

MNOSHA INSTRUCTION **STD 5-1.7**
December 5, 2006

SUBJECT: Foot-actuated Machines

Purpose: To clarify Minnesota Rules 5205.0870 requiring physical protection of treadles or pedals on foot-actuated machines.

Scope: This Directive applies MNOSHA-wide

Background:

- A. 1910.213(b)(6), 1910.217(b)(4)(i) and (b)(7)(x), 1910.218(b)(2) and 1910.255(b)(6) are vertical standards which require that certain machines be equipped with foot pedal or treadle guards.
- B. ANSI B11.3-2002 at 6.10.2, .3, & .4 requires that power press brakes have a means provided to prevent accidental operation of the equipment. The standard differentiates between the different types of brakes (mechanical, hydraulic, and special purpose) and which types of safeguarding are required for each (i.e., removal of foot pedals, providing locking pins on locking levers, enclosed foot controls, etc.).
- C. Minn. Rules 5205.0870 requires physical protection of treadles or pedals on foot-actuated machines.
- D. Not all foot pedals or treadles initiate a closing action to the point of operation. Some machines such as a tapping drill press use a foot pedal to reverse the motor.
- E. Some machines may have foot pedals or treadles fixed inside the periphery of the machine, therefore are not subject to accidental operation.

ACTION:

- A. Minnesota Rules 5205.0870 shall be cited for protection of foot pedals or treadles on all foot-actuated machines other than those covered by applicable vertical General Industry standards. (See Background A. above)
- B. For **mechanical press brakes**, in addition to point of operation guarding, the employer shall provide **one** of the following types of treadle/pedal guards (copyrighted illustrations of these contained in ANSI B11.3-1983(R1988)):
 - 1. Protective cover over the treadle or foot pedal; **or**
 - 2. Locking pin or locking lever; **or**
 - 3. Remove the foot pedal and place in a safe location.Cite Minn. Rules 5205.0870 for failure to provide this protection.
- C. For **hydraulic and special purpose press brakes**, if the point of operation is safeguarded, then the brake does not need to be equipped with treadle or pedal guards.
- D. When the function of the foot pedal or treadle is other than initiating and closing action to the point of operation, then Minnesota Rules 5205.0870 would not apply unless such action creates a hazard to the operator.

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- E. When a treadle or pedal is fixed inside the periphery of a machine (minimum 6") and is not likely to be accidentally struck or stepped upon due to its location, the employer does not have to provide foot treadle/pedal guarding.

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Distribution: MNOSHA Compliance and WSP Director

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