

Frequent Questions Regarding Control of Hazardous Energy (Lockout/Tagout)

OSHA's Control of Hazardous Energy (Lockout/Tagout or LOTO) standard serves to protect workers from the harmful effects of hazardous energies - electrical, mechanical, hydraulic, pneumatic, chemical, thermal, and other energy sources. It is critically important in preventing workplace incidents, injuries, and fatalities due to electrocution, crushing, burns, cuts, amputations, fractures, etc.

Here are a few common questions we receive that may help answer questions at your facility.

Question #1: *Must a "tag" accompany each lock used for lockout/tagout purposes?*

Answer: Locks used to secure an energy isolation device must be singularly identified. This means you should be able to look at a lock and determine exactly who applied that device. This can be achieved several ways, including but not limited to, firmly attaching a durable tag with your name to the lock, applying a sticker with your name to the lock, engraving your name into the lock, or utilizing a log to identify each employee's lock based on a serial number or similar identifier.

Question #2: *Must LOTO procedures be followed for routine tool changes and/or minor servicing?*

Answer: Note an exception in the LOTO standard that states, "Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations, are not covered by this standard if they are routine, repetitive, and integral to the use of the equipment for production, provided that the work is performed using alternative measures which provide effective protection."

OSHA has stated that an energy control or LOTO procedure would not be required if a tool change activity meets all of the criteria contained in the minor servicing exception, or if machine guarding methods eliminate employee exposure by preventing the employee from placing any part of his body in the machine's danger zone. In both of these cases, the LOTO standard would not apply.

Question #3: *Do we have to lock out our forklifts when making repairs?*

Answer: Yes. The standard's coverage includes vehicles, such as, but not limited to, automobiles, trucks, tractors, refrigeration transport vehicles, and material handling equipment. Along with vehicle manufacturer's recommendations, OSHA's Directive, CPL 02-00-147, "The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures" can provide further detail.

Question #4: *Are "cord-and-plug" machines required to be locked out when servicing or repairing?*

Answer: If the machine wiring consists of a flexible cord-connected by an attachment plug to the permanent wiring, energy control procedure requirements would not apply as long as: (1) the employer unplugs the cord- and plug-connected machinery, (2) unplugging controls all of the hazardous energy to which the employee may be exposed, and (3) the plug is in the exclusive control of the employee who is performing the tool change. In all other situations in which employees are performing servicing and/or

maintenance activities and may be exposed to hazardous energy, LOTO must be performed to protect employees from hazardous energy.

Remember, that it is a requirement to have machine-specific lockout/tagout procedures developed and on-hand for operators and maintenance staff. Additionally, employees need to be properly trained to ensure that they know, understand, and follow the applicable provisions of the hazardous energy control procedures. Let us know if Affinity can be of assistance to any of these requirements.

If you have any related questions, or any other safety or environmental needs, please contact Tim Schwendeman at 330-854-9066 x12.