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 78-1910.212-8

Subject: Article VI, Section 1910.212 (a) (3) (ii), Point of Operation Guarding of All Machines; As Applied to Hand-Fed Engraving Presses Used in the Engraved Stationery Manufacturing Industry.

Standard: Article VI, Section 1910.212 (a) (3) (ii), Rules and Regulations, Commissioner of Labor, State of South Carolina.

Cross Reference to Federal Standards: 29 CFR 1910.212 (a) (3) (ii).

Background: 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.

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 linked.

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 Article VI, Section 1910.212 (a) (3) (ii). Further technological difficulties in completely guarding the point of operation have been uncovered in investigations, according to federal OSHA, by insurance companies, New York State Division of Industrial Services, the Die Stampers and Engravers Union, Local No. 30, the National OSHA 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 art, 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.

Interpretation: In order to provide adequate safety for operators of hand-fed engraving presses from point of operation hazards, the intent of Article VI, Section 1910.212 is satisfied when the following guidelines are followed:

a. Automatic or semi-automatic feeders shall be used where feasible.

b. Where automatic feeders are not feasible citations under Section 1910.212 will not be issued where precautions (1) through (5) are strictly followed.

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

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

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

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

(5) A positive locking device is installed on each manual control to protect the press operators from unexpected stroking of the ram. 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 as during setup, repairs, changing dies and clearing jams.

Effective Date: This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand, Director
November 15, 1978