

**Summary of
OSHA Final Rule on
Powered Industrial Truck
Operator Training**

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Summary of OSHA Final Rule on Powered Industrial Truck Operator Training

1. INTRODUCTION

On December 1, 1998, OSHA issued a final rule which revised its existing requirements for powered industrial truck operator training and issued new requirements to improve the training of these operators.

In this final rule, OSHA requires that operators of powered industrial trucks be trained in the operation of such vehicles before they are allowed to operate them independently. The training must consist of instruction in proper vehicle operation, the hazards of operating the vehicle in the workplace, and the requirements of the OSHA standard for powered industrial trucks.

Employers must then evaluate operators who have completed training while they operate the vehicle in the workplace. Employers must also periodically evaluate operators (at least once every three years) to ensure that their skills remain at a high level. Employers must provide operators with refresher training whenever there is a demonstrated need for it.

The new standard for powered industrial truck operator training replaces very general training provisions that were viewed as ineffective by many.

II. SCOPE OF COVERAGE

OSHA's new standard for powered industrial truck operator training applies to all industries (including distribution and manufacturing) in which powered industrial trucks are used.

The term "powered industrial truck" includes, but is not limited to, forklifts, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motor or internal combustion engines. The term does not include compressed air or nonflammable compressed gas-operated industrial trucks, farm vehicles, nor vehicles intended primarily for earth moving or over-the-road handling.

Please note that employers must train all employees who operate powered industrial trucks including those that have other duties but sometimes operate a powered industrial truck.

III. EFFECTIVE DATES

Operators of powered industrial trucks hired before December 1, 1999 must be trained and evaluated by December 1, 1999. Operators hired on or after December 1, 1999 must be trained

and evaluated before the employee is assigned to operate a powered industrial truck.

IV. GENERAL DUTY

Each employer must ensure that each employee that operates a powered industrial truck is competent to operate such trucks safely as demonstrated by the completion of the training and evaluation required by the final rule.

Furthermore, employers must ensure that, before an employee is permitted to operate a powered industrial truck (except for training purposes), the employee has successfully completed the required training including an evaluation of the effectiveness of the training.

There are a number of ways an employer can execute this general duty. For example, employers may hire outside qualified training organizations to conduct the required training and evaluation activities. In the alternative, an employer also may have an employee perform the training and evaluation provided the employee has the requisite knowledge training and experience to train operators of powered industrial trucks. Additionally, truck manufacturers and dealers can provide information and assistance in developing a training program.

V. IMPLEMENTATION OF THE TRAINING PROGRAM

A. Trainees. Trainees may operate powered industrial trucks provided that:

1. The trainee does so under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence; and
 2. Such operation of the truck is conducted in areas where there is minimum danger to the trainee and other employees.
2. Format. Under the final rule, training shall consist of a combination of:
1. Formal instruction (e.g., lecture, classroom type instruction, discussion, interactive computer learning, video tape, written material, etc.);
 2. Practical training (e.g., demonstrations performed by the trainer; practical exercises performed by the trainee, etc.); and
 3. Evaluation of the operator's ability to apply the training in workplace.

Comments: According to OSHA, a combination of formal and practical training is necessary to ensure effective employee training. Formal or classroom type training is necessary to teach some of the principles

of vehicle operation and provide the basis for practical training. Hands-on practical training provides the trainee with the necessary physical skills and enhances the employee's ability to operate a powered industrial truck safely. In addition, evaluation of the trainee's ability to operate a truck safely in the workplace will ensure that the trainee has successfully transferred the skills learned to the work environment.

C. Trainer Qualifications. The final rule requires that operator training and evaluation must be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

OSHA's performance oriented approach to the qualifications of trainers and evaluators allows employers who have the necessary prerequisites to qualify as trainer and evaluator. In the alternative, employers may assign the responsibility for training and evaluation to one or more employees who have the requisite knowledge, training and experience. An employer could also contract with an outside training organization to conduct the required training and evaluation activities.

4. Content of Training Program. Operators of powered industrial trucks must receive initial training in the following topics (except those topics which the employer can demonstrate are not applicable to safe operation of the truck in the employer's workplace):

1. Truck Related Topics.

- 1) Operating instructions, warnings and precautions for the types of truck(s) the operator will be authorized to operate.
- 2) Differences between the truck and the automobile;
- 3) Truck controls and implementation (e.g., where they are located, what they do, and how they work);
- 4) Engine or motor operation;
- 5) Steering and maneuvering;
- 6) Visibility including restrictions due to loading;
- 7) Fork and attachment adaptation, operation and use limitations;
- 8) Vehicle capacity;
- 9) Vehicle stability;
- 10) Any vehicle inspection and maintenance that the operator will be required to perform;

- 11) Refueling and/or charging and recharging of batteries;
- 12) Operating limitations; and
- 13) Any other operating instructions, warnings or precautions listed in the operator=s manual for the type(s) of vehicle(s) that the employee is being trained to operate.

2. Workplace Related Topics.

- a) Surface conditions where the vehicle will be operated;
- b) Compositions of loads to be carried and load stability;
- c) Load manipulation, stacking and unstacking;
- d) Pedestrian traffic in areas where the vehicle will be operated;
- e) Narrow aisles and other restricted places where the vehicle will be operated;
- f) Hazardous environment (classified) locations where the vehicle will be operated;
- g) Ramps and other sloped surfaces that could affect the vehicle=s stability;
- 8) Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust; and
- 1) Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

3. Requirements of 29 CFR 1910.178. The relevant general requirements of Section 1910.178 must be reviewed with trainees. This section sets forth general regulatory requirements for powered industrial trucks.

Comments: The training regulation allows employers to omit some of the elements listed above provided that the employer can demonstrate that they are not relevant to the safe operation of powered industrial trucks in the employer=s workplace. In this event, the employer must be able to demonstrate that a particular topic on the above list is not relevant to the training program because that element does not apply to the type of vehicle in use, or because the workplace condition addressed by the topic does not exist.

For example, if a powered industrial truck is not used in a hazardous environment (i.e., gases, vapors, combustibles) see 29 CFR 1910.178(c) no training in this element is needed. Similarly, if the truck will be operated on smooth concrete floors, no training needs to be provided on operating on rough terrain. Likewise, if an operator has no servicing or maintenance responsibilities, the operator need not be trained in how to conduct that servicing or maintenance activity.

VI. REFRESHER TRAINING AND EVALUATION

A. General Duty. Employers must provide refresher training (including an evaluation of the effectiveness of that training) to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely. The obligation to provide refresher training is triggered by the events listed in Paragraph B below. Such refresher training also is needed if evaluation reveals that an operator is not operating the truck safely.

2. **When Refresher Training Must be Provided.** Refresher training in relevant topics (and appropriate evaluation) must be provided to the operator(s) when:
 1. The operator has been observed to operate the vehicle in an unsafe manner;
 2. The operator has been involved in an accident or near-miss incident;
 3. The operator has received an evaluation that reveals that the operator is not operating the truck safely;
 4. The operator is assigned to drive a different type of truck; or
 5. A condition in the workplace changes in a manner that could affect the safe operation of the truck (i.e., a different type of paving, reconfiguration of storage racks, new construction leading to narrower aisles or restricted visibility, etc.)
3. **Periodic Evaluation.** An evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.

Comments: The type and amount of training needed in the refresher training depend on several factors including, but not limited to: the nature of the observed unsafe practice or act; the different characteristics of the new or different truck; the practice or practices that the evaluation indicated needed improvement; the nature of the changes to workplace conditions; and the potential for an accident to occur.

In regard to the required periodic evaluations, OSHA believes that they need not take excessive time nor interrupt the workplace operations. In most cases, persons conducting the evaluation would do two things.

First, they should observe the operator of the powered industrial truck during normal operations to determine if the operator is performing safely. Secondly, the evaluator should ask pertinent questions to ensure that the operator has the knowledge or experience needed to operate a truck safely. In some cases, the evaluation will need to be lengthier and more detailed because of the danger or complexity of the operation, the extent of the change in conditions, the operator=s need for additional skills, or other factors. Employers may wish, but are not required, to document their evaluations by committing to writing the evaluation process.

VII. AVOIDANCE OF DUPLICATIVE TRAINING

The final rule allows employers to forego those portions of the required training that operators have previously received. Specifically, if an operator has previously received training in a topic specified in the final rule (see Paragraph V(D) of this summary), and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely.

This provision in the final rule is intended to prevent unnecessary or duplicative training both for newly hired operators, as well as existing employees. Therefore, employers need not provide further training to any operator in any training topic in which the operator has previously received training, if the operator, after evaluation, is found to be competent to perform the operator=s duties safely. However, the operator would need additional training in any element(s) for which the evaluation indicates the need for further training, and for any new type of equipment or changes in workplace conditions.

In evaluating the applicability and adequacy of an operator=s prior training, employers may wish to consider the following factors: the type of equipment the operator has operated; how much experience the operator has had on that equipment; how recently this experience was gained; and the type of environment in which the operator worked. The employer may, but is not required to, use written documentation of the earlier training to determine whether an operator has been properly trained.

The operator=s competency may also simply be evaluated by the employer or another person with the requisite knowledge, skills, and experience to perform evaluations. The employer can determine from this information whether the experience is recent and thorough enough, and whether the operator has demonstrated sufficient competence in operating the powered industrial truck to forego any of the initial training. Please note, some training related to site-specific factors of the new operator=s workplace is likely always to be necessary.

VIII. CERTIFICATION

The employer must certify that each operator has been trained and evaluated as required by paragraph (l) of 29 CFR 1910.178. The certification shall include the name of the operator, the date of the training and the identity of the person(s) performing the training and evaluation.

A sample certification form has been attached for your use as Appendix A of this summary. In addition to the certification, employers may wish, but are not required to, maintain copies of any training materials used as well as commit their evaluations to writing as further evidence of their compliance.

APPENDIX A

**Certification of Powered Industrial
Truck Operator Training**

This statement certifies that the employees named below have been trained and evaluated consistent with the OSHA Final Rule on Powered Industrial Truck Operator Training set forth at 29 CFR 1910.178(1).

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Date of Training: _____ Date of Evaluation: _____

Trainer: _____
(Print Name)

Evaluator: _____
(Print Name)

Signature
of Trainer: _____

Signature
of Evaluator: _____

Company Name: _____

Company Address: _____

City/State/Zip: _____

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