

OSHA Directives

STD 1-12.22 - 29 CFR 1910.212(a)(3)(ii) Point of Operation Guarding for All Machines as Applied to the Hand-Fed Engraving Presses Used ...

- **Record Type:** Instruction
 - **Directive Number:** STD 1-12.22
 - **Standard Number:** 1910.212(a)(3)(ii)
 - **Subject:** 29 CFR 1910.212(a)(3)(ii) Point of Operation Guarding for All Machines as Applied to the Hand-Fed Engraving Presses Used ...
 - **Information Date:** 01/02/1979
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OSHA PROGRAM DIRECTIVE

TO: REGIONAL ADMINISTRATION

THRU: DONALD E. MACKENZIE Field Coordinator

SUBJECT: 29 CFR 1910.212(a)(3)(ii), Point of Operation Guarding for All Machines; As Applied to Hand-Fed Engraving Presses Used in the Engraved Stationery Manufacturing Industry

1. Purpose

The purpose of this directive is to provide guidance in applying point of operation guarding requirements relative to hand-fed engraving presses in the engraved stationery industry, when using the face down method of printing.

2. Documentation Affected

None.

3. Background

a. Engraving or die stamping presses are not mechanical power presses. The design, control and operation of these presses are not the same as mechanical power presses. Although constructed, in part, of closing dies, the engraving press is a special purpose, continuous operation printing press with an integrally driven sliding lower die which is automatically inked.

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b. Guarding the point of operation on hand-fed engraving presses, where the ink is applied to the underside of the paper, poses a difficult compliance problem. Barrier guards may cause ink to smear when the paper is extracted from the press. An awareness barrier is only a partial guard and does not constitute full compliance with 29 CFR 1910.212(a) (3)(ii). Further technological difficulties in completely guarding the point of operation have been uncovered in investigations by insurance companies, New York State Division of Industrial Services, the Die Stampers and Engravers Union, Local #30, safety specialists in the National Office, and an independent Safety Consultant retained to study the problem in 1976. All these studies have concluded that a point of operation guard which complies with OSHA standards is not technically feasible, within the current state of the act, for engraving presses which use the face-down method of printing. Furthermore, the seriousness of the hazard relative to the point of operation is minimal. The few recorded accidents that have occurred were primarily during setup, cleaning, or maintenance.

4. Action

a. In order to provide adequate safety for operators of hand-fed engraving presses from point of operation hazards, the intent of 29 CFR 1910.212 is satisfied when the following guidelines are followed:

(1) Automatic or semiautomatic feeders shall be used where feasible

(2) Where automatic feeders are not feasible citations under 29 CFR 1910.212 will not be issued where precautions (a) through (e) are strictly followed.

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(a) Stock material of sufficient size so that 2 inches or more of the material being printed projects in front of the closed die is used.

(b) A finger slot in the counterboard which is 2 inches or more from the die is used.

(c) A safety training program for press operators and maintenance personnel to assure safe operating practice and hazard awareness is instituted.

(d) A sign readily visible to the operator affixed to the press and warning of the point of operation hazard is in place.

(e) A positive locking device on each manual control to protect the press operators from unexpected stroking of the ram is installed. The device shall protect against unintentional engagement of the clutch and shall be engaged in all circumstances when the employees are

required to place their hands in the point of operation area such as setup, repairs, changing dies and clearing jams.

b. The engraving industry and the engraving press manufacturer will continue further research to develop an automatic or semiautomatic feeder which is capable of processing the small short-run orders, or develop a positive point of operation safeguarding device. Progress on this research will be reported annually to the Office of Compliance Programming, Room N3106.

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5. Effective Date

This directive is effective upon receipt and shall remain in effect until revised or canceled by standards changes.

Bruce Hillenbrand Acting Director, Federal Compliance and State Programs

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