


Thomas Kenaga  
 OSHA Compliance  
 Safety & Health  
 Officer

Madison Area  
 OSHA Office  
 Interesting Case

2023 WSC Annual  
 Conference



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**BACKGROUND**

- Compliance Officer with Madison OSHA 2.5 years
  - Safety CSHO
- B.S. Occupational Safety
  - U.W. Whitewater 2020

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**CASE BACKGROUND**

- Madison Area Office received report of amputation
  - Food manufacturing facility
  - Indicated that employee was clearing food material from mixer towards end of shift
- Inspection initiated under National Emphasis Program on Amputations in Manufacturing Industries.
- 2022: Local Emphasis Program for Food Manufacturing Industry



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CASE BACKGROUND CONT.

- Employees added oil and salt to mixture at end of production run
- Then run mixer to loosen materials
- S.O.P. indicated to "push" remaining mixture out
- Employee partially opened interlocked door on top
  - Pushed remaining mixture out with left hand
  - Could reach into bottom of mixer with door partially opened
  - Easily bypassed guard
- Fingertip of left thumb was amputated

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CONCERNS

- Written lockout/tagout procedure for mixer machine
- Employee had received training on application of lockout/tagout
- Interlock (unknown classification) had been replaced/altered following injury
- Guard was easily bypassed so that mixer would continue operating
  - Could fit hand/forearm through door opening with mixer operating
- **Machine guarding or lockout?**

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FINDINGS & VIOLATION

- Lockout/tagout covered activity
- Not a part of normal production operation
- Guarding was not alternative effective protection
- **29 CFR 1910.147(c)(4)(i)**
- Procedures were not developed, documented and **utilized** for the control of potentially hazardous energy

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ABATEMENT SOLUTIONS

- Lockout/tagout when reaching inside mixer OR
- Installation of new guarding & interlock on door
- Provides alternative effective protection = task can be considered minor servicing activity under 1910.147(a)(2)(ii)(B)

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QUESTIONS?

- Madison office: (608) 733-2822

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