ABSTRACT

Purpose: To renew the Local Emphasis Program for Powered Industrial Vehicles

References: A) CPL 02-00-160, Field Operations Manual (FOM), August 2, 2016.
B) CPL 04-00-002 Procedures for Approval of Local Emphasis Programs (LEPs), November 13, 2018.
C) CPL 02-00-111, Citation Policy for Paperwork and Written Program Requirements Violations, November 27, 1995.
D) CPL 02-00-051, Enforcement Exemptions and Limitations Under the Appropriations Act, May 28, 1998.

Cancellations: This Instruction cancels the Local Emphasis Program for Powered Industrial Vehicles, CPL 04-00 (LEP 002), made effective October 1, 2017.

Expiration: This Instruction expires September 30, 2023.

State Impact: None

Action Offices: Region V Area Offices

Originating Office: Naperville Area Office

Contact: Assistant Regional Administrator enforcement Programs
USDOL-OSHA
230 S. Dearborn Street, Rm. 3244
Chicago, IL 60604
(312) 353-2220
By and Under the Authority of

Ken Nishiyama Atha
Regional Administrator
I. **Purpose.** This Instruction continues the Local Emphasis Program for Powered Industrial Vehicles.

II. **Scope.** This Instruction applies to the jurisdictional areas of the Region V OSHA Area Offices. All inspections conducted under this directive will be in accordance with the Field Operations Manual.

Any referral or complaint classified by OSHA as “serious” which alleges a hazard or a condition that may be a violation of the powered industrial truck standard or a potentially fatal “struck/caught/fall hazard” associated with the operation of a powered industrial vehicle (e.g., struck by falling load, struck against, caught between, caught in, or fall hazard) in general industry or construction will be activated for inspection. Additionally, any ongoing inspection where powered industrial vehicles are observed in use will be expanded to evaluate possible violations of the powered industrial truck standard. A hazard is determined by OSHA to be serious if there is substantial probability that death or serious physical harm could result from an existing condition, or from one or more practices, means, methods, operations, or processes which have been adopted or are in use. Inspections meeting the criteria set forth in this LEP will also evaluate safety and health hazards in or around loading docks or other designated loading and unloading areas where powered industrial trucks are in use (Including, but not limited to: loading docks, shipping and receiving areas, yard areas, and other locations where vehicles are loaded and unloaded).

III. **Expiration.** This Instruction expires on September 30, 2023.

IV. **Definitions.** A powered industrial vehicle (PIV) as used in this LEP includes vehicles as defined by 1910.178, skid steer loaders, and earth moving equipment that was designed to move earth and has been modified to accept forks. Powered industrial vehicles can be ridden or controlled by a walking operator and include any mobile power-propelled truck used to carry, push, pull, lift, stack or tier materials. Vehicles covered include, but are not limited to:

- High Lift trucks
- Cantilevered trucks
- Forklift trucks
- Low lift trucks
- Motorized hand trucks
- Narrow aisle trucks
- Reach rider trucks
- High lift order picker rider trucks
- Rough terrain trucks
- Counter-balanced trucks
- Rider trucks
- High platform trucks
- Loft lift platform trucks
- Pallet trucks
- Straddle trucks
- Single side loader trucks
- Motorized hand/rider trucks
- Skid steer loaders
V. **References.**

A. OSHA Instruction CPL 04-00-002, November 13, 2018, Procedures for Approval of Local Emphasis Programs (LEPs)

B. CPL 02-00-160, Field Operations Manual (FOM), August 2, 2016

C. OSHA Instruction CPL 02-00-111, November 27, 1995, Citation Policy for Paperwork and Written Requirement Violations

D. OSHA Instruction CPL 02-00-051, May 28, 1998, Enforcement Exemptions and Limitations Under the Appropriations Act

VI. **Background.** A Powered Industrial Truck (PIT) Local Emphasis Program (LEP) originated in the Illinois Area Offices in FY 2003 due to the number of PIT fatalities within the State. In FY 2007, the Region V PIT LEP was expanded to all of the Illinois, Ohio, and Wisconsin OSHA Area Offices and the name was changed to Powered Industrial Vehicle (PIV). The reason for the national and local emphasis on powered industrial vehicles is the need to reduce the number of fatalities caused by PIVs. In the Federal jurisdiction of Region V, PIVs have been the source of 136 occupational fatalities from fiscal years 2006 through 2018.

The breakdown of these fatalities by equipment and hazard type in the past thirteen fiscal years in Region V follows. This information is provided to OSHA staff so that they can advise employers of the biggest risks of fatal incidents and to better evaluate workplaces for these hazards.

**Region V PIV Fatality Comparison – FYs 2006 – 2018**

<table>
<thead>
<tr>
<th>Powered Industrial Vehicle</th>
<th>FY 06</th>
<th>FY 07</th>
<th>FY 08</th>
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<tr>
<td>Forklifts (includes walkies)</td>
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<td>Annual Totals</td>
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Other agencies have also noted fatalities caused by PIVs. In June 2001, the National Institute for Occupational Safety and Health (NIOSH) issued Alert Publication No. 2001-109 (Preventing Injuries and Deaths of Workers Who Operate or Work Near Forklifts). The publication states “In the United States, 1,021 workers died from traumatic injuries and over 200,000 others were seriously injured in forklift related accidents from 1980 to 1994.” The National Traffic Occupational Fatalities Surveillance System (NTOF) uses death certificates to identify work-related deaths. These fatalities resulted from the following types of accidents.

<table>
<thead>
<tr>
<th>Type of incident</th>
<th>% total victims</th>
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<tbody>
<tr>
<td>Forklift overturns</td>
<td>22</td>
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<tr>
<td>Worker on foot struck by forklift</td>
<td>20</td>
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<tr>
<td>Victim crushed by forklift</td>
<td>16</td>
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<tr>
<td>Fall from forklift</td>
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</table>

NIOSH recommends that employers and workers comply with OSHA regulations and consensus standards, maintain equipment, ensure comprehensive worker training, and institute systematic traffic management to prevent forklift accidents. This emphasis program will enable Region V Area Offices to increase the awareness of employers, ensure proper training of employees, the required operation, inspection and maintenance of powered industrial trucks, along with compliance with OSHA regulations and all other applicable consensus standards.

OSHA Region V will target and evaluate the hazards of Powered Industrial Vehicles (PIVs) through this LEP.

VII. **Action.** Region V Area Directors shall ensure that the procedures outlined in this Instruction are followed and adhered to in the scheduling of inspections under this LEP. OSHA Compliance Officers shall ensure that the procedures contained in this Instruction are followed when conducting inspections related to this program. Area Directors shall ensure that the State Consultation Program Manager is notified of the procedures to be used in the conduct of inspections under this LEP.

VIII. **Procedures.** The following procedures will be used when scheduling and conducting inspections under this LEP.

A. **Inspection Goals.** Region V Area Offices shall conduct inspections under this program through the Fiscal Year this program is active. Inspections of all General Industry and Construction worksites utilizing powered industrial vehicles will be expanded to include powered industrial vehicle hazards and equipment.

B. **Selection and Scheduling of Complaints and Referrals.** The Area Offices will identify and schedule for inspection all serious complaints and referrals, alleging a hazard or a condition that may be a violation of the powered industrial truck standard or a potentially fatal “struck/caught/fall hazard” associated with the
operation of a powered industrial vehicle (e.g., struck by falling load, struck against, caught between, caught in, or fall hazard) in general industry or construction. The inspection will address all complaint items, all aspects of the powered industrial truck standard, powered industrial vehicles and associated hazards, collection of OSHA 300 data and hours worked for the previous three years plus the current year, an evaluation of the employer’s safety and health program in accordance with the FOM, an evaluation of safety and health hazards at the employer’s loading dock or other designated loading and unloading areas where powered industrial vehicles are used (including loading docks, shipping and receiving areas, yard areas, and other locations where vehicles are loaded and unloaded.)

C. **Data Collection.** The Area Offices will collect data from OSHA 300 logs for the previous three calendar years plus the current year from all employers inspected under this program that are required to maintain them. The data, which will include the totals from all the columns of the 300 log and the total hours worked by all employees for these years, will be used to assist in the evaluation of the program.

D. **Deletion Criteria.** OSHA Instruction CPL 02-00-025, *Scheduling Systems for Programmed Inspections*, will be adhered to in the implementation of this program.

IX. **OIS Coding.** The OSHA-1 form for all inspections conducted in establishments that are covered by this program shall be coded in Block 25c, Local Emphasis program, with “PIV.”

X. **Outreach.** Appendices 1 and 2 may be used for outreach.

Notification of major users of powered industrial vehicles as well as distributors of the equipment will be accomplished via outreach mailing, electronic mailing, and presentations.

XI. **CSHO Protection.** Inspections conducted under this Instruction will occur in a broad range of general industry and construction establishments. Inspections under this LEP are to be conducted by CSHOs who have received training on the LEP and the hazards of the industry most likely to be encountered. Compliance Officers shall establish the presence of hazardous substances prior to initiating the walk-around portion of the inspection, relying on information such as previous inspection histories, safety data sheets, and/or previous exposure monitoring surveys.

XII. **Evaluation.** The Naperville Area Office will prepare a written evaluation of this LEP in the format specified by OSHA Instruction CPL 04-00-001. Evaluations will be submitted annually for the previous Fiscal Year.
Appendix 1  
Powered Industrial Vehicles Information Package  

Powered Industrial Vehicle Fatalities in Illinois, Ohio, and Wisconsin

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<tr>
<th>Powered Vehicle</th>
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Appendix 2

Powered Industrial Vehicle Evaluation Points

1. Forklifts:
   - Equipment and training
   - Truck and traffic control and controlling speed
   - Powered industrial truck driving – Note that tip-overs occur most frequently when the truck is driven in reverse and turned with mast elevated
   - Seat belt use
   - Fall protection tie-offs for order picking at heights in warehouses to prevent fall deaths
   - Maintenance practices – blocking/cribbing when a lift is jacked up to prevent crushing deaths
   - Maintenance practices – blocking mast and upright when working around mast to prevent caught between deaths
   - Dock safety program to prevent struck by/crush by deaths
   - Use of approved lifting platform secured to forks to prevent fall deaths
   - For open lifting platforms used in warehouse stocking, use of appropriate tie-off fall protection to prevent fall deaths
   - Lifting carriage amputation protection (chains/moving parts)

Photo: overturn after driven off dock, seat belt not worn, fatality

Photo: approved lifting platform with guardrails and metal mesh guard
2. Excavators/backhoes

- Prevention of overhead loads to prevent struck by load deaths
- Swing radius protection to prevent caught between deaths
- Operator and pedestrian worker training and communication to prevent struck by deaths
- High visibility clothing for pedestrian employees
- Chains and rigging for lifting loads to prevent struck by load deaths
- Riding in bucket or on side of excavator to prevent fall deaths
- Powerline program to prevent electrocution deaths

Photo: quick coupler and buckets

3. Front end loader

- Chains and rigging for lifting loads to prevent struck by load deaths
- Operator and pedestrian worker training and communication to prevent struck by vehicle deaths
- High visibility clothing for pedestrian employees

4. Skid steer/bobcat

- Driver and pedestrian worker training to prevent struck by vehicle deaths
- Seat belt use
- Safety interlocks not bypassed or malfunctioning
- Driver training to keep head and body inside driver cockpit to prevent caught between deaths
- Reference: NIOSH Alert “Preventing Injuries and Deaths from Skid Steer Loaders,” Publication #98-117, 2/98

5. Scraper/grader

- Operator and pedestrian worker training and communication to prevent struck by vehicle deaths
- High visibility clothing for pedestrian employee
**OSHA References:**

OSHA CPL 04-00 (LEP 002) Local Emphasis Program for Powered Industrial Vehicles – Region V

03/07/1996 - Use of seat belts on powered industrial trucks


CPL 02-01-028 Compliance Assistance for the Powered Industrial Truck Operator Training Standards


CPL 02-01-030 Chocking of Tractor Trailer under the Powered Industrial Truck Standard


Powered Industrial Trucks. - 1910.178


OSHA CPL 02-00-124 Multi-Employer Citation Policy


**Revision History**

<table>
<thead>
<tr>
<th>Document Number</th>
<th>Revision Date</th>
<th>Revised By</th>
<th>Reason</th>
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Disclaimer

- This information has been developed by an OSHA Compliance Assistance Specialist and is intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics or hazards, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer’s legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, OSHA may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA’s website at www.osha.gov.

This document is designed to assist dock managers in the development, maintenance, and updating of a comprehensive dock safety program and to provide assistance in finding useful safety information.