

# U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210



October 8, 1999

Mr. Stuart Flatow, Director  
American Trucking Associations  
2200 Mill Road  
Alexandria, VA 22314-4877

Dear Mr. Flatow:

Thank you for your July 8, 1999 letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Compliance Programs. You have questions regarding the Powered Industrial Truck Operator Training, Final Rule, December 1, 1998, 29 CFR 1910.178(l). We appreciate the opportunity to provide you with clarification on this matter.

**Question #1.** At what point does the final training rule require employers to conduct training on different makes and models of powered industrial trucks?

**Response.** Operators who have successfully completed training and evaluation as specified in 1910.178(l) (in a specific type of truck) would not need additional training when they are assigned to operate the same type of truck made by a different manufacturer. However, operators would need additional training if the applicable truck-related and workplace-related topics listed in 1910.178(l)(3) are different for that truck.

**Question #2.** Is the required training weight and brand specific?

**Response.** The extent of required training is determined not by the differences in brand or rated capacity but by whether the trucks which an operator may operate differ with respect to any one or more of the "truck-related" topics. If, however, the only significant difference between two trucks is that they have different capacities, then an operator trained on the larger capacity truck need only receive additional training on the lesser capacity of the other truck.

**Question #3.** As the standard applies to site-specific training, can employers establish broad categories of site/establishment specificity that could include freight docks, dirt yards, warehouses, etc.?

**Response.** Whether an operator trained and evaluated at one of an employer's facilities must receive additional training at another facility on "workplace-related topics" will depend on whether the two facilities significantly differ with respect to any one or more of the topics set out at 1910.178(l)(3)(ii). If, as you state, all of the potential hazards addressed in the workplace-related topics are the same, then no additional training or evaluation would be necessary. Thus, for example, where all of an employer's facilities have substantially similar ramps or narrow aisles, no additional training on those topics would be required. To take another example, however, additional training would be required if the loads to be carried at different facilities significantly differ in composition or stability. It should not be thought that an operator generally trained in, for example, warehouse operations has been fully trained to operate in all warehouse situations. The key factor is whether the other situations are substantially the same as that in which the operator has been trained.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's website at <http://www.osha.gov>. If you have any further questions, please feel free to contact the Office of General Industry Compliance Assistance at 202-693-1850.

Sincerely,

Richard E. Fairfax, Director  
Directorate of Compliance Programs