

**OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**

PROGRAM DIRECTIVE

Program Directive: A-190
Issued: January 1, 1979
Revised: August 8, 2008

SUBJECT: Chocking Trailers

AFFECTED STANDARDS/

DIRECTIVES: OAR 437-002-1910.178(k)(1)
OAR 437-002-1910.178(m)(7)
OAR 437-002-2224(10)
OAR 437-003-3224(10)
OAR 437-004-1700(7)(a)
OAR 437-004-3410(3)(a)(L)

PURPOSE: To establish policy for uniform enforcement of the above rules.

BACKGROUND: A. On October 19, 1999 federal OSHA issued CPL 2-1.30 about their policy for citing rules 1910.178(k)(1) and (m)(7) about chocking of trailers being boarded by employees on powered industrial trucks (forklifts). The CPL cancelled STD 1-11.5 that had been part of the basis for the Oregon OSHA policy on this subject. OSHA does not require states to adopt this CPL nor follow its jurisdictional limitations.

B. On September 26, 2007 new Oregon OSHA rules on vehicles became effective for General Industry and Construction employers. These included language about chocking vehicles that are likely to move while loading or unloading.

C. Previously, Oregon OSHA had followed the federal OSHA restrictions for enforcement of these rules.

ACTION: A. With the cancellation of the OSHA STD, Oregon OSHA enforce all of its rules (cited above) about this hazard. The rules apply to General Industry, Construction and Agriculture employers. The four OSHA exemptions specific to agricultural commodity trailers, commercial motor vehicles, heavy hauler trailers and pulpwood trailers as defined in the OSHA CPL do not apply in Oregon.

B. Compliance Officers must document employee exposure to an actual hazard when citing these rules. Mere lack of wheel chocks or a restraining device is not sufficient to warrant a citation. The employees must be working the vehicle with equipment or methods that are likely to cause movement that creates a hazard. In the case of 1910.178, enforcement is limited to cases involving powered industrial trucks. Use other rules for other situations. Consider all circumstances like the configuration of the dock (sloped ramp or flat ramp), whether the trailer is connected to the tractor, condition of the vehicle, method of loading or unloading. Although some of the rules mention only chocks, other devices are an acceptable substitute if they prevent movement of the trailer. Such devices include dock devices that connect to the trailer.

C. Violations will be cited to the employer of the employee exposed to the hazard. When drivers load or unload their own vehicles and are sole proprietors or otherwise not covered by Oregon OSHA standards, there will be no citation for their exposure to the hazard.

D. This program directive replaces all previous program directives and interpretations on this subject.

EFFECTIVE DATE: June 10, 2008