

INFORMATION MEMORANDUM 81-X-21 (REVISED)  
OSHA-PD-75-46

TO: All OSHA Directors, Supervisors and Industrial Hygienists

FROM: William M. Lybrand, Director of OSH

SUBJECT: Point of Operation Guarding Under Article VI, Section 1910.212(a)(3)(ii)  
As Applied to Power Press Brakes

DATE: May 1, 1981

A number of comments and requests for variances have been received concerning Article VI, Section 1910.212(a)(3)(ii) Point of Operation Guarding as it applies to press brakes. Strict interpretation of this standard requires a guarding device so designed and constructed as to prevent an operator from having any part of his body in the danger zone during the operating cycle. In addition, Article VI, Section 1910.212(a)(3)(iii) permits the use of special handtools for material handling.

The standard, as written, does not provide for those instances where, due to work being performed, guarding devices cannot be used.

ANSI Standard B11.3-1973 recognizes the fact that in some situations guarding devices cannot be used on press brakes. It also mentions using handtools or maintaining a safe distance between the operator and the point of operation determined by the dimensions of the part being formed. In addition, if a point of operation guard or device can be used it shall be used.

The above points will receive strong consideration for inclusion in an OSHA standard.

If it is necessary to cite an employer for an alleged violation of Section 1910.212(a)(3)(iii) involving press brakes not equipped with a guard or device, the following should be observed:

“Where it can be determined that the operator is not being exposed to the hazards of point of operation by using handtools to feed the part and/or maintaining a safe distance from the point of operation, determined by the dimensions of the part being formed, the violation is to be considered de minimis.”

This memorandum is effective upon receipt and will remain in effect until cancelled or superseded.