7.06

Use of Powered Industrial Truck Load-Engaging Means to Reduce Awkward Lifting

Date: May 8, 2012

I. Purpose

This DOSH Directive provides guidance to DOSH enforcement and consultation staff in applying the requirements of the Forklifts and Other Powered Industrial Trucks standard, Chapter 296-863 WAC, when the operator of the truck has dismounted to transfer loads by hand with the load-engaging means raised.

II. Scope and Application

This Directive applies to DOSH operations statewide. It replaces all previous direction on this subject, whether formal or informal.

III. References

- Chapter 296-863 WAC, Forklifts and Other Powered Industrial Trucks
- Chapter 296-800-110 WAC, Employer Responsibilities: Safe Place
- DOSH Ergonomics web page https://lni.wa.gov/safety-health/preventing-injuries-illnesses/sprains-strains/

IV. Definitions

- Load-Engaging Means is a device attached to a powered industrial truck and used to manipulate or carry a load.
- Powered Industrial Truck is a mobile, power-driven vehicle used to carry, push, pull, lift, stack, or tier material.

V. Background

Lifting tasks in workplaces account for a significant number of work-related musculoskeletal disorders every year in Washington State. Lifting in awkward postures, such as while bending to lift an object from a low height on a pallet, increases the risk of injury. Use of a powered industrial truck to raise a pallet so that loads can be lifted at waist height, or slid across without lifting, is an effective means of reducing awkward

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lifting. In many cases, it would be the operator of the powered industrial truck who would be transferring the load rather than another worker. However, the Powered Industrial Truck Operations Standard, WAC 296-863-40020, requires that the load engaging means (e.g., forks) be fully lowered while the operator is dismounted and within 25 feet of the truck.

VI. Enforcement Policies

- A. The requirement to have the load-engaging means fully lowered should be treated as a *de minimis* violation, and therefore not cited, in situations where the operator:
 - Has left the load-engaging means raised solely for the purpose of placing the load at a height that reduces awkward lifting, or
 - Allows the load to be slid across instead of lifted.

This guidance applies only while the operator is **actively** loading or unloading materials from the load-engaging means.

The operator, and any other persons assisting the operator, shall not position themselves beneath the load engaging means, or beneath the materials supported by the load-engaging means, at any time during this activity.

B. This Directive does not affect any of the other requirements of the Powered Industrial Truck Operations Standard. The remaining requirements of the standard, including the requirements to have the controls neutralized and the brakes set to prevent movement, must still be followed.

VII. Who to Contact

Contact the Technical Services Powered Industrial Truck specialist with any questions about this Directive or Chapter 296-863 WAC.

Approved:

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