North Carolina Department of Labor
Occupational Safety and Health Division

Raleigh, North Carolina

Field Information System Standards Notice 66

Subject: Spring Brake System or Dock Lock used in lieu of Chocking as Means to Secure Trucks or Trailers at a Loading Dock; ref. 29 CFR 1910.178(k)(1) and (m)(7):

A. **Discussion.**

This Standards Notice is provided to allow use of spring-loaded brake system or dock lock in lieu of chocking, as means that secures trucks or trailers to loading docks. The information offered here is in addition to existing guidance of STD 1-11.7 (Securing Trucks or Trailers to Loading Docks) and CPL 2-1.30 (Chocking Tractor Trailers under the Power Industrial Truck Standard), that allow the use of a mechanical means which secure trucks or trailers to loading docks in situations in which they provide the equivalent protection of wheel chocks.

B. **Scope.**

The OSHA standards in effect do not recognize the technology of spring-loaded brakes or dock locks as adequate substitutes for wheel chocks or blocks to secure semi-trailers against loading docks. 29 CFR 1910.178(k)(1) requires wheel chocks to be placed under the rear wheels of highway trucks to prevent the trucks from rolling while they are boarded by powered industrial trucks; and 29 CFR 1910.178(m)(7) requires wheel blocks to be in place to prevent movement of trailers while loading or unloading. However, it is the opinion of the North Carolina Department of Labor that, spring-loaded brakes or dock locks are as safe as compliance with the standards, and are an acceptable alternative to compliance with the standards provided the brake systems or dock locks are properly maintained, inspected, and functionally checked to ensure effectiveness and reliability.

C. **Action.**

Employers are granted permission to use spring brake systems or dock locks in lieu of wheel chocks or blocks as a method of securing trailers against loading docks. Permission is contingent upon the employer's routine and unfailing implementation of corporate policy of periodic maintenance, frequent inspections, and functional checking of the spring brakes prior to each trip, to include when parking at loading dock, to ensure effectiveness and reliability.

To ensure compliance with 29 CFR 1910.178(k)(1) and .178(m)(7) as pertained to compliance inspection, the employer's written policy (to include related procedures or practices), provided to compliance personnel during an inspection, must identify and state requirement for truck driver/operator to **accomplish functional check** (action to verify effectiveness of spring brake system) prior to commencing of load or unload activity at dock. (i.e. driver attempts to move truck/trailer to ensure or verify spring brake system is engaged/activated). The compliance officer will compare employer's policy (written or otherwise) and determine whether efforts used ensure an effective policy, program, and/or procedure for employee safety. Areas of consideration include, but not limited to, maintenance, servicing and repair, operational practices and procedures for truck/trailer equipment that assure proper function of spring brakes or dock lock when positioned at loading dock areas.

The dock lock mechanism and trailer rear end protection device (hitch/connection point for dock lock) should both be periodically and frequently inspected for damage, structural integrity, and functionality. After parking the trailer against the dock, and before loading/unloading activities commence, a visual check should be performed to ensure that the dock lock is properly engaged and secure.

Federal OSHA has distributed a notice (Memorandum, dated April 24, 2001) to its field office with instructions and information to address issue of spring brakes as follows: **OSHA enforcement personnel are not to cite 29 CFR 1910.178(k)(1) and .178(m)(7)** with regard to any "commercial motor vehicle" (CMV) due to the Section 4(b)(1) issues raised in the Department of Transportation's letter. A CMV:

1. Has a gross vehicle weight rating or gross vehicle weight of at least 10,001 pounds, whichever is greater, or
2. is designed or used to transport more than 8 passengers (including the driver) for compensation, or
3. is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation, or is used in transporting hazardous material in an amount requiring placarding under DOT regulations.

OSHNC compliance officers may cite 29 CFR 1910.178(m)(7) or .178(k)(1) for lack of wheel blocks (chocks) or "other positive mechanical means (ref. STD 1-11.7, para. F.1.)" when inspection determines that the spring-loaded brakes or dock locks in use during trailer loading/unloading operations have not been properly maintained, inspected, and/or functionally checked to prevent movement of trailer.

D. **Reference.**

29 CFR §1910.178 (Powered Industrial Trucks); 49 CFR §393.40 (Required Brake Systems); 49 CFR §393.41 (Parking Brake Systems); OSHA STD1-11.7, 8/05/81 (Mechanical Means to Secure Trucks or Trailers to a Loading Dock)

E. **Expiration.**

This notice shall be effective on the date it is signed and shall remain in effect until revised, replaced, or cancelled by the Director.

Signed on Original
Bobby R. Davis
Safety Standards Officer

Signed on Original
John H. Johnson
Director

3/28/03
Date of Signature