Worker Safety

OSHA-Compliant Lockout/Tagout Procedures: Why the Rules for Hazardous Energy Are Worth Reviewing

Roland Jones | Aug 06, 2020

With manufacturing processes and work schedules disrupted by the coronavirus pandemic, be sure you are reiterating the importance of lockout/tagout (LOTO) procedures required by OSHA. Here's what you need to know.

As manufacturers deal with the ongoing COVID-19 pandemic and facilities operate with fewer workers but comparable—if not increased—responsibilities, it's a challenge to make sure worker safety remains a top priority.

Aside from protecting workers against the coronavirus, one of the most important safety challenges in a factory is maintaining the facility's ***lockout/tagout*** procedures, which are critical to keeping workers safe by making sure they don't turn on machines that are being serviced, or when maintenance is being performed.

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> John Robinson
> Brady Corporation's Safety Services Business

The lockout/tagout standard, ***29 CFR 1910.147***, addresses "the safety of employees engaged in servicing and maintenance activities in general industry workplaces," the Occupational Safety and Health Administration notes. The standard is a complement to the requirements for machine and process operator safety found in the various general industry standards in 29 CFR Part 1910.

Lockout/tagout violations remain "a focus of OSHA" and have featured in ***the top 10 list of most-cited violations*** for the last decade, says John Robinson, lockout/tagout solutions owner for Brady Corporation's Safety Services Business.

For facilities with reduced production, now is a great time to verify their procedures for accuracy and further improve their lockout programs, he notes. Serious injuries may be avoided with the proper training, and when companies create a workplace culture that makes safety a top priority.

Developing a Lockout/Tagout Program

Lockout procedures are required for all machinery that has multiple energy sources within a facility. The procedures must be developed, documented and utilized for each piece of equipment on-site. Some equipment may be exempt—such as equipment that has a single energy source, like devices powered only by a plug and cord, for example—if it meets OSHA's exceptions (see ***1910.147(c)(4)(i)*** for those exceptions).

An equipment inventory should be conducted to ensure a lockout procedure has been developed for each machine that requires it, Robinson says. The development of those procedures will require some data collection, he adds, which can be achieved by performing an ***energy trace and barrier analysis*** (ETBA) for all hazardous energy sources that are associated with the machine.

Each machine should have a specific procedure, he says, because even if you have 10 exhaust fans that are the same model and from the same manufacturer, they will have different isolation points that need to be identified in the lockout procedure.

Read more: Fall Protection No. 1, as 2019's Top 10 OSHA Violations See 15% Drop

Once developed, these procedures should be verified by an authorized employee. That person can testify to the accuracy of the assessment and include periodic inspections of the equipment to ensure that the procedures are accurate and that the company's employees can perform the lockout process.

Organizations have a lockout program document and as many sets of work instructions as they need, depending on the number of systems that require a lockout.

"We have designed the front page of the lockout procedure to be the machine specifics and the back page is the lockout process," Robinson notes. That means the authorized employees can reference the back page to perform the required steps each time.

In the end, proper lockout/tagout processes, devices and adequate training are required to ensure workers are safe from harm.

Read more: 6 Key Elements to a Successful Lockout/Tagout Program

How Lockout/Tagout Procedures May Change in the Future

Last summer, OSHA ***issued a request for information*** regarding a possible update to its 30-year-old LOTO rules. Industry trade groups have since weighed in on the request, which dealt with the use of control circuit-type devices to isolate energy, as well as evolving technology for robotics.

The current LOTO standard requires that all sources of energy that are related to a machine must be controlled during its maintenance by way of an energy-isolating device, or EID, but circuit-type devices are excluded from OSHA's definition. Now OSHA is indicating that advancements in technology may mean modern circuit-type devices are as safe as EIDs.

OSHA's request for information is also addressing the possible need for changes to how it controls hazardous energy for new robotics technologies, recognizing the growing use of robots and other automated devices in workplaces.

If the changes are made, they could have a significant impact on the industrial manufacturing sector, making LOTO standards easier to manage, increasing efficiency and flexibility and decreasing machine downtime.

At present, there is no word on any changes, Robinson says. The American National Standards Institute

(ANSI) updated its energy control rules in 2016 and may provide another update in 2021, he adds.

Getting Smart About Lockout/Tagout

An uncontrolled energy hazard can have devastating consequences for workers. In some cases, injuries can result in amputations or death.

If a fatality or an amputation occurs, the employer must notify OSHA within 24 hours (for amputees) or eight hours (for a fatality). This will most likely lead to an OSHA on-site investigation where an OSHA compliance safety and health officer, or CSHO, will likely easily spot noncompliance, Robinson says.

Companies often struggle to meet the requirements of the 1910.147 standards because employers do not revise procedures after changes have occurred, or because they are not completing periodic inspections to verify the accuracy of their procedure and the ability of authorized employees to perform the lockout process, Robinson says.

New LOTO technologies may help them. For its part, Brady has developed new lockout devices for pipe flanges, powered industrial truck electrical connections and battery terminals. And Brady's ***Smart Lockout*** is a single-purpose mobile app that guides customers through the lockout verification process.

Do you need assistance with your LOTO program? If you do, MSC has team of experts who can help you. Reach out today for help developing safe LOTO procedures.

What steps are you taking to improve your uncontrolled hazardous energy program?

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