

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 81-1910.178-7

Subject: Subarticle 6, Section 1910.178 (k) (1) and (m) (7): Mechanical Means to Secure Trucks or Trailers to a Locking Dock.

Standard: Subarticle 6, Section 1910.178 (k) (1) and (m) (7), Rules and Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.178 (k) (1) and (m) (7).

Background:

- a. The current OSH standards in Subarticle 6, Section s 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.
- b. 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.
- c. S. C. Information Memorandum No. 78-x-33 implements guidelines on de minimis violations which have no direct or immediate relationship to safety and health. Compliance Officers shall recognize minor technical deviations which have no direct or immediate relationship to safety and health as de minimis violations.
- d. S. C. OSH Division's Authority to regulate motor carriers in this regard is delineated in S. C. Program Directive number 78-1910.178-5, Powered Industrial Trucks, Chocks and Blocks.

Interpretation: Under the following conditions, failure to use wheel chocks in accordance with Subarticle 6, Sections 1910.178 (k) (1) and (m) (7) will be deemed to be de minimis violations and will not be cited:

- a. 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.
- b. All of the mechanical equipment shall be installed, maintained and used as recommended by the manufacturer.
- c. Any damaged mechanical equipment will be removed from service immediately.

Effective Date: This directive is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Regulation or Program Directive.

William M. Lybrand, Director
September 11, 1981