

Ameritube LLC
1000 N. Hwy 77, Hillsboro TX 76645

Revision Level:
A

Procedure No.
SM-103

Revision Date:
09/16/2023

Page No. 1 of 5

**Comprehensive Safety Plan For Metal
Tube Manufacturing Based on OSHA 29
CFR 1910**

<i>Date</i>	<i>Description Of Change</i>	<i>Signature</i>	<i>Rev. Level</i>
07/15/2013	Initial Release	Parth Siddhpura	
09/16/2023	Revised to Add Maria Muniz as Production Manager	Gary Ravitsky	A

Procedure Approval:

Company Title:
Quality Manager

Date:
08/15/2017

Ameritube LLC 1000 N. Hwy 77, Hillsboro TX 76645	Revision Level: A	Procedure No. SM-103
	Revision Date: 09/16/2023	Page No. 2 of 5
Comprehensive Safety Plan For Metal Tube Manufacturing Based on OSHA 29 CFR 1910		

Comprehensive Safety Procedure For Metal Tube Manufacturing Based on OSHA 29 CFR 1910 – General Industry Standards

1. Purpose To establish a comprehensive safety program specific to the manufacturing of metal tubing, in compliance with OSHA 29 CFR 1910, and to ensure the health and safety of employees through proactive hazard identification, prevention, and control.

2. Scope This safety manual applies to all operations, employees, contractors, and visitors involved in the production, maintenance, storage, and shipment of metal tubes.

3. Responsibilities

3.1 Employer Responsibilities

- Provide a workplace free from recognized hazards.
- Conduct hazard assessments and implement controls.
- Provide and maintain appropriate PPE.
- Deliver safety training and maintain compliance with OSHA standards.
- Keep accurate injury and illness records.

3.2 Employee Responsibilities

- Follow all safety policies and procedures.
- Use PPE and report unsafe conditions immediately.
- Participate in safety training and drills.
- Maintain clean and safe work areas.

4. Hazard Identification & Control

4.1 Hazard Communication (1910.1200)

- Maintain updated SDS for all chemicals (coolants, lubricants, cleaning agents).
- Properly label all containers.
- Provide employee training on chemical hazards.

4.2 Physical Hazards

- Guard pinch points on roll mills and draw benches (1910.212).
- Use fall protection near elevated platforms (1910 Subpart D).
- Inspect and maintain hoists and cranes (1910.179).
- Enclose or shield radiant heat sources during annealing processes.

4.3 Health Hazards

- Monitor noise levels; provide hearing protection where necessary (1910.95).

Ameritube LLC 1000 N. Hwy 77, Hillsboro TX 76645	Revision Level: A	Procedure No. SM-103
	Revision Date: 09/16/2023	Page No. 3 of 5
Comprehensive Safety Plan For Metal Tube Manufacturing Based on OSHA 29 CFR 1910		

- Implement a respiratory protection program if dust or fume levels exceed limits (1910.134).
- Follow OSHA PELs for metalworking fluids and airborne contaminants.

4.4 Fire Safety (1910 Subpart L)

- Maintain fire extinguishers near furnaces, cutting, and welding areas.
- Prohibit open flames near flammable substances.
- Ensure all employees know evacuation routes.

5. Personal Protective Equipment (1910 Subpart I)

5.1 Required PPE

- Safety glasses with side shields.
- Cut-resistant gloves for handling sharp tubing.
- Steel-toed boots.
- Hearing protection in production areas.
- Flame-resistant clothing near furnaces.

5.2 Training and Maintenance

- Train employees on PPE use and limitations.
- Replace damaged PPE promptly.
- Maintain documentation of training.

6. Lockout/Tagout – Control of Hazardous Energy (1910.147)

- Apply LOTO procedures during maintenance of draw benches, annealing lines, and hydraulic systems.
- Only trained and authorized personnel may perform LOTO.
- Perform annual audits of LOTO program.

7. Emergency Action Plan (1910.38)

- Post evacuation maps throughout the facility.
- Assign evacuation coordinators.
- Conduct annual drills and document outcomes.
- Provide fire extinguisher and first aid training.

8. Machine Guarding (1910.212–219)

- Guard all rotating shafts, belts, chains, and gears on equipment such as tube mills and swagers.

Ameritube LLC 1000 N. Hwy 77, Hillsboro TX 76645	Revision Level: A	Procedure No. SM-103
	Revision Date: 09/16/2023	Page No. 4 of 5
Comprehensive Safety Plan For Metal Tube Manufacturing Based on OSHA 29 CFR 1910		

- Perform routine inspections to ensure guards are in place.

9. Walking-Working Surfaces (1910 Subpart D)

- Maintain clean floors free of oil and metal shavings.
- Mark and repair damaged floor grates and ramps.
- Use non-slip surfaces where liquids are used.

10. Electrical Safety (1910 Subpart S)

- Label all disconnects and circuits.
- Only licensed electricians may service panels or control systems.
- Inspect extension cords and GFCI devices.

11. Confined Spaces (1910.146)

- Identify and label all permit-required confined spaces (e.g., large tanks).
- Train entry teams and provide monitoring and rescue plans.

12. Forklift and Powered Industrial Trucks (1910.178)

- Train operators and certify them every 3 years.
- Perform and document pre-shift inspections.
- Maintain safe speeds and aisle clearances.

13. Housekeeping and Sanitation (1910.22, 1910.141)

- Dispose of scrap tubing, swarf, and rags in designated containers.
- Clean restrooms and break areas daily.
- Provide hand-washing facilities.

14. Incident Reporting and Investigation

- Report all injuries and near misses immediately.
- Conduct root cause analysis.
- Implement corrective actions.

15. Safety Training and Communication

- Conduct orientation and job-specific training.
- Hold monthly toolbox talks.
- Document all training events.

Ameritube LLC
1000 N. Hwy 77, Hillsboro TX 76645

Revision Level:
A

Procedure No.
SM-103

Revision Date:
09/16/2023

Page No. 5 of 5

**Comprehensive Safety Plan For Metal
Tube Manufacturing Based on OSHA 29
CFR 1910**

16. Contractor Safety

- **Require contractors to comply with company safety procedures.**
- **Monitor work areas for compliance.**

17. Recordkeeping and OSHA Compliance

- **Maintain OSHA 300 logs.**
- **Report fatalities within 8 hours and serious injuries within 24 hours.**
- **Conduct annual safety program review.**

Appendices

- **A: Hazard Assessment Checklist**
- **B: LOTO Procedure Template**
- **C: Confined Space Entry Permit**
- **D: PPE Training Log**
- **E: Machine Guarding Audit Form**

Prepared By: Gary Ravitsky

Effective Date: 01/12/2024

Review Date: 12/20/2025