



OSHA Docket Office
Docket No. OSHA–2007–0003
RIN 1218-AC98
U.S. Department of Labor
Room N–2625, 200 Constitution Avenue, NW.
Washington, DC 20210

October 23, 2021

Please find enclosed, a consensus response to the 68 questions published in your 28 July 2021 Federal Register (RFI) notice requesting information regarding mechanical power presses from the Forging Industry Association (FIA) – a trade association representing 95 North American forging producers and 114 equipment, material and services suppliers to forging producers.

Please also find attached FIA’s response to a similar inquiry back in 2007 from our Safety & Health Specialist George Layne. We attached letter as it is still relevant today to OSHA’s inquiry.

Please direct any questions regarding this submission of comments to James R. Warren, President & CEO, at either 216-781-6260 or jwarren@forging.org.

Sincerely,

James R. Warren

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OSHA Questions	Forging Industry Association (FIA) Responses
<p>A. Hazards and Incidents</p> <p>OSHA seeks comments on hazards associated with the operation of mechanical power presses and presses other than mechanical power presses, <i>i.e.</i>, hydraulic and pneumatic presses. CDC last studied Injuries and Amputations Resulting from Work with Mechanical Power Presses in the late 1980s and this study was specific to Mechanical Power Presses. OSHA requests additional studies or data on workplace injuries or fatalities related to mechanical power presses and presses other than mechanical power presses, particularly recent studies or data.</p>	<p>The Forging Industry Association, (FIA), a former OSHA Alliance Agreement Partner (https://www.osha.gov/alliances/national/fia_closeout-report_20100104) is the trade association for the North American Forging Industry. FIA is a corporate membership association comprised of approximately 94 North American forging producers operating over 135 plants. Membership also includes more than 114 suppliers to the forging industry including companies engaged in the manufacturing, processing or distribution of steel or other forging stock, die stock, machine tools, equipment or providing consulting and engineering services and supplies commonly used in the industry. FIA member companies account for approximately 75% of all custom forging volume that is produced in the U.S. and Canada.</p> <p>Many of our member companies utilize mechanical power presses in their facilities in the traditional types of operations performed on these types of machines and covered by OSHA 1910.217 and ANSI B11.1. Those machines and processes should continue to be regulated by the provisions of 1910.217 and ANSI B11.1.</p> <p>The primary business of our member companies utilizes forging presses and other forging machinery as their principal manufacturing process. Though these machines are similar to mechanical power presses, their function and use differs substantially. OSHA recognized this difference in the early 1970s by excluding these machines and processes from 1910.217 and establishing C.F.R. 1910.218 to specifically address the unique nature of these machines. Given this, the FIA response to this RFI will focus on ratifying the continued exclusion from OSHA 1910.217 of forging machinery (forge presses, hammers, hot trimming presses, cold trimming presses, upsetters, boltheadings, and rivet making and strongly recommending that these machines continue to be regulated by OSHA 1910.218 and that they not be included in the revised 1910.217.</p>

(1) Is there more recent information about the risks and hazards associated with the operation of power presses?	The nature of these risks and hazards have not changed. Manual operations continue to be replaced by automation. Dangers from automation usually occur during set up and system failure clearing. Incidents/injuries for forging presses have trended downward 2014-2020. Supporting data is available upon request.”
(2) Based on a review of accident and injury data (see Table 1), OSHA has identified finger and fingertip amputations, crush injuries, lacerations, and fractures as the main types of injuries caused by mechanical power presses. Please supply any additional information on these and other injuries associated with power presses?	Due to the nature of the forging process, the injuries mentioned in this statement would not be caused by the press machine, but other tools and equipment other than the press. Possible sharp edges or pinch points of other pieces of equipment in the work area.
(3) How frequently are workers using power presses injured? How frequently are workers using power presses severely injured? How frequently are workers using power presses fatally injured?	?? do we have forging specific info
(4) Do injury rates and severity vary based on the type of press used or other factors?	Same
(5) Have injury rates associated with the use of power presses increased or declined over time? If so, why?	Same
B. Power Presses Standard	

<p>OSHA seeks comment on how it should update the mechanical power presses standard.</p>	<p>The operations performed in forging machinery differs significantly from operations performed in mechanical power presses. Specifically, the forging process is performed on hot metal (typically at 2300 deg.) and this material can only be handled by the use of tongs, long reaches, or manipulators. 1910.218 addresses the unique operational needs of the forging operation. The provisions of 1910.217 cannot be applied to much of the forging operation as operators are typically at a safe distance from the point of operation due to the extremely high temperature of the piece being worked with.</p>
<p>(6) Should OSHA use ANSI B11.1 as the basis for a standard update?</p>	<p>Yes.</p>
<p>(7) Are there provisions in the ANSI standard not in the OSHA standard that are important for providing worker protection?</p>	<p>Please refer to the consensus response submitted by the ANSI B11.1 sub-committee that specifies the updated or new provisions found in ANSI B11.1 not found in 1910.217.</p>
<p>(8) If the agency bases a revised standard on ANSI B11.1, should OSHA add explanatory material in the form of non-mandatory appendices?</p>	<p>Yes</p>
<p>(9) Would employers find a non-mandatory appendix useful if it addressed similar subjects as the explanatory text in the latest ANSI standard?</p>	<p>yes</p>
<p>(10) What material, if any, should be in the appendices?</p>	<p>Please refer to the consensus response submitted by the ANSI B11.1 sub-committee that specifies the updated or new provisions found in ANSI B11.1 not found in 1910.217.</p>
<p>(11) If OSHA updates the standard to be consistent with the provisions of ANSI B11.1-2009 or its equivalent, should OSHA exclude all of the machines that ANSI B11.1-2009 excludes?</p>	<p>Yes. Specifically, those machines covered by OSHA 1910.218.</p>
<p>(12) If so, why?</p>	<p>As discussed earlier, in forging operations metal is often heated up to 2300 °F; the forging process creates scale and dust that is commonly airborne. Forging hammers also produce significant shock vibration during the forging process. Combining the extreme radiant heat, the airborne particulate and the vibration would make maintaining sophisticated electronics like laser curtains and presence sensing devices technically infeasible. The continual false trips would not only cripple production but also create additional safety hazards to personnel.</p>

(13) Alternatively, should OSHA continue to exclude only the machines currently excluded by the OSHA standard?	See #11
(14) Should OSHA exclude any other machines that ANSI B11.1-2009 does not specifically excluded?	We are not aware of any other machines
(15) What are these other machines and why should OSHA exclude them?	See #11
16) Is your firm currently complying with the ANSI B11.1 standard?	This should be answered by a user and as an industry association we encourage our membership to comply with the best practices as described in the ANSI A B & C level standards.
17) Is compliance with any of the provisions in the ANSI standard prohibitively costly? If so, please specify which provisions are prohibitively costly.	
18) Do you believe it would be less costly for your firm to comply with the ANSI standard as opposed to OSHA's existing standard?	See #16
19) If so, in what areas do you anticipate savings, including reduced compliance costs and/or improved efficiency?	See #16
C. Standards other than ANSI Consensus Standards (No specific questions – just seeking comments regarding other standards besides B11.1).	As a North American based industry association, we encourage our membership to comply with the best practices as described in the ANSI A B & C level standards for their domestic operations and Canadian, and European standards for their foreign based operations.
D. Presses other than Mechanical Power Presses	
In this RFI, OSHA seeks comment on whether it should regulate other types of presses, i.e., hydraulic and pneumatic presses.	
20) Should these presses be covered under a new standard written in the fashion of the existing mechanical power presses standard, § 1910.217?	Yes. As was done previously by establishing a separate regulation for forging machinery 1910.218.
21) Should OSHA base any new requirements for hydraulic and pneumatic presses on ANSI B11.2-2013 (R2020), Safety Requirements for Hydraulic and	Yes.

Pneumatic Power Presses?	
22) Does compliance with the ANSI B11.2-2013 (R2020) consensus standard provide adequate protection for workers using hydraulic and pneumatic presses?	Yes.
23) Are there any ANSI B11.2-2013 (R2020) provisions or other protections critical to protecting workers that OSHA should include if the agency decides to propose a rule addressing non-mechanical power presses?	No. The standards should be used as written.
24) If so, which ones?	
25) Do you currently follow other ANSI consensus standards corresponding to any other types of presses (for example, ANSI B11.4, Safety Requirements for Shears)?	See #16
26) Are any provisions in this ANSI standard especially costly or difficult to comply with?	See #16
27) If so, which ones?	
E. Presence-Sensing Device Initiation	
Both the ANSI B11.1-2009 standard and the existing OSHA mechanical power presses standard, § 1910.217, contain requirements for PSDI. However, unlike the ANSI standard, OSHA's standard requires third-party validation for PSDI. As previously noted, no third party has stepped forward to issue such certification.	PSDI cannot be applied to forging operations. PSDI is a process designed for hand fed operations and uses a presence sensing device that can only operate in an ambient temperature range significantly below the temperatures found in a forging operation. Forging operations are generally performed on metal heated to 2300 deg. and manipulated with tongs or other such tools.
28) Should OSHA revise or eliminate its requirements regarding the use of PSDI systems?	Yes. The requirements should be revised to match the requirements as defined in ANSI B11.1 for those machines included in ANSI B11.1
29) Should OSHA base its PSDI requirements on the PSDI requirements in ANSI B11.1-2009?	Yes.
30) Are there any types of operations that should not allow PSDI?	Yes. Please refer to the exclusions found in ANSI B11.1
31) If so, which operations and why?	See #30
32) Should OSHA consider an	Yes. Hydraulic and Servo presses

option that includes regulating other types of power presses?	
33) Are there any types of power presses that should not allow PSDI?	Yes.
34) If so, which ones and why?	Presses regulated by 1910.218
35.1) Should OSHA eliminate the third-party validation requirement?	Yes.
35.2) OSHA also seeks comment on whether it should continue to include mandatory and/or non-mandatory appendices with additional requirements for PSDI.	Yes – the appendices should continue to provide guidance and requirements on the establishment of a PSDI system. B11.1 and B11.19 address the requirements of PSDI.
36) If OSHA were to eliminate the existing requirements for PSDI systems, would you incorporate this technology on your existing power presses?	This question is best answered by a user
37) What would it cost to incorporate PSDI technology into your presses?	This question is best answered by a user
38) Do you agree that PSDI devices would improve productivity?	This question is best answered by a user
39) If so, to what extent?	
F. Existing Presses	
40) How many power presses do you use at your facility?	This question is best answered by a user
41) What type of presses are they (mechanical, hydraulic, and pneumatic), and, if any are mechanical, how many do you use and what percentage of those mechanical power presses have part-revolution clutches? The agency seeks comment on the service life of mechanical power presses.	See #40
42) What type of press would you purchase to replace a mechanical power press?	See #40
43) What proportion of those mechanical power presses would you replace with presses equipped with part-revolution clutches?	See #40
45) Would you upgrade any of your presses to meet the ANSI B11.1 consensus standard, or would you replace the presses?	See #40
46) What percentage of your	. See #40

presses would you upgrade versus replace?	
G. Modifying and Repairing Existing Presses; Records of Maintenance	
47) Should OSHA require that only competent persons perform these tasks?	Yes.
48) If so, how should OSHA define the term “competent person” with respect to mechanical power presses?	One who has experience, knowledge and associated technical skills on the design, maintenance, use and operation of a press.
OSHA also seeks comment on how to handle documentation of maintenance on power presses.	
49) Should OSHA require documentation and, if so, should OSHA require document retention and access?	Yes, for a specific time frame. 2-5 yrs.
50) Who should maintain the documentation: the manufacturer, the owner, or a third party?	The user (employer)
H. Reporting and Recordkeeping Requirements	
OSHA requires that employers keep separate records and submit reports for injuries to employees operating mechanical power presses. These records are specific to OSHA’s mechanical power presses standard and were put in its standard to allow OSHA to track the effectiveness of its mechanical power presses standard.	
51) Are employers aware of these specific reporting requirements, and that they are additional to BLS occupational injury data collections and OSHA SIR reporting?	Each user should be responsible to seek out and obtain the training to provide this reporting.
52) Should OSHA retain these requirements?	See #51
53) Should OSHA modify these requirements and, if so, how?	See #51
I. Affected Industries and Economic Impacts	
OSHA seeks comments on what occupations employ power press workers.	
54) Do the job titles listed above	Job titles are company specific and should be directed to

encompass all power press workers?	the individual companies for their input and comments.
55) If not, what job categories or job titles should OSHA include?	See #54
56) What are the job titles of workers who use power presses at your facility?	See #54
57) Would you classify your facility's power press workers in one of the occupations listed above or is there a more appropriate occupational category for them?	See #54
58) How many total workers are at your establishment and how many of those workers use power presses as part of their job?	See #54
59) What types of power presses do they use (mechanical, pneumatic, hydraulic, or other)?	See #54
60) If those employees work on mechanical power presses, how many (or what percentage) of those presses have part revolution clutches?	See #54
OSHA seeks comment on the industries that employ mechanical power press workers, and, if possible, those that use mechanical power presses with part-revolution clutches.	
61) Are there any affected industries that the agency has not included in Table 3?	Table #3 seems to be complete
62) If so, which ones and how are those industries using mechanical power presses?	
To further refine this estimate, the agency seeks comment on the service life of mechanical power presses.	
63) What type of press do you typically purchase to replace a mechanical power press?	See #54
64) What proportion of those replacement mechanical power presses are replaced with presses equipped with part-revolution clutches?	See #54
Expected impacts of a revision	

based on current consensus standards	
65) Would small entities face economic or technological feasibility concerns in complying with a revised standard that references current consensus standards?	See #16
66) If OSHA promulgated standards similar to the mechanical power presses standard for hydraulic and pneumatic presses, would this raise any economic or technological feasibility concerns specific to small businesses?	See #16
67) If you identify as a small entity in your industry, what is the basis for that identification	See #16
J. Other Issues	
68) Are there any other issues related to mechanical, hydraulic, or pneumatic power presses that OSHA should address? Include issues remaining from, or not sufficiently addressed in, the 2007 ANPRM.	<p>FIA appreciates OSHA's willingness to accept input from the industry group whose members may be affected by this proposed change. We feel this is another example of the spirit of cooperation that launched a very successful OSHA Alliance Partner (2005-2009) between our two organizations.</p> <p>We strongly believe there is every reason for OSHA to continue to regulate the forging industry under 29 C.F.R. 1910.218, and have the machines covered by 1910.218 be excluded from 1910.217. The Forging Industry has a good safety record under the current approach. The Forging Industry Association members have the necessary equipment, methods of operation, employee training, safety programs and extensive experience in complying with 1910.218. Any change that would upset this long-standing and settled approach would have an adverse impact on the industry without producing any increase in safety performance. We therefore ask that OSHA not propose any modification to 1910.217 that would bring the forging industry within its ambit to the detriment of the safe practices now in force under 1910.218.</p>