WHEEL CHOCKS - OSHA STANDARDS

1910.178(k)(1)

The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.

1910.178(m)(7)

Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading. Fixed jacks may be necessary to support a semitrailer during loading or unloading when the trailer is not coupled to a tractor. The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.

Directive issued (30 years ago!) by OSHA

OSHA Instruction STD 1-11.7 August 5, 1981 Office of Compliance Programming

Subject: 29 CFR 1910.178(k)(1) and (m)(7): Mechanical Means to Secure Trucks or Trailers to a Loading Dock

- A. Purpose. This instruction allows the use of a mechanical means which secures trucks or trailers to a loading dock in situations in which they provide the equivalent protection of wheel chocks.
- B. Scope. This instruction applies OSHA-wide.
- C. Reference. OSHA Instruction STD 1-11.5, January 31, 1978, Powered Industrial Trucks, Chocks, and Blocks.
- D. Action. OSHA Regional Administrators/Area Directors shall take action to ensure that 29 CFR 1910.178(k)(1) and (m)(7) are enforced in accordance with the guidelines in F. of this instruction.
- E. Federal Program Change. This instruction describes a Federal program change which affects State programs. Each Regional Administrator shall:
- 1. Ensure that this change is forwarded to each State designee. 2. Explain the technical content of the change to the State designee as requested. 3. Ensure that State designees are asked to acknowledge receipt of this Federal program change in writing, within 30 days of notification, to the Regional Administrator. This acknowledgment should include a description either of the State's plan to implement the change or of the

reasons why the change should not apply to that State. 4. Review policies, instructions and guidelines issued by the State to determine that this change has been communicated to State program personnel. Routine monitoring activities (accompanied inspections and case file reviews) shall also be used to determine if this change has been implemented in actual performance.

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- F. Guidelines. Under the following conditions, failure to use wheel chocks in accordance with 29 CFR 1910.178(k)(1) and (m)(7) will be deemed to be de minimis violations and will not be cited:
- 1. A positive mechanical means to secure trucks or trailers to a loading dock is allowed provided the system is installed and used in a manner that effectively prevents movement of trucks and trailers during loading, unloading and boarding by handtrucks and powered industrial trucks. 2. All of the mechanical equipment shall be installed, maintained and used as recommended by the manufacturer. 3. Any damaged mechanical equipment will be removed from service immediately.

G. Background.

1. The current OSHA standards in 29 CFR 1910.178(k)(1) and (m)(7) only allow the use of wheel chocks under the rear wheels to prevent the trucks from moving while loading and unloading. 2. The U.S. Department of Transportation has a mandatory regulation (49 CFR 393.86) that all truck trailers be equipped with a rear end protection device mounted at the rear to prevent cars from being wedged underneath the back of a trailer during a collision. A mechanical fastening device may be bolted to the loading dock to secure the truck or trailer rear end protection device and prevent any separation from the dock. 3. OSHA Instruction CPL 2.11A implements guidelines on de minimis violations which have no direct or immediate relationship to safety and health. CSHO's shall recognize minor technical deviations which have no direct or immediate relationship to safety and health as de minimis violations.

OSHA Instruction STD 1-I1.7 August 5, 1981 Office of Compliance Programming

4. OSHA authority to regulate motor carriers in this regard is delineated in OSHA Instruction STD 1-11.5, Powered Industrial Trucks, Chocks, and Blocks.

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