

OSH INFORMATION MEMORANDUM 80-X-42

TO: All OSH Directors, Supervisors, and Field Personnel

FROM: William M. Lybrand, Director of OSH

SUBJECT: Citing Under Article VI, Section 1910.212 for Punch Stations of Iron Workers and Punch Stations of Single-End or Double-End Punching Stations.

DATE: July 21, 1980

Purpose

The purpose of this information memorandum is to clarify the citing of punch stations on ironworkers and punch stations on single-end and double-end punching machines.

Background

This OSH information memorandum is intended to replace the Chief Safety Specialist's memorandum dated October 10, 1977, and the Standards Officer's memorandum dated September 29, 1977, on this subject. The two referred memorandums were written after researching the following references:

- a. ANSI B11.5
- b. Formal hearing decision of Owens Steel Company, Inc., SS No. 27, DOSH-C-1 No. 76-21
- c. Formal hearing decision of Pioneer Steel Company, SS No. 23, DOSH-C-1 No. 77-59.

Interpretation

- a. Punching stations of ironworkers and of single-end and double-end punching machines are not covered under Article VI, Section 1910.217 of the South Carolina Rules and Regulations, as adopted. These exposed points of operation may be cited under Article VI, Section 1910.212(a)(3)(ii). However, due to the above references, it appears there is a low probability of injury from these punching processes. Furthermore, due to use of different shapes and thicknesses of materials it often makes it impractical to safe guard the point of operation with a guard, device, or awareness barrier; therefore, the point of operation may be safeguarded with a stripper, which is also considered an awareness barrier. Training, warning signs, and color coding which will warn of the hazard and hand tools used to ensure that the operator will not place his fingers or hands beyond the adjustable restrictor-stripper may be used in conjunction with the stripper.

- b. If Safety Specialists are inspecting punching stations of an iron worker or the punching station of a single-end or double-end punching machine, then consideration must be given as to citing the unguarded point of operation under Section 1910.212(a)(3)(ii). The first consideration is to observe and accumulate information as to the type of stock being used for the punching operation. If this stock is of various sizes and of a custom type nature where it is impractical to devise a particular guard due to the various operations and stock being used, then the item will be considered de minimus if a warning barrier such as a stripper is at the point of operation of the punching station. This de minimus violation must be listed on your narrative or on the worksheet in your report.
- c. Pictures of some of the referred machines and of the stripper or adjustable stripper are attached for your information. Also guards for other positions on ironworkers are included.
- d. If there are any questions concerning this information memorandum, please contact your supervisor.

Effective date

This memorandum is effective upon receipt and will remain in effect until cancelled or superseded.