



Virginia Commonwealth University Mobile Work Equipment Operator Use Program

Original Edition: March 01, 2018
Last Updated: May 09, 2025

- 1) **Purpose:** The purpose of the Mobile Work Equipment Operator Use Program is to protect Virginia Commonwealth University (VCU) employees who operate or maintain mobile equipment by ensuring safe operating practices and maintaining regulatory compliance with OSHA standards. These standards, in part, permit only trained and authorized individuals to operate a Powered Industrial Truck (PIT) or Mobile Elevated Work Platform (MEWP).
- 2) **Scope / Applicability:** This Program applies to all Virginia Commonwealth University employees that operate and/or maintain mobile work equipment and contractors that operate mobile work equipment on VCU property. For the purposes of this program, “mobile work equipment” refers to any Powered Industrial Truck (PIT) or Mobile Elevated Work Platform (MEWP).
 - a) PITs include any specialized industrial trucks powered by electric motors or internal combustion engines. This commonly refers to forklifts and electric pallet jacks but includes material delivery vehicles that are self-propelled, that the operator walks with, stands on, or sits on.
 - b) MEWPs include any machine or device intended for moving persons, tools and material to working positions consisting of a work platform and controls and an extending structure. This includes articulating aerial lifts (“boomlifts”), vertical man lifts, vehicle mounted lifts, and scissor lifts.

Out of Scope: This program does not apply to:

- a. Compressed air or nonflammable compressed gas-operated industrial trucks;
- b. Farm vehicles;
- c. Vehicles intended primarily for earth moving or over-the-road hauling; nor
- d. Cranes, derricks, or similar hoisting devices

3) Responsibilities:

- a) **Owner Departments** are responsible for:
 - i) Ensuring employees attend training, operate equipment in a safe manner, and are competent to operate their equipment safely;



- ii) Requesting and scheduling training with Occupational Health and Safety (OHS) for their employees;
 - iii) Ensuring all equipment is in proper working condition;
- b) **Supervisors** are responsible for:
- i) Assuring operators perform appropriate pre-operation safety inspections and complete checklist prior to operating equipment;
 - ii) Scheduling maintenance by outside contractors;
 - iii) Conducting assessments of their work areas in which PITs are used to determine if specialty designed equipment may be required (see OSHA standard 29 CFR 1910.178(c) for reference). If designated locations exist, notify Occupational Health and Safety (OHS) for assistance in determining which type of industrial truck to use;
 - iv) Reviewing daily inspection checklists on a monthly basis at minimum; and
 - v) Maintaining required documentation including operator manuals.
- c) **Occupational Health and Safety (OHS)** is responsible for:
- i) Conducting an annual review of the Mobile Work Equipment Operator Use Program to assure compliance;
 - ii) Coordinating and/or providing training to affected employees; and
 - iii) Maintaining training records for all operators.
 - iv) Performing periodic inspection of the Mobile Work Equipment Program and its implementation
 - v) Providing safety consultation upon request or after an accident
- d) **Employees** are responsible for:
- i) Complying with this Program and all applicable federal and state regulations regarding their mobile work equipment;
 - ii) Completing the required training prior to operating mobile work equipment;
 - iii) Conducting an inspection using the checklist prior to operating any mobile work equipment;
 - iv) Maintaining and providing proper authorized operator documentation in either certification form or wallet card; and
 - v) Immediately reporting unsafe conditions or incidents to their supervisor and taking any mobile work equipment out of service if needed.

4) General Requirements



- a) Only **trained and authorized** operators shall be permitted to operate mobile work equipment. Contractors, with the exception of those specifically conducting maintenance on the equipment, are not permitted to operate VCU-owned equipment.
 - b) Both Occupational Health and Safety (OHS) and the manufacturer's written approval is required to make any modifications or additions that may affect the capacity or the safe operation of mobile work equipment. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly.
 - c) If a PIT is equipped with front-end attachments other than factory installed attachments, the PIT shall be marked to identify the attachments and show the approximate weight of the truck and attachment combination at maximum elevation with load laterally centered.
 - i) VCU permits the use of front-end man basket attachments to PITs but requires the use of a fall restraint harness when doing so.
 - ii) Any individual working from a man basket must have received training in the use of a personal fall arrest system.
 - d) Nameplates and markings shall be in place and maintained in a legible condition.
 - e) If at any time a piece of mobile work equipment is found to be in need of repair, defective, or in any way unsafe, it shall be removed from service and repaired to the manufacturer's specifications. It is not to be put back into service until all repairs have been made.
- 5) Safety Inspections:** Prior to operating mobile work equipment, the employee shall perform a pre-operation safety inspection using the inspection checklist as follows:
- a) The inspection shall be conducted and documented at least once per day every day the equipment is used;
 - b) When the equipment is used on a round-the-clock basis, it shall be inspected and documented before each shift.
 - c) The forklift inspections need not be documented before each use if they have already been documented once prior on the same shift.
 - d) The inspection shall identify any condition(s) that could affect the safe operation;
 - e) If any unsafe condition(s) exist, the equipment shall be taken out of service and tagged "Out of Service", or similar language, until it is restored to safe operating conditions;
 - f) If a piece of mobile work equipment fails inspection, the operator shall immediately notify the supervisor so repairs can be scheduled..
 - g) Prior to operating a MEWP, the employee shall also perform a work zone inspection. A work zone inspection shall be performed for each general location the equipment is to be operated in.



6) Fuel Handling, Storage and Battery Charging: The storage and handling of liquid fuels such as gasoline and diesel fuel shall be in accordance with National Fire Protection Association (NFPA) Flammable and Combustible Liquids Code (NFPA 30). Then storage and handling of liquefied petroleum gas fuel shall be in accordance with NFPA Storage and Handling of Liquefied Petroleum Gases (NFPA 58). The following procedures shall be followed:

- a) Personal protective equipment shall be worn during refueling and battery filling/charging operations, propane tank change-outs and any other potentially hazardous operation. PPE shall include approved face shield, goggles and gloves;
- b) When refueling or recharging the batteries of a PIT or MEWP, the operator shall ensure that the equipment is shut-off and the parking brake is engaged;
- c) Smoking shall be prohibited in refueling and recharging areas. Fuel vapors and gases are extremely flammable;
- d) Battery charging installations shall be located in areas designated for that purpose;
- e) Facilities shall be provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks and for adequate ventilation for dispersal of fumes from gassing batteries and fuels;
- f) For battery changing areas, an emergency eyewash/shower unit shall be present in the area;
- g) When using plug connected cords to charge equipment, the cords shall not be daisy-chained or plugged into a relocatable power tap nor a power strip. Cords are to be run directly from the machine to the outlet.
- h) Cords shall be visually inspected before use to check for damage such as torn jackets, missing ground pins, etc.
- i) Cords shall always be plugged into the wall, then into the equipment when charging, and removed from the equipment, then the wall, when removing.
- j) Check the level in the battery monthly;
- k) Battery maintenance is to be conducted by qualified service personnel only.
- l) Precautions shall be taken to prevent open flames, sparks, or electric arcs in battery changing areas.

7) Operating a PIT

- a) Always travel with the forks as low as practically able to ensure sufficient ground clearance
- b) Always survey the area ahead and to the sides while traveling. Be prepared to handle hazardous conditions including:



- i) Overhead obstructions including power lines;
- ii) Co-workers or pedestrians;
- iii) Poor housekeeping and/or debris or obstacles in the path of travel;
- iv) Poor visibility around corners;
- v) Poor floor condition; and
- vi) Poor visibility around corners
- c) Always travel in reverse or use a “spotter” when the load being carried obstructs the operator’s view.
- d) The Owner Department is responsible for providing guards for their machinery, and taking the equipment out of service until the appropriate guards are in place.

8) PIT Safety Practices: The following safety practices shall be adhered to at all times:

- a) Always wear the seatbelt whenever the truck is equipped with one;
 - i) All seated forklifts must have a seatbelt. If one does not, tag it OUT OF SERVICE until a seatbelt can be repaired or replaced;
- b) Keep all body parts inside the driver’s compartment;
- c) Drive at appropriate speeds;
- d) No person is permitted to stand or pass under the elevated portion of any truck, whether loaded or empty;
- e) Maintain a safe distance of at least three truck lengths from the truck ahead while traveling and maintain control of the truck at all times;
- f) Approach ramps and inclines straight, not at an angle and never turn the PIT while on a ramp or an incline;
- g) A PIT is considered unattended when the operator is 25 ft. or more away from the vehicle which remains in his view, or whenever the operator leaves the vehicle and it is not in his view. If a PIT is unattended:
 - i) the load shall be fully lowered,
 - ii) controls shall be neutralized,
 - iii) power shall be shut off, and
 - iv) breaks set;
- h) If the operator is dismounted and within 25 ft. of the truck still in his view, the load shall be fully lowered, controls neutralized, and the breaks set to prevent movement;
- i) Never park a PIT in front of any fire protection equipment, emergency exits, or in a manner that would obstruct a person from exiting the area.

9) MEWP Safety Practices: The following safety practices shall be adhered to at all times:

- a) Always wear Personal Fall Arrest Systems (PFAS) when in an articulating aerial lift.



- i) PFAS are not required when inside of a scissor lift or vertical manlift.
- b) Always lower the equipment before driving it, and drive at appropriate speeds;
- c) No person is permitted to stand or pass under the elevated portion of any articulating lift.
- d) Do not operate a lift on an incline unless specifically designed to do so.
- e) Never park a MEWP in front of any fire protection equipment, emergency exits, or in a manner that would obstruct a person from exiting the area.
- f) Climbing on the side rails of a lift is not permitted.
- g) Do not construct or utilize an additional platform while in a raised piece of equipment.
- h) Follow all manufacturer-specific use guidelines.

10) Training and Recordkeeping

Initial Training: VCU employees are required to participate in and successfully complete a training program specific to the type of equipment they will be operating in order to ensure the competent and safe operations. The program must be provided or approved by VCU Occupational Safety & Health. Prior to authorizing an employee to operate a piece of mobile work equipment, the supervisor shall ensure that each operator has successfully completed the required training.

- a) Training will consist of a combination of formal instruction, practical training, and an evaluation.
 - i) Formal instruction must include lecture, interactive discussion, video and written material handouts.
 - ii) Practical training includes demonstrations performed by the trainer.
 - iii) Evaluation consists of reviewing the operator performing practical exercises in the workplace.
- b) Curriculum – The training program shall address, at a minimum, the following:
 - i) Safety inspection;
 - ii) Workplace hazards;
 - iii) Safe driving and operating procedures; and
 - iv) Loading-carrying-unloading of materials
- c) All training and evaluation shall be conducted by persons who have the knowledge, training, and experience to train operators and evaluate their competence.
- d) Trainees may operate equipment only:
 - i) Under the supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence; and
 - ii) Where such operation does not endanger the trainee or other employees.

**Additional, Refresher, and Retraining:**

- a) Additional Training: Additional retraining is required when a new type of equipment is introduced into the workplace (for example, an operator trained only on an LP-fueled forklift would require additional training to operate a scissor lift).
- b) Refresher Training: Employees are required to participate in refresher training at least once every three (3) years
- c) Retraining: Retraining is required when it has been documented that the operator has been observed operating equipment in an unsafe and/or inappropriate manner, involved in an incident or near miss event, or a condition in the workplace changes in a manner that could affect safe operation of the equipment.

Recordkeeping

- a) Training records will be maintained on the Occupational Health and Safety (OHS) learning management system
- b) Authorized operators are responsible for maintaining Operator ID card(s).
- c) Maintenance, repair records, and inspections must be documented and kept by the department. Records may be maintained via physical documentation or kept online.

11) References

- a) 29 CFR 1910.27 - Scaffolds and Rope Descent Systems
- b) 29 CFR 1910.67 - Powered Platforms, Manlifts, and Vehicle-Mounted Work Platforms
- c) 29 CFR 1910.178 – Powered Industrial Trucks
- d) 29 CFR 1926.21 - Safety Training and Education
- e) 29 CFR 1926.453 - Aerial Lifts
- f) ANSI/SAIA A92.22-2021 Safe Use of Mobile Elevating Work Platforms