.
- Vehicle capacity and stability.
- Vehicle inspection and maintenance.
- Refueling procedures/charging of batteries.
- Operating limitations.
- Any other instruction or precaution the operator must be aware of to operate the equipment safely.

Workplace-Related Review Topics:

- Surface conditions where the equipment will be operated.
- Composition of loads and load stability.
- Load stacking and unstacking.
- Pedestrian traffic.
- Narrow aisles or other restrictions.
- Operating in hazardous classified atmospheres.
- Operating the truck on ramps and other sloped surfaces.
- Operating the vehicle in enclosed spaces which could lead to a build-up of carbon monoxide gas or diesel exhaust.
- Any unique operating conditions that may exist in your workplace.

Practical Training and Demonstration:

- This is where the trainee gets the behind-the-wheel experience and demonstrates to the instructor that he or she understands safe forklift operation and can apply what has been taught. Be aware that at this point, trainees are not allowed to operate the truck in any area that is occupied by other employees. Drivers cannot handle forklift equipment in the work area until they have demonstrated they are qualified and have been certified as an authorized operator.

WHICH INDUSTRIES MUST ADOPT THE STANDARD?

Specifically mentioned are businesses that are covered by General Industry (1910), Marine Terminals (1917), Shipyards (1915), and Longshoring (1918). If you operate in a jurisdiction with a state OSHA agency, your state will have these same, or more stringent, standards.

OSHA regulations are often viewed as burdensome and unnecessary. The standard should not be considered an expensive hindrance. It should be used as a guide for developing well trained, safe, and professional forklift operators.

In the process of closely examining their lift truck operations, companies often realize additional benefits as well. Management's focus on training frequently generates ideas that reduce forklift traffic problems and increase the productivity of receiving and shipping operations as well. As usual, safety, efficiency and production go hand in hand.