

OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION
TECHNICAL SERVICES SECTION

RULE INTERPRETATION

IM-92-13 (R)

Record No: IM 92-13 (r)
Date: March 27, 1992
Standard: OAR 437-02-1910.212(a)(3)(ii)
Index: Machine guarding.
Subject: Point of operation guarding for bag turning machines.

Discussion:

Recent enforcement actions have brought to light the need to determine if bag turning machines similar to those pictured with this interpretation are subject to citation for lack of point of operation guarding under 1910.212.

These machines have been thoroughly evaluated by members of the OR-OSHA Technical staff, manufacturer's representatives and user representatives. The observation of the operation of these machines has led to the conclusion that there is no technologically feasible method of engineering point of operation guarding that will also allow the machine to be operated. It has also been determined during these observations that machine operators are exposed to a significantly minimal risk of injury when operating the machine as recommended by the manufacturer. It has not been shown that normal operation of this machine exposes employees to injury because no part of their body enters the danger zone.

The most likely time for an accident would be during the clearing of tangled bags. Because this process requires entering the most dangerous zone of the machine, point of operation guarding would not be feasible during this operation. There has also been a review of the accident history of these machines over an extended operation period. No accidents involving point of operation are known for the past 20 years.

The major accident prevention method for these machines must rely on training and supervision. Employers must demonstrate a structured procedure and training program to assure machines are fully stopped before employees attempt to remove clogs and snags. In addition, the provisions of OAR 437-02-1910.147, lock-out/tag-out, would apply when clearing jams from these machines unless the machine can be started only from a location at the operator's station.

Conclusion:

The provisions of OAR 437-02-1910.212(a)(3)(ii) do not apply to this type of bag turning machine.

Prepared by: Ron Preece

Marilyn Schuster, Manager
Standards & Technical Resources

818-ORTECH/KER

cc: OR-OSHA Managers and Supervisors
Resource Center Coordinator