

To the Occupational Safety Health
Standard Board,

This petition is regarding
the enforcement of proposed state
standard, title 8, chapter 4, man-
datory seat belt law.

signed,
Nina S. Duren
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SEP 08 2009

**OCCUPATIONAL SAFETY AND HEALTH
STANDARDS BOARD**

Reasons for petition:

1.) Due to the restricting nature of the safety belt which limits range of motion, forklift operators are unable to comply with forklift operation guidelines rule number fifteen which states that operators shall look in the direction of travel and shall not move a vehicle until certain all persons are clear. The inability to comply with rule number fifteen causes a severe safety hazard for both operator and fellow workers.

2.) Due to the obstruction of vision caused by carrying the required large loads, forklift operators spend the majority of their workday driving in reverse. Subjection to this position added to the restriction of the safety belt causes back and neck pain and may ultimately cause long term back and neck injuries.

3.) Certain jobs require one to get on and off the forklift repeatedly in a short amount of time. This action is also a safety hazard due to the high pace, high stress environment in which workers are subjected to; also slowing productivity.

Conclusion: Since job descriptions vary between companies, safety belt regulations should be left up to the discretion of the company based on individual job descriptions and requirements.

FORKLIFT OPERATION GUIDELINES

Every employer using forklifts shall post and enforce a set of operating rules, and supervisors shall train applicable employees on the following rules:

1. Only drivers **authorized** by the employer and **trained** in the operation of forklifts shall be permitted to operate such vehicles.
2. Stunt driving and horseplay are prohibited.
3. No rides shall be permitted on vehicles unless provided with adequate riding facilities (lift trucks/ enclosed platforms).
4. Employees shall not ride on the forks of lift trucks.
5. Employees shall operate the forklift smoothly without jerky turns; starts or stops.
6. Employees shall not place any part of their bodies outside the running lines of a forklift or between mast uprights or other parts of the forklift where shear or crushing hazards exist.
7. Employees shall not be allowed to stand, pass, or work under the elevated portion of any forklift, loaded or empty, unless it is effectively blocked to prevent it from falling.
8. Drivers shall check the vehicle at the start of each shift, and if it is found to be unsafe, the matter shall be reported immediately to a supervisor, and the vehicle shall not be put in service again until it has been made safe. Attention shall be given to the proper functioning of tires, horn, lights, battery, controller, brakes, steering mechanism, cooling system, and the lift system (forks, chains, cable, and limit switches). Inspections shall be recorded daily on the Forklift Inspection Sign-In sheet.
9. No forklift shall be operated with a leak in the system.
10. At the beginning of each shift, the operator must check the fuel level and fill up if necessary. When filling the lift with butane, the operator must use the protective gear provided at the butane tanks. Operator must wear the face shield and gloves.
11. Vehicles shall not exceed the authorized or safe speed, always maintaining a safe distance from other vehicles, keeping the forklift under positive control at all times, and all established traffic regulations shall be observed. For forklifts traveling in the same direction, a safe distance may be considered to be approximately three lift lengths or preferably a time lapse – three seconds – passing the same point.
12. Forklifts traveling in the same direction shall not be passed at intersections, blind spots, or dangerous locations.
13. Employees shall sound horn and come to a complete stop before proceeding forward when approaching locations with obstructed views.
14. Pallet loads shall not exceed 62 inches while driving in a forward motion.
15. Operators shall look in the direction of travel and shall not move a vehicle until certain that all persons are in the clear.
which causes a huge safety hazard.
16. Forklift shall not be driven up to anyone standing in front of a bench or other fixed object such that the person could be caught between the forklift and the object.
17. Grades shall be ascended or descended slowly.
 - a. On all grades, the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
 - b. Motorized hand and hand/rider trucks shall be operated on all grades with the load engaging forks downgrade.
18. The forks shall always be carried as low as possible, consistent with safe operations.
19. When leaving a vehicle unattended, either:
 - a. Shut off power and forks left in the down position. When left on incline, the wheels shall be blocked; or
 - b. Set brake, bring the mast to the vertical position, and leave forks in the down position.
20. Vehicles shall not be run onto any elevator unless the driver is specifically authorized to do so and the elevator is rated for such loads.
21. Motorized hand trucks shall enter elevators or other confined areas with the load end forward.