

**OSC 12**  
Ohio Safety Congress & Expo

**WELL AT HOME. SAFE AT WORK.**

**505 Forklift Safety: Taking Your Facility to the Next Level**

David Hoover

Wednesday, March 28, 2:30 to 3:30 p.m.

**Ohio** Bureau of Workers' Compensation

**FORKLIFT TRAINING SYSTEMS**

**Forklift Safety Compliance and Beyond**

Presented by:  
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Experimental Employee Motivational Technique



**How Big Is The Forklift Safety Problem?**

What do 85 deaths and 96,000+ injuries look like?



85 lives



96,000+ injuries



**How Serious Is Forklift Safety?**

**Startling Stats**

- Over 11% of the forklifts in the U.S. will be involved in an accident each year! (Assuming only one accident per forklift)
- 90% of all forklifts will be involved in some type of accident during their useful life! (Assuming a useful life of approximately 8 years)

Source: OSHA

## The OSHA Forklift Standard

The OSHA Forklift standard for general industry is 29 CFR 1910.178

It went into effect in 1970 and was relatively unchanged until December of 1998 when its operator training portion (Paragraph L) was updated.

## What is a Powered Industrial Truck?

A mobile, power-driven vehicle used to carry, push, pull, lift, stack, or tier material.



## Exclusions

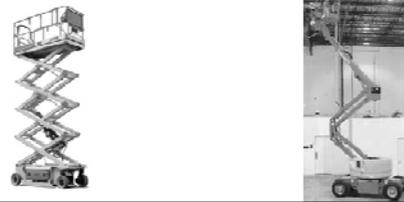
- Excluded are vehicles intended primarily for earth moving or over-the-road hauling, even if they carry forks.
- Personnel and burden carriers are also not covered per OSHA Directive Number: CPL 2-1.28A



## Aerial Work Platforms

Scissor (mobile scaffolds) and boom lifts are NOT classified as forklifts, they have their own training and OSHA standards.

Do you have a formal training program for these?  
If not now is the time to get that in place!



## OSHA Forklift Hot Topics

The top five citations issued for 29CFR1910.178:  
(In no particular order)

- Failure to ensure operator competency
- Failure to certify operator's training and evaluation
- Failure to provide refresher training and evaluation
- Failure to examine forklifts before placing them in service
- Failure to take damaged forklifts out of service

### (1) Safe operation

- ✓ The employer shall ensure that each powered industrial truck operator is *competent* to operate a powered industrial truck safely, as demonstrated by successful completion of the training and evaluation specified in the OSHA standard.
- ✓ Prior to permitting an employee to operate a powered industrial truck, *except for training purposes*, the employer shall ensure that each operator has successfully completed the required training or has previously received all appropriate training.

## Training Program Implementation

Trainees may operate a forklift only:

- Under the direct supervision of persons who have the knowledge, training and experience to train operators and evaluate their competence.
- Where such operation does not endanger the trainee or other employees.



## (3) Training Program Content

Powered industrial truck operators shall receive initial training in the following topics, except in topics which the employer can demonstrate are not applicable to safe operation of the truck in the employer's workplace.



## OSHA Forklift Trainer Requirements

**29CFR1910.178(l)(2)(iii)**

All operator training and evaluation shall be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

**OSHA Directive Number: CPL 2-1.28A**

An example of a qualified trainer would be a person who, by possession of a recognized degree, certificate, or professional standing, or who by knowledge, training and experience, has demonstrated the ability to train and evaluate powered industrial truck operators.

## Questions

- If you are using an in-house trainer are they:
  - 1) Qualified?
  - 2) Up to date?
  - 3) Using interesting and current materials?
- If you are using a contractor to train your people are they:
  - 1) Customizing the program to your facility and lifts?
  - 2) Doing the hands on evaluations at your location?
  - 3) Helping you solve your forklift safety problems?

## THE BUCK STOPS ...

With the employer – no matter who conducts the training...

- ✓ A forklift dealer
- ✓ A safety company
- ✓ A consultant
- ✓ A staffing company

YOU are ultimately responsible for ENSURING that YOUR employees are properly trained on all topics and competent to operate your equipment.

## OSHA Citation Policy

In certain instances OSHA is now citing on a "per affected employee" basis, verses grouping citations for training and PPE related violations. This means a \$7,000 serious citation for failure to train forklift operators, or failure to provide seatbelts, could become \$210,000 if you had 30 operators or trucks out of compliance.

#### (4) Refresher Training And Evaluation

Refresher training in relevant topics, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely if any of the following occur:

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 conditions in the workplace change in a manner that could affect safe operation.



An evaluation of each operator's performance shall be conducted at least once every three years.

(Is meant to test if knowledge and skills have been retained, and if they are still being used in every day operation)

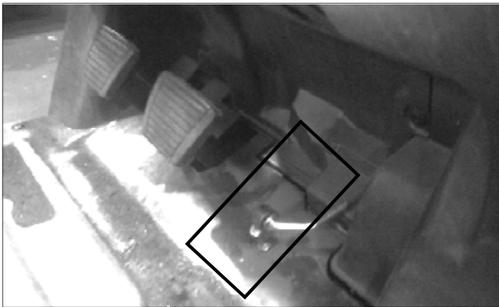
Reality Checks

Have Some Rules Become Optional?



Do your people really follow the rules?

**How Safe Are Your Forklifts?**



Do you have a good system in place for documenting pre shift inspections on every forklift and every shift?

**Are The Manual And Warning Labels Present And Readable?**



## Are People Working Safely?



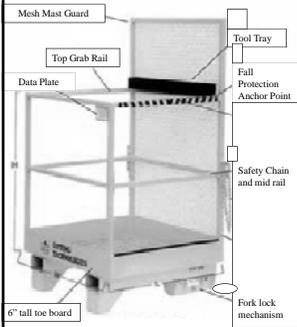
The only way you'll know if they are doing things safely is to keep a watchful eye and address issues as they arise.

## Do Not Modify Your Forklifts Without Written Approval From The Manufacturer

This lift was designed so that in a tip-over the operator could step out and away from the lift. With the modifications installed by the customer, that became impossible and created a serious hazard.

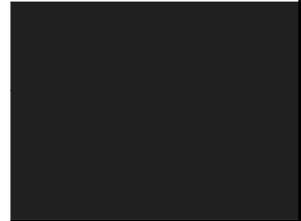


## Only Use Lifting Devices Which Are Approved By The Manufacturer Of The Forklift



Note: Most forklift manufacturers will no longer approve the use of "man cages" on their forklifts. OSHA will cite companies which do not have this permission, therefore Forklift Training Systems does not recommend the use of these cages and suggests using an aerial work platform, such as a scissor lift, instead.

## Are Your Operators Wearing Their Protective Equipment All The Time?



## Training Forklift Operators Is Not Enough!

You must also have...

- ✓ Proper supervision of operators.
- ✓ Effective discipline and positive reinforcements.
- ✓ Open communication with labor and management.
- ✓ The right equipment to do all jobs safely.
- ✓ Good maintenance of lift equipment.
- ✓ Support from every member of management.
- ✓ Current and correct policies and procedures.

## Do You Have The Right Rules In Place?

- ✓ Policy for when and how to properly train operators
- ✓ Establishment of specific rules and regulations for the following
  - Pre-shift safety inspection
  - Battery charging or refueling
  - Handling of forklift
  - Traveling in your facility
  - Loading and unloading of materials
  - Maintenance (reporting and responsibility)
  - Lockout procedure for unsafe or defective forklifts
  - Accident and near miss reporting
  - Other special hazards, conditions or applications
- ✓ Establishment and enforcement of fair disciplinary procedures which include the following:
  - Following union contract if applicable
  - A progressive system of discipline
  - Periodic review of discipline procedures
- ✓ Establishment of minimum standards for operator physical and mental fitness
  - Consult medical and legal experts when setting these requirements

## Train Operators To Keep People Out Of Their Danger Zones At All Times



### Commonly Violated Rules:

- ✓ Excessive speed.
- ✓ Sloppy operation when in a hurry.
- ✓ Failure to look when backing up.
- ✓ Failure to wear required safety equipment. (Seat belt, harness, etc.)
- ✓ Failing to properly complete pre shift checklists.

Where is your facility strong and weak?

### And You Thought OSHA Was Tough!



- ✓ "We don't get paid until you win!"
- ✓ Frivolous lawsuits are becoming common.
- ✓ One lawsuit can cost a company hundreds of times more than an average OSHA citation!

### What Does A Forklift Lawsuit Look Like?



### Can A Manager, Supervisor Or Trainer Be Held Personally Responsible For Their Actions At Work?

#### Feds charge five Atlantic States managers

Federal indictments were handed down in December charging Atlantic States Cast Iron Pipe Co. and five managers with violating federal workplace safety laws and obstructing criminal and regulatory investigations by EPA and OSHA. The criminal charges were announced by the U.S. Attorney for New Jersey. The 35-count indictment was unsealed with the arrests of the company's plant manager, maintenance supervisor, engineering and environmental manager, and finishing superintendent. The arrests took

place at the plant. A former Atlantic States human resource manager was to surrender later at the federal courthouse in Trenton.

The feds charged Atlantic States and the individual defendants with alleged repeated cover-ups from health and safety inspectors of crushing injuries to employees, broken bones, amputations and burns from furnaces and molten iron, as well as routine and concealed releases of high levels of pollutants.

In one incident, the defendants allegedly repaired a forklift with faulty brakes that had run over and killed an employee before OSHA inspectors arrived.

Can in-house trainer's be personally sued apart from their Co?  
Discuss trainer's fatal mistake and OSHA write up (ramp issue)



### Products That Can Assist In Improving Safety At Your Facility

- Vehicle Monitoring Systems
- Early warning systems



If You Have Any Additional Questions Or  
Needs Please Contact Us At 740-763-4978  
or [www.forklifftrainingsystem.com](http://www.forklifftrainingsystem.com)

**MAY WE ANSWER ANY  
QUESTIONS FOR YOU?**

**Thank You For Your Time And  
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