



OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: BHM-CPL-04-00-002

SUBJECT: Regional Emphasis Program (REP) for Powered Industrial Trucks

REGION: Birmingham Region

SIGNATURE DATE: April 17, 2025

EFFECTIVE DATE: April 17, 2025

ABSTRACT

Purpose: The purpose of this instruction is to renew a Regional Emphasis Program (REP) to reduce injuries and fatalities related to powered industrial trucks in General Industry, Maritime, and Construction.

Scope: This instruction applies to Nashville, Jackson, Birmingham, and Mobile Federal Offices.

References: [OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections](#), January 4, 1995
[OSHA Instruction CPL 04-00-002, Procedures for the Approval of Local Emphasis Programs \(LEPs\)](#), November 13, 2018
[OSHA Instruction CPL 02-00-164, Field Operations Manual \(FOM\)](#), April 14, 2020

Cancellations: This Instruction updates and replaces an earlier version.

State Impact: No Impact

Action Offices: Nashville, Jackson, Birmingham, and Mobile Federal Offices.

Originating Office: Birmingham Regional Office

Contact: Assistant Regional Administrator for Enforcement Programs

By and Under the Authority of

DORINDA HUGHES

Regional Administrator

Executive Summary

Many hazards are associated with the operation of powered industrial trucks, which could lead to serious injury and death to employees. The intent of this Regional Emphasis Program is to encourage employers to take steps to correct these hazards thereby reducing potential injuries and death. We intend to accomplish this through outreach and enforcement activities. Outreach activities will include letters to employers, training sessions, and possible partnerships or alliances with stakeholders. Enforcement activities include reviewing powered industrial truck operations on all inspections where applicable and conducting inspections for complaints that allege powered industrial truck hazards.

Significant Changes

Update OSHA Information System statistical data. Update Bureau of Labor Statistics charts and information.

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I. Purpose.

The purpose of this instruction is to renew a Regional Emphasis Program (REP) to reduce injuries and fatalities related to powered industrial trucks in General Industry, Maritime and Construction as part of the OSHA region realignment. This REP will provide the legal authority to evaluate the employer's forklift program on all unprogrammed inspections or other limited scope inspections to assure that employees are being properly protected. Powered industrial truck (PIT) operations will be inspected on all programmed and unprogrammed inspections in General Industry, Maritime, and Construction. Area offices will normally conduct inspections for all complaints, formal or non-formal, which contain allegations of powered industrial truck hazards, unless there are significant resource implications. In addition, all unprogrammed inspections will be expanded to include powered industrial truck operations if applicable.

II. Scope.

This instruction applies to Nashville, Jackson, Birmingham, and Mobile Area Offices.

III. References.

- A. Title 29 Code of Federal Regulations, Part 1910.
- B. [OSHA Instruction CPL 04-00-002, Procedures for the Approval of Local Emphasis Programs \(LEPs\)](#), November 13, 2018
- C. [OSHA Instruction CPL 02-00-164, Field Operations Manual \(FOM\)](#), April 14, 2020
- D. [OSHA Instruction CPL 02-00-051, Enforcement Exemptions and Limitations under the Appropriations Act](#), July 18, 2024
- E. Powered Industrial Truck Operator Training; Final Rule. Federal Register Tuesday, December 1, 1998; 63(230):66238-66274.
- F. ASME (American Society of Mechanical Engineers) B56.1- 2020, Safety Standard for Low Lift and High Lift Trucks. (www.itsdf.org)

IV. Cancellations.

- A. This Instruction updates and replaces an earlier version.

V. Expiration.

This instruction expires on September 30, 2026, unless extended.

VI. Action Offices.

A. Responsible Office.

Birmingham Regional Office – Enforcement Programs.

B. Action Office.

Nashville, Jackson, Birmingham, and Mobile Area Offices.

VII. Federal Program Change.

None.

VIII. Significant Changes.

Update OSHA Information System statistical data. Update Bureau of Labor Statistics charts and information.

IX. Background.

OSHA estimates there are approximately 1.5 million workers in the United States who operate powered industrial trucks. Powered industrial trucks are a significant source of serious and fatal injuries to workers.

A. Statistics.

According to the U.S. Department of Labor/Bureau of Labor Statistics (BLS), TABLE A-5 of Fatal occupational injuries by occupation and event or exposure, all United States, for 2023, the number of fatal injuries among industrial truck and tractor operators was 39. During calendar years 2022 and 2023, Federal OSHA and the State programs investigated 140 fatalities, and 64 other non-fatal incidents related to violations of the power industrial trucks standards. During the same period, the Birmingham Region conducted 365 inspections where power industrial trucks were used and issued 180 citations related to power industrial trucks hazard.

B. Definition.

Powered industrial trucks are used in almost all industries. They are used to move, raise, lower, or remove large objects or several smaller objects on pallets or in boxes, crates, or other containers. OSHA Standard 1910.178 powered industrial trucks contains requirements related to fire protection, design, maintenance, and use of fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks. ASME B56.1-1969, Safety Standard for Low Lift and High Lift Trucks, which is incorporated by reference in 1910.178, defines powered industrial trucks as “mobile, power propelled trucks used to carry push, pull, lift, stack, or tier material.”

C. Hazards.

Each of the different types of powered industrial trucks has its own unique characteristics and inherent hazards. Characteristics of powered industrial trucks that affect safe truck operation are the truck's tendency to become unstable; its ability to carry loads high off the ground; and its characteristic mode of steering, i.e., with the rear wheels while being powered by the front wheels. Moving loads upward, downward, forward, and backward causes a shift of the center of gravity and can adversely affect the vehicle's stability. When a load is raised or moved away from the vehicle, the vehicle's longitudinal stability is decreased.

Workplaces, where powered industrial trucks are used, present a variety of

different hazards such as, but not limited to, rough, uneven, or sloped surfaces; unusual loads; hazardous areas; narrow aisles; blind spots; and pedestrian traffic or employees working close to the path of travel. Some hazardous work practices relate to all trucks, including driving at excessive speed, poor loading, and carrying unauthorized passengers. Poor truck maintenance can also contribute to accidents. Improper truck maintenance has caused death from over exposure to carbon monoxide, loss of brakes, or rupture of hydraulic lines.

Many accidents have occurred because of unsafe truck operation. For example, employees have fallen from trucks while using them to change light bulbs on overhead fixtures or riding on the forks to manually retrieve items from high racks. In addition, accidents have occurred when an operator has attempted to drive with an obstructed view in the direction of travel and has run into another employee.

The Birmingham Regional OSHA Office is reissuing this REP to ensure that powered industrial truck operations are evaluated on all inspections to determine if the employer is in compliance with all relevant OSHA requirements and to ensure that employees are protected from the hazards related to powered industrial trucks.

X. Procedures.

The conduct of inspections shall adhere to the following:

- A. All inspections conducted in general industry, maritime and construction are covered by this instruction.
- B. During all inspections, compliance officers shall determine if powered industrial trucks are utilized at that worksite. If they are, the compliance officer will either expand the inspection or make a referral to cover those operations unless powered industrial trucks operations have been inspected at the worksite within the last three years.
- C. In accordance with the FOM, Chapter 9, Complaint and Referral Processing, area offices will normally conduct an inspection for all complaints, formal or non-formal, which contain allegations of powered industrial truck hazards unless there are significant resource implications.
- D. If an employer refuses to allow the compliance officer to expand an inspection being conducted under this program to cover powered industrial truck operations, a warrant shall be sought in accordance with procedures in the current FOM, Chapter 15, Section III, for handling such refusals.
- E. Area Directors shall insure that compliance officers are sufficiently qualified/trained to conduct this type of inspection.

XI. Recording in OIS.

Current instructions for completing the appropriate OSHA forms shall be applied when recording inspections under this REP.

- A. All inspections expanded or scheduled under this REP shall be coded in OIS as “FORKLIFT” under local emphasis.
- B. Unprogrammed activities such as Fatality, Complaint, Referral, and Employer-Reported referral shall be coded in OIS as “FORKLIFT” in the appropriate field.

XII. Evaluation.

An evaluation of the program will be conducted midway through and at the completion of the effective period that addresses whether or not the program advances OSHA’s goals and initiatives and will include quantitative and qualitative measures.

XIII. Outreach.

The Regional and Area Office will conduct outreach activities intended to reach as many employers and stakeholders as is practicable. Outreach activities will be conducted to raise awareness of the hazards associated with powered industrial trucks to inform stakeholders and employers of the elements of the REP.

The Area Office is encouraged to conduct mailings to stakeholders within Area Office jurisdiction to both raise awareness of the hazards associated with powered industrial trucks, and to develop possible partnership or alliances with the stakeholders. The Area Office should consider having these stakeholders participate in training, assist in the dissemination of information from this REP, and participate in any other outreach activity where their participation would benefit the program. Stakeholders may include powered industrial truck vendors, parts suppliers, manufacturer’s representatives, industry periodical publishers, safety and health consultants, safety councils, and unions.

APPENDIX A

Date

Company Name

Address

Dear Stakeholder:

The United States Department of Labor/Occupational Safety and Health Administration (OSHA), Birmingham Region, has developed a local outreach, education, prevention, and inspection program regarding employers who may have powered industrial truck operations. We will be conducting outreach efforts to employers to raise awareness of the hazards related to powered industrial trucks. We are writing to invite you to participate in our outreach efforts.

The goal of the program is to reduce fatalities and serious injuries related to powered industrial trucks and to encourage employers to bring their facility into compliance with the applicable OSHA regulation for Powered Industrial Trucks in General Industry, Maritime and Construction. Hazards associated with powered industrial trucks include: inadequately trained drivers, improper operation (tip-overs, collisions with structures and pedestrians), improper storage of materials in areas serviced by powered industrial trucks, use of powered industrial trucks in a hazardous location, inadequate lockout-tagout procedures while working on powered industrial trucks, carbon monoxide and propane exposures, falls from powered industrial trucks while elevated, and improper maintenance procedures.

Small employers may contact the On-site Consultation Program for a free confidential safety and health consultative visit. The consultation program, funded primarily by federal OSHA, provides safety and health consultative services to help employers establish and maintain a safe workplace by coming into compliance with OSHA's regulations. Although the consultants' findings are confidential, employers are required to correct any hazards they observe on their visit. Information related to the On-site Consultation Program may be found at the OSHA website, www.OSHA.gov.

The mission of OSHA is to ensure that working men and women arrive home safe each night from their place of employment. Together, we can accomplish this task. OSHA shares each employer's goal of reducing occupational injuries and illnesses to the maximum extent practical. Should you wish to participate with us in our efforts or if you have any questions or comments, please contact me at (xxx) xxx-xxxx. We look forward to working with you toward this common objective.

Sincerely,

Area Director (xxxx)

APPENDIX B

Powered Industrial Truck (PIT) Inspection Guidance

This guidance provides recommendations for evaluating PITs. The compliance officers shall familiarize themselves with OSHA standard, [29 CFR 1910.178](#). The CSHOs shall conduct a complete and thorough evaluation and inspection utilizing the steps listed below:

Step 1. Determine the types of PITs at the establishment, such as but not limited to; electric motor rider trucks, order pickers, sit down forklift trucks, walk behind trucks, etc. Reference 1910.178, ANSI/ASME B.56.1 and <https://www.osha.gov/etools/power-industrial-trucks>.

Step 2. Determine which employees have been designated to operate the PITs. Determine through interviews and an evaluation of the employer's training program their level of training, experience, refresher training, and evaluation.

Step 3. Inspect one or more of the different types of PITs used in the establishment. The truck(s) shall be visually inspected to address hazards outlined in the appropriate OSHA standard. Have an operator and the member of management responsible for the PITs onsite demonstrate how they perform inspections of the PITs.

Step 4. Observe the PITs in operation for safe operation and handling.

Step 5. Interview the operators. Discuss training, evaluations, incidents/accidents, handling of defective trucks, and repairs.

Step 6. Interview the employer/trainer. Discuss policies/procedures, training program, frequency of training, determination of competency when hiring experienced operators, evaluation of operators, maintenance/servicing of trucks, knowledge of the owner's manual, and removal/return of trucks to service.