

OSHA Regulations 29 CFR – 1910.178(I)

Powered Industrial Trucks

Mushroom Generic (I) (Sample) Program

March 2012

The following are explanations and instructions on what you need to do to be in compliance with the above OSHA Standard. The following will be your guide for your company's formal written program:

- I. If you or your employees use a Powered Industrial Truck – **commonly called forklifts, lift trucks and jacks** – to move, raise, lower, or remove large objects or a number of smaller objects on pallets or in boxes, crates, or other containers you fall under OSHA regulation – 29CFR – 1910.178.**
- II. The principal goal of this regulation is to minimize the number of accidents, injuries and deaths due to incidents involving Powered Industrial Trucks that are operated by your employees.**
- III. The regulation requires all employees who use and operate a Powered Industrial Truck to be trained and certified. This training and certification includes the following:**
 - A. Classroom Training:** Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video, written material)
 - B. Take and pass a test on material covered in classroom training:** Not required by OSHA, but an excellent tool to measure training results.
 - C. Practical Training:** Demonstration performed by the trainer and practical exercise performed by the trainee during which the employee is observed by the trainer using his/her Powered Industrial Truck.
 - All operator training and evaluation shall be conducted by persons known by the company to have the knowledge, training, and experience to train Powered Industrial Truck operators and evaluate their competence. They should be knowledgeable in the uses of the Powered Industrial Truck in the company's mushroom operation.
- IV. Steps to be taken to be in compliance if your business uses Powered Industrial Trucks:**

- 1) Create a list of employees who are certified in your company to use and operate Powered Industrial Trucks
- 2) Create a list of employees who need to be trained and certified in Powered Industrial Truck use if your company is starting a new program.
- 3) Create a list of Powered Industrial Trucks owned and used at your company

The Seven Types of Powered Industrial Trucks

Class I – Electric motor rider trucks

Class II – Electric motor narrow aisle trucks

Class III – Electric motor hand trucks or hand/rider trucks

Class IV – Internal combustion engine trucks (solid cushion tires)

Class V – Internal combustion engine trucks (pneumatic tires)

Class VI – Electric and internal combustion engine tractors

Class VII – Rough terrain forklift trucks

The following are classes of commonly-used powered industrial trucks. This classification does not include all powered industrial trucks covered by the OSHA standard [[29 CFR 1910.178\(a\)](#), [29 CFR 1910.178\(b\)](#) and [29 CFR 1910.178\(c\)](#)].



Class I: [Electric Motor Rider Trucks](#)



Class II: [Electric Motor Narrow Aisle Trucks](#)



Class III: [Electric Motor Hand Trucks or Hand/Rider Trucks](#)



Class IV: [Internal Combustion Engine Trucks \(Solid/Cushion Tires\)](#)

Class V: [Internal Combustion Engine Trucks \(Pneumatic Tires\)](#)

Class VI: [Electric and Internal Combustion Engine Tractors](#)



Class VII: [Rough Terrain Forklift Trucks](#)

Use the above descriptions and pictures to create your list.

- 4) Complete a Job Hazard Analysis (JHA) survey on the uses of Powered Industrial Trucks at your company
- 5) Set up the Training Program
 - Training program must include the general OSHA safety guidelines; however, it also must also include site specific information in your JHA(s).
- 6) Keep accurate records of individuals trained
 - Sign in sheet
 - Test Results
 - Form that states employee knows how to operate his Powered Industrial Truck safely – Form must be signed by person who does this evaluation. This is usually done by the owner of company, the manager of employee or the employee's trainer. This evaluation shall be conducted by persons the company knows have the knowledge, training, and experience to evaluate the competence of other

employees and are knowledgeable in the uses of the Powered Industrial Truck in the company's mushroom operation.

- 7) Set up a system for every three year evaluations of employees certified
- 8) Set up a training program for new hires who will use Powered Industrial Trucks
- 9) Set up program for outside contractors who work on your company property
 - If you use an outside contractor to do work and they are required to use a Powered Industrial Truck, you must be certain that each person using a Powered Industrial Truck has gone through training and is certified.
- 10) Refresher training shall be provided for operators when the following conditions exist:
 - Operator has been observed operating the vehicle in an unsafe manner
 - Operator has been involved in an accident or near-miss event
 - Operator has received an evaluation that reveals that the operator is not operating the truck safely
 - Operator is assigned to drive a different type of truck
 - Conditions in the workplace change so they effect operations of the truck

v. Training Program – Two Options:

A. Your Powered Industrial Truck Program can be as simple as:

We use _____ (company) to do our Powered Industrial Truck training for our employees. However, if you use an outside firm/individual to do your training there is several things you must do:

- 1) Develop the list of employees who use Powered Industrial Trucks
- 2) Develop list of types of Powered Industrial Trucks used in your business
- 3) Ensure the person who does your training knows how the Powered Industrial Trucks are used in your business
- 4) Have an outline of the trainers classroom material for your records
- 5) Decide who will certify that employee if that person will not be the outside trainer. The person certifying must knows how to use the Powered Industrial Trucks that will be operated for the certification process.
- 6) Keep all records of the training
- 7) Refresher Training or Three Year Evaluation

Refresher training in relevant topics shall be provided to the operator when:

- The operator has been observed to operate the vehicle in an unsafe manner;
- The operator has been in an accident or near-miss accident;
- The operator has received an evaluation that reveals that the operator is not operating the truck safely;

- The operator is assigned to drive a different type truck;
- A condition in the workplace changes in a manner that could affect safe operation of the truck.

The employer shall certify that the operator had refresher training and the refresher training form shall include the operator's name, date of the refresher training and the name and signature of the person(s) performing the training.

A visual evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.

- The operator is following all company's safety rules
- The operator is following all OSHA required safety regulations
- The operator is using equipment he/she was certified to use
- The operator has had no accidents or near-miss accidents in the past three years

The employer shall certify that the operator was evaluated and the evaluation form shall include the operators name, date evaluated and the name and signature of the person(s) performing the evaluation.

8) All of the above become part of your program

B. Your Powered Industrial Truck program can be developed in-house and use a qualified employee(s) as a trainer. However, if you develop your own training program, you must:

- 1) Develop a list of employees who use Powered Industrial Trucks
- 2) Develop a list of types of Powered Industrial Trucks used in your business
- 3) The training program must be conducted by a person(s) who has the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.
- 4) Trainer(s) should go through a Train the Trainer program: this is not mandatory if the company is certain that the trainer is a highly experienced and safe operator. It is essential for in-house training if you do not have such a qualified individual.
- 5) Develop your own classroom training program that includes:
 - a) Formal classroom instruction: e.g. lectures, discussions, interactive computer learning, written materials and a Powered Industrial Truck safety video
 - b) Develop a classroom material test (usually 20 or more questions): This is not required by OSHA but is an excellent tool to measure training.

- 6) **Procedure to evaluate employee's competence to use his/her Powered Industrial Truck**
- 7) **Develop a certification card/certificate and evaluation form:**
- a) Certification card/certificate include name of employer, name of employee trained, type Powered Industrial Truck(s), date trained and name of trainer
 - b) The employer shall certify that the operator was evaluated and the evaluation form shall include the operators name, date evaluated and the name and signature of the person(s) performing the evaluation.
- 8) **Keep all records of the training**
- 9) **Refresher Training or Three Year Evaluation**
Refresher training in relevant topics shall be provided to the operator when:
- The operator has been observed to operate the vehicle in an unsafe manner;
 - The operator has been involved in an accident or near-miss incident;
 - The operator has received an evaluation that reveals that the operator is not operating the truck safely;
 - The operator is assigned to drive a different type of truck;
 - A condition in the workplace changes in a manner that could affect safe operation of the truck.

The employer shall certify that the operator had refresher training and the refresher training form shall include the operator's name, date of the refresher training and the name and signature of the person(s) performing the training.

A visual evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.

- The operator is following all the company's safety rules
- The operator is following all OSHA required safety regulations
- The operator is using equipment he/she was certified to use
- The operator has had no accidents or near miss accidents in past three years.

The employer shall certify that the operator was evaluated and the evaluation form shall include the operators name, date evaluated and the name and signature of the person(s) performing the evaluation.

The most important part in either Option A or B, besides the actual training, is that you have and keep a record of everything you do.

Powered Industrial Truck

The following person has attended a training program in Occupational Safety and Health Act, Section 1910.178 – Powered Industrial Truck on _____.

Employee's Name

Company's Name

The above named person successfully completed and passed the Industrial Powered Truck Training Safety Training Course:

____ Fork Lift/Tow Motor

____ Manual Hand Jack

____ Electric Hand Jack

____ Other

Classroom Training and Test

Date: _____

Trainer: _____

A. Pre-driving and Driving Exam

Date: _____

Trainer or Supervisor: _____

B. Three Review (Once every Three Years)

Date: _____

Trainer/Supervisor: _____

Date: _____

Trainer/Supervisor: _____

Powered Industrial Truck Test

Company Name

Name _____
Employee name

Instructor _____

Date _____

Test Score _____

1. _____

13. _____

14. _____

2. _____

15. _____

3. _____

16. _____

4. _____

17. _____

5. _____

18. _____

6. _____

19. _____

7. _____

20. _____

8. _____

9. _____

10. _____

Signature of Employee

11. _____

12. _____

Operator's Daily Checklist - Electric Industrial Truck (Sample – You may develop your own)

Date		Operator		Battery Water	
Truck#		Model#		Hydraulic Oil	
Department		Serial#			
Shift		Drive Hour Meter Reading		Hoist Hour Meter Reading	

SAFETY AND OPERATIONAL CHECKS (PRIOR TO EACH SHIFT)

Have a qualified mechanic correct all problems.

Motor Off Checks	OK	Maintenance
Leaks – Hydraulic Oil, Battery		
Tires – Condition and Pressure		
Forks, Top Clip Retaining Pin and Heel -- Condition		
Load Backrest Extension – Attached		
Hydraulic Hoses, Mast Chains, Cables & Stops – Check Visually		
Finger Guards – Attached		
Overhead Guard – Attached		
Safety Warnings – Attached (Refer to Parts Manual for Location)		
Battery – Water/Electrolyte Level and Charge		
Hydraulic Fluid Level – Dipstick		
Transmission Fluid Level – Dipstick		
Operator's Manual in Container		
Capacity Plate Attached – Information Matches Model, Serial Number and Attachments		
Battery Restraint System – Adjust and Fasten		
Operator Protection Sit-down Truck - Seat Belt – Functioning Smoothly Man-up Truck – Fall protection/Restraining means - Functioning		
Brake Fluid – Check level		
Motor On Checks (Unusual Noises Must Be Investigated Immediately)		
Accelerator Linkage – Functioning Smoothly		
Parking Brake – Functioning Smoothly		
Service Brake – Functioning Smoothly		
Steering Operation – Functioning Smoothly		
Drive Control – Forward/Reverse – Functioning Smoothly		
Tilt Control – Forward and Back – Functioning Smoothly		
Hoist and Lowering Control – Functioning Smoothly		
Attachment Control – Operation		
Horn – Functioning		
Lights & Alarms (where present) – Functioning		
Hour Meter – Functioning		
Battery Discharge Indicator – Functioning		
Instrument Monitors – Functioning		

*If there is a problem – write problem in Maintenance column and Lock out or Tag out this machine and it cannot be used until maintenance signs and dates that the problem has been corrected

Company Name

Industrial Truck – OSHA Regulation 1910.178

Three year Re-certification

Employees Trained in _____ (Date and Year)

On _____, 20__ I observed _____ (Employees name) using his Fork Lift and/or Electric Jack and he/she was using it correctly in a safe manner and observing all OSHA Safety requirements and following all Company rules and regulations.

Supervisor

Company name

_____, 20__

Date