



Lockout/Tagout Procedures and Compliance

The Occupational Safety and Health Administration (OSHA) issued its lockout/tagout standard in 1990 to prevent accidents and injuries that may result from accidental machine start-up or the unexpected release of stored energy when maintenance or servicing is performed on machinery or equipment. One of the requirements of the standard (1910.147) is to develop written machine/equipment specific energy control procedures (additional elements include an employee training and inspection requirement for written procedures). The written procedures must clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy. The procedures must include the following:

- The intended use of the procedure.
- Procedural steps for shutting down, isolating, blocking and securing machines or equipment.
- Procedural steps for the placement, removal and transfer of lockout/tagout devices.
- Requirements for testing a machine or equipment to verify the control of energy.

A written procedure is required when any one of the following exists:

- The machine or equipment has the potential for stored or residual energy or re-accumulation of stored energy after shut down;
- The machine or equipment has more than one energy source (e.g. boilers, air conditioning equipment, and water pumps);
- The isolation and locking out of that energy source will not de-energize and deactivate the machine or equipment;
- More than one lockout device is required to achieve a lock-out condition;
- The lockout device is not under the exclusive control of the authorized employee performing the servicing or maintenance;
- The servicing or maintenance creates hazards for other employees.

The requirements of the standard represents quite a challenge to employers, given that there may be many of pieces of equipment/machinery with multiple energy sources. Furthermore, the type of energy sources and lockout requirements may be similar for different pieces of machinery/equipment.

In response to questions from employers and industry trade groups, OSHA officials issued an interpretation in September 1995 addressing the provisions related to energy control procedures. The interpretation indicated that a comprehensive (generic) energy control procedure with supplemental checklists may be used to address the steps necessary to perform servicing and maintenance activities with similar types of machinery/equipment. In order to qualify as one procedure, the checklists must support the generic procedures by having the same intended uses for different machines or equipment and the elements contained in the list above. For example, you could have one procedure for five injection molding machines, noting the different air valves and electrical disconnect for each individual machine.

The procedures should be used as both an operational and training tool. OSHA compliance inspectors have given high priority to the three primary elements of the lockout/tagout standard: written procedures, inspection/audits of procedures and training. Each written procedure must be inspected annually. The inspection must document the equipment, the person using the procedure and the person conducting the inspection. Two primary levels of training are required, Authorized and Affected employee training. Authorized employees are those who conduct lockout on equipment for the purpose of maintenance or repair. Affected employees are those employees who operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

If you need assistance developing Lockout/Tagout energy control procedures, please call your account manager today.

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