

DEPARTMENT OF CONSUMER & BUSINESS SERVICES
Oregon Occupational Safety & Health Division

MEMORANDUM

Date: February 24, 2003
To: All OR-OSHA
From: Marilyn Schuster
Subject: Mast Guards on Forklifts

The question was posed of whether there is a specific height required for guarding of the mast on forklifts and whether the general machine guarding standard could be applied to guarding the mast on forklifts.

OAR 437-002-1910.178 covers the subject of preventing employee contact with dangerous parts of forklift masts in two places. There is very vague guidance in 1910.178(m)(4) and more specifically related to lifting workers in 437-002-0227(4)(f). Neither of these citations provides a specific height for the guards and for good reason.

The Machine Guarding standard should not be relied on for guidance for three reasons. First, that standard was never intended to apply to vehicles. There are several other standards that cover vehicles. Second, 1910.178 covers the subject of protecting employees from mast-related hazards in two places. If a fixed requirement was appropriate it would be found there. Third, the only applicable reference to a 7 foot height in Machine Guarding is clearly applicable only to blades (1910.212(a)(5)).

Likewise, ANSI B56.1 does not offer a specific height requirement. It also requires protection at the usual working position. There is no support in the ANSI standard for a specific height for the guarding because that height presumes a single, given work position.

The objective of the rule is not to require ubiquitous guards but to prevent employee injury. Some forklifts might require no guard while others might require a guard of a

certain height and others a guard of another height, etc. The acceptable guard is the one, of whatever design, that prevents employee contact with the hazardous points when they are in their usual work position.