

## OSHA Directives

### STD 1-12.24 - Clarification and Interpretation of 29 CFR 1910.217, Mechanical Power Press, as Applies to the Safeguarding ...

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- **Record Type:** Instruction
  - **Directive Number:** STD 1-12.24
  - **Standard Number:** 1910.217
  - **Subject:** Clarification and Interpretation of 29 CFR 1910.217, Mechanical Power Press, as Applies to the Safeguarding ...
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SUBJECT: Clarification and Interpretation of 29 CFR 1910. 217, Mechanical Power Presses, as Applied to the Safeguarding Requirements for Diesetters

A. Purpose. This instruction provides guidance in applying point-of-operation guarding requirements on mechanical power presses during diesetting operations. Also, it provides for the application of consensus standards and identifies topographical errors in 29 CFR 1910.

B. Scope. This instruction applies OSHA-wide.

C. Action. OSHA Regional Administrators/Area Directors shall use the guidelines set forth in paragraph F. of this instruction for enforcement of the referenced standard.

D. Federal Program Change. This instruction describes a Federal program change which affects State programs. Each Regional Administrator shall:

1. Ensure that this change is forwarded to each State designee.
2. Explain the technical content of the change to the State designees as requested.
3. Ensure that State designees are asked to acknowledge receipt of the Federal Program change in writing, within 30 days of notification, to the Regional Administrator. The acknowledgment should include a description either of the State's plan to implement the change or of the reasons why the change should not apply to that State.

4. Review policies, instructions and guidelines issued by the State to determine that this change has been communicated to State program personnel. Routine monitoring activities (accompanied inspections, spot check visits and case file reviews) shall also be used to determine if this change has been implemented in actual performance.

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E. Background. 29 CFR 1910.217(c)(1)(i) requires protection of employees through the use of point-of-operation guards or devices (as defined in 29 CFR 1910.211(d)(11) and (32)) on every operation performed on a mechanical power press. Diesetters working on mechanical power presses are covered by the provisions of 29 CFR 1910.217(c).

1. 29 CFR 1910.217(d) provides specifically for the protection of diesetters. 29 CFR 1910.217(d)(9) (i) was intended to clarify that the provisions of 29 CFR 1910.217(c) apply to diesetters concerning point-of-operation guarding. When 29 CFR 1910.217(d)(9)(i) was adopted, it erroneously referred to paragraph (b) of 1910.217 rather than to paragraph (c). The typographical error occurred during a reorganization of the provisions of the ANSI B11.1-1971 standard when it was incorporated into 29 CFR 1910 as Section .217. Additional typographical errors included:

a. Erroneous references to paragraph (b) rather than to paragraph (c) by 29 CFR 1910.217(d) (3) and (d)(5).

b. 29 CFR 1910.217(b)(8)(iv) erroneously refers to "a nominal 240-volt d.c. supply obtained from a transformer" where it should have read "120-volt a.c."

2. Mechanical power presses equipped with part revolution clutches comply with point-of-operation safeguarding for diesetters when an inch mode is installed as specified in 29 CFR 1910.217(b)(7)(iv). Use of the inch mode in accordance with 1910.217(b)(7)(iv) constitutes use of a "device" within the meaning of 1910.217(d)(11).

3. Full revolution mechanical power presses cannot normally be safeguarded with guards during die-setting operations. However, in instances when guards are not applicable and for presses provided with barring holes in the flywheel, the diesetter is protected if:

a. The power press is de-energized and the flywheel is brought to rest; and

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b. The prime mover power to the power press is locked-out; and

c. The slide is moved by manually turning the crankshaft with the aid of a turnover bar (a lever) inserted through the barring hole in the flywheel.

4. On some full revolution mechanical power presses, primarily those over 60 tons in size, the slide cannot be moved manually during diesetting. Safeguarding is provided if they are equipped with a jog mode of operation, and

a. The flywheel is brought to rest and the clutch is engaged before the drive motor is jogged, and

b. The jog control requires two-hand operation, or

c. The jog control is a single control protected against accidental actuation and so located that the worker cannot reach into the point-of-operation while operating the single control.

5. For full revolution mechanical power presses, safeguarding of the diesetter, as set forth in E.3., and E.4. constitutes a "device" as defined in 29 CFR 1910.211(d)(11).

6. ANSI B11.1-1971, Section 2.51 regarding turnover bars states: Two methods of insuring the removal of the turnover bar from the barring hole have been found acceptable. They are (1) use of spring action on the end of the bar, and (2) use of storage pockets for the bar, incorporating an interlock switch.

F. Guidelines. For compliance purposes, OSHA field staff will assure that the requirements of 29 CFR 1910.217 and applicable sections are interpreted in the following manner:

1. As the result of the errors noted in paragraph E.1., when diesetters are operating a mechanical power press, such as running test and production parts, diesetting or trouble shooting, they shall

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be protected by point-of-operation guards or devices. Failure to provide such safeguards shall constitute a violation of 29 CFR 1910.217(c)(1)(i).

2. When diesetters operate a mechanical power press, equipped with a part revolution clutch, in the inch mode where such device is not installed per 29 CFR 1910.217(b)(7)(iv), a violation exists and a citation shall be issued if no alternative safe guard is provided

3. As the result of the errors noted in paragraph E.1., when a diesetter operates a full cycle mechanical power press without point-of-operation guards or devices such as those described in paragraphs E.3. and E.4., the employer shall be for a violation of 29 CFR 1910.217(c)(1)(i).

4. On mechanical power presses equipped with part revolution clutches, turnover bar operations shall comply with 29 CFR 1910.217(b)(7)(xv). (See also paragraph E.6.)

5. Regarding 29 CFR 1910.217(b)(8)(iv), where employee exposure is established, 5(a)(1) citations shall be issued with reference to ANSI B11.1-1971, section 3.6.4., when mechanical

power press control circuits and solenoid valve coils are not powered by a nominal 120-volt a.c. or less as stipulated by ANSI B11.1-1971.

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