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LOCK OUT/TAGOUT PROCEDURES DURING DIE CHANGE

Standard Opinion by Production Resources, Inc. – Please read the actual standard language to make sure you are fully informed.

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

1910.217(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: 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).

Die change is commonly considered in the industry as routine, repetitive, and integral to the use of the press. Consequently; the employer must provide appropriate machine guards or devices to avoid implementing lockout/tagout during die change. This would include presence sensing devices (light curtains), sliding barriers, and/or interlocked barrier guards. It is our opinion that a two hand control would not suffice. 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.