

# Lockout Tagout (LOTO) – Are You in Compliance?

While conducting LOTO training I always ask the question “What Happens if LOTO Fails?” After 5 seconds of blank stares from the attendees I answer “People Die.” If LOTO is not implemented properly employees can be seriously hurt and die.

Is your LOTO program properly implemented at your facility? Have all employees that perform LOTO been trained? Does your facility have written energy control procedures for all pieces of equipment covered by the LOTO standard? Are LOTO locks singularly identified, only used for controlling energy and not used for other purposes? Has group LOTO been implemented in your facility? Have periodic inspections been conducted annually and documented? Hopefully you can answer yes to all of the questions. If not, you are placing your employees and your company at risk. What is in the standard? OSHA 1910.147 The control of hazardous energy (lockout/tagout)

An **Energy Control Program** must be established. This consist of energy control procedures, employee training and periodic inspections.

Energy control procedures need to be written. In a large facility, this is not an easy task. The person assigned this task must be fully capable of recognizing all of the energy sources associated with the particular machine or equipment. By the way, what is the definition of energy source? So many people think energy source is only electricity. They are so wrong. Energy sources are any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy. A nice exercise is to have your employees list out all the energy sources in your facility. Once energy source employees tend to forgot is gravity.



Loto requires the use of protective materials and hardware to lockout various items. What are you using for locks in your facility? Are the locks singularly identifiable? Wherever I have worked in the past I always used red locks for LOTO. Why? It is easy to train on, employees remember red is for LOTO and the Safety Manager does not have to stock various colors of locks for different departments. One facility I worked at had 5 different lock colors. Of course, a tag needs to be hung with each LOTO lock. Hanging of the tag with each lock tends to not happen quite often in facilities that do not have an effective safety and health program with accountability. A best practice with locks and tags is to have the employee's name and picture on

the lock and tag. Tags shall warn against hazardous conditions as follows: Do Not Start, Do Not Open, Do Not Energize or Do Not Operate.

The established procedures for the application of energy control (the lockout or tagout procedures) shall cover the following elements and actions and shall be done in the following sequence:

- 1) **Preparation for shutdown:** Make sure the authorized employee knows how to shut down the machine properly. Some machines require cooldown procedures, etc.
- 2) **Machine or equipment shutdown:** Make sure the authorized employee knows how to shut down the machine properly. Some machines require cooldown procedures, etc.
- 3) **Machine or equipment isolation:** Must be able to locate and isolate the energy to the machine
- 4) **Lockout or tagout device application:** Attach locks and tags
- 5) **Stored energy:** All potentially hazardous stored or residual energy shall be isolated
- 6) **Verification of isolation:** The authorized employee shall verify that isolation and deenergization of the machine has been accomplished. Some call this lockout/tryout. **This is the most important step to conduct for your safety.**
- 7) **Release from lockout or tagout:** Written procedures to make sure nonessential items have been removed and the machine components are operationally intact.
- 8) **Employees:** Make sure employees are safely positioned. Notify affected employees.
- 9) **Lockout or tagout devices removal:** Must be removed by the employee who applied the device.



**Training.** The employer shall certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training. Additional training is required if equipment changes in the workplace or job assignments.

**Periodic Inspection.** The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.

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