

Lift Platforms

A regulation change by OSHA in 2003 all but banned lift platforms. Are you still using them? Many are. Do you have the required written approval? Can you even get it?



Lift platforms, sometimes called safety platforms, are essentially work platforms attached to a forklift and used to raise personnel. Think of them as a poor man's aerial lift. Such platforms are in common use and range in our experience from commercially produced and well designed to homemade models that would not even pass for a good deer stand. Since May 1971 OSHA permitted elevation of personnel by a "safety platform firmly secured to the lifting carriage and/or forks" of the powered truck as long as there was adequate protection from falling objects and a means for personnel on the platform to shut off power to the truck. This was found at 29 CFR 1910.178(m)(12). Standard training materials provided by OSHA even included a schematic of a properly constructed platform along with specifications for dimensional components (i.e., "Strong 1¼" O.D. siderails keep workers safe and secure.").

The problem is that on 6/2/03, this portion of the standard was "removed and reserved" by OSHA. To the untrained eye, it implies that OSHA no longer regulates the activity, but with several questions on this lately, we called the OSHA compliance hotline (301-515-6796) and asked.

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Key Points

Personnel lifting allowed since 1971 under certain conditions

OSHA formally removed the regulation in 2003

Current OSHA position is that platforms are "attachments"

Attachments require prior written approval from manufacturer

Getting written approval appears almost impossible



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That portion of the regulation is indeed removed, but the compliance officer pointed us to 29 CFR 1910.178(a)(4), which states:

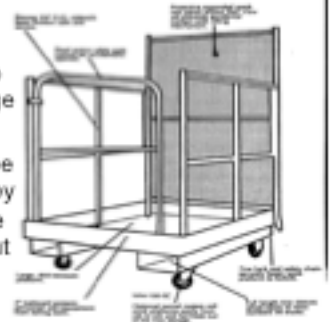
“Modifications and additions which affect capacity and safe operation shall not be performed by the customer or user without manufacturers prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly.”

She explained that OSHA considers lift platforms to be “additions” requiring prior written approval from the manufacturer. Curious as to where truck manufacturers stand on approving something that OSHA feels is inherently risky, we called several of them and asked. In short the dominant answer was “NO.” Most simply will not approve any personnel-lifting scenario, though some do a better job than others at communicating this. For example, CLARK flatly states on their website (FAQ #11):

“CLARK's general-purpose lift trucks are not designed as personnel elevators. While the OSHA and ANSI safety standards permit such attachments to be used, CLARK does not itself sell safety platforms and does not permit the use of platforms on lift trucks. There are specific products designed to raise people for overhead work, and CLARK believes that these machines are better suited for this work.”

1910.178(m) Truck operations

- (12)(i) Use of a safety platform firmly secured to the lifting carriage and/or forks
- (ii) Means shall be provided whereby personnel on the platform can shut off power to the truck



John L. Henshaw,
Assistant Secretary of Labor:

“Because it is unenforceable, OSHA is removing that provision, 29 CFR 1910.178(m)(12), from the Powered Industrial Trucks Standard.”

May 23, 2003



A welder in Iowa fell to his death from this platform attached to the forks of a boom forklift. The 4 X 12 platform was made by the company specifically for use with their rough terrain lift. The killed worker was 35-40 feet high when he fell, landing on a catwalk 20 feet below.

From OSHA Removal Final Rule:

“Indeed, if proper equipment, procedures and training are not provided, the lifting of personnel with powered industrial trucks poses hazards likely to cause death or serious injury to employees. As noted in OSHA's 1998 amendment to the Powered Industrial Trucks Standard, a significant percentage (4 to 14% depending on the study) of the 100 deaths and 95,000 injuries per year that involve powered industrial trucks, result from falls from personnel lifting.”

“...a 26-year-old furniture warehouse worker was fatally injured after falling 18 feet from an order-picker forklift truck. The incident occurred as the victim was moving the raised forklift truck down a narrow aisle between the warehouse racks. No one saw the incident, but apparently the forklift platform (a flat cart designed to be carried on the forks) struck the metal warehouse racks, pulling the platform off the forks...”



“Warehouse Worker Dies After Falling 12 Feet...”

Toyota’s position is less clear. Although platforms for Toyota trucks can be purchased commercially from non-Toyota vendors, the distributors we talked with noted that owner manuals for current models “do not approve” the use of any personnel lifting apparatus, and that requests for written approval or a “data tag” to reflect the aftermarket units would almost certainly be refused.

Hyster was an exception, allowing use of listed commercially produced units that meet Hyster specifications (available upon request). For example, platform capacity cannot exceed half of the rated truck capacity. Hyster stated that under no circumstances would “homemade” or unlisted units be approved.

In short, since mid-2003 wholesale use of these platforms has been effectively banned since OSHA requires manufacturer approval, and our research indicates that nearly none of them will give it. Without written approval in hand for each platform, you are 100% out of compliance. You have a slim chance with certain manufacturers and models, but with shop-fabricated or “homemade” units, chances of approval are zero. OSHA will cite for this under both the General Duty Clause and fall protection standards depending on the situation, and should you be defending against an injury or fatality claim, lacking the required approval you are defenseless and very possibly negligent. Discuss this with your loss prevention and safety personnel, and contact your truck manufacturer for confirmation.

We’re with CLARK on this one: Our recommendation is to remove noncompliant platforms from service immediately, destroy and dispose of them, and move toward using equipment specifically designed for personnel lifting, such as aerial, scissor and boom lifts.

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