



# PIAMS Weekly News

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**Printing & Imaging Association**  
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## **OSHA Focus on Machine Guarding & Lockout/Tagout**

*John Holland, President, Assured Compliance Solutions, Inc.*  
Last week's OSHA safety newsletter article pointed out that OSHA in Colorado can now legally extract much greater fines by multiplying the fine by the total number of employees who are found to be in violation of a particular OSHA safety standard. For instance, if you have 15 plant employees who operate machines and none of those people have been trained on Lockout/Tagout, then the total fine can now be 15 times greater than before. A year ago, this infraction would have had a maximum fine option of up to \$7,000.00 for this infraction. **Today, the maximum fine could legally be up to \$105,000.00!**

*When OSHA enforcement visits your plant to see if you have correctly guarded equipment and if you have safety procedures in place to effectively prevent employee amputations, they will likely:*  
**Examine carefully your last five (5) years of OSHA form 300s** to see if there is any pattern of hand cutting or crushing at your facility.

- Observe machinery operation and question your employees to **see if it is possible for any employee to catch their hands, clothing, or hair in moving machinery parts.**
- **Review** your employee Lockout/Tagout formal training and **your company's formal written Lockout/Tagout procedures for each plant machine.**
- OSHA is now additionally focusing on whether employers are complying with **the requirement to conduct periodic inspections (at least annually) of the energy control procedures**, as required by 20 CFR 1910.147 (c)(6)(i).

**How will your company fare under the above scrutiny?** Can you produce right now the last five years of correctly completed, signed, and dated OSHA form 300 and 300As? If not, get started now recreating this documentation. It's a fine citation for not have this documentation completed correctly!

If you've had employees sustain hand cutting or crushing injuries, why? Was it due to employees operating machines where guards/safeties have been disabled or removed? Do they operate older machines that were never equipped with guards?

**THERE IS NOT A "GRANDFATHER CLAUSE" THAT ALLOWS FOR THE OPERATION OF OLDER UNGUARDED MACHINERY!** Yes, you are expected to retrofit older machines with effective guards that will help keep your employees safe. And, OSHA will likely inspect your machine guarding whether you've already had injuries in this area or not!

Many times, when one of our customers has had an employee sustain a partial or complete amputation, the severe injury is sustained because the "inch safe service method" (an accepted alternative to locking out equipment) has not been properly implemented during machine wash ups. Under this clean up method, an employee's hand cannot be allowed to be in contact with moving machine parts. The machine's rollers (or other parts to be cleaned) can be safely rotated to the cleaning position manually or by means of the inch control button. Once the machine parts have stopped moving, then the employee can safely place his/her hand and cleaning rag on the machine part, and the cleaning can be safely accomplished (with no moving parts being in contact with the employee's hands). We have had customer employees receive severe hand injuries by holding a cleaning rag on moving parts, while continually inching the parts or when using the "slow roll mode".

**The Print Industry does have an allowable exception to this OSHA rule, but there are several criteria that must be met, to allow hands to be in contact with moving parts.** These criteria are very specific and difficult to meet. For instance, one of the requirements does not allow cleaning on "inbound" rollers unless there are barrier guards that extend all the way across the smooth surface of the rolls to provide complete protection from all in-going nip hazards. The barrier guards must be adjusted to no more than a .25 inch opening at any point between the guard and the print rollers. Many presses have this type of barrier guard, but they are usually farther than .25 inch from the rollers. Therefore, this exception cannot be utilized. Current ACS customers receive a complete description of this exception, and the other criteria that must be met before a clean-up can take place on moving parts, in their Lockout/Tagout Student Training Manual. **This same information will be provided to all July 20, 2010 PIAMS OSHA Seminar attendees.**

**If you have not yet completed your written Lockout/Tagout procedures for each of your plant machines, please prioritize and complete this task now.** OSHA will want to see your written procedures. ACS customers can access a completed Lockout/Tagout written procedure Example at [complianceanswers.com](http://complianceanswers.com) by logging-on with your company's Location Manager sign-on, go to the homepage and click on Resources, then click on Training Materials "Read More". **Also, all July 20<sup>th</sup> PIAMS OSHA Seminar attendees will be taught how to write OSHA compliant Lockout/Tagout machine procedures, and they'll be provided a completed Lockout/Tagout written procedures example.**