

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 77-1910.178-3

Subject: Article VI, Section 1910.178 (m) (6) – Powered Industrial Trucks;
Truck Operations.

Standard: Article VI, Section 1910.178 (m) (6), Rules and Regulations,
Commissioner of Labor, State of South Carolina.

**Cross Reference to
Federal Standards:** 29 CFR 1910.178 (m) (6).

Background:

- a. A Federal proposed amendment to 29 CFR 1910.178 (m) (6) allowing powered industrial trucks to open and close freight car doors by certain practices was published in the Federal Register, April 23, 1974. Current national consensus standards allow certain powered industrial trucks equipped with a specifically designed device to open and close railroad freight car doors.
- b. The Federal proposal and national consensus standards are in limited conflict with the subject standard, which states in part, that trucks shall not be used for opening or closing freight doors.

Interpretation: When the movement of a powered industrial truck is used to open or close railroad freight car doors, and the truck is using an attached device specifically designed to open and close car doors, the violation of the part of Article VI, Section 1910.178 (m) (6) shall be considered “de minimis” when the following requirements have been met:

- a. The design of the door opening device shall require the force applied by the device to the door to be in a direction parallel with the door travel.
- b. The operator is trained in the use of the door opening device and keeps the operation in full view.
- c. Employees, other than the operator, stand clear while the door is being moved.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand, Director
August 31, 1977