

INFORMATION MEMORANDUM 81-X-52

TO: All OSH Directors, Supervisors and Field Personnel

FROM: William M. Lybrand, Director of OSH

SUBJECT: Applicable Standards as They Pertain to Iron Workers and Mechanical Power Presses.

DATE: August 5, 1981

PURPOSE

This memorandum provides guidelines to aid in the recognition of the difference between ironworkers and similarly configured mechanical power presses as they are used in industry. Proper identification will permit the correct application of standards.

BACKGROUND

OSH Field Personnel has frequently confused the applicability of standards as they pertain to iron workers and certain configurations of mechanical power presses. In addition, field personnel have incorrectly attempted to enforce provisions of Subarticle 6, Section 1910.217 with regard to ironworkers. Subarticle 6, Section 1910.212 is the appropriate standard to apply to ironworker machines.

- a. ANSI B11.5-1975, Safety Requirements for the Construction, Care, and use of Iron Workers, deals specifically with ironworkers. Although this standard has not been adopted, it provides useful guidance in evaluating and correcting ironworker hazards. Part of this ANSI Standard is attached to Information Memorandum #80-x-42.
- b. Information Memorandum #80-x-42 shall be consulted when considering a citation under Section 1910.212 or when attempting to enforce a citation issued under that standard for exposure to a hazard on an ironworker machine.

GUIDELINES

For compliance purposes, OSH Field Personnel will apply the applicable Sections of 1910.212 and 1910.217 as interpreted by this memorandum.

- a. This instruction applies to those combinations, multipurpose powered machines that punch, shear, notch, cope, and form metals or other materials, commonly referred to as iron workers, and also applies to certain single-purpose powered machines, noted below:

1. Specifically machines to which Subarticle 6, Section 1910.212 shall apply include, but are not limited to, the following:
 - i. Single-end punches
 - ii. Double-end punches
 - iii. Structural Shearing Machines
 - iv. Notching machines
 - v. Coping machines
 - vi. Beam punches
 - vii. Detail punches
 - viii. Spacing punches
 - ix. Combinations of (a) through (i)
 2. Machines similar in construction and function to mechanical power presses, but which are identified by the respective machine manufacturers as ironworkers, are regulated under Subarticle 6, Section 1910.212.
 3. Machines whose most distinguishing feature is the multiple work stations at which various operations may be performed singly or simultaneously, including, but not limited to, punching, shearing, notching, coping, and forming, shall be evaluated as an iron worker, and are regulated under Subarticle 6, Section 1910.212.
- b. Mechanically powered machines that shear, punch, form, or assemble metal or other material by means of tools or dies attached to slides, and identified by their respective manufacturers as mechanical power presses, are regulated under Subarticle 6, Section 1910.217.

EFFECTIVE DATE

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