

SAFETY & TRAINING BULLETIN

During an industry meeting early this year, the subject of C-type light truck tires and OSHA 29 CFR 1910.177 was brought up by a member of the group. Specifically, they asked if it applies to C-type light truck tires when light truck tires labeled with the letters "LT" are not covered by 1910.177. TIA's interpretation at that time was they technically were covered by 1910.177 because the scope does not cover light truck tires with the "LT" designation and the C-type tires do not contain an LT in the size designation. After a lengthy discussion, the group voted to reach out to OSHA for an answer. TIA immediately volunteered to contact OSHA on behalf of the industry and the group agreed that TIA would be the best organization to approach the agency for an interpretation.

After several online video conferences and an in-person meeting that included an LT and C-type tire in the same size that TIA left with the agency for their review, TIA requested that the exemption in 1910.177 for light truck tires with the LT designation should be extended to C-type light truck tires since they are the same basic construction while using the same equipment and practices for servicing. The only difference is that the C-type tires have a slightly higher inflation pressure that enables them to carry a slightly higher load with the same size.

The OSHA response reflected that the differences in load and inflation pressure were enough for them to determine that "they are not identical nor universally interchangeable." As a result, they are covered by 1910.177 but "may be considered as a de minimus condition." The lack of clarity regarding the context of "de minimus" and the fact that the OSHA letter does not apply to States with their own State plans leaves tire service providers without any guidance regarding the servicing of C-type light truck tires.

TIA's position is that since OSHA determined C-type light truck tires are covered by 1910.177, service providers should follow these servicing guidelines:

- After reaching 5 psi on the tire changing machine to seal the beads, C-type light truck tires must be seated and inflated with the valve core removed in an OSHA-compliant restraining device (i.e. safety cage) using an OSHA-compliant inflation device that includes a clip-on air chuck, an in-line valve with a pressure gauge or a presettable regulator, and a sufficient length of hose to allow the employee to stand outside the trajectory of the sidewall during inflation.

OR

- The C-type tire is inflated to 5 psi on the tire changing machine to seal the beads and then bolted to the vehicle with the lug nuts fully tightened before the employee uses an OSHA-compliant inflation device to complete the bead seating and inflation process on the vehicle with the valve core removed while standing outside the trajectory of the sidewall.

AND

- TIA does not believe that all of the employee training requirements in 1910.177 apply for passenger and light truck tire service technicians who occasionally service a C-type light truck tire. However, employers must provide documented training on the proper use of an OSHA-compliant restraining device and inflation device that includes an emphasis on standing outside the trajectory of the sidewalls during inflation in a restraining device or bolted on the vehicle with the lug nuts fully tightened. There must also be documentation that each employee demonstrates the ability to properly inflate a tire with an OSHA-compliant device while standing outside the trajectory of the sidewalls during inflation.