

South Carolina Department of Labor, Licensing and Regulation
Division of Labor
Office of Occupational Safety and Health
Columbia, South Carolina 29211

OSH Program Directive Number 75-1910.218-1

Subject: Forging Machines Under Section 1910.218.

Standard: Article VI, Section 1910.218, Rules and Regulations,
Commissioner of Labor, State of South Carolina.

**Cross Reference to
Federal Standards:** 29 CFR 1910.218.

Background: This program directive clarifies appropriate enforcement of Article VI, Section 1910.218. Several situations have arisen in the Federal enforcement area where alleged violations of hot forging operations have been cited under 29 CFR 1910.212 and Section (5) (a) (1) of the Act (Federal General Duty Clause). These citations were inappropriate in that there were specific standards to cover the operations in Section 1910.218 of the OSHA standards.

Interpretation: Employees working with machines used in the forming of hot metal including hot trimming presses, forging hammers, hot forging presses, upsetters, hot bending and hot metal presses, etc., use tongs of a sufficient length to avoid heat as well as the ram. Therefore, the standards contained in Article VI, Section 1910.218 shall be applicable.

All citations which have been issued by State Safety Specialists for violation of Section 1910.212, Point of Operation Guarding or Article I, Section 1.12, General Duty Clause, involving the above situations shall be withdrawn.

A citation for violation of Article VI, Section 1.12 would be appropriate only when a condition exists that could be recognized as a hazard and conditions are other than normal forging machine operations covered by Article VI, Section 1910.218.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the regulation or program directive.

Basil A. Needham, Director
July 10, 1975