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# DEPARTMENT OF BUSINESS AND INDUSTRY DIVISION OF INDUSTRIAL RELATIONS OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION

Date: November 19, 2025
To: Nevada Businesses

Re: Guidance for Nevadan Business related to an Update to the National Emphasis Program

on Amputations in Manufacturing Industries

On June 27, 2025, an update to Federal OSHA's <u>National Emphasis Program (NEP) on Amputations in Manufacturing Industries (CPL 03-00-027)</u> went into effect. Employees operating machinery or equipment are exposed to amputation hazards when machinery or equipment is not properly guarded or safely maintained, or when hazardous energy is not controlled. Injuries involving machinery or equipment often result in death or permanent disability. Implementation of this NEP aims to identify and reduce or eliminate amputations hazards in manufacturing industries, by placing emphasis on enforcement of industrial and manufacturing workplaces having machinery and equipment that can potentially cause amputations.

Significant changes to this OSHA Instruction include the following:

- Establishments that have had inspections initiated under this NEP in the previous 24 months, with no reported amputations within those 24 months, may be deleted from the programmed inspection list.
- Unprogrammed inspections may be expanded to an Amputations NEP inspection only if the NAICS code is listed in Nevada OSHA's Programmed Inspection Plan (PIP).
- Any establishment having 10 or fewer employees and has their primary NAICS code listed on the "Low-Hazard Industry Table" of the Appropriations Act Directive should not be inspected under this NEP.
- Revisions to the industry targeting methodology in Appendix A Amputations Targeting Methodology.
- Updates to Appendix B, related to the NAICS codes covered under the NEP.

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On November 18, 2025, Nevada OSHA adopted the NEP in a modified form to reflect Nevada specific injury and illness data. This instruction supersedes Nevada OSHA's previous adoption of Federal OSHA's National Emphasis Program on Amputations in Manufacturing Industries (CPL 03-00-022), which Nevada OSHA adopted on February 24, 2020. This instruction will terminate five years from the effective date.

Currently, <u>Nevada OSHA's Programmed Inspection Plan</u> (PIP), focuses its programmed inspections on the following manufacturing industries:

- Food Manufacturing NAICS 311XXX
- Wood Manufacturing NAICS 321XXX
- Plastics and Rubber Products Manufacturing NAICS 326XXX
- Nonmetallic Mineral Product Manufacturing NAICS 327XXX

As part of this NEP, Nevada OSHA's PIP will now include the following industries:

- Primary Metal Manufacturing NAICS 331XXX
- Machinery Manufacturing NAICS 333XXX
- Electrical Equipment, Appliance, and Component Manufacturing NAICS 335XXX
- Transportation Equipment Manufacturing NAICS 336XXX
- Furniture and Related Product Manufacturing NAICS 337XXX

Fabricated Metal Product Manufacturing (NAICS 332XXX) will not be included in Nevada OSHA's PIP as the state-specific 3-year average DART rate is 2.1, which does not meet or exceed the trigger of 2.5, which warrants possible industry programmed inspection focus, per Nevada OSHA's PIP.

While the update to the OSHA Instruction includes revisions to the industry targeting methodology in Appendix A, to identify high-risk industries for targeting under this NEP, Nevada OSHA will continue to employ its own policies and procedures through its PIP with respect to the identifying high-risk industries and selecting establishments within those industries warranting programmed inspections.

The following is a list which includes, but is not limited to, the standards applicable to work performed in manufacturing. Employers are responsible for reading the full standards and maintaining compliance:

#### **Hazard Communication**

➤ 29 CFR 1910.1200 - Hazard Communication: Employers must have a written hazard communication program, maintain Safety Data Sheets (SDS), and train employees on chemical hazards.

## **Personal Protective Equipment**

- ➤ 29 CFR 1910.312 Workplace Hazard Assessment: Employers shall assess their workplace(s) to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall elect, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment; communicate selection decisions to each affected employee; and select PPE that properly fits each affected employee.
- ➤ 29 CFR 1910.133 Eye and Face Protection: The employer shall ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
- 29 CFR 1910.134 Respiratory Protection: In the control of those occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors, the primary objective shall be to prevent atmospheric contamination. This shall be accomplished as far as feasible by accepted engineering control measures. When effective engineering controls are not feasible, or while they are being instituted, appropriate respirators shall be used.

Respirators shall be provided to each employee when such equipment is necessary to protect the health of such employee. The employer shall provide respirators which are applicable and suitable for the purpose intended. The employer shall be responsible for the establishment and maintenance of a respiratory protection program, which shall include all applicable requirements. The program shall cover each employee required by this section to use a respirator.

- ➤ 29 CFR 1910.133 Eye and Face Protection: The employer shall ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
- ➤ 29 CFR 1910.95 Hearing Protection: The employer shall ensure the monitoring of noise exposure and provide hearing protection/training if levels exceed action thresholds.

## **Machine Guarding**

➤ 29 CFR 1910 Subpart O – Machinery and Machine Guarding: Employers shall ensure machines are guarded to protect workers from hazards like rotating parts, nip points, flying chips, and sparks.

## Lockout/Tagout

> 29 CFR 1910.147 – The Control of Hazardous Energy (Lockout/Tagout): Employers shall ensure control of hazardous energy during servicing and maintenance of machines.

## Welding, Cutting, and Brazing

➤ 29 CFR 1910 Subpart Q: Employers shall ensure control of hazardous energy during servicing and maintenance of machines. Employers shall ensure the prevention of fires, in addition to providing proper ventilation, and protective equipment when performing welding, cutting, and/or brazing.

## **Compressed Gasses**

**29 CFR 1910.101:** Employers shall ensure the safe storage, handling, and use of compressed gases (e.g., oxygen, acetylene, nitrogen, carbon dioxide).

#### Flammable and Combustible Liquids

**29 CFR 1910.106:** Employers shall ensure the safe storage, and dispensing of flammable/combustible liquids such as solvents, fuels, and paints.

#### **Powered Industrial Trucks**

➤ 29 CFR 1910.178: Employers shall ensure that powered industrial truck operators are trained and certified prior to use, as well as daily inspections being conducted, and that trucks are maintained safely, and operations are conducted according to manufacturer specifications.

## **How to File a Complaint**

Employees who feel they have been exposed to a hazardous condition in the workplace, have the right to raise their concerns with their employer or to file a complaint with Nevada OSHA. Such a complaint may trigger an inspection of the workplace. An employee who raises concerns with their employer or files an OSHA complaint is protected against retaliation or discrimination for having done so by NRS 618.445 and section 11(c) of the federal Occupational Safety and Health Act, Pub. L. 91-596, 84 Stat. 1590. If an employee files a complaint with Nevada OSHA, their name and contact information will be held as confidential information pursuant to NRS 618.341(3)(a).

To file a complaint, please visit <a href="https://www.osha.gov/workers/file-complaint">https://www.osha.gov/workers/file-complaint</a> or call Nevada OSHA at (702) 486-9020 (southern Nevada) or (775) 688-3700 (northern Nevada).

## Assistance Available from Nevada Safety Consultation and Training Section (SCATS)

SCATS is here to help. SCATS is focused on keeping Nevadans safe and healthy while on the job. SCATS offers resources for employers and employees alike, from training to consultation to safety program review. If your business has questions or needs onsite training or consultation, please submit a request by calling 877-472-3368 or submitting a consultation request at <a href="https://www.4safenv.state.nv.us/contact/">https://www.4safenv.state.nv.us/contact/</a>.

## References:

- National Emphasis Program on Amputations in Manufacturing Industries
- Nevada OSHA Programmed Inspection Plan (PIP)
- 29 CFR 1910 Occupational Safety and Health Standards in General Industry