

Docket Number OSHA-2011-0062

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ASEM 616 Policy Issues in PtD

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December 6, 2020

I am writing to participate in public comment about docket number OSHA-2011-0062 regarding the Power Industrial Truck Standard (*Docket Number OSHA-2011-0062* 2011), specifically about the extension of office management and budget's approvals for information collection requirements. I am in full support of the docket's scope. I would like to present why this docket is important for the safety of Industrial Power Truck Operators and equally those in the immediate work areas who may be affected due to equipment malfunctions. As I am interpreting it, the rule suggests that due to the influx of power industrial trucks being used, there is a need for allocation of additional time and resources to support the management requirements for documentation and evaluation of accessories and additional equipment used with powered industrial trucks. The docket also suggests the requirement for more robust documentation and reference documents regarding accessory and truck capability while utilizing the accessory. Power Industrial Truck standard requires that employers assess the application of additional accessories and seek manufacturers' approvals for the accessory's use with the type of truck being used. While I am in full support of the docket, I think it can be further expanded upon. A more in-depth assessment including a representative of the company to assess the actual condition of the equipment in which the accessory is being used due to the potential for legality due to poor maintenance of the lift truck before the application of the accessory. Without a thorough assessment of the trucks conditions, I feel this could be an at-risk decision if made solely upon information provided by the employer. Although the employer is required to maintain the workplace to prevent incidents or fatality through the general duty clause, there is still a high potential for false information to be provided during the approval process. I would like to see more stringent requirements for the approval process outside of written consent. Having experienced a major power industrial truck incident in my career, I know these pieces of

equipment can become the link to a fatality easily if the program and truck are not maintained sufficiently. The current requirements are necessary and could be further strengthened to ensure the information provided and truck conditions are evaluated robustly to ensure operator safety.

As stated in the docket, employers are required to maintain the labeling for powered industrial truck capacity and the capacity of the accessory being used on the truck at all times. To maintain compliance, I feel it is important that the manufacturers supply dual copies of the labels and decals to ensure easy reapplication to prevent extended periods of non-compliance. This will protect employees from overloading equipment due to a lack of information. The company I support does not typically utilize power industrial truck accessories in our day-to-day operations; therefore, labeling and capacity information is highly necessary when non-standard applications are completed utilizing an accessory. We manage these non-standard processes through the management of change analysis. In the analysis, the manufacturer's approval documents are required and photographic evidence that the labels for both the lift and lift accessory being present and in good condition are required for the project to begin. Pre-job briefings, including a walk-through of the lift's process determination and if the equipment meets capabilities, is required. As a further attempt to make the process more robust, I feel the requirement for documentation of the inspection and validation of these documents and labels should be required quarterly through written documentation or a standardized audit.

I feel strongly that the burden hours apply to the operator's inspection requirements and overall maintenance of the equipment to meet standard requirements and maintain the lift's safe operating conditions. My personal experience with the power industrial truck inspection process is that it is often overlooked or not completed due to it taking time away from the operator's productivity. A common option that if the truck was in proper operating condition at the

beginning of the month, then it is most likely still in appropriate condition at the end of the month. However, special consideration for the use of the equipment, both regarding frequency and conditions of application, can change the equipment's operational integrity in a matter of minutes.

To lighten the load on the operators performing the inspections, I think suggesting the utilization of technology would greatly improve the completion rate. From a record management standpoint, modern technology such as iPad or digital spreadsheet would make the documentation process much easier. Special consideration for the current state of the world regarding COVID technology is also vital to help minimize some surface contamination on shared devices such as paper and clipboards. The application of technology is easier to sanitize, but it also supports green initiatives and reduces paper use. I feel the addition of burden hours is unnecessary for the record retention and maintenance aspect of the standard.

While evaluating statistical data and references to support increased evaluation and record-keeping requirements for powered industrial truck attachments and accessories, I was surprised to find very little information regarding non-fatal or fatal incidents due to these devices' failures. The real issue seems to be around equipment tip-overs and falls from heights due to riding forks or loads. I feel the emphasis on safe operation requirements needs to be a large portion of this docket. The bureau of labor published a report in 2019 that shared six hundred and fourteen employees lost their lives, and another seven thousand suffered non-fatal injuries between 2011 and 2017. (*Fact Sheet | Occupational Injuries, Illnesses, and Fatalities Involving Forklifts | June 2019*) The data supports a strong emphasis on the increased focus of powered industrial truck safety and safe operation. If we divide those fatalities over the six years, approximately 100 employees die a year due to power industrial truck incidents. What is the

missing link to preventing these incidents? I feel the fatality data presents a much larger case that there is a need to focus organizations on the program. With that, the proposed items in this docket are fully necessary. Allocation of time to complete the training, inspection, and management of the equipment, and increased record, audits, and inspection requirements, which should, in turn, emphasize safe utilization of the equipment through job evaluations and pre-work inspections, and process management. In closing, I am in full support of the proposed docket.

References

Fact Sheet | Occupational Injuries, Illnesses, and Fatalities Involving Forklifts | June 2019. (2019, June 10). Retrieved November 30, 2020, from <https://www.bls.gov/iif/oshwc/cfoi/forklifts-2017.htm>

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