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## SOME THOUGHTS on SAFETY

We believe there are several critically important points that are often overlooked when managing a safety program in an industrial environment. While not necessarily part of any industry standards or legal requirement, we believe these considerations are key to an effective safety program. We will address the following:

- Motivation
- Simplicity
- Mixed messages
- Process knowledge
- Ownership
- Setting standards

### **Motivation**

The motivation for safety should be the welfare of employees. Regulatory compliance is certainly necessary and important, but it should not be the primary purpose of a safety program. The primary purpose of a safety program is the protection of employees. It is entirely possible to devote so much of the available resources to complying with governmental and internally generated requirements that critical safety issues get ignored. Don't let this happen.

### **Simplicity**

Safety rules and procedures should be simple and intuitive. Complex procedures require thought resulting in increased opportunity for the errors that cause accidents.

### **Mixed messages**

The purpose of all safety rules and procedures needs to be to protect employees. Significant resources should be committed to making the rules and procedures practical and easy to comply with. For example, lock-out rules are simple, necessary, and appear straight forward. A single disconnect switch on the main power source will probably meet code. But, what if a machine has accessories that have been powered from a separate source? Are you prepared to prevent this from happening by better engineering of the power distribution system? Will you update existing systems to make compliance easier? Or, will the expense be considered too great for the "convenience" of the operator? What about the added ongoing training costs and the cost of gaining and maintaining compliance?

Another limitation to a single disconnect switch is that it can require locking out a whole machine to make a minor adjustment. Do you really expect operators to interrupt power to chillers, agitators, and circulating pumps for glues or coatings each time a minor repair is required to any section of the machine? Shutting down and restarting can take considerable time

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and material. Do you dedicate the resources needed to adequately mitigate these problems through better engineering? Will you expect time consuming and inconvenient procedures to be followed without fail? Even when a customer is waiting for a sample to approve so he can catch the last flight of the day? Will your operator take a short cut “just this time” to “help” you satisfy your customer?

There are numerous other examples. Each sends a mixed message about safety and greatly undermines any safety program. Regulatory compliance is essential. If it gets in the way of asking and dealing with tough questions like those posed here, the safety program has gotten in the way of safety. Don't let this happen.

### **Process knowledge**

Properly installing a manufacturing line requires significant knowledge of the manufacturing process. Equipment manufacturers are concerned about meeting safety codes. They are not responsible for insuring ongoing compliance to safe procedures, nor are they necessarily concerned with many of the practical implications of integrating components and accessories from different vendors. Each vendor will look at their own responsibilities, and attempt to minimize their own expenses. It is always the end users responsibility for insuring that there are no gaps in the engineering.

### **Ownership**

Manufacturers must *own* their safety programs. Adherence to safe practices needs to be required for the protection of employees - not because OSHA or any other outside entity requires it. Laws only make you do what you should already be doing. OSHA has few regulations other than to make the employer solely responsible for safety. The best way to insure the spirit of OSHA requirements is met is to carefully examine all potential hazards and eliminate them. If this is done successfully, no one gets hurt, and an OSHA audit is unlikely.

### **Setting standards**

In the USA, setting safety standards for equipment and procedures is the responsibility of the employer. Once an employer has established a standard, it is almost impossible to eliminate or lower it. Employers can be held responsible for insuring compliance to any standard they have set. Make sure any standard that is established meets a need, and you are prepared to insure compliance *before* establishing it. A good standard that meets a serious need can be carried to such a ridiculous extreme that it undermines a safety program.

In short, it is too easy to blame, or put the burden solely on the operator. Say what you mean. Mean what you say. Commit the resources to make what you say practical. If you do this, everyone will have greater respect your safety program. It will probably be effective. Failure in these areas, even if it makes your lawyers happy, can seriously undermine any safety program.

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