



Regulatory Compliance

## 7 Steps Safety Experts Recommend to Improve LOTO Procedures

Vanessa Jo Roberts | Oct 10, 2019

Lockout/tagout continues to be a safety challenge in manufacturing. We talk to two experts from Brady Safety Services to share tips on how businesses can better tackle No. 4 on the OSHA top 10 violations list.

“Have a thorough plan, and execute it.” That’s the bottom line on lockout/tagout, says John Robinson, safety services consultant for lockout tagout and confined spaces at *Brady Corp.*

Sounds easy enough, right? Yet when it comes to complying with lockout/tagout regulations—*OSHA 1910.147* and *ANSI Z244.1*—and protecting workers from sudden or unexpected hazardous energy releases, it often proves to be anything but, Robinson says.

“It’s going to take an administrative approach, complemented by buy-in from the authorized employees,” he says.

Lockout/tagout continues to challenge metalworking and manufacturing shops. In fact, lockout/tagout violations moved up from No. 5 to No. 4 this fall on the *Occupational Safety and Health Administration top 10 list*.

We talked with Robinson and Ben Starke, a product manager for Brady Safety Services, to get pointers learned from helping hundreds of businesses with lockout/tagout audits and solutions.

### Common Lockout/Tagout Challenges and Issues

Common lockout/tagout challenges can be avoided by having a detailed and site-specific written program that outlines roles and responsibilities for all employees within the organization, Robinson says.

“Many of our clients may have a lockout station and only hire qualified mechanics, but depending on training, experience and previous employment, lockout/tagout implementation will vary by employee,” he says.

The most common issues that challenge businesses are the lack of: machine-specific lockout/tagout

procedures, written programs or policies, and documentation of periodic inspections.

That makes it “easy to identify noncompliance, but hard to meet compliance with the procedures, inspections and devices.” When OSHA inspectors show up at your plant, the agency will want to see a written program and all required documentation, which includes training records, lockout/tagout procedures and periodic inspection reports.

“Without a written program, you have nothing to share with customers or contractors,” Robinson says. “You’re immediately out of compliance.”

So what are the tactics your safety team can undertake to have a plan ready and to execute on it? Here are Robinson and Starke’s seven must-do recommendations:

### **LOTO Step No. 1: Create a Written Plan**

Every business, no matter its size, needs to develop a *written* program that is site-specific. The details are important and will vary for every facility, which is why having the written program as a reference point is so important, Starke says.

“The written program is going to drive the effectiveness of all of your lockout/tagout activities,” he says. “It’s the road map.”

It should include all applicable forms so that it can be used for all employees and contractors.

### **LOTO Step No. 2: Inventory All Equipment That Has Two or More Energy Sources**

Identifying and knowing the equipment that can put a worker in harm’s way is critical. As part of creating an inventory of potentially hazardous equipment, the safety team should assess each isolation point to see whether it can take a lock or needs a specific lockout device, such as a circuit breaker device or a ball valve device.

Robinson suggests grouping equipment by type and then also creating groups of the affected and authorized people who will use and maintain equipment. And that includes internal and contract employees, he says.



*If you need to add lockout/tagout kits around your facility or update existing devices or tags, here’s a selector to help you compare products.*

### **LOTO Step No. 3: Make Access to Lockout Devices a No-Brainer**

Place lockout devices in kits by department so all your authorized employees can easily access them, Robinson says.

This tip might seem obvious, but it’s critical if you want to make sure employees use the devices. If they’re not nearby where work must be done, the chances increase that your employees won’t use them.

Also, it’s a good time to note that you don’t want to identify everyone in your shop as an authorized employee.

“If you make every employee you have an authorized employee, it’s like trailing kittens,” Starke says.

“You have more people than you can manage.”

Only employees who perform equipment maintenance should be *authorized*, he says. Users or operators are the *affected* employees. Even given these distinctions, everyone in a facility should be trained in safe lockout/tagout practices, Starke adds.

***New to lockout/tagout? Find out the difference between an affected versus an authorized employee.***

## **LOTO Step No. 4: Reduce Key Overload on Authorized Employees**

As more automated equipment comes to shop floors, it increases the likelihood that employees are locking out multiple machines, Robinson says.

“You want to avoid multiple locks and multiple keys,” he says.

Instead, assign personal locks that are all keyed alike to each individual maintenance employee. That way, even if someone is responsible for as many as 10 machines, that employee will only need a single key for those locks.

## **LOTO Step No. 5: Use a Standard Template for Your Procedures Companywide**

Often procedure templates vary from one company location to another—sometimes within one location—but businesses need to have an enterprise-wide approach to lockout/tagout for their authorized employees to follow.

It’s not just a facility that’s on the hook for noncompliance. The company as a whole will start racking up fines if OSHA finds a violation, Robinson points out.

The use of standard templates also makes it easier to ensure consistency across the business, in the safety expectations, the layout of the equipment on the shop floor, and in carrying out all lockout/tagout processes.

## **LOTO Step No. 6: Take a Proactive Approach to Periodic Inspections**

Just as with grouping procedures, it makes sense to group your periodic inspections by equipment and employee type.

While there is no right or wrong way to perform the required annual inspections, Robinson recommends scheduling the inspections with the preventive maintenance tasks throughout the year. That way they don’t overwhelm the business.

The inspections are critical, as they demonstrate for OSHA that lockout/tagout processes are understood and performed properly.

“Remember, everything is an open-book test if OSHA comes in,” Robinson says. “The more familiar the authorized employee is with demonstrating the lockout process from reading the established procedures, the less likely the company will be to receive a violation.”



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## **LOTO Step No. 7: Move Your Procedures Online**

Increasingly, businesses are adopting preventive maintenance management systems to do away with manual paperwork and to make sure that written procedures stay up to date. This can create a single resource for all safety documentation.

The use of PMMS software for lockout/tagout means that all employees can pull up the procedures as well as information from periodic inspections on their smartphones. There's no need to find and rifle through notebooks or to update manual files.

Use of a PMMS, like *Brady's Link360*, can also reduce the burden on the safety team, Robinson says. He gives the example of a plant with 100 pieces of equipment and 10 authorized employees. That would equate to at least 1,000 lockout/tagout requirements a year and more than 3,000 pages of paper documentation. And that's for a relatively small environment.

The adoption of such software also "definitely raises accountability" and can help with creating a culture of safety, Starke says. Everyone can immediately see the last time someone was in the procedures, when the last periodic inspection was done, and review inspections across groups of machines and employees.

*How does your plant handle its periodic lockout/tagout inspections? Are they all documented?*

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