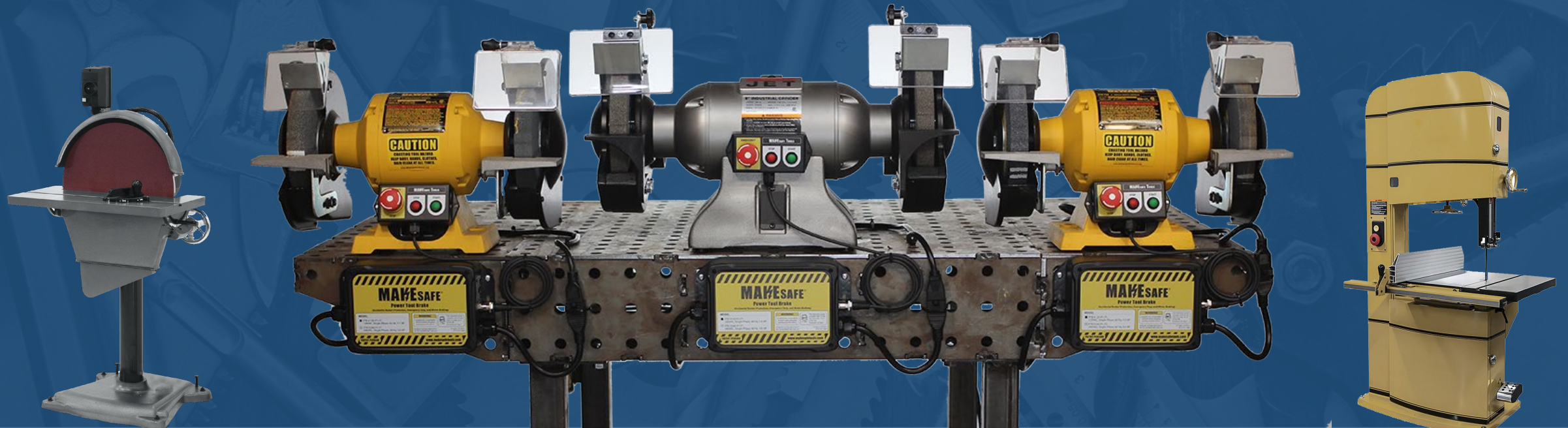


# Practical Machine Guarding

## (OSHA Compliance & Injury Prevention)



# Why this Topic?

- Because 40,000 people each year suffer from traumatic machinery-related injuries, and it's been the same for over a decade.
- Because machine guarding has been on the top ten list of most commonly citations every year for a decade.
- And because many of these injuries and citations are easily avoidable by implementing some simple safeguards.
- Because machine cost has nothing to do with it.
- Because it sometimes feels like details don't matter ... until they do.

THE  
TRUE  
COSTS  
OF

## MACHINE GUARDING

FOUR REASONS WHY **DOING NOTHING IS THE MOST EXPENSIVE OPTION.**

### Machine Guarding (29 CFR 1910.212)

One of the 10 most common OSHA citations  
**EVERY YEAR** since the list started in 2002.



### 2019 at a glance...

**1,987** machine guarding citations,  
resulting in **\$13,401,951** in penalties



**OSHA Penalty**  
(for each other-than-serious violation)

**\$13,494**



**Average  
employer cost  
for each injury**

**Laceration:**  
\$53,575  
**Amputation**  
\$186,881

# Agenda

- Does this apply to me?
- Can we afford it?
- A simple risk assessment:
  - Step 1 – Watch, listen, learn
  - Step 2 – Write it down
  - Step 3 – Prioritize
  - Step 4 – Implement
- Insights on where to start
- Commercial options

# Does this apply to me?

- Does your company employ people?
- Do you have a role in safety, supervision, and/or management?
- Do you have machines?

## Production Machinery & Tool Rooms



## Process Machinery



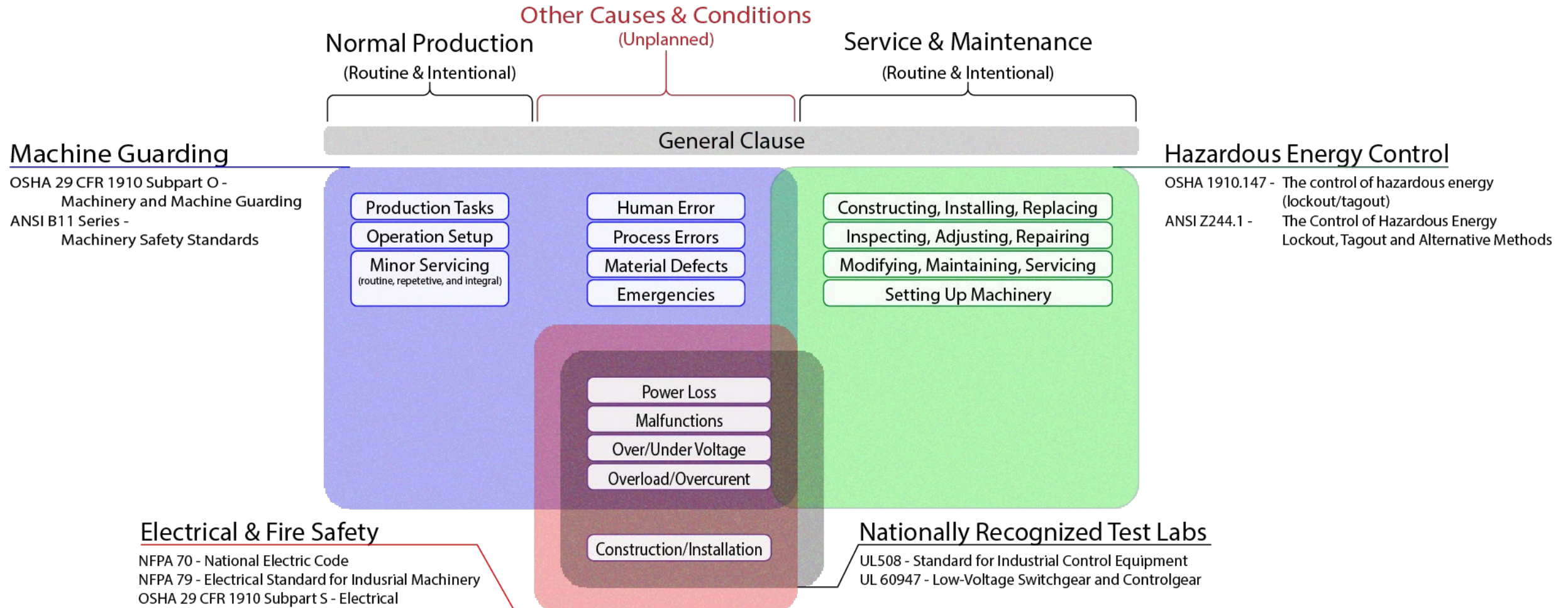
## Everything with a Motor



## Maintenance Closets



# What applies?



# Can I Afford It?

- It doesn't need to be expensive
- It might even be free!

THE  
TRUE  
COSTS  
OF

## MACHINE GUARDING

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\$53,575  
Amputation  
\$186,881**

# Watch, Listen, Learn (risk assessments)

- Planning:
  - What machines do we have?
  - Who should be involved?
- Machine Prep:
  - What is it? (*listen, learn*)
  - Where is it? (*watch*)
  - What is it used for? (*listen, watch*)
  - Who uses it? (*listen, watch*)
  - Are there any machine-specific standard(s)? (*learn*)
  - Is there a quick guide? (*learn*)
  - Any history with the machine? (*watch, listen*)

# Watch, Listen, Learn (risk assessments)

- Identify any job hazards:
  - During: setup, use, power-down, maintenance (*listen, watch*)
  - Low hanging fruit! (*listen, watch*)
  - Compare to quick guide
  - Check machine-specific standard(s)
  - Document what you find!



# Misconceptions ...

## **New Tool = Compliant Tool**

Most brand-new tools, even those from reputable companies, are non-compliant out of the box. It is not a manufacturer's legal responsibility to protect operators - it's yours!

## **Inexpensive Tool = Inexpensive Hazard**

Many companies struggle to justify spending hundreds of dollars on safeguards for a bench grinder that cost less than \$200 yet an injury or fatality resulting from a \$200 bench grinder has the same human and financial cost as one caused by a \$2,000,000 press.

# Prioritize (risk assessments)

- Quantify each hazard using a risk assessment template (UL has a good one)
- Use a reasonable approach to identify which hazards to tackle first
- Document it!

# Risk Assessment Template



Equipment: Mold Press Machine name RD-437 Machine # BRT-NXC  
 Location: Manufacturing B Building

Assessment Team Members \_\_\_\_\_ Start Date [Date] \_\_\_\_\_ Accident follow up: Yes or No

Team Lead: Jannet Wells

Members: [Names here]

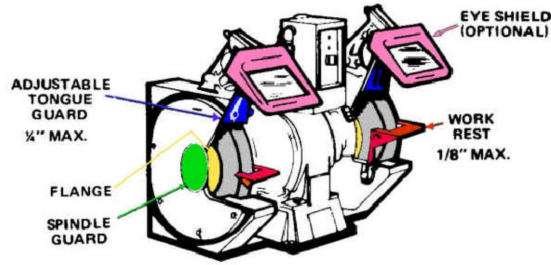
Contact UL for more information: [www.ul.com/MachineRiskAssessment](http://www.ul.com/MachineRiskAssessment), email: [FactoryServices@ul.com](mailto:FactoryServices@ul.com), 1-877-UL-HELPS

**Instruction: Please follow Risk Assessment Steps below. Use Risk Assessment Flow Chart and Risk Factor Definitions.**

Task #	Task	Affected Persons	Hazard Type	Risk Level Estimate							Method of Reduction					Final Risk Estimate					Notes			
				Frequency of Exposure 1,2,4	Probability of Injury 1,2,4,6	Severity of Injury 1,3,6,10	Number of People Exposed	Contracted time in Danger Zone	Est. Risk Level	Tolerable?	Design	Safe-guarding	Admin. Controls	Method description	Date Final Follow-up Assessment	Owner	Frequency of Exposure 1,2,4	Probability of Injury 1,2,4,6	Severity of Injury 1,3,6,10	Number of People Exposed		Contracted time in Danger Zone	Final Risk Level	Tolerable?
				Risk Level: 1-8 Represents Low Level 9-14 Represents Medium Level 15-20 Represents High Level																				
<b>Normal Operation</b>																								
1	Open guard to load or unload materials. Guard interlock switch not safety rated. Circuit not control reliable.	Operator / Helper	10.1 - Failure/disorder of the control system	4	4	10	1	0	18	No	X	X	Add safety rated switch and control reliable stopping circuit. Ensure all guards comply with OSHA/ANSI guard openings. E-Stop accessible.	#####	J. Wells	1	1	6	1	0	8	Yes		
2	During production, operator cleans excess material off press.	Materials Handler	1.1 - Crushing hazard	4	2	6	1	0	12	No	X	X	Light curtain detects operator presence and is wired into a Control Reliable stopping circuit. Control Reliable circuit includes functional safety rated components, redundant wiring, monitoring, and redundant final switching elements. E-Stop is provided. Operator uses a tool to clean. Validated by 3rd party.	#####	J. Wells	4	1	3	1	0	8	Yes		
								0	0	Yes										0	Yes			
<b>Maintenance Activities</b>																								
3	Replace hydraulic cylinder.	Maintenance Personnel	1.9 - High pressure fluid injection or ejection hazard	1	6	10	1	1	18	No		X	Use LOTO procedures to ensure all energy is removed.	#####	J. Wells	0	0	0	1	1	1	Yes		
								0	0	Yes										0	Yes			
<b>Commissioning/Other</b>																								
4	N/A - Machine already installed.							0	0	Yes										0	Yes			
5	Plant Visitors are not allowed close to machine. Supervisors are trained operators.							0	0	Yes										0	Yes			

<https://www.ul.com/resources/understanding-importance-machine-risk-assessment>

# Checklist for Abrasive Wheel Equipment Grinders<sup>1</sup>



Standard 29 CFR 1910	Description	YES	NO <sup>2</sup>
<i>From the Abrasive Wheel standard</i>			
215(a)(2)	Do side guards cover the spindle, nut and flange and 75% of the wheel diameter?		
215(a)(4)	Is the work rest used and kept adjusted to within 1/8-inch (0.3175cm) of the wheel?		
215(b)(9)	Is the adjustable tongue guard on the top side of the grinder used and kept to within 1/4-inch (0.6350cm) of the wheel?		
215(d)(1)	Is the maximum RPM rating of each abrasive wheel compatible with the RPM rating of the grinder motor?		
215(d)(1)	Before new abrasive wheels are mounted, are they visually inspected and ring tested?		
<i>From other OSHA standards</i>			
22(a)	Is cleanliness maintained around grinders?		
94(b)(2)	Are dust collectors and powered exhausts provided on grinders used in operations that produce large amounts of dust?		
133(a)(1)	Are goggles or face shields always worn when grinding?		

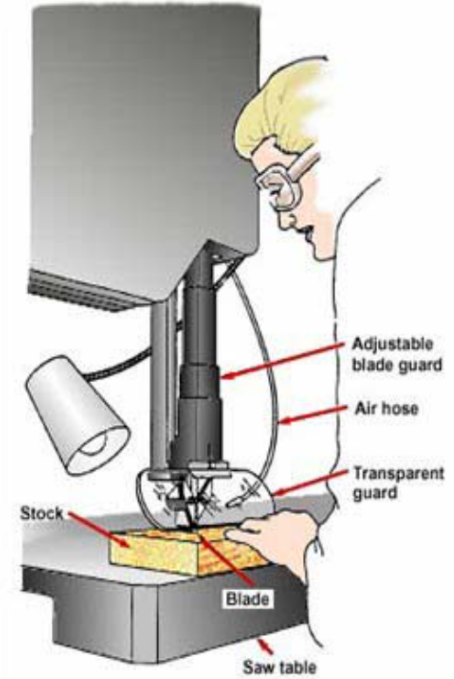
## Saws»

### Band Saws

Band saws use thin, flexible, continuous steel strips with cutting teeth on one edge. They are used primarily for cutting curves in stock or in food processing plants to cut and trim meat, poultry, and fish. The blade runs on two pulleys, driver and idler, and through a work table where material is manually fed. Automatic feeds can be used for production cutting. However, this machine is usually considered a manual-feed tool. The two types of band saws, horizontal and vertical, are named for their respective cutting blade positions.

#### Operator Involvement

The operator is required to hand-feed and manipulate the stock against the blade to saw along a predetermined line. The user must also keep the stock flat on the work table and exert the proper cutting force.



Vertical band saw in operation

#### Point of Operation

##### Potential Hazard:

- Contact with the blade is the most common cause of injury. Extreme caution is necessary because the operator's hands may come close to the saw blade, and a band saw cannot be completely guarded.

##### Solutions:

- Guard the entire blade except at the point of operation (the working portion of the blade between the bottom of the guide rolls and the table). [29 CFR 1910.213(i)(1)]
- Use a self-adjusting guard for the portion of the blade between the sliding guide and the upper saw so that it raises and lowers with the guide. [29 CFR 1910.213(i)(1)]
- Fully enclose the pulley mechanism. [29 CFR 1910.219(d)]

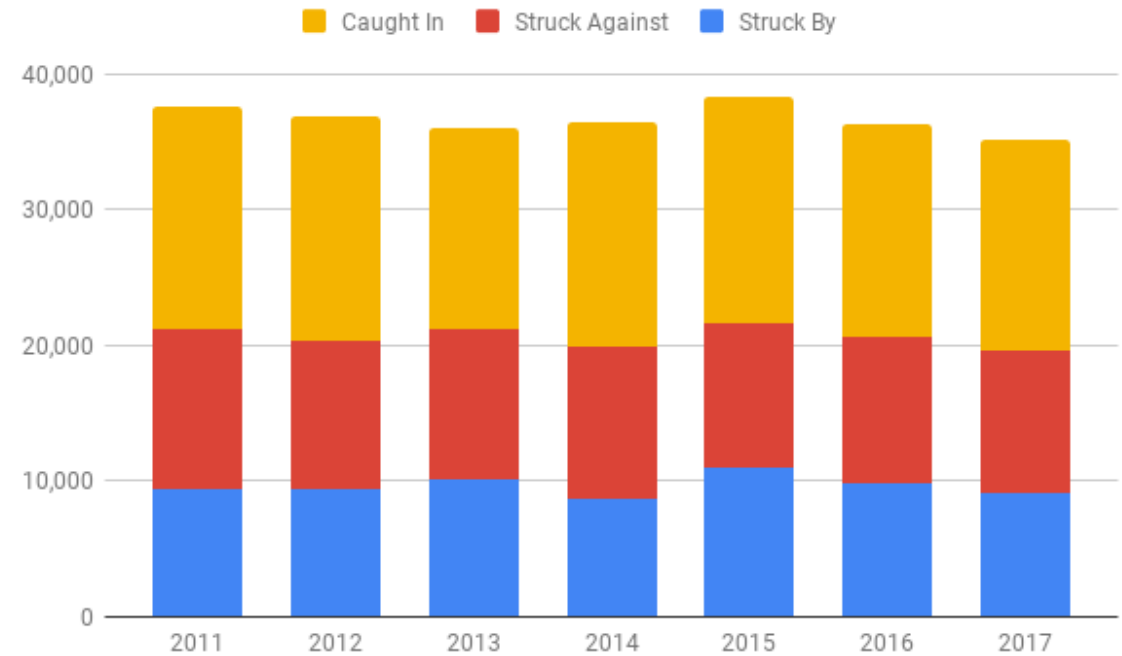


# INJURY PREVENTION

## Injury Profiles

- This is only reported injuries resulting in missed days from work or medical treatment.
- By population, that means over 1,100 incidents in Los Angeles alone.

### Injuries Resulting From Machinery



*Number of nonfatal occupational injuries and illnesses involving days away from work by [all] workers, All U.S., all ownerships, 2011 – 2017.*

*SOURCE: Bureau of Labor Statistics, U.S. Department of Labor, Jul 6, 2019*

# INJURY PREVENTION

## Injury Profiles

- Worst Offenders
  - Grinders & Polishers
  - Presses, Benders, Rollers, Shapers
  - Drills, Mills, & Planers
  - Saws

## Injuries Resulting From Machinery



*Number of nonfatal occupational injuries and illnesses involving days away from work by [all] workers, All U.S., all ownerships, 2011 – 2017.*

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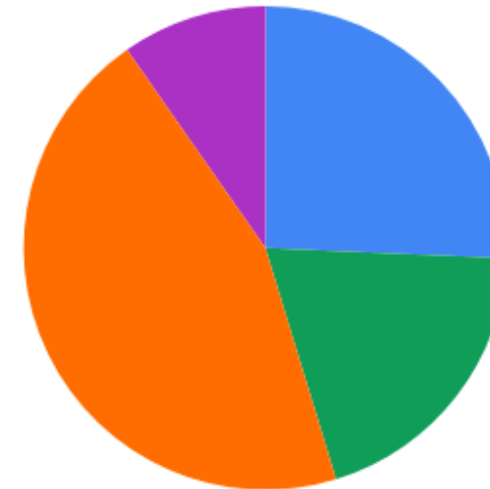
# INJURY PREVENTION

## Injury Profiles

- More than 50% of the injuries are not a result of “regular operation”.
- So when and how do these injuries occur?

### Injuries Resulting From Machinery

- Struck Against Moving Part of Machinery
- Caught In Running Machinery During Regular Operation
- Caught In Running Machinery, Unspecified
- Caught In During Maintenance/Cleaning



*Number of nonfatal occupational injuries and illnesses involving days away from work by [all] workers, All U.S., all ownerships, 2011 – 2017.*

*SOURCE: Bureau of Labor Statistics, U.S. Department of Labor, Jul 6, 2019*

# INJURY PREVENTION

## Injury Profiles

### Common Cause:

- The Control of Hazardous Energy (Lockout Tagout)
- Unintentional Restart
- Coasting
- Emergency Situations & E-Stop

### Common Times:

- Before & After Operation (Setup/Cleanup)
- Jams, Cutoffs, Malfunctions
- Power Loss (1910.213(b)(3))
- Emergencies (1910.213(b)(1))
- Maintenance and Cleaning



Bench Grinders

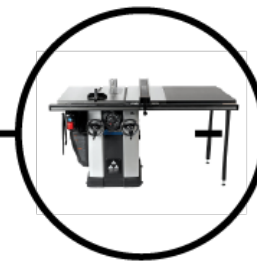


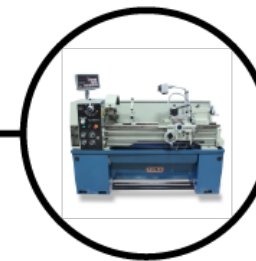
Table Saws



Band Saws



Disc Sanders

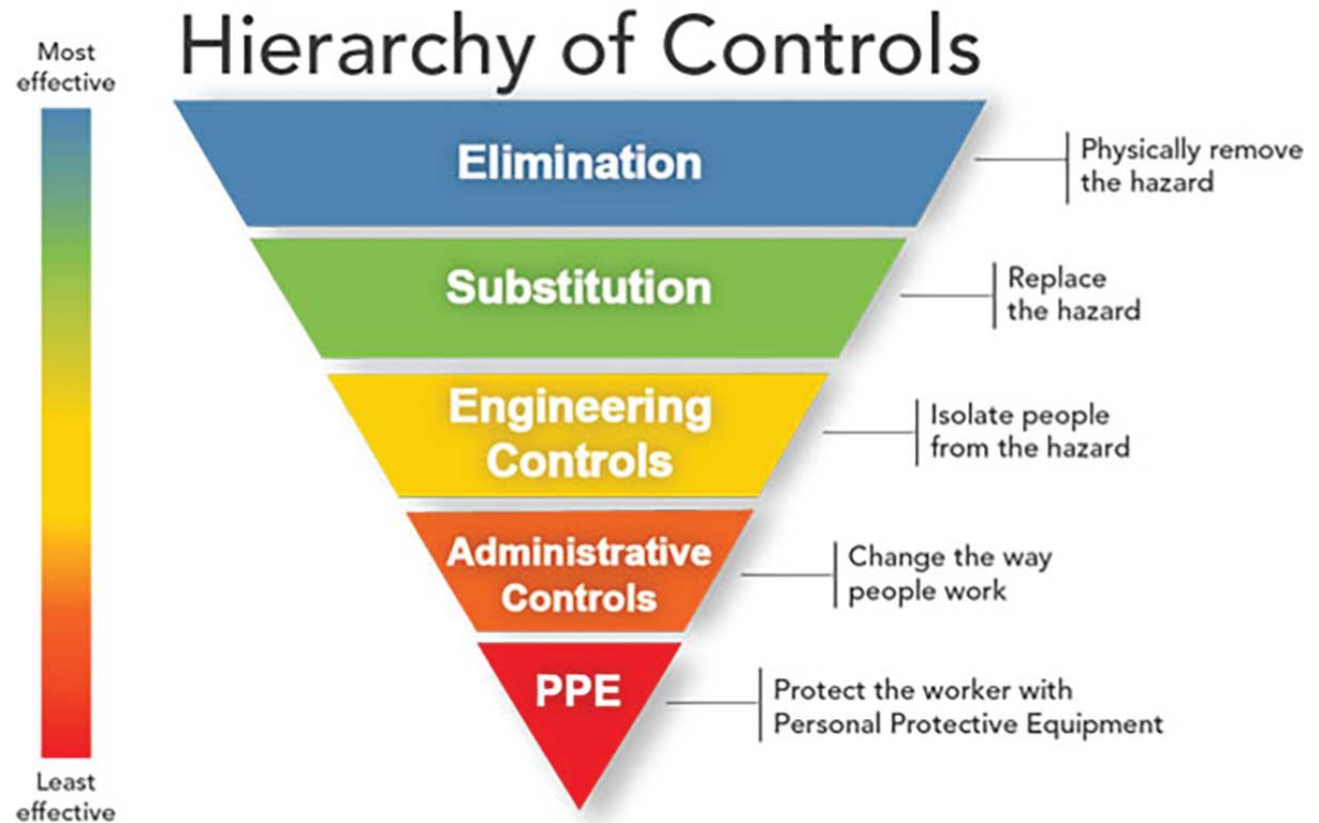


Lathes



# Make Changes (risk assessments)

- Find a way to protect from each hazard
- “Guards” vs. “engineering controls”
- Buy or DIY the fix
- Reassess
- Document it!
- Iterate



# Other P-P-P Pressures

## People

- Can't get in the way.
- Can't be bypassed.
- Can't cause additional hazards.
- Can't be "too hard".

## Production

- Can't slow people down.
- Can't impact workflow.

## Profit

- Can't be expensive to implement or use.
- Can't require significant training.



# Means of Mitigation

- A look at your options for how to prevent injury and comply.

## Common Cause:

- The Control of Hazardous Energy (Lockout Tagout)
- Unintentional Restart
- Coasting
- Emergency Situations & E-Stop

## Common Times:

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Bench Grinders



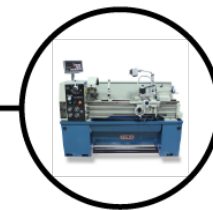
Table Saws



Band Saws



Disc Sanders



Lathes

# Lock Out Tag Out

- Lots of information online
- Lots of product options



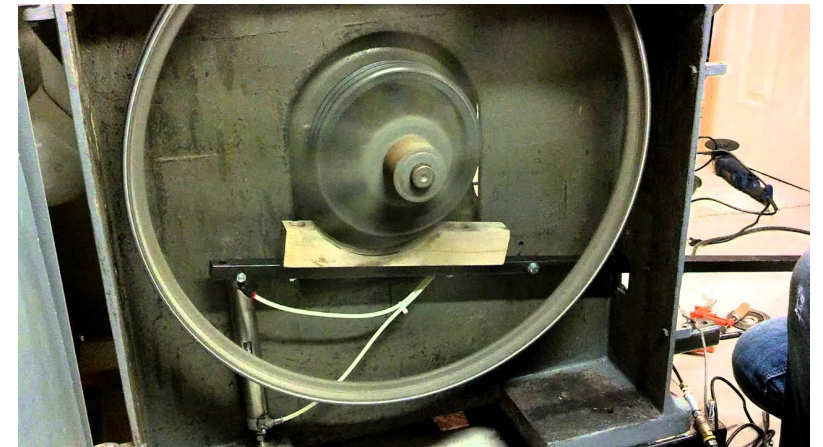
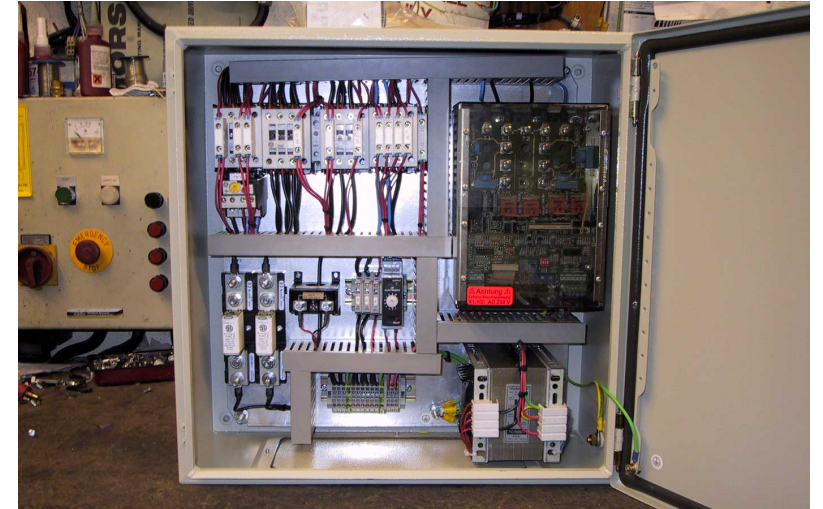
# Restart Prevention

- Lots of Names:
  - “Safe Start”
  - “Accidental Restart Protection”
  - “Anti-Automatic Restart Protection”
  - “Low Voltage Dropout”
- Beware ... there is a reason they’re low cost.



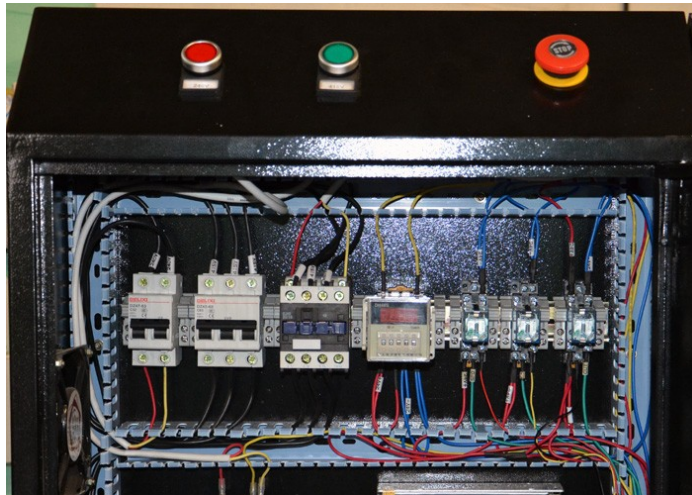
# Braking Systems

- Braking Systems
  - OEM vs. Retrofit
  - Mechanical Braking
  - Electrical (Motor) Braking




# Emergency Stop

- E-Stop Categories
- ANSI Requirements




# Specifications

Considerations when purchasing and specifying electrical safeguards.




**ELECTRICAL**

There's more to consider than just current and voltage.



**NRTL MARKS**

A Listing Mark from a Nationally Recognized Test Lab is Required for All Electrical Products



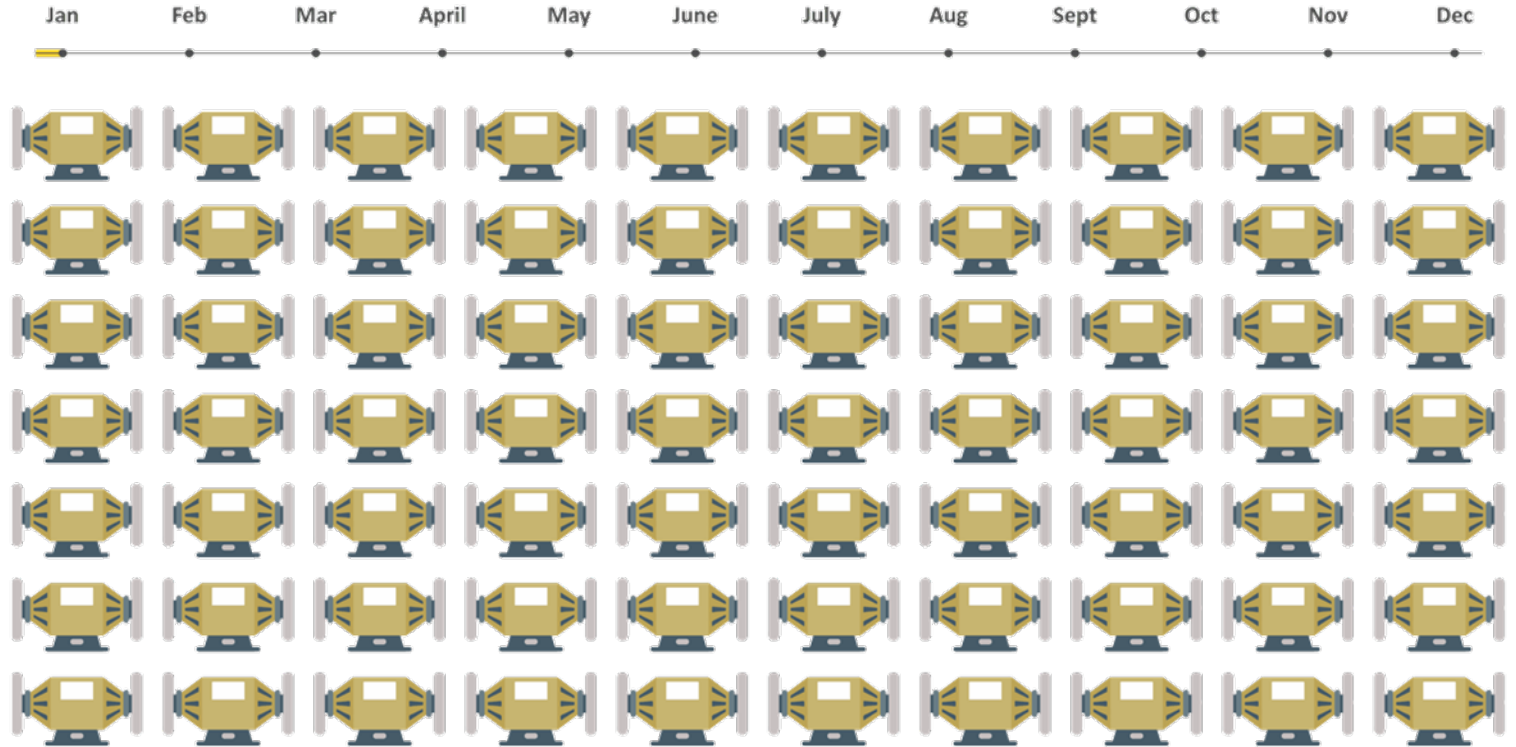
**RISK ASSESSMENT**

Always perform and document a risk assessment.



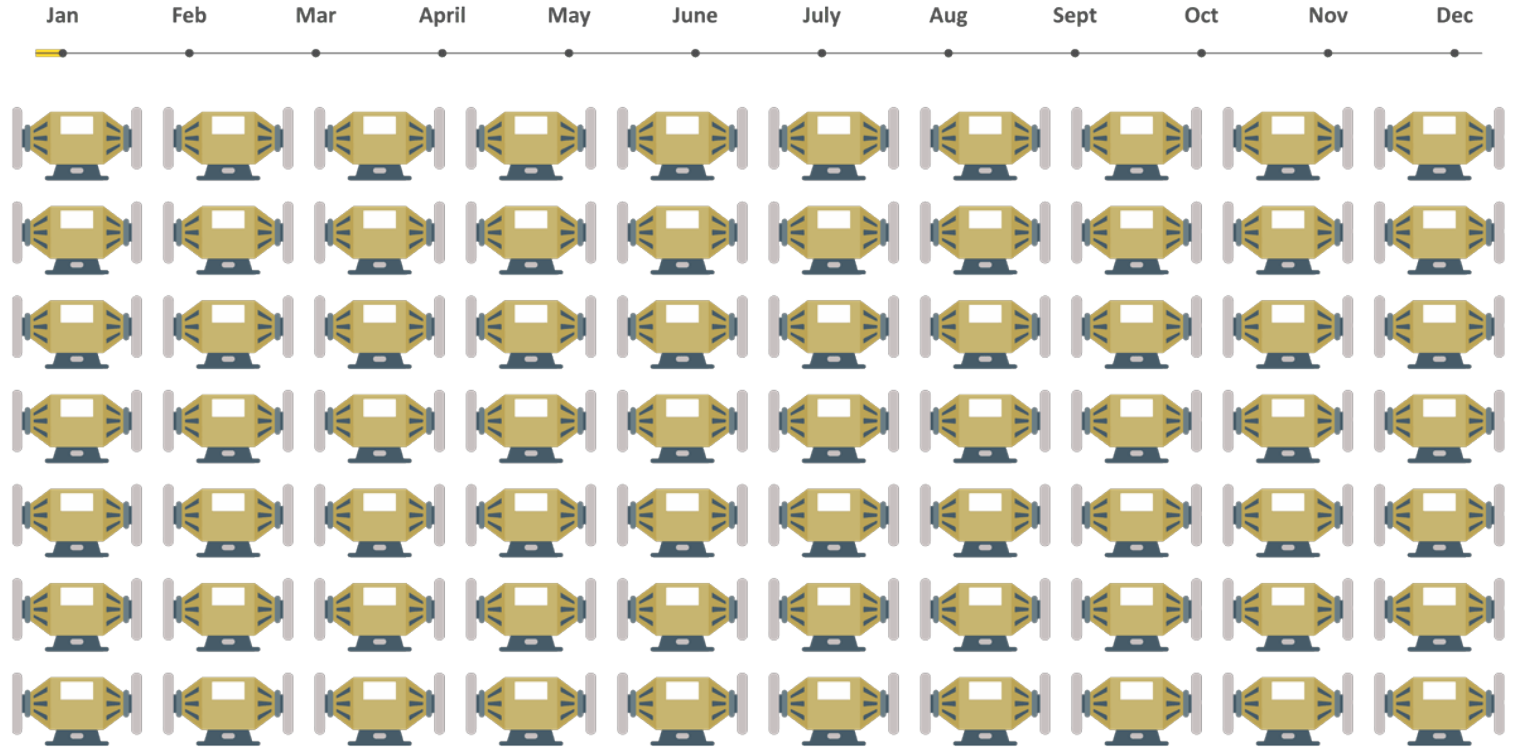
# Misleading Products

- Customer: Aerospace parts manufacturer
- Intent: Protect operators and comply w/ anti-restart regulation.
- Context: Customer has a pedestal bench grinder at each CNC operator station, used for tool sharpening.
- Project Scope: Install commercially available anti-restart devices on 70 bench grinders.
- Result: Based on monthly testing, between one and three devices failed each month.



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# Why they fail (Electrically)

## The Machine



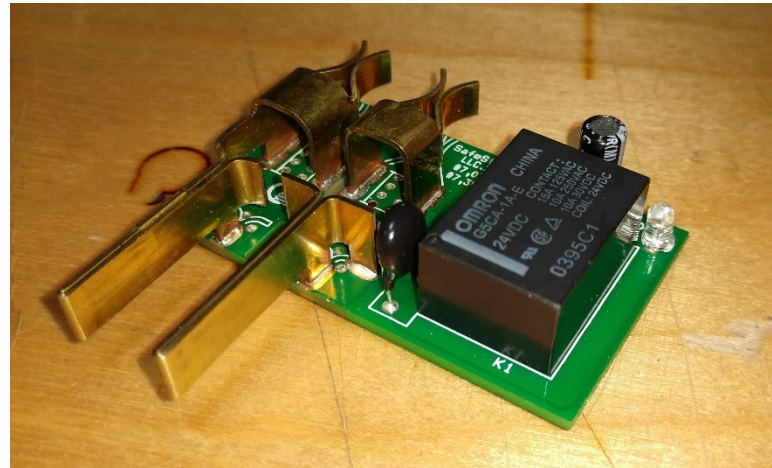
8" Bench Grinder

1HP

120V, 60Hz

8A

## The Failed Device

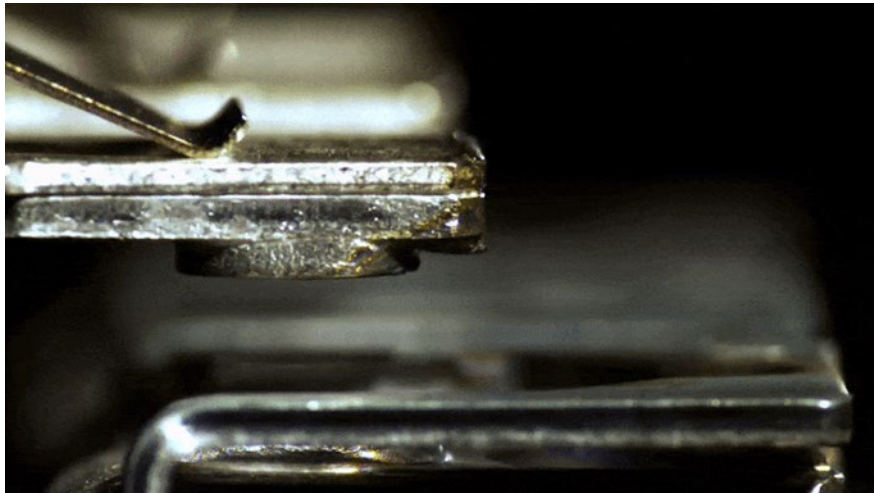


Just One of Many  
The product shown here is just one of many anti-restart devices that suffer from the same shortcomings.

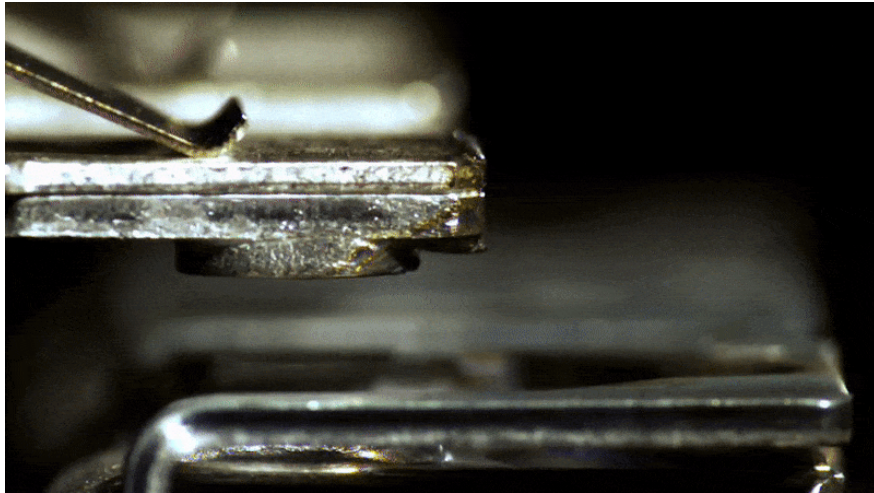
## The Relay Inside



# Why they fail (Electrically)



# Why they fail (Electrically)



# Why they fail (NRTLs)

## UL 246A - Appliance Controls

“This category covers controllers ... [with] one or more output switching components to directly control ... household-type appliances, such as portable luminaires, audio/video equipment, etc.”

“They are not intended for controlling motor-operated appliances”



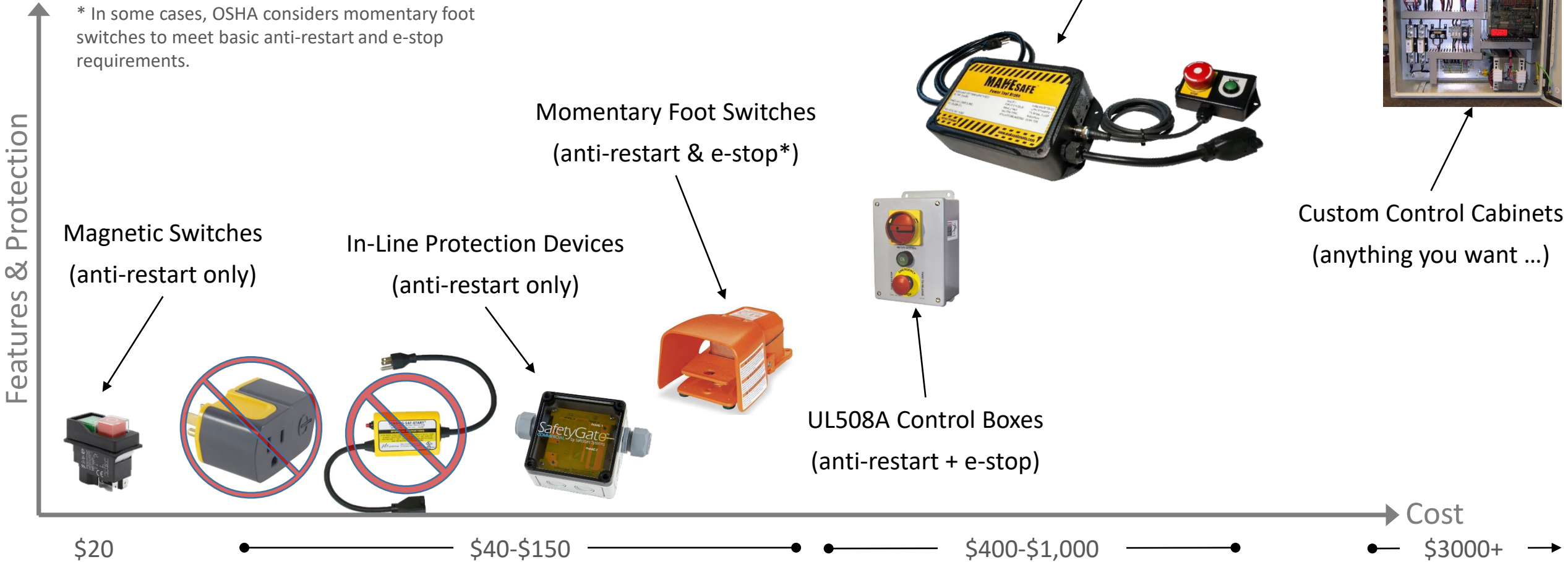
Two relays with similar current ratings under each standard  
(to scale)

## UL 508 - Industrial Control Equipment

“These requirements cover industrial control devices, and devices accessory thereto, for starting, stopping, regulating, controlling, or protecting electric motors.”



# Commercial Options



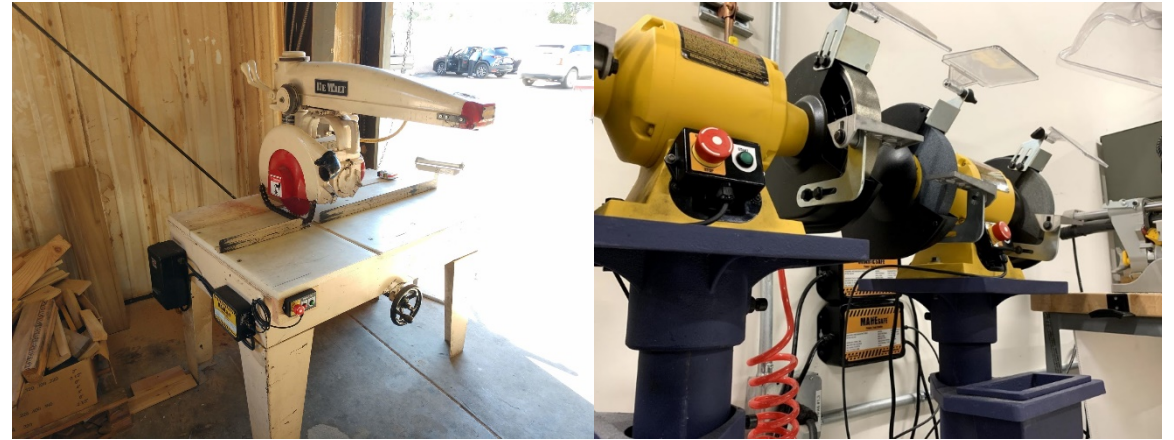
# Bandsaw Demo





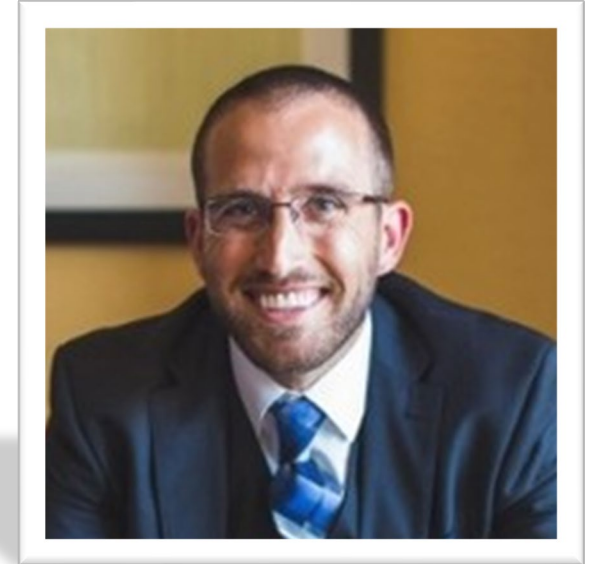
# Features

- Category-1 Emergency Stop Button
- Unintentional Restart Prevention
- Motor Braking
- Installs in <5 min.
- Works with most industrial machines



# I'm here to help!

- [www.makesafetools.com](http://www.makesafetools.com)
- [scott@makesafetools.com](mailto:scott@makesafetools.com)
- (415) 937-1808



**Scott Swaaley, PE**  
Founder and President,  
MAKESafe Tools, Inc.