1. **How can VR simulation increase forklift safety? What is OSHA’s point of view regarding VR training?**

Virtual reality (VR) training methods can be used as a part of formal instruction to satisfy the training requirements of § 1910.178(l)(2)(ii). However, this formal training (e.g., lecture, discussion, interactive computer learning, VR, digital media, and written material) must be supplemented by practical training (e.g., demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator’s performance in the workplace.

2. **Are daily forklift inspections required to be documented?**

OSHA’s Powered Industrial Trucks Standard requires in § 1910.178(q)(7) that powered industrial trucks be examined before being placed in service. They must not be placed in service if the examination shows any conditions adversely affecting the safety of the vehicle. Although the standard requires that the examination be conducted, there is no OSHA requirement that the examination be recorded in writing on a checklist. Please see the following interpretation letter: https://www.osha.gov/laws-reggs/standardinterpretations/2000-05-09.

3. **Clarification on daily inspection, what if you don’t drive the forklift every day?**

Powered industrial trucks are required to be examined prior to use; however, if the powered industrial truck is stored or is not used every day, it would not require an examination until it is ready to be placed in service. Please see the following interpretation letter: https://www.osha.gov/laws-reggs/standardinterpretations/2005-03-03.

4. **Does OSHA require a training sign in sheet that is signed by trainees or just an attendance sheet with dates and type of training?**

OSHA’s Powered Industrial Trucks Standard does not require a training sign in sheet; however, the agency believes it would be a good practice. According to § 1910.178(l)(6), employers shall certify that each operator has been trained and evaluated as required by § 1910.178(l). The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.
5. Is a full retraining required every 3 years or can the operator just be evaluated?

Full retraining is not required every three years. However, §1910.178(l)(4)(iii) stipulates that each [PIT] operator's performance must be evaluated at least once every three years.

Additionally, to ensure that operators have the knowledge and skills needed to safely operate powered industrial trucks, §1910.178(l)(4) mandates that refresher training, including an evaluation of that training, in relevant topics shall be provided to an 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.

Scott Bicksler

1. Do staffing agencies really visit every site where they send temporary workers?

I will speak for my company (Aerotek) only; does it happen 100% of the time, no. Is it required by internal policy and OSHA, yes. Within Aerotek we have a designated compliance department that tracks every new client and every new start. Those new clients and new starts are audited weekly and a report sent to the offender and their supervisor, if there is no site survey on file. Performance counseling is conducted with escalating consequences for being out of compliance. If OSHA were to conduct an investigation on a client site per their requirements they are to inquire with the employer (Host Employer) to see if they utilize temporary employees. If the answer is yes, OSHA opens an investigation of the temporary staffing company. A site health and safety survey is always on their document request, if the staffing company does not have one on file a citation will most likely be issued.

Aerotek goes a little further with site surveys, the Account Manager is responsible for the initial survey. Additionally, we have what is called an internal site survey that is conducted by one of our Regional Safety Managers RSM(s). Our RSMs will conduct the internal site survey for every client they visit.

Chuck Moratz

1. What kind of practices can customers implement to prevent the rapid spread of a virus, like the recent/ongoing coronavirus pandemic?

Guidelines have been provided by Federal, State and Local agencies including OSHA. These should be carefully reviewed and followed. In addition to those guidelines forklift operators should wipe all lift truck controls and touch points down with an alcohol base sanitizer before and after use.
2. Please explain the proper methods for stabilizing a fork lift load for transport.

The weight of the load should be evenly distributed on the pallet, it should have no loose parts that could easily fall from the load, the load should be wrapped or strapped if possible, and the load should not block the Operator view of the path of travel. The load should be positioned so that both forks share the load equally. Raise the load slightly and back tilt fully prior to traveling.

3. Are there any suggestions for eliminating blind spots on stand up reach trucks?

While mirrors or a camera might help eliminate blind spots on stand up reach trucks, the real answer is to train operators to operate their lift trucks at a slow speed and to be extra cautious when operating in an area that increases the chances of a blind spot during the lift truck operation. If an employer has an operation that causes the lift truck operator to have blind spots the employer should try to change the operation to eliminate the blind spots. If that is not possible, they should create a policy about how the lift truck is to be operated in that area and then enforce it.

4. Can you please discuss the critically important role vehicle restraints play in forklift safety?

The truck restraint system may be a Truck Locking System or simply wheel chocks under the rear wheels of the truck or trailer. Either plays a critical role to aid in the prevention of trailer creep and trailer pull away, allowing the forklift to safely enter and exit a trailer. The lift truck operator MUST BE PROPERLY TRAINED in the importance and proper use of either vehicle restraint system the employer is using and the training must be reinforced.

5. Our company has automatic dock locks and trailers match this equipment. Do you feel like it is a requirement, best practice, or overkill to require another redundancy to secure the trailer, such as chocks, hand locks, or other additional safe practice?

a. Automatic dock locks and matching trailers are a very effective tool for the lift truck operator, as long as the operator has been properly trained on how to use them. However, 1910.178(k)(1) states “The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.” Now you would think that means regardless of whether or not the employer is using a Truck Lock System the wheel chocks have to be under the rear wheels while the lift truck is loading or unloading the truck or trailer. OSHA issued guidance for that specific situation on 5 August 1981 that effectively states that if the employer uses a positive mechanical means to secure trucks or trailers to a loading dock, failure to use wheel chocks in accordance with 29 CFR 1910.178(k)(1) and (m)(7) will be deemed to be de minimis violations and will not be cited if:

i. A positive mechanical means to secure trucks or trailers to a loading dock is allowed provided the system is installed and used in a manner that effectively prevents
movement of trucks and trailers during loading, unloading and boarding by handtrucks and powered industrial trucks.

ii. All mechanical equipment shall be installed, maintained, and used as recommended by the manufacturer.
    iii. Any damaged mechanical equipment will be removed from service immediately.

With all of this being stated CLARK still strongly recommends that wheel chocks be placed under the rear wheels of the truck or trailer any time the lift truck boards the truck or trailer to load or unload it. CLARK considers this a “Best Practice” procedure and that all lift truck operators should be trained appropriately for this procedure.