SUBJECT: Explosive Actuated Fastening Tools

A. PURPOSE. This directive (based on OSHA Instruction STD 1-13.2A) provides specific interpretation as to when magazine-fed, explosive power operated hand tools are loaded.

B. SCOPE. This instruction applies VOSH-wide and specifically to those personnel assigned to occupational safety and construction safety.

C. ACTION. The Assistant Commissioner and the Enforcement Directors and Supervisors shall ensure that when magazine-fed tools covered by these standards are inspected, the tool is not considered loaded until the operator’s instructions shall provide for removing the magazine when the tool is left unattended.

D. APPLICATION. For the General Industry, Construction and Maritime industries, the following standards shall apply:

- Construction, 1926.302(e)(5) and (6).
- Maritime, 1915.135(c)(3).

E. EXPLANATION. In developing and promulgating the standards, the magazine or clip-fed explosive power load was not considered. The magazine contains several explosive power loads and single loads are fed into the ram (firing chamber) as needed. Until such time as single loads are fed into the ram, explosive power loads are not a part of the firing cycle. A separate operation on the part of the operator has to be made to place the load into the firing position.

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