OSHA/FMCSA Safety Regulations

Castell’s Salvo product will meet and exceed OSHA and FMCSA safety regulations regarding truck safety at the loading dock.

Salvo will ensure that the OSHA-required barriers for open dock door applications are returned to the closed position before a trailer leaves the dock door opening. It also ensures the parking brake is held in place by energy other than fluid pressure, air pressure or electric energy.

OSHA’s letter states that their enforcement of the wheel-chocking requirement, 29 CFR 1910.178 (k)(1) for commercial vehicle are pre-empted by FMCSA’s 49 CFR Part 393 braking regulation.

Below is a summary of the aforementioned regulations applicable to Salvo:

**OSHA 29 CFR 1910.178 (k)(1) for Commercial Vehicles**
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.

**FMCSA’s 49 CFR Part 393 Braking Regulation**
This regulation details the required brake systems for trucks. Specifically,

**FMCSA’s 49 CFR 393.41 (c)**
(1) Each singly driven motor vehicle must be equipped with a parking brake system adequate to hold the vehicle or combination on any grade on which it is operated, under any condition of loading in which it is found on a public road (free of ice and snow).
(2) The parking brake system shall, at all times, be capable of being applied by either the driver’s muscular effort or by spring action. If other energy is used to apply the parking brake, there must be an accumulation of that energy isolated from any common source and used exclusively for the operation of the parking brake.
   a. **Exception:** This is not applicable to air-applied, mechanically-held parking brake systems.
(3) The parking brake system shall be held in the applied position by energy other than fluid pressure, air pressure, or electric energy. The parking brake system shall not be capable of being released unless adequate energy is available to immediately reapply the parking brake with the required effectiveness.

**FMCSA’s 49 CFR 393.43 (d)**
Every trailer required to be equipped with brakes must have brakes that apply automatically and immediately upon breakaway from the towing vehicle.

**OSHA 1910.23 (c) (1)**
Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing (or equivalent as specified in (e) (3) ) on all open sides except where there is entrance to a ramp, stairway or fixed ladder.

**OSHA 1910.23 (e) (3)**
The anchoring of posts and framing of members for railings of all types shall be of such construction that the completed structure shall be capable of withstanding a load of at least 200 lbs. applied in any direction at any point on the top rail.

For more detailed information, visit:
http://www.fmcsa.dot.gov/rules-regulations/administration/fmcsr/393.htm