

PROGRAM DIRECTIVE

Program Directive A-53

Issued August 10, 1979

Revised March 9, 2001

SUBJECT: Industrial Trucks: Opening or Closing Railroad Freight Car Doors

**AFFECTED CODES/
DIRECTIVES:** OAR 437-02-1910.178(m)(6)

PURPOSE: To give guidelines on citing 1910.178(m)(6), Powered Industrial Trucks, when trucks are used as door opening devices for opening or closing railroad freight car doors.

BACKGROUND:

- A. 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. National consensus standards allow powered industrial trucks equipped with a specially designed device to open and close railroad freight car doors.
- B. The proposal and national consensus standards are in limited conflict with 1910.178(m)(6), which states in part that, "trucks shall not be used for opening or closing freight doors."

ACTION: When a powered industrial truck is being 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 1910.178(m)(6) shall be considered "minimal," when the following requirements have been met:

- A. When the door opening device applies the force to the door in the direction parallel to the door travel, and;
- B. The operator is trained in the use of the door opening device and keeps the operation in full view, and;
- C. The employees, other than the operator, stand clear when the door is being moved.

**EFFECTIVE
DATE:** This directive is effective immediately and will remain in effect until cancelled or superseded.