

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



Mr. Stephen Wilson
Flowsolve
Corporate Director of Safety,
Health and Environmental Affairs
P.O. Box 8820
Dayton, Oh 45401

Dear Mr. Wilson:

This is in response to your letter of October 16, 1998, in regard to the Occupational Safety and Health Administration's (OSHA's) standard, 29 CFR 1910.219 as it relates to plastic shaft guarding and your company's new non-metallic coupling guard.

We have reviewed your letter and attachments. As you may be aware, OSHA does not approve, endorse or promote any products or test results.

As your letter acknowledges, OSHA has taken the position that guards constructed of any substantial material may be an acceptable alternative to the metal construction required by the standard at 29 CFR 1910.219(m). Until such time as the standard is modified, we are not in a position to deviate from that interpretation, and OSHA will continue to regard the use of suitable materials other than metal as a de minimis violation but will not be cited.

In this regard, we would like to suggest that you contact the American National Safety Institute (ANSI) and submit your test data for evaluation and review by a third party; to be considered in the future for the purpose of modifying OSHA's standard.

Thank you for your inquiry. If you have questions regarding the preceding, please contact Alcmena Haloftis of my staff at 202-693-1850.

Sincerely,

Richard E. Fairfax, Director
Directorate of Compliance Programs