

June 18, 1998

Sue Benoit, Health & Safety Manager
Cascade Steel Rolling Mills, Inc.
P.O. Box 687
McMinnville, OR 97128-9399

Dear Ms. Benoit:

Thank you for contacting us about concerns you have with installing suspension seats on your 15-ton Caterpillar lift trucks. As we understand it, this installation has not been approved by the manufacturer. As you are aware, the Occupational Safety and Health Administration (OSHA) standard at 29CFR 1910.178(a)(4) relates to modifications of powered industrial trucks which adversely affect their safe operation and/or capacity. The installation of any substandard component would be considered a violation of the standard.

However, replacement of the seat with a seat of equal or superior characteristics is acceptable on powered industrial trucks without need to obtain prior approval from the truck manufacturer. Such replacement would not be in violation of the OSHA standard, since it is unlikely that it would create a potential safety hazard.

In your letter you address paragraphs 1910.178(q)(5) and (6). These do not apply to the situation in question.

For further information contact Bob Thiessen at 378-3272. You are also invited to see the OR-OSHA pages on the Internet at www.cbs.state.or.us/external/osha/index.html.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division

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