

OSC | 11
Ohio Safety Congress & Expo



**#353 – Forklift safety:
Compliance and beyond**

David Hoover, Forklift Training Systems

Thursday, March 31, 2011
11:15 a.m. to 12:15 p.m.

Ohio Bureau of Workers' Compensation

Experimental Employee Motivational Technique



How big is the forklift safety problem? Forklift accidents result in an average of 85 fatalities, 34,902 serious injuries and 61,800 non-serious injuries in the United States each year!

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.



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(1)(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 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

The employer is ultimately responsible for ensuring that their employees are properly trained on all topics, including the site and equipment specifics!

New 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 follow the rules?

How Safe Are Your Forklifts?



The entire accelerator pedal was missing. The operator did not want to give his lift up for repairs!

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.



Are Your Operators Wearing Their Protective Equipment All The Time?



We regularly meet companies who think they are doing a good job, but are not.



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



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?

Points of view, ideas, products, demonstrations or devices presented or displayed at the Ohio Safety Congress & Expo do not constitute endorsements by BWC. BWC is not liable for any errors or omissions in event materials.