

## Document Details

### Comment from Wentzel, Mike; Morgan Ceramics

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This is comment on [Notice: Reports of Injuries to Employees Operating Mechanical Power Presses; Extension of the Office of Management and Budget's \(OMB\) Approval of an Information Collection \(Paperwork\) Requirement](#). ACTION: Request for public comments.

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- OSHA Mechanical Power Press

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I appreciate the opportunity to comment on the requirement to report injuries to employees operating mechanical power presses that is found in 29 CFR 1910.217(g). I oppose the continuation of this information collection requirement.

***The mechanical power press injury reporting requirement is inconsistent with the OSHA injury recordkeeping and reporting requirements found in 29 CFR 1904.***

Section 1904 clearly establishes injury recordkeeping and reporting requirements. Nowhere in section 1904 does it indicate that additional injury reporting requirements are found in the Mechanical Power Press Standard. If OSHA wants to single out mechanical power press injuries for special reporting, then that requirement should be clearly stated in the regulation that relates to injury recording and reporting (i.e., Section 1904). The reporting requirement should not be hidden in the Mechanical Power Press Standard where people are unlikely to identify the requirement and are therefore unlikely to comply.

***The reporting requirement is vague.***

29 CFR 1910.217(g) states that the employer shall report all point-of-operation injuries to operators or other employees. This statement implies that even first-aid injuries (for example, a bump on the knuckle that requires a band-aid) would require reporting. I suggest that the vagueness of this language has likely resulted in significant underreporting over the years. One could interpret this requirement to apply only to injuries that meet OSHA's criteria for recordability but, again, it's very much open to interpretation. If this reporting requirement is allowed to continue, then the degree of injury should be defined.

***Why single out mechanical power press injuries for special reporting.*** Why are injuries from mechanical power presses more important than injuries from other equipment such as band saws, drill presses, hydraulic presses or those which involve lockout/tagout requirements? Again, this reporting requirement is inconsistent with OSHA injury recordkeeping and reporting requirements found in 29 CFR 1904 and doesn't make sense.

***OSHA's estimate of the time required to submit this report is not accurate.***

It has been my experience in over 30 years that whenever a report of this nature is submitted, it has invariably resulted in an OSHA inspection. In every case, the inspector was compelled to issue an NOV and a fine. Since submission of a report **will** result in an inspection, the time and cost involved in follow-up (informal hearing, the inspection process itself and, in some cases, the use of legal counsel) should be factored in to the estimate of time.

Before extending approval for continuation of this reporting requirement, I challenge OSHA and OMB to answer a simple question: What purpose is served by this information collection activity? Does anyone actually use these injury reports for any useful purpose?

Thank you for this opportunity to provide these comments. Please consider my comments and please do not approve continuation of this information collection activity unless it does in fact serve an identifiable useful purpose.

If OSHA does decide to continue this reporting requirement, please include a reference to this requirement in 29 CFR 1904. Please note that the injury/illness recording and reporting

requirements in 29 CFR 1904 are currently under review (with a current proposed revision). If reporting of mechanical power press injuries is in fact necessary, OSHA should take the opportunity to state that requirement in the proper section of the regulations.