



Occupational Safety and Health Administration

- **Standard Number:** 1910.178(a).

OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <https://www.osha.gov>.

March 7, 2000

Ms. Michele Corbin
Pennsylvania Landscape & Nursery Association
1707 South Cameron Street
Harrisburg, Pennsylvania 17104

Dear Ms. Corbin:

Thank you for your February 4, 2000 letter to the Occupational Safety and Health Administration's (OSHA's) [Directorate of Enforcement Programs (DEP)]. Your letter has been referred to the [Office of General Industry Enforcement (GIE)] for answers to your questions regarding operator training for powered industrial trucks. Your specific questions have been restated below for clarity.

Question 1. If a vehicle that is intended primarily for earth moving utilizes removable forks, would the vehicle fall under the Powered Industrial Truck Regulations?

Response. The preamble to the Final Rule, found on page 66255 of Federal Register Vol. 63, No. 230, clearly states that equipment that was designed to move earth but has been modified to accept forks is not covered by the final rule. Therefore, if your vehicle is designed as earth moving equipment, it would not be considered a powered industrial truck within the scope of §1910.178.

Question 2. Would a skid steer be considered an earth moving vehicle?

Response. A skid steer loader designed, manufactured, and used in accordance with Society of Automotive Engineers (SAE) J1057 would ~~be~~ not be considered a powered industrial truck under §1910.178. However, vertical mast skid steer loaders are designed as powered industrial trucks meeting ANSI B56.6 **Rough Terrain Forklift Trucks**. These skid steers would be considered powered industrial trucks under §1910.178.

Question 3. Is there a percentage of time that the removable forks must be used on the vehicle to qualify for the Powered Industrial Truck Regulations?

Response. As stated above, the design of the vehicle is the determining factor, rather than the time of use aspect.

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 Enforcement] at (202) 693-1850.

Sincerely,

Richard E. Fairfax, Director
[Directorate of Enforcement Programs]

[Corrected 6/2/2005]

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