Lockout Tagout

The *Control of Hazardous Energy (lockout/tagout) Standard* is a frequent source of OSHA and OHS citations. Some employers get tripped up on the inspection provisions of the standard. It's not enough just to *have* energy control procedures. You need to periodically inspect those procedures—and certify this to OSHA (or your state or provincial OHS authority).

What the OSHA Standard Requires

The OSHA lockout/tagout standard requires you to establish energy control procedures to ensure that dangerous equipment remains shut off and doesn't unexpectedly energize, start up or release stored energy during servicing. This involves setting up a program and following procedures to affix lockout devices such as combination locks and tagout devices such as warning tags, to prevent injuries to workers servicing the equipment and others nearby. The standard also requires employers to inspect their energy control procedures at least once a year to ensure that workers are following them.

LOTO in Canada & OSHA-Equivalent States

Unlike in the U.S., there's no single lockout/tagout standard that applies equally across Canada. But each province, territory and the federal jurisdiction require locking out and controlling energy sources of machinery during servicing.

However, not all of the OHS laws specifically mention inspection of energy control procedures the way the U.S. OSHA standard does. Still, the duty to monitor the effectiveness of safety measures *is* at least implicitly required by Canadian OHS laws. And if you need to do the inspection, you need to document the inspection. So Hal's advice will work for you too.

The specific procedures to use set out in this article are mandated by the U.S. OSHA standard. If you're Canadian or come from a state that has its own OSHA requirements, you need to follow the LOTO procedures set out in your state or province's laws.

How to Conduct the Inspection

The first step is to designate an inspector. This should be somebody who services equipment at your facility; but the inspector can't inspect energy

control procedures that he actually uses. So inspectors shouldn't inspect the equipment they service.

The inspector is supposed to review the energy control procedures to ensure they comply with OSHA standards and that all workers who are supposed to follow the procedures have copies of them. The inspector should also meet with the workers as part of the inspection.

Lockout Inspection

If the inspection covers energy control procedures involving lockout, the inspector must meet with each worker who uses the procedure inspected and ask them to explain their responsibilities under the procedures. If workers aren't clear about certain aspects of the procedure, the inspector should explain the correct procedure and make a note indicating that additional training may be needed.

Tagout Inspection

While inspecting tagout procedures, the inspector must do a review not just with each worker who uses the procedure but also workers who work in the immediate area or who use the particular equipment or machine. The inspector must meet with each worker and verify that the worker understands:

- His or her responsibilities under the procedures;
- The limited protection provided by tagout; and
- That he or she is not to remove a tagout device that's been placed on equipment or attempt to bypass or otherwise override it.

Documentation & Certification

Documenting the steps you take to comply with an OSHA or OHS standard is just as important as taking those steps in the first place. As lawyers like to say, if it isn't documented, it never happened.

This principle is especially true in the realm of the lockout/tagout. I've seen cases where employers who did perform required inspections got cited because they couldn't prove it. Let me explain how to document your periodic energy control procedure inspections in case an OSHA inspector shows up. There's also a Model Form below that you can use for this purpose.

What the LOTO Standard Requires

The LOTO standard requires you to set out procedures to control energy to shut down equipment and inspect those procedures at least once a year. The standard also requires you to certify that you've done an inspection and describe what the inspection covered.

How to Certify the Inspection

The Model Form below is an example of how to properly certify an inspection. Although there's no such thing as a one-size-fits-all form, there are standard kinds of information that all forms should include. Make sure that whatever certification you use lists the following items:

1. Inspection Date

The LOTO standard specifically requires listing the date the inspection was performed. One year from that date is your deadline for conducting your next inspection.

2. Location of Equipment

List the area or department of the facility in which the equipment or machinery covered by the inspected lockout/tagout procedures is located. Make sure you do a separate inspection and complete a separate certification form for each area of the workplace you inspect, even if the area contains the same machinery or equipment as an area you've already inspected. Keep in mind that the point of the inspection is to ensure that workers *in each area*understand the LOTO procedures.

3. Description of Equipment

Describe and provide specific identifying information of the equipment or machinery covered by the inspection, such as a model or serial number.

4. Description of Procedures

Use a check box to indicate what kind of procedures were inspected—lockout or tagout.

5. Workers Spoken To

List the name of each worker the inspector spoke to and the department in which they work. This is critical information to document because it enables you to show that you went over the procedures with all the workers the LOTO standard requires you to talk to.

6. Inspector's Name

OSHA requires you to list the name of the inspector. It's also a good idea to include the person's extension and other contact information so you can easily follow-up with the inspector.

Canada: CSA Z460

The Canadian Standards Association (CSA) has published a lockout standard. *CSA Z460 Control of Hazardous Energy—Lockout & Other Methods* sets out requirements for controlling hazardous energy associated with potentially dangerous machines, equipment and processes. Clause 7.6 of CSA Z460 requires management review to ensure that the hazardous energy control process is functioning properly. This is essentially the same thing required by the OSHA LOTO standard—although the review procedures to be used aren't identical.

The Upshot: The recommendations and Model Form can be adapted for CSA Z460. And, while CSA standards aren't legally required (unless the OHS law specifically says they are), they're relevant to compliance because they represent a consensus standard regarding safety.

MODEL FORM

Documentation of Periodic Energy Control Procedure Inspection

Here's a Model Form you can use to document that you've conducted periodic inspections of energy control procedures as required by the OSHA lockout/tagout standard. Speak to your lawyer about adapting it for your own use.

ENERGY CONTROL PROCEDURES:
OSHA SELF-INSPECTION CERTIFICATION

- Date of Inspection: _____
- Area or Department_____
- Equipment Covered By Procedure(s) Inspected:

Name of Equipment: _____

Serial/ID Number: _____

- Type of Procedure Inspected:
  Lockout
  Tagout

5. Employees Spoken To:
   Name &
   Dept: _____

Further Training Req'd: _____	Yes	No
_____	Yes	No
_____	Yes	No
_____	Yes	No
_____	Yes	No
_____	Yes	No
_____	Yes	No
_____	Yes	No

6. Inspector's Name, Ext.: _____

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