

THE CITADEL

The Military College of South Carolina

171 Moultrie Street

Charleston, SC 29409

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POWERED INDUSTRIAL TRUCK (FORKLIFT) SAFETY PROGRAM

PURPOSE

The purpose of The Citadel Powered Industrial Truck (PIT) Safety Program is to establish requirements for the safe selection, operation, inspection, maintenance, training, and evaluation of powered industrial trucks used by Citadel employees. The program is intended to prevent injuries, property damage, struck-by incidents, tip-overs, falling loads, and other hazards associated with powered industrial truck operation.

This program is designed to comply with the applicable requirements of OSHA 29 CFR 1910.178, Powered Industrial Trucks, as well as other applicable OSHA, manufacturer, and institutional safety requirements.

SCOPE

This program applies to Citadel employees who operate powered industrial trucks covered by 29 CFR 1910.178 as part of their assigned duties, and to departments that own, lease, rent, supervise, or authorize the use of such equipment.

- Covered equipment may include fork trucks, tractors, platform lift trucks, motorized hand trucks, powered pallet trucks, and other specialized industrial trucks powered by electric motors or internal-combustion engines, provided the equipment is within the scope of 29 CFR 1910.178.
- This program does not automatically apply to golf carts, utility carts, farm vehicles, equipment intended primarily for earthmoving, or over-the-road vehicles unless the equipment is determined to fall within the scope of the OSHA powered-industrial-truck standard.
- Aerial lifts, mobile elevating work platforms, cranes, and other equipment subject to separate OSHA standards shall be addressed under the applicable program.

REFERENCES

- 29 CFR 1910.178 - Powered Industrial Trucks.
- 29 CFR 1910.147 - The Control of Hazardous Energy (Lockout/Tagout), when applicable to maintenance or repair.
- 29 CFR 1910.132 - General Requirements for Personal Protective Equipment.
- 29 CFR 1910.110 - Storage and Handling of Liquefied Petroleum Gases, when applicable.
- Manufacturer operating, inspection, and maintenance instructions for each truck and attachment.

DEFINITIONS

Authorized Operator - An employee who has successfully completed required formal instruction, practical training, and workplace evaluation and has been authorized by The Citadel to operate specified types of powered industrial trucks.

Attachment - A device or component attached to a powered industrial truck that changes or supplements the truck's function, configuration, capacity, or load-handling capability.

Evaluation - An observation and assessment of an operator's performance in the workplace to determine whether the operator can safely operate the powered industrial truck.

Formal Instruction - Classroom, lecture, discussion, interactive computer learning, video, written material, or similar instruction addressing required safety topics.

Powered Industrial Truck (PIT) - A mobile, power-propelled truck used to carry, push, pull, lift, stack, or tier materials and that is covered by 29 CFR 1910.178.

Practical Training - Demonstrations performed by the trainer and practical exercises performed by the trainee on the type of truck to be operated.

Refresher Training - Additional training in relevant topics provided when required by an OSHA trigger or when The Citadel determines that additional instruction is needed to ensure safe operation.

Trainee - An employee receiving PIT operator training who may operate a truck only under direct supervision of a qualified trainer and only where the operation does not endanger the trainee or other employees.

Unattended Truck - A powered industrial truck when the operator is 25 feet or more away while the truck remains in view, or whenever the operator leaves the truck and it is not in view.

RESPONSIBILITIES

Department of Environmental Health & Safety (EHS)

- Administer and maintain the campus PIT Safety Program.
- Provide, coordinate, or approve operator training and evaluation processes.
- Maintain or coordinate required operator training and evaluation certification records.
- Periodically audit departments for compliance with operator authorization, inspections, maintenance, and recordkeeping requirements.
- Assist departments with interpretation of 29 CFR 1910.178 and investigation of PIT-related incidents and near misses.

Department Managers and Supervisors

- Do not assign or permit an employee to operate a PIT until the employee has completed required training and evaluation and is authorized for the type of truck to be operated, except during supervised training.
- Ensure operators receive workplace-specific training for the conditions and hazards in their assigned areas.
- Ensure required daily or shift inspections are completed and deficiencies are addressed.
- Remove unsafe trucks from service and ensure repairs are performed by authorized personnel.
- Ensure operator performance evaluations occur at least once every three years and refresher training is provided when required.
- Take corrective action when unsafe operation is observed.

Authorized Operators

- Operate only the types of PITs and attachments for which they have been trained, evaluated, and authorized.
- Complete required pre-use inspections before operation.
- Operate the truck in accordance with this program, manufacturer instructions, posted workplace rules, and the truck's capacity/nameplate information.
- Immediately report defects, unsafe conditions, accidents, near misses, and damage to the supervisor.
- Remove or tag unsafe equipment out of service in accordance with departmental procedures and do not operate it until restored to safe condition.

Contractors and Temporary Employees

Contractors remain responsible for training, evaluating, and supervising their employees. When temporary or contract operators will use Citadel PITs or operate in Citadel work areas, the host department shall verify appropriate training and, as necessary, provide workplace- and equipment-specific information and evaluation before operation is authorized.

TRUCK APPROVAL, MODIFICATIONS, ATTACHMENTS, AND MARKINGS

- Powered industrial trucks shall meet applicable design and approval requirements of 29 CFR 1910.178.
- Modifications or additions that affect capacity or safe operation shall not be made without prior written approval from the truck manufacturer or other approval accepted by OSHA when the manufacturer is unavailable or will not approve the change.
- Capacity, operation, and maintenance plates, tags, or decals shall be revised when approved modifications or additions affect the information shown.
- Non-factory-installed front-end attachments shall be approved as required and the truck shall be marked to identify the attachment and the approximate combined weight/capacity information required by OSHA.
- Nameplates, capacity plates, and required markings shall remain in place and legible.

- Operators shall not exceed the rated capacity shown on the truck nameplate for the truck/attachment configuration in use.

OPERATOR TRAINING, EVALUATION, AND AUTHORIZATION

Before permitting an employee to operate a powered industrial truck, except during supervised training, The Citadel shall ensure that the employee has successfully completed the required training and evaluation.

Training Method

- Formal instruction.
- Practical training, including trainer demonstrations and trainee exercises.
- Evaluation of the operator's performance in the workplace.

Persons with the knowledge, training, and experience to train PIT operators and evaluate their competence shall conduct training and evaluation.

Required Training Content

Training shall address applicable truck-related and workplace-related topics, including:

- Operating instructions, warnings, and precautions for the types of truck the employee will operate.
- Differences between the PIT and an automobile.
- Truck controls and instrumentation.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility, including restrictions caused by loads.
- Fork and attachment adaptation, operation, and limitations.
- Vehicle capacity and stability.
- Inspection and maintenance tasks the operator is expected to perform.
- Refueling and/or battery charging and recharging.
- Operating limitations and manufacturer warnings.
- Surface conditions in the work area.
- Load composition, stability, manipulation, stacking, and unstacking.
- Pedestrian traffic.
- Narrow aisles and restricted areas.
- Hazardous or classified locations, when applicable.
- Ramps and sloped surfaces.
- Closed environments where carbon monoxide, diesel exhaust, or inadequate ventilation may create hazards.
- Other unique workplace conditions that could affect safe operation.
- Applicable requirements of 29 CFR 1910.178.

Refresher Training

OSHA does not require annual PIT refresher training simply because a calendar year has passed. Refresher training on relevant topics, including an evaluation of the effectiveness of that training, shall be provided when:

- The operator is observed operating the vehicle in an unsafe manner.
- The operator has been involved in an accident or near-miss incident.
- An evaluation reveals that the operator is not operating the truck safely.
- The operator is assigned to operate a different type of truck.
- A condition in the workplace changes in a manner that could affect safe operation.

The Citadel may require additional periodic safety instruction as an institutional requirement when warranted by risk, incident trends, equipment changes, or department needs.

Three-Year Performance Evaluation

The workplace shall evaluate each authorized operator's performance at least once every three years. The evaluation shall confirm that the operator continues to demonstrate safe operation of the types of trucks for which authorization is maintained.

Prior Training

Previously completed training may be credited when it is appropriate to the truck and the working conditions encountered, and the operator has been evaluated and found competent. Workplace- or equipment-specific training shall be added as necessary.

Certification

The Citadel shall certify operator training and evaluation. Certification shall include the operator's name, the dates of training and evaluation, and the identity of the person(s) performing the training or evaluation.

PRE-OPERATION INSPECTION

Each powered industrial truck shall be examined at least daily before being placed in service. Trucks used on a round-the-clock basis shall be examined after each shift. The Citadel requires completion of a written pre-use inspection checklist.

- A truck found to be unsafe, defective, or in need of repair shall be removed from service until restored to safe operating condition.
- The operator shall report deficiencies to the supervisor immediately.
- Inspection items shall be appropriate to the truck type and manufacturer instructions and may include forks, mast, chains, hoses, tires, steering, brakes, horn, lights/alarms, seat belt/restraint system, controls, leaks, fluid levels, battery/fuel system, capacity plate, overhead guard, load backrest, and attachments.
- Hands shall not be placed inside the mast to check chain tension or components; an appropriate method shall be used.

GENERAL SAFE OPERATING RULES

- Operators shall maintain control of the truck and operate at a speed that permits the truck to be brought to a safe stop under prevailing conditions.
- Operators shall look in the direction of and maintain a clear view of the path of travel.
- When a load obstructs forward view, the operator shall travel with the load trailing when required for safe visibility.
- Slow down and sound the horn at cross aisles and other locations where vision is obstructed.
- Slow down for wet or slippery surfaces.
- Reduce speed to a safe level before turns and account for rear-end swing.
- Stunt driving and horseplay are prohibited.
- Unauthorized personnel shall not ride on powered industrial trucks. The Citadel prohibits passengers unless the truck is specifically designed and authorized for an additional rider.
- No person shall stand or pass under an elevated portion of a truck, whether loaded or empty.
- Arms and legs shall not be placed between mast uprights or outside the running lines of the truck.
- Operators shall not drive a truck up to a person standing in front of a bench or other fixed object.
- Installed operator-restraint systems and seat belts shall be used in accordance with manufacturer instructions and Citadel requirements.
- Operators shall observe campus traffic rules, pedestrian routes, emergency-vehicle right-of-way, and posted speed restrictions.

LOAD HANDLING AND STABILITY

- Only stable or safely arranged loads shall be handled.
- Loads shall remain within the rated capacity of the truck and attachment configuration.
- Forks or other load-engaging means shall be placed under the load as far as possible and the mast carefully tilted back to stabilize the load.
- Long, high, or unusual loads that may affect capacity or stability shall be adjusted and handled with additional caution.
- Trucks equipped with attachments shall be operated as partially loaded trucks when not handling a load because attachments affect truck stability.
- Tilting forward with an elevated load is prohibited except as necessary to pick up or deposit a load in accordance with OSHA and manufacturer instructions.
- Loads shall be secured or stabilized when necessary to prevent shifting or falling.

GRADES, RAMPS, AND INCLINES

Operators shall travel on grades in accordance with 29 CFR 1910.178 and manufacturer instructions.

- Grades shall be ascended and descended slowly.
- On grades exceeding 10 percent, loaded trucks shall be driven with the load upgrade.
- On grades exceeding 10 percent, unloaded trucks shall be operated with the load-engaging means downgrade.
- On all grades, the load and load-engaging means shall be tilted back, when applicable, and raised only as far as necessary to clear the road surface.
- Turning on a grade or incline shall be avoided. Where a maneuver is necessary, follow manufacturer instructions and site-specific procedures.

PARKING AND UNATTENDED TRUCKS

- When a truck is unattended, fully lower the load-engaging means, neutralize controls, shut off power, and set the brakes. Block the wheels when parked on an incline.
- When the operator is dismounted and within 25 feet while the truck remains in view, the load-engaging means shall be fully lowered, controls neutralized, and brakes set to prevent movement.
- Park only in authorized areas and do not block aisles, exits, fire equipment, stairways, emergency access, or traffic routes.
- Do not park on a grade unless required safeguards are in place.
- Remove the key or otherwise secure the truck in accordance with departmental and manufacturer procedures when the truck is out of service or unattended.

PEDESTRIANS, VISIBILITY, AND WORKPLACE TRAFFIC

- Separate PIT and pedestrian traffic to the extent feasible through marked walkways, barriers, mirrors, signs, spotters, designated routes, or other controls.
- Do not assume pedestrians can see or hear the truck.
- Use a horn, spotter, warning light, or other appropriate warning method where visibility is limited.
- Use extreme caution at doorways, intersections, blind corners, loading docks, narrow aisles, and transitions between bright and dark areas.
- Where general lighting is less than the OSHA minimum applicable to PIT operation, provide directional lighting on the truck as required.

LOADING DOCKS, TRAILERS, DOCKBOARDS, AND ELEVATORS

- Maintain a safe distance from dock edges and use barriers or other controls where appropriate.
- Before entering a highway truck or trailer, verify that the trailer is suitable for entry and protected against movement. Set vehicle brakes and use wheel chocks or an approved positive vehicle-restraint system as applicable.
- Fixed jacks or other supports shall be used when needed to prevent a semitrailer from upending during loading or unloading.
- Dockboards and bridgeplates shall be secured, driven over carefully and slowly, and shall not be loaded beyond rated capacity.
- Approach elevators slowly and enter squarely after the elevator car is properly leveled. Once on the elevator, neutralize controls, shut off power, and set brakes as required.
- Verify elevator capacity before entry.

BATTERY CHARGING, REFUELING, AND LPG

Battery Charging and Changing

- Battery charging and changing shall occur in designated areas suitable for the task.
- Provide facilities or procedures for flushing and neutralizing spilled electrolyte, fire protection, protection of charging apparatus from damage, and adequate ventilation.
- Smoking and open flames are prohibited in charging areas.
- Take precautions to prevent sparks, flames, electric arcs, and ignition sources near batteries.
- Employees shall use PPE required by the hazard assessment when handling electrolyte or servicing batteries.
- Battery connectors, cables, restraints, and ventilation provisions shall be inspected before use.

Fueling and LPG

- Fuel tanks shall not be filled while the engine is running.
- Fuel spills shall be cleaned and allowed to evaporate as appropriate, and the fuel cap replaced before the engine is restarted.
- A truck with a fuel-system leak shall not be operated until the leak is corrected.
- LPG cylinders shall be handled, connected, inspected, and stored in accordance with applicable requirements and manufacturer instructions.
- Open flames shall not be used to check battery electrolyte or fuel levels.

MAINTENANCE AND REPAIRS

- Any PIT that is not in safe operating condition shall be removed from service.
- Repairs shall be made by authorized personnel.
- Replacement parts shall be equivalent in safety to parts used in the original design.
- Repairs to fuel and ignition systems involving fire hazards shall be performed only in locations designated for that work.
- For electrical-system repairs, disconnect the battery before work when required by OSHA and manufacturer instructions.
- Trucks shall not be altered, counterweighted, or modified except in accordance with the approval requirements in this program.
- Raised forks, platforms, masts, or components shall be blocked or otherwise positively supported before employees work beneath or within a potential fall/crush zone.
- Applicable lockout/tagout procedures shall be used during maintenance when hazardous energy exposure is present.

PERSONNEL LIFTING

Powered industrial trucks shall not be used to elevate personnel unless the truck and work platform are designed, approved, and used for that purpose in accordance with the manufacturer's requirements and applicable OSHA requirements.

- A work platform or personnel attachment that affects truck capacity or safe operation requires the applicable manufacturer or accepted engineering approval before use.
- The truck shall be properly marked or its capacity information updated when required.
- The platform shall be secured to the truck and provided with required guardrails, toe protection, and other safeguards.
- The operator shall remain at the controls when required by the approved operating procedure.
- Standing directly on forks, pallets, makeshift platforms, or other unapproved devices is prohibited.

PERSONAL PROTECTIVE EQUIPMENT

PIT operators and employees working around PIT operations shall use PPE as identified in the applicable workplace PPE hazard assessment. This may include safety footwear, high-visibility garments, eye/face protection, hand protection, hearing protection, or chemical-resistant PPE for battery and LPG service activities.

INCIDENTS, NEAR MISSES, AND CORRECTIVE ACTION

- PIT accidents, tip-overs, property damage, struck-by events, load drops, and near misses shall be reported promptly to the supervisor and, in accordance with Citadel incident-reporting procedures, the Department of Environmental Health & Safety shall be notified.
- The operator shall be removed from PIT operation when necessary pending evaluation, investigation, or retraining.
- Refresher training and evaluation shall be conducted when an OSHA refresher trigger is met.
- Damaged equipment shall be inspected and removed from service until safe operation is verified.

RECORDKEEPING AND PROGRAM REVIEW

- Operator training and evaluation certification shall identify the operator, training date, evaluation date, and trainer/evaluator identity.
- The Citadel shall maintain current records sufficient to demonstrate operator authorization and required evaluations.
- The Citadel requires daily/shift inspection checklists and related departmental records to be retained for at least three years as an institutional recordkeeping requirement unless a longer retention period applies.

- Maintenance and repair records shall be maintained in accordance with departmental and institutional retention requirements.
- EHS shall periodically review the program and revise it when equipment, work practices, hazards, regulatory requirements, or incident experience indicate a need for change.

APPENDIX A - OPERATOR TRAINING AND EVALUATION CERTIFICATION

Field	Information	Field	Information
Operator Name		Department	
Employee ID		Authorization Date	
Truck Type(s) / Class / Model		Attachments Authorized	
Formal Training Date		Practical Training Date	
Workplace Evaluation Date		Previous Evaluation Date	
Trainer Name / Identity		Evaluator Name / Identity	
Authorization Limitations / Notes			

Training Topics Verified

Topic	Complete	Topic	Complete
Truck operating instructions and warnings	☐	Controls and instrumentation	☐
Steering / maneuvering / visibility	☐	Forks and attachments	☐
Capacity and stability	☐	Inspection and maintenance tasks	☐
Refueling / battery charging	☐	Surface and workplace conditions	☐
Load composition / stability / stacking	☐	Pedestrian traffic	☐
Ramps and grades	☐	Restricted / hazardous locations	☐
Closed-environment / exhaust hazards	☐	Applicable OSHA requirements	☐

Evaluation Result

Evaluation	Result / Signature
Operator demonstrated safe workplace operation	☐ Competent ☐ Additional Training Required
Evaluator Signature / Initials	
Operator Acknowledgment	

APPENDIX B - DAILY / SHIFT POWERED INDUSTRIAL TRUCK INSPECTION CHECKLIST

Truck Information	Details
Date	
Department / Location	
Operator	
Truck ID / Serial Number	
Hour Meter	
Truck Type / Fuel Type	

Pre-Start / Motor-Off Checks

Inspection Item	OK	Maintenance Required / Notes
Leaks - hydraulic oil, fuel, battery/electrolyte	☐	
Tires / wheels / condition / pressure	☐	
Forks / heel / retaining pins	☐	
Load backrest	☐	
Mast / chains / rollers / hoses / cables	☐	
Finger guards / overhead guard	☐	
Safety decals / nameplate / capacity plate	☐	
Operator compartment / housekeeping	☐	
Seat belt / restraint system	☐	
Battery restraint / connectors / electrolyte, as applicable	☐	
Fuel / LPG tank mounting and connections, as applicable	☐	
Fluid levels, as applicable	☐	
Attachments and locking devices	☐	

Operational / Motor-On Checks

Inspection Item	OK	Maintenance Required / Notes
Service brake	☐	
Parking brake	☐	
Steering	☐	
Forward / reverse / drive controls	☐	
Lift / lower controls	☐	

Inspection Item	OK	Maintenance Required / Notes
Tilt controls	☐	
Horn	☐	
Lights / alarms / warning devices	☐	
Hydraulic operation	☐	
Gauges / indicators / hour meter	☐	
Unusual noise / vibration / exhaust	☐	

If the truck is not in safe operating condition, remove it from service and notify the supervisor. Repairs shall be made by authorized personnel before return to service.

Operator Signature / Initials	Supervisor / Maintenance Notification

APPENDIX C - THREE-YEAR OPERATOR PERFORMANCE EVALUATION

Complete at least once every three years for each authorized operator and additionally when required as part of refresher training.

Field	Information
Operator	
Department	
Evaluation Date	
Truck Type(s) Evaluated	
Evaluator	
Previous Evaluation Date	

Performance Criterion	Satisfactory	Needs Improvement / Notes
Pre-use inspection completed correctly	☐	
Mounting / dismounting and restraint use	☐	
Starting / stopping / control use	☐	
Travel speed and path control	☐	
Turning and rear-swing awareness	☐	
Horn / warning use at blind locations	☐	
Pedestrian awareness	☐	
Load pickup / stability / capacity awareness	☐	
Load travel height / visibility	☐	
Grade and ramp operation	☐	
Dock / trailer / bridgeplate operation, if applicable	☐	
Parking / unattended-truck procedure	☐	
Battery / fuel handling, if applicable	☐	
Attachment use, if applicable	☐	
Overall compliance with workplace rules	☐	

Overall Evaluation	Result
Operator remains competent for authorized truck type(s)	☐ Yes ☐ No
Refresher / corrective training required	☐ No ☐ Yes - Complete Appendix D
Evaluator Signature / Initials	

APPENDIX D - REFRESHER TRAINING / CORRECTIVE ACTION RECORD

Field	Information
Operator	
Department	
Date Trigger Identified	
Truck Type	
Supervisor / Evaluator	

Reason for Refresher Training

Trigger	Select
Observed unsafe operation	☐
Accident	☐
Near-miss incident	☐
Evaluation revealed unsafe operation	☐
Assigned to a different type of truck	☐
Workplace condition changed	☐
Other Citadel-directed corrective training	☐

Corrective Training and Evaluation

Item	Documentation
Topics retrained	
Practical instruction provided	
Workplace reevaluation completed	
Operator demonstrated competence	☐ Yes ☐ No
Return to authorized operation date	
Trainer / Evaluator Signature	

DOCUMENT CONTROL

Field	Information
Program Owner	Department of Environmental Health & Safety
Primary OSHA Standard	29 CFR 1910.178 - Powered Industrial Trucks
Revision	09/30/2026
Effective Date	_____
Approved By	_____
Approval Date	_____
Next Program Review	_____