



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Public Health Service

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National Institute for Occupational
Safety and Health
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati OH 45226-1998
June 28, 1996

Docket Office
Docket No. S-008
Room N2624
U.S. Department of Labor
Occupational Safety and Health
Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210

DOCKET OFFICER

DATE

Dear Sir/Madam:

Enclosed you will find posthearing comments from the National Institute for Occupational Safety and Health (NIOSH) on the OSHA proposed rule on powered industrial truck operator training [29 CFR Parts 1910, 1915, 1917, and 1918]. NIOSH presented testimony on this proposed rule on April 30, 1996, and submitted comments to OSHA on July 11, 1995. Our comments are enclosed in quadruplicate.

If you have any questions regarding our submission, please call me at 513/533-8303.

Sincerely yours,

for

Paul A. Schulte, Ph.D.
Director
Education and Information Division

4 Enclosures

NIOSH

Posthearing Comments to DOL

POSTHEARING COMMENTS OF THE
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH
ON THE
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
PROPOSED RULE ON
POWERED INDUSTRIAL TRUCK OPERATOR TRAINING

29 CFR Parts 1910, 1915, 1917, 1918
Docket No.S-008

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

June 28, 1996

These posthearing comments are submitted by the National Institute for Occupational Safety and Health (NIOSH) in response to requests for information made at the Occupational Safety and Health Administration (OSHA) hearing on powered industrial truck operator training held April 30, 1996.

1. **Mr. Charles Gordon from OSHA asked if NIOSH would look at the Monaco Group's statement and give NIOSH's views on the approach of evaluating, by a series of hands-on exercises, how operators drive industrial trucks.**

We have reviewed the testimony submitted by the Monaco Group in response to the proposed rule on powered industrial truck operator training and find it to be a valid and efficient approach to operator training. The proposed rule is intended to assure that individuals have received the necessary knowledge, skills, and abilities to operate an industrial powered truck safely in the field. The ultimate goal is that the training lead to safe performance. Given that the basic skills required in operating a powered industrial truck are of a perceptual-motor nature (e.g., locating, manipulating, and coordinating the controls; accurately judging distance and speed; recognizing and reacting to obstacles; properly balancing and transporting a load, etc.), it is important that the initial training and subsequent evaluation be behaviorally based. Classroom lectures, videos, observation learning, paper and pencil exercises and similar passive techniques are useful precursors in preparing the trainee for "hands-on-learning" by focusing attention on relevant cues and the concepts to be learned, but they cannot substitute for hands-on practice and performance. NIOSH therefore agrees with the Monaco Group's approach that both the training and evaluation should be behaviorally-based and objectively measurable.

Aside from the endorsement of the general approach to training suggested by the Monaco Group, we do have two additional reactions to their testimony:

- The first is the quote on page 2 which reads "The accidental injuries of lift truck operators (and pedestrians injured by lift trucks), are caused by on-truck behavior of the operators resulting in physical harm and financial loss to employees and our company." The implication is that all injuries to operators or pedestrians are due to operator error. Certainly there are circumstances in which injury may occur through no fault of the operator.
- The second is recommendation "D" on page 11 which reads that evaluation should occur "The first year of this requirement and every three years thereafter . . .". We feel that the monitoring and evaluation of employee safety performance should be a continuing responsibility of management, with feedback and corrective instruction given whenever necessary. If the Monaco Group is referring to a formal or standardized evaluation at these intervals, in addition to the noted responsibilities of management, then the document should be worded accordingly. However, NIOSH agrees with the OSHA provision for an annual performance evaluation for operators when possible.

2. **Ms. Saneya El-Mekawi from OSHA asked if NIOSH could supply specific information regarding fatality data for SIC 07 (Agriculture) and SIC 13 (Mining).**

An analysis of the NTOF data showed that from 1990 through 1992, the only period for which data was coded to detailed SIC, three fatalities in agricultural services (SIC 07) and three fatalities in oil and gas extraction (SIC 13) involved forklifts. The information contained in the narratives did not allow further description of these events other than that they involved forklifts.

3. **Ms. Saneya El-Mekawi from OSHA asked if NIOSH could supply the percentage of forklift-related fatalities from Table 1 that were pedestrians.**

From 1980 through 1992, 52 "run over" cases were assumed to be pedestrians, i.e., the victim was not in the forklift at the time of the incident. Nine additional fatalities in the "Other" category were specifically identified as pedestrians. Thus, the percentage of the 862 fatalities in Table 1 that were pedestrians is at least 7% (based on a total of 61 pedestrian fatalities), and possibly more.