



A recording of this live presentation is available online at:

<https://youtu.be/CQD655bIt4g>

Risk Assessments

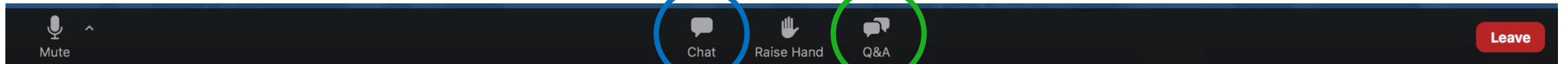
*How to get started ...
... and what they don't tell you in school.*

Zoom Webinar Participation

Attendee microphones are disabled by default.

Use the **chat feature** to introduce yourself and chat with other attendees.

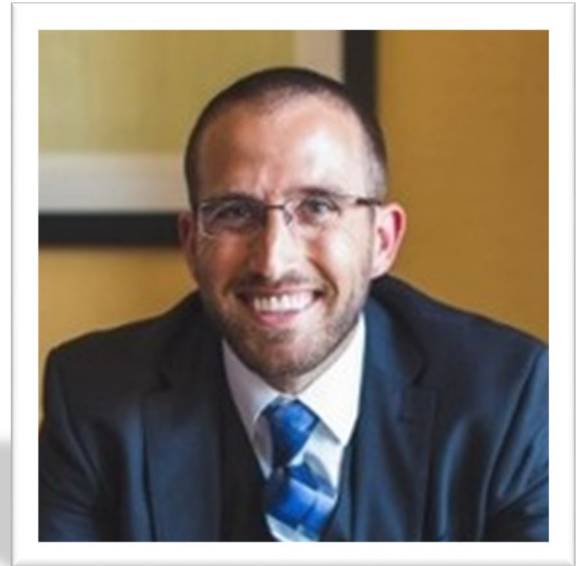
Use the **Q&A** to ask the presenter questions.



This black bar is your zoom menu, available on the bottom of your screen.

Our Speaker

- Active participant in regulatory process with the NFPA, OSHPD, NRTLs, and CAL/OSHA.
- Over a decade of experience with electrical design for hospitals, data centers, and renewable energy systems.
- Managed production and training shops across three industries.
- Carpenter, machinist, programmer, engineer.
- Has been featured in four documentary films, holds a US patent, and loves his greyhounds.



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

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 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**

Kinds of Machinery

Everything with a Motor



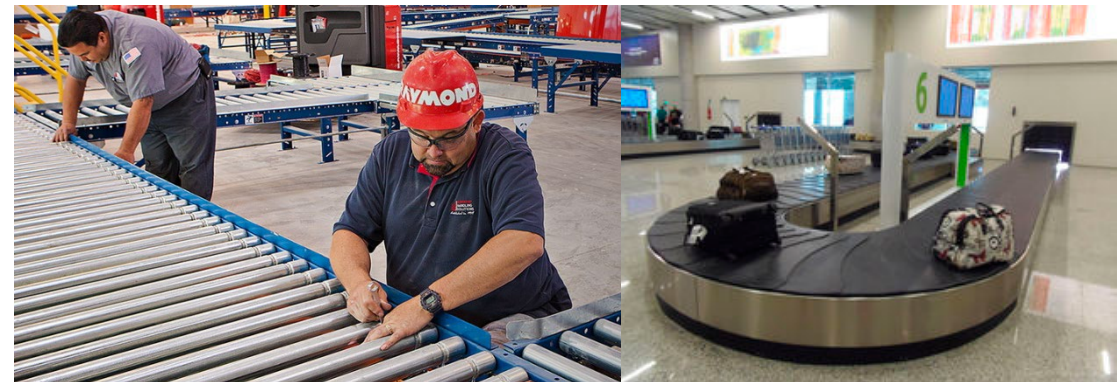
Process & General Machinery



Conveyors & Infeed Rollers



Power Tools & Machine Tools



RISK ASSESSMENT

Overview



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

Assessment Team Members _____ Date: _____ Accident follow up: Yes or No

Team Lead: Jannet Wells

Members: [Names here]

Contact UL for more information: www.ul.com/MachineRiskAssessment, email: FactoryServices@ul.com, 1-877-UL-HELPS

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

		Risk Level: 1-8 Represents Low Level										9-14 Represents Medium Level				15-20 Represents High Level						
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	Ext. Risk Level 1	Tolerable?	Design	Safeguarding	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
Normal Operation																						
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	Yes											0	Yes	
Maintenance Activities																						
3	Replace hydraulic cylinder.	Maintenance Personnel	1.3 - 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	Yes											0	Yes	
Commissioning/Other																						
4	NIA - Machine already installed.								0	Yes											0	Yes
5	Plant Visitors are not allowed close to machine. Supervisors are trained operators.								0	Yes											0	Yes

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

RISK ASSESSMENT

Context

Equipment: [Machine Name here] [Machine # here] [Other ID here]
Machine name Machine # SAP#

Location: [Building Name here]
Building

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

Team Lead: [Name here]

Members: [Names here]

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

RISK ASSESSMENT

Job Hazard Analysis

Task #	Task	Affected Persons	Hazard Type
	Normal Operation		
	Maintenance Activities		
	Commissioning/Other		

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

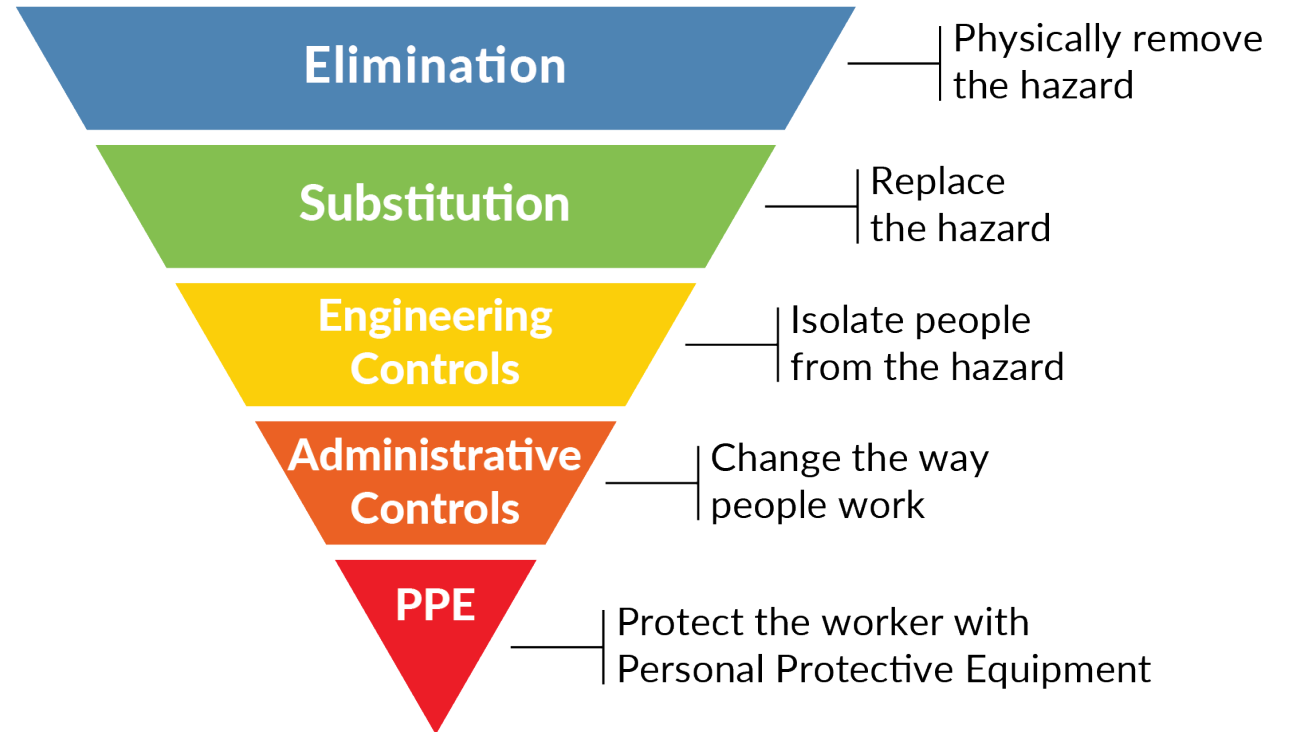
RISK ASSESSMENT

Mitigations

Method of Reduction					
Design	Safe-guarding	Admin. Controls	Method description	Date Final Follow-up Assessment	Owner
	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
	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
		X	Use LOTO procedures to ensure all energy is removed.	#####	J. Wells

Most effective
Least effective

Hierarchy of Controls



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

Today's Focus

Things to watch out for

Job Hazard Analysis

Mitigations

Risk Level: 1-8 Represents Low Level 9-14 Represents Medium Level 15-20 Represents High Level																						
Task #	Task	Affected Persons	Hazard Type	Risk Level Estimate						Method of Reduction						Final Risk Estimate						Notes
				Frequen- cy of Exposur e 1,2,4	Probabil- ity of Injurg 1,2,4,6	Severit- y of Injurg 1,3,6,10	Number of People Expose- d	Protract- ed time in Danger Zone	Est- - Risk Lev	Tolerabl- e?	Desig- n	Safe- guardi- ng	Admin- - Con- trols	Method description	Date Final Follow- up Assess-	Own- er	Frequen- cy of Exposur e 1,2,4	Probabil- ity of Injurg 1,2,4,6	Severit- y of Injurg 1,3,6,10	Number of People Expose- d	Protract- ed time in Danger Zone	
	Normal Operation								0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
	Maintenance Activities								0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
	Commissioning/Other								0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	
									0	Yes										0	Yes	

Hazard Analysis

Two sides of the same coin.



INJURY PREVENTION

The primary goal of an EHS professional is to keep people safe.



COMPLIANCE

Injuries and citations are expensive. EHS professionals need to know about standards and best practices.



PRODUCTION

If the business doesn't keep running and stay profitable, then everyone is out of a job.

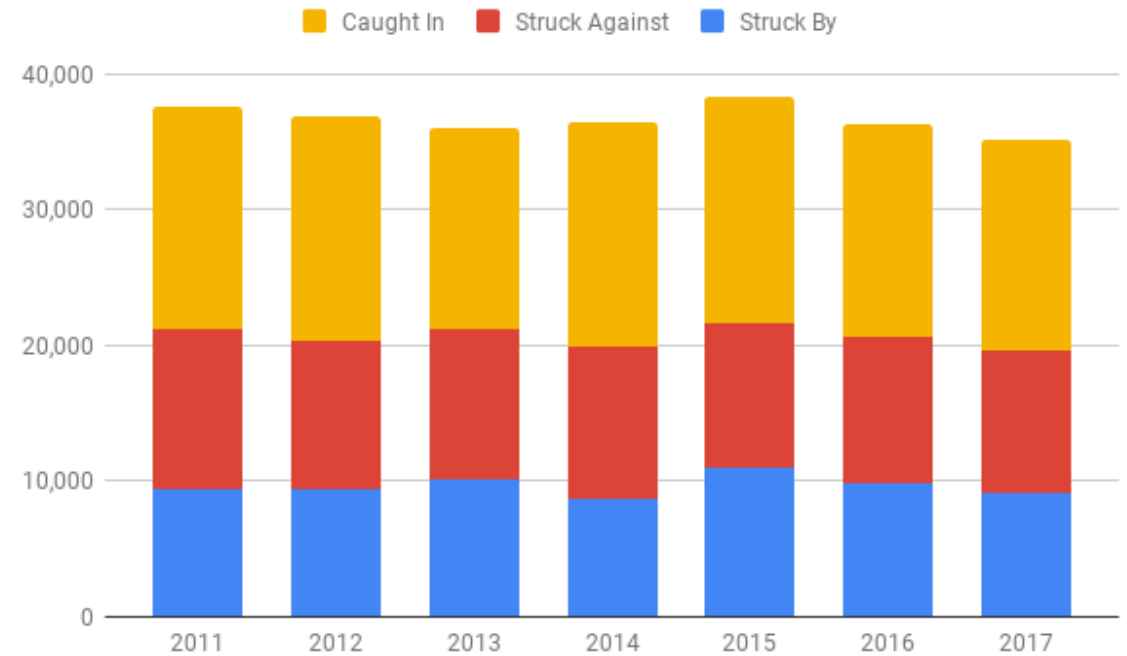
PERSONAL LIABILITY

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.

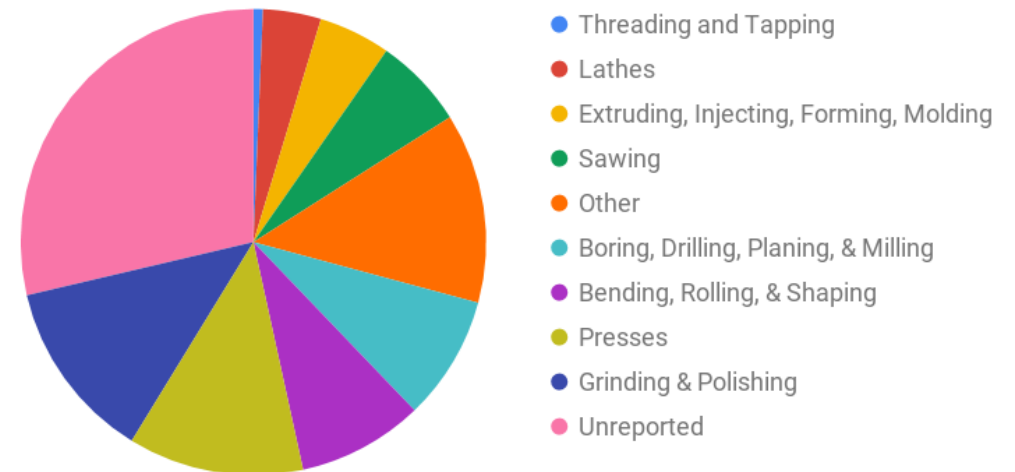
SOURCE: Bureau of Labor Statistics, U.S. Department of Labor, Jul 6, 2019

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.

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

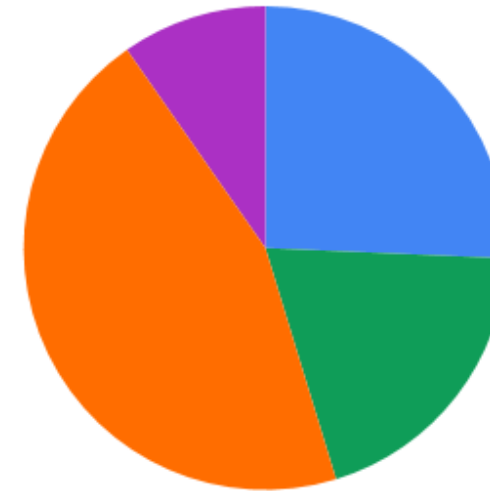
INJURY PREVENTION

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

- The Control of Hazardous Energy (Lockout Tagout)
- Accidental Restart
- Coasting
- Emergency Situations & E-Stop
- And more ...



Bench
Grinders



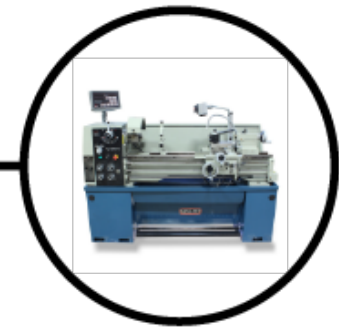
Table
Saws



Band
Saws



Disc
Sanders



Lathes

INJURY PREVENTION

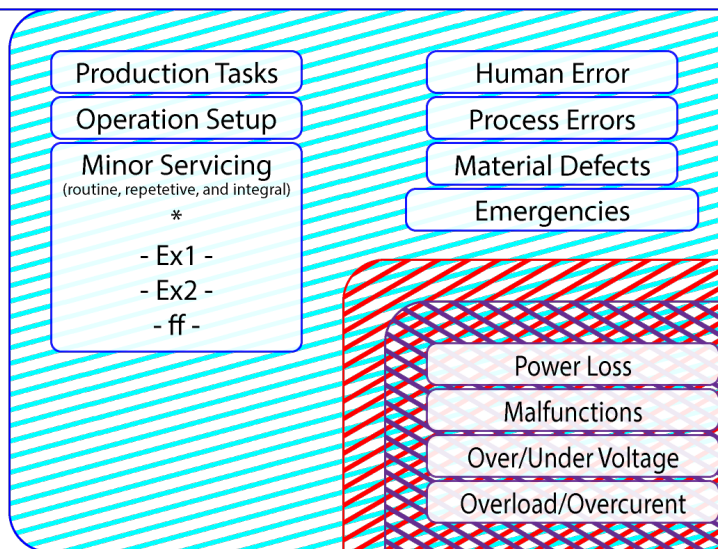
COMPLIANCE

According To ...



Machine Guarding

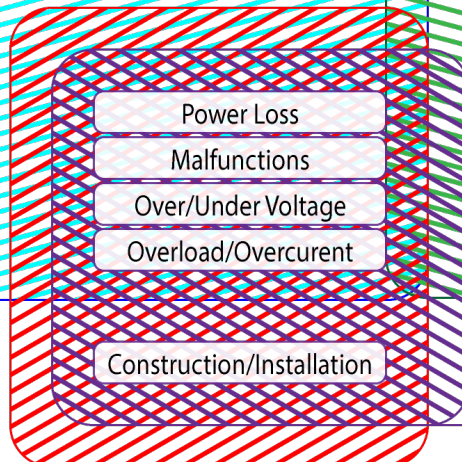
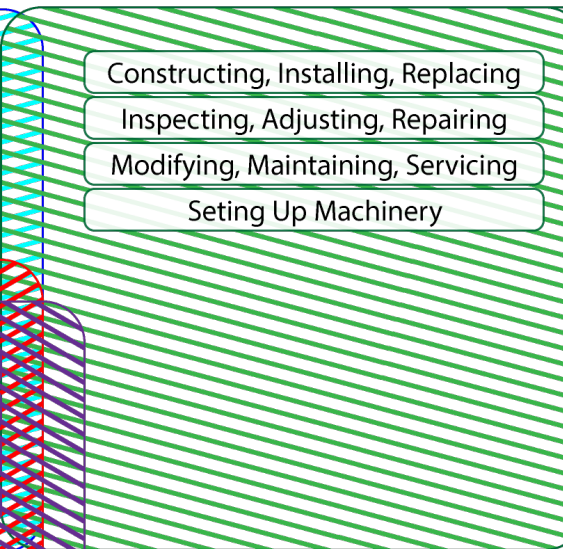
OSHA 29 CFR 1910 Subpart O - Machinery and Machine Guarding
ANSI B11.19 - Performance Criteria for Safeguarding



Hazardous Energy Control

Hazardous Energy Control

OSHA 1910.147 - The control of hazardous energy (lockout/tagout)
ANSI Z244.1 - The Control of Hazardous Energy Lockout, Tagout and Alternative Methods



Electrical & Fire Safety

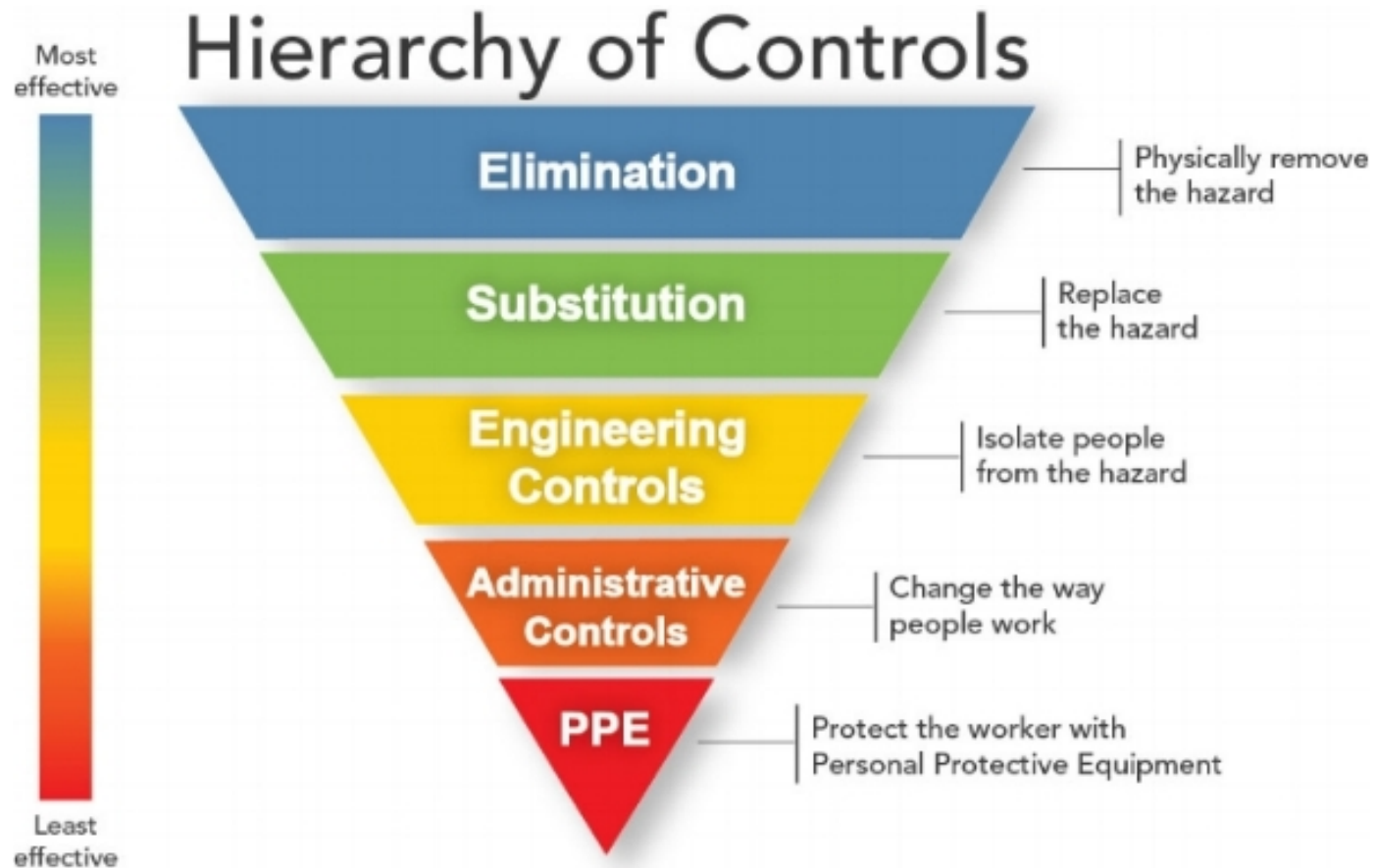
NFPA 70 - National Electric Code
NFPA 79 - Electrical Standard for Industrial Machinery
OSHA 29 CFR 1910 Subpart S - Electrical

Nationally Recognized Test Labs

UL508 - Standard for Industrial Control Equipment
UL 60947 - Low-Voltage Switchgear and Controlgear

INJURY PREVENTION

COMPLIANCE



OSHA 1910.212 - General Requirements for all Machines

OSHA 1910.212(a)(1)

“Types of guarding. One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are-barrier guards, two-hand tripping devices, electronic safety devices, etc.”

1910.212(a)(3)(ii)

*“The point of operation of machines whose operation exposes an employee to injury, shall be guarded. **The guarding device shall be in conformity with any appropriate standards therefor, or, in the absence of applicable specific standards, shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone during the operating cycle.”***

INJURY PREVENTION

COMPLIANCE

- What is the “operating cycle”?
- The Operating Cycle = Normal Operation + Other Conditions Likely to Occur.
- “ ... and other employees ... ”
- Examples include:
 - Before Operation (Setup)
 - After Operation (Cleanup/Shutdown)
 - Jams, Cutoffs, Malfunctions
 - Power Loss (1910.213(b)(3))
 - Emergencies (1910.213(b)(1))
 - Maintenance and Cleaning

*“The guarding device ...shall be so designed and constructed as to prevent the operator from having any part of his body in the danger zone **during the operating cycle.**”*
(1910.212(a)(3)(ii))

*“One or more methods of machine guarding shall be provided to protect the operator **and other employees** in the machine area from hazards ...”*

OSHA 1910.212(a)(1)

INJURY PREVENTION

COMPLIANCE

PRODUCTION

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.

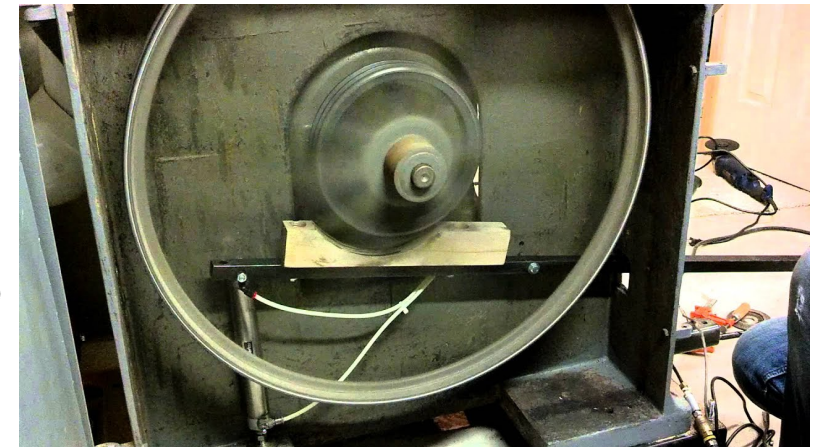
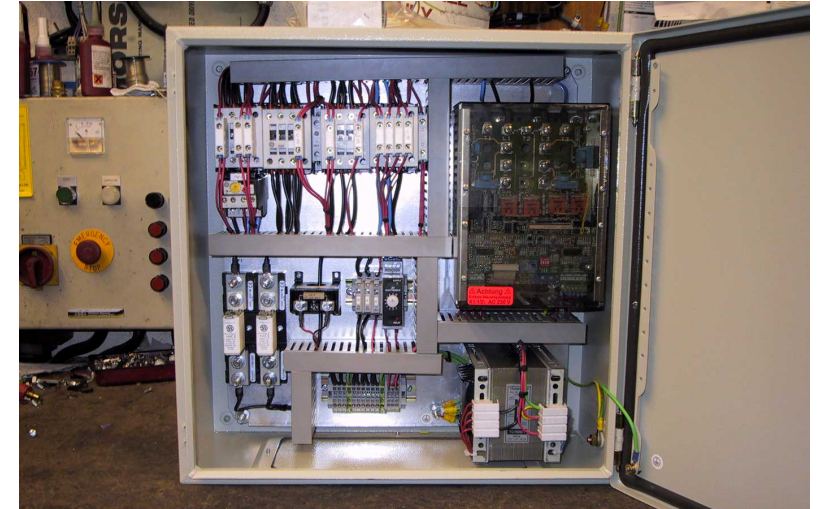
Lock Out Tag Out

- Lots of information online
- Lots of product options



Braking Systems

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



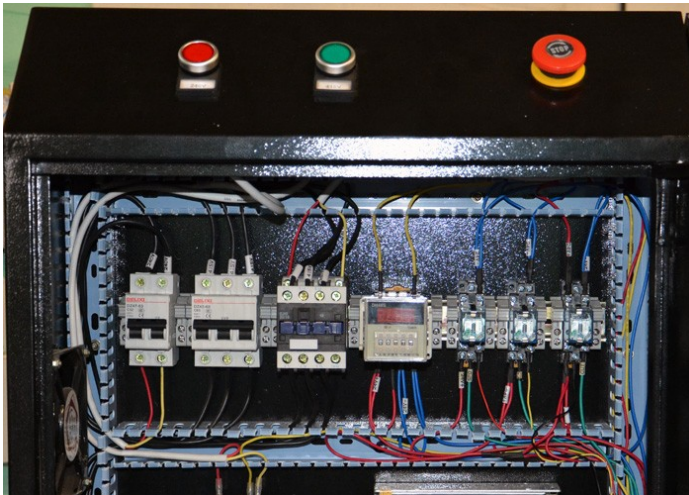
Restart Prevention

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




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.

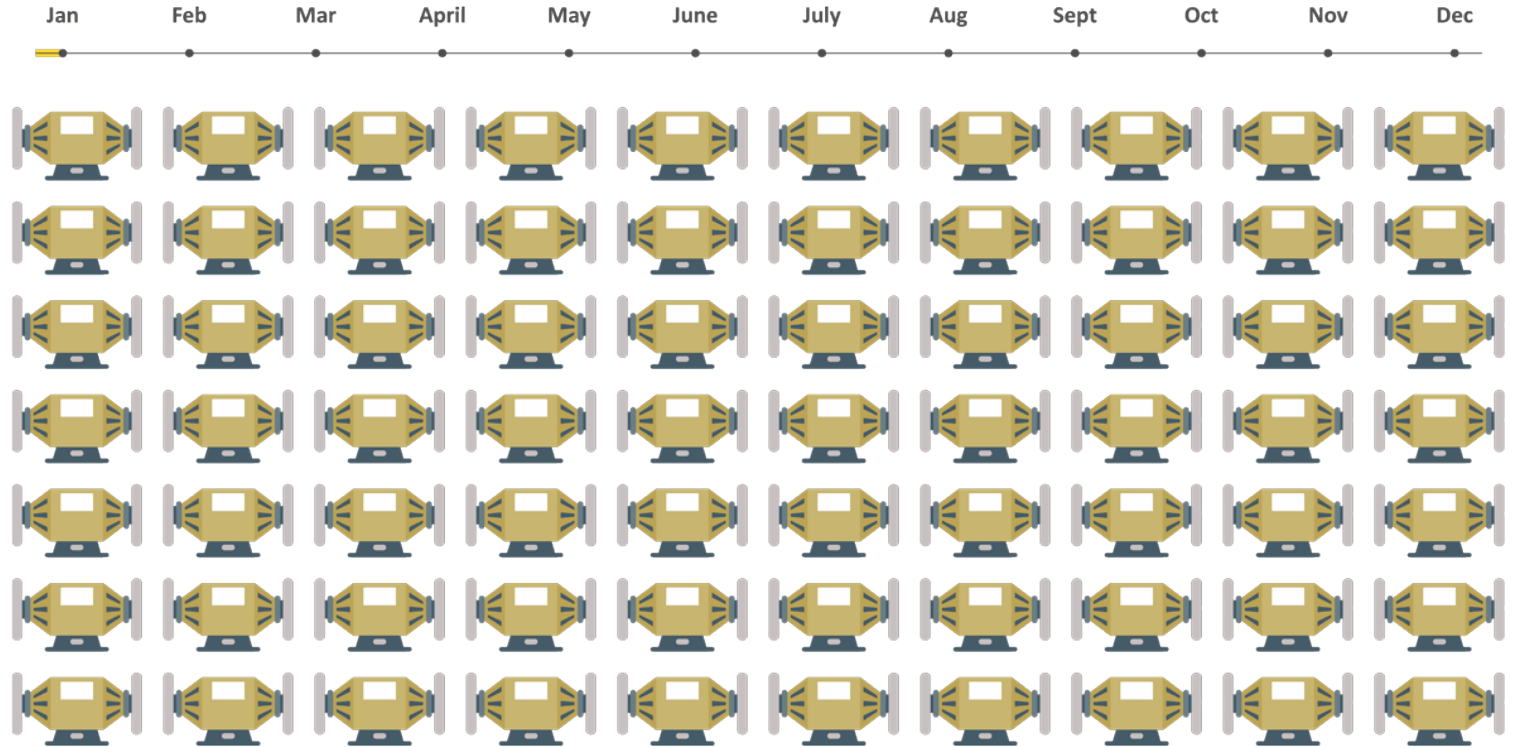
Misleading Products

- 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.



Misleading Products

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Why they fail (Electrically)

The Machine



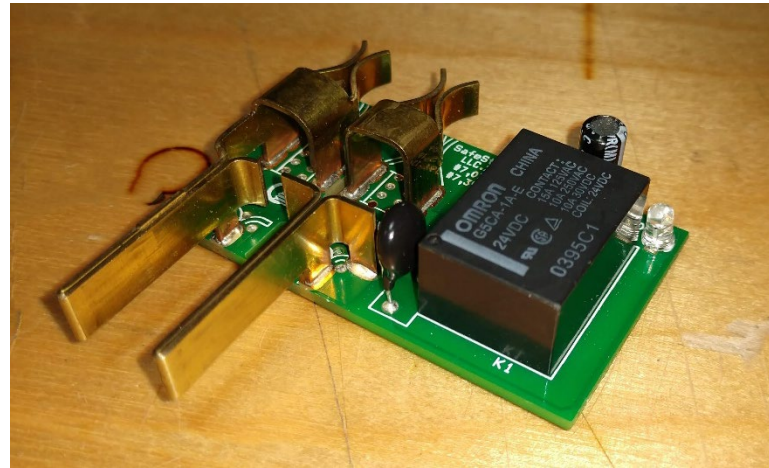
8" Bench Grinder

1HP

120V, 60Hz

8A

The Failed Device

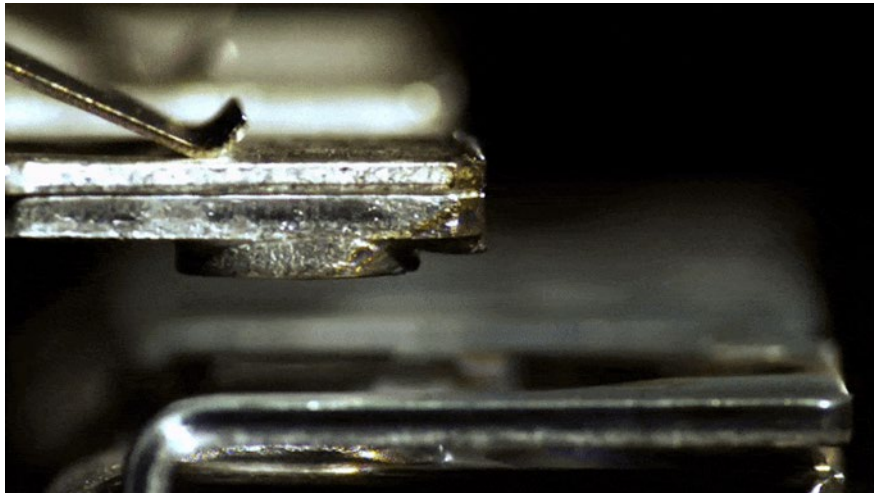


Just One of Many
The product shown here is just one of many anti-restart devices that suffer from the same shortcomings.

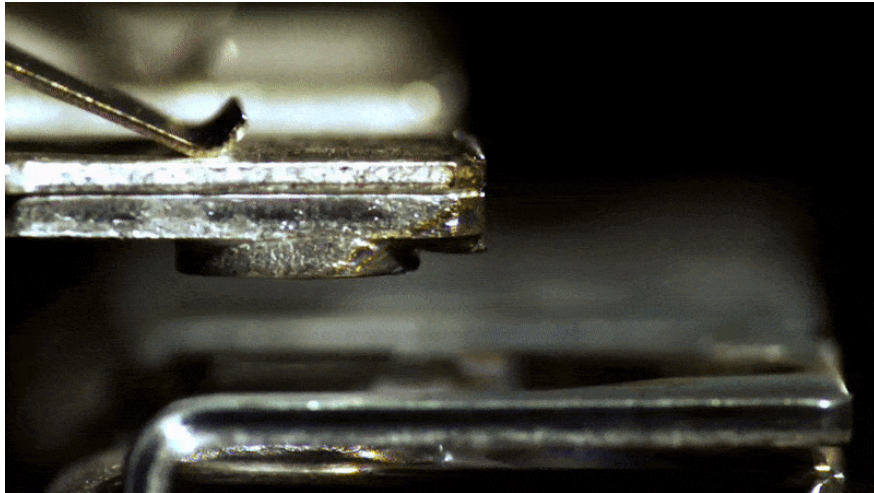
The Relay Inside



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.”



Alternatives

* In some cases, OSHA considers momentary foot switches to meet basic anti-restart and e-stop requirements.

Features & Protection

Magnetic Switches
(anti-restart only)



In-Line Protection Devices
(anti-restart only)



Momentary Foot Switches
(anti-restart & e-stop*)



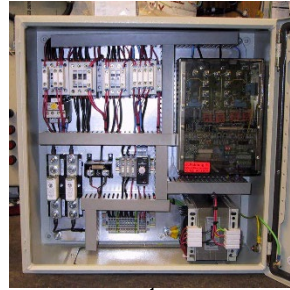
UL508A Control Boxes
(anti-restart + e-stop)



MAKESafe One-Stop
(anti-restart + e-stop + motor braking)



Custom Control Cabinets
(anything you want ...)



\$20

\$40-\$150

\$400-\$1,000

Cost

\$3000+

Bandsaw Demo

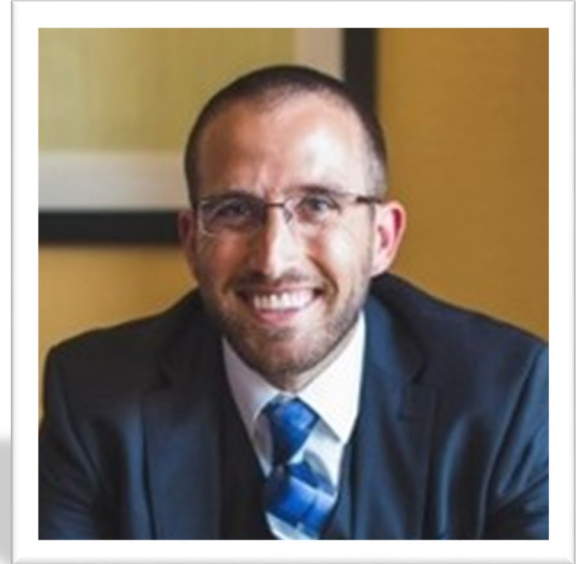


In Summary – Client Resources

- Risk assessments:
 - Simple Version: MAKESafe Tools Risk Assessment Workshop
 - Technical Version: <https://www.ul.com/resources/understanding-importance-machine-risk-assessment>
- Easy-to-install mitigations exist.
 - Practical Implications: MAKESafe Webinar
 - More about NRTLs: <https://www.osha.gov/dts/otpca/nrtl/>
- Make sure to check your mitigation specs
 - Look for HP ratings!
- Go evaluate your machinery!
 - Low hanging fruit!
- Search Terms:
 - “restart prevention”, “category 1 emergency stop”, “make safe tools”, “motor braking”

I'm here to help!

- scott@makesafetools.com
- (415) 937-1808



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