



118 Seaboard Ln. Suite 106  
Franklin, TN 37067-2819  
PH – (615) 371-3888  
FAX – (615) 371-3282

## LOCK OUT/TAGOUT PROCEDURES DURING DIE CHANGE

Opinion presented by Production Resources, Inc.

Please read the actual standard language to make sure you are fully informed – Go to [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9804](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9804)

You may also want to review typical minimal lockout procedures - [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=9805](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9805)

The code of federal regulations part 1910.147 covers the control of hazardous energy during servicing and maintenance of machines and equipment where unexpected cycle initiation or start up of the machines or equipment, or release of stored energy could cause injury to employees.

1910.147(a)(2)(ii) Normal production operations are not covered by this standard. Servicing and/or maintenance which takes place during normal production operations is covered by this standard only if:  
(A) Employee is required to remove or bypass a guard or other safety device.  
(B) Employee is required to place any part of his body into the point of operation or where an associated danger zone exists.

**Note: this standard has an exception to(a)(2)(ii) :** Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations are not covered by this standard if they are ***routine, repetitive, and integral*** to the use of the equipment. This exception requires the employer to use alternative measures which provide effective protection per subpart O (Machinery and Machine Guarding)(Refer to 1910.217(c). Die change is commonly considered in the industry as routine, repetitive, and integral to the use of a power press.

When using the above exception guarding method selection is especially important. Appropriate & practical devices would include presence sensing devices (light curtains) and sliding barriers. These devices would need to be active during die change; ergo, a stroke can't be initiated if the operator or anyone else is in the die space. Large presses often create an opportunity for die setters and or operators to pass through a light curtain and work between the light curtain and the bolster and/or enter the bolster area. Eliminating any walk through hazard is very important (see article on our web site). Presses large enough to allow an operator undetected access to the bolster space should be considered candidates for lockout/tagout during die change.

It is our opinion that a two-hand control would not suffice as a guarding device when using the rule exception as it is foreseeable that two or more people could be involved with die change. This would allow one person to accidentally operate the two hand control while another was in the die space. Further it is our opinion that this exception applies only to part revolution (air clutch) or hydraulic presses not full revolution clutch presses.

Production Resources, Inc. specializes in power press safeguarding and automation. Call us at (800)863-3164 if you have questions.