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OSHA Docket Office
Occupational Safety and Health Administration
U.S. Department of Labor Room N-3653
200 Constitution Avenue NW
Washington, DC 20210

**Re: Docket No. OSHA-2018-0008
Powered Industrial Trucks; Request for Information**

RIPA appreciates the opportunity to submit these comments in response to the U.S. Occupational Safety and Health Administration's Request for Comment on Powered Industrial Trucks (84 Fed. Reg. 8633, March 11, 2018).

The Reusable Industrial Packaging Association (RIPA) is the U.S.-based trade association for businesses involved in the reconditioning, manufacturing, reuse and recycling of industrial containers such as steel drums, plastic drums, and intermediate bulk containers (IBCs). RIPA's membership accounts for the vast majority of the U.S. container reconditioning industry, as well as a substantial share of packaging manufacturing firms.

Businesses in container reconditioning fall under industry classification codes SIC 7699 and NAICS 811310 – Repair Shops Not Elsewhere Classified; Industrial Equipment Repair and Maintenance. While not in a manufacturing sector, these operations do utilize powered industrial trucks or, more specifically, forklifts. This is particularly true for IBCs which, by design (275 or 330 gallons), typically have a pallet as an integral part of the container.

In its request for information, OSHA posed a series of specific questions related to safety and the use of powered industrial trucks. Where we can offer some information in response to a question, we do so here.

Q: What should be removed as ineffective, outdated or overly burdensome?

A: RIPA believes a requirement to have a fire extinguisher on board a forklift is redundant in workplaces where fire extinguishers are stationed by rule every 75 feet.

Q: Do you use any “new” forklift designs? Particularly as relates to “new” fuel/power sources?

A: At this time, we are not aware of any new designs for fuel or power that are in use among our members.

Q: How do you conduct training? In-house? Contract out?

A: At this time, our members primarily conduct in-house training.

Q: Do you use DVDs? Online courses? Just “hands-on” training?

A: On-line courses and hands-on practical training are regularly used.

Q: Do you use back-up cameras or perimeter sensor alarms? Are they effective in preventing accidents?

A: We are not aware of any use of sensors or cameras, and so cannot comment on whether they help prevent accidents.

Q: Do you have any rollover protection or enclosures?

A: Some models that are in use have cage-type enclosures.

Q: How often do you inspect the equipment?

A: Daily equipment inspections are made unless otherwise specified by the manufacturer’s guidelines.

Q: What measures or retrofitting might improve safety on equipment?

A: Regular preventive maintenance is vital; seat belts are helpful when already OEM included; side- or rear-view mirrors could also be recommended as OEM features.

RIPA appreciates the opportunity to submit comments on this matter. Please contact RIPA for any additional information.

Respectfully submitted,



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