

Lockout Tagout – Do I Need a Written Procedure?

This question is brought up quite often during Lockout Tagout training. Below are the requirements that must be met in order not to need a written procedure for Lockout.

Each piece of equipment must meet all 8 criteria below or a written lockout-tagout procedure is required:

- (1) The machine or equipment has no potential for stored or residual energy or reaccumulation of stored energy after shut down which could endanger employees;
- (2) The machine or equipment has a single energy source which can be readily identified and isolated;
- (3) The isolation and locking out of that energy source will completely deenergize and deactivate the machine or equipment;
- (4) The machine or equipment is isolated from that energy source and locked out during servicing or maintenance;
- (5) A single lockout device will achieve a locked-out condition;
- (6) The lockout device is under the exclusive control of the authorized employee performing the servicing or maintenance;
- (7) The servicing or maintenance does not create hazards for other employees;
- (8) The employer, in utilizing this exception, has had no accidents involving the unexpected activation or reenergization of the machine or equipment during servicing or maintenance.



If the job you are about to perform fits the 8 criteria above, then a written Lockout Tagout “procedure” is not required. Lockout Tagout still needs to be performed though in most cases. An example where Lockout Tagout might not be performed is on a piece of equipment that its only energy source is an electric cord. If you can **keep complete control of the cord while servicing the equipment** a lockout device is not required. To be safe a Lockout Tagout device can be placed around the electrical cord plug end and locked (see picture). This ensures that no one can energize the equipment while you are working on it.



OSHA Training Requirements: Programs listed in bold indicate mandatory written program is required

OSHA Program Topic	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Accident Reporting and Investigation Plan	1904.35	No	Yes	Yes	---	Yes	No	No
Anhydrous Ammonia Storage & Handling	1910.111	No	No	No	Yes	Yes	No	No
Bloodborne Pathogens Safety Program	1910.1030	Yes	Yes	No	Yes	Yes	Yes	No
Compressed Gas Plan	1910.101	No	Yes	No	Yes	Yes	No	No
Confined Space Entry (Permit-Required)	1910.146	Yes	Yes	Yes	Yes	Yes	Yes	No
Dipping & Coating Operations	1910.122-126	No	Yes	No	Yes	Yes	No	No
Electrical Safety Plan	1910.331-335	Yes	Yes	No	Yes	Yes	No	Yes
Emergency Action Plan	1910.38	Yes	Yes	Yes	---	Yes	No	Yes
Ergonomics Plan	5(a)(1)	No	No	No	No	No	No	No
Fire Extinguisher Program	1910.157	Yes	Yes	No	Yes	Yes	Yes	No
Fire Prevention Plan	1910.39	Yes	Yes	No	Yes	Yes	No	Yes
Fire Protection Equipment Maintenance Plan	Subpart L	Yes	Yes	No	Yes	Yes	No	No
First Aid Program	1910.151	No	No	No	Yes	Yes	Yes	No
Flammable & Combustible Liquids Safety	1910.106	No	Yes	No	Yes	Yes	No	No
General Working Spaces – Housekeeping	1910.141	No	No	No	No	No	No	No
Grain Handling Facilities	1910.272	Yes	Yes	No	Yes	Yes	Yes	No
Hand Tool Safety Program	1910.242	No	Yes	No	Yes	Yes	No	No
Hazard Communication Program	1910.1200	Yes	Yes	Yes	---	Yes	No	Yes
Hazardous Waste Operations	1910.120	Yes	Yes	No	Yes	Yes	Yes	No
Hearing Conservation Program	1910.95	Yes *	Yes	No	Yes	Yes	Yes	No
Hot Work (Cutting/Welding) Program	1910.252-255	Yes	Yes	No	Yes	Yes	No	No
Indoor Air Quality Program	1910.1000	Yes	No	No	Yes	Yes	Yes	Yes
Laboratory Safety Program	1910.1450	Yes	Yes	No	Yes	Yes	No	Yes
Ladder Safety Program	1910.25-26	No	Yes	No	No	No	No	No
Laser Safety Program	5(a)(1)	No	No	No	No	No	No	No
LPG Safety Plan	1910.110	Yes	Yes	No	Yes	Yes	No	No
Lockout/Tagout	1910.147	Yes	Yes	Yes	---	Yes	No	Yes
Machine Safeguarding Program	1910.212	Yes	Yes	No	Yes	Yes	Yes	No
Material Handling & Crane Safety	1910.179/184	Yes	Yes	No	Yes	Yes	No	No
Means of Egress Compliance Program	1910.36-37	No	Yes	No	No	No	No	No
Medical Record Access	1910.1020	Yes	No	Yes	---	Yes	Yes	No
Mechanical Power Presses	1910.217	Yes	Yes	No	Yes	Yes	Yes	Yes
Personal Protective Equipment Program	1910.132	Yes	No	No	Yes	Yes	No	Yes
Power Transmission/Generation	1910.269	Yes	Yes	No	Yes	Yes	Yes	No
Powered Industrial Truck Program	1910.178	Yes	Yes	No	Yes	Yes	No	Yes
Powered Platforms	1910.66	No	Yes	No	Yes	Yes	No	No
Process Safety Management	1910.119	Yes	Yes	No	Yes	Yes	No	3 Yrs

Programs listed in bold indicate a mandatory written program is required

* Medical evaluation required

OSHA Program Topic	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Radiation (Ionizing) Safety	1910.1096	Yes	Yes	No	Yes	Yes	Yes	No
Recordkeeping Practices & Reporting	1904	Yes	Yes	No	Yes	No	No	No
Respiratory Protection Program	1910.134	Yes *	Yes	No	Yes	Yes	Yes	No
Safety & Health Management Policy	54 FR 3904	No	No	No	No	No	No	No
Safety Committee Organizational Plan	54 FR 3904	No	No	No	No	No	No	No
Safety Signs & Safety Colors Program	1910.144-145	No	No	Yes	---	Yes	No	No
Spray Finishing Compliance Program	1910.94/107	No	Yes	No	No	No	No	No
Telecommunications	1910.268	No	Yes	No	Yes	Yes	No	No
Ventilation Compliance Program	1910.94	No	Yes	No	Yes	Yes	No	No
Walking-Working Surface Maintenance Plan	1910.23-24	No	No	No	No	No	No	No

Toxic & Hazardous Substances	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Asbestos	1910.1001	Yes *	Yes	No	Yes	Yes	Yes	No
Carcinogens (13 listed)	1910.1003	Yes *	No	No	Yes	Yes	Yes	No
Vinyl Chloride	1910.1017	Yes *	No	No	Yes	Yes	Yes	No
Inorganic Arsenic	1910.1018	Yes *	Yes	No	Yes	Yes	Yes	No
Lead	1910.1025	Yes *	No	No	Yes	Yes	Yes	No
Cadmium	1910.1027	Yes *	Yes	No	Yes	Yes	Yes	No
Benzene	1910.1028	Yes *	Yes	No	Yes	Yes	Yes	No
Coke Oven Emissions	1019.1029	Yes *	Yes	No	Yes	Yes	Yes	No
Cotton Dust	1910.1043	Yes *	Yes	No	Yes	Yes	Yes	No
1,2-dibromo-3-chloropropane (DBCP)	1910.1044	Yes *	No	No	Yes	Yes	No	No
Acrylonitrile	1910.1045	Yes *	Yes	No	Yes	Yes	Yes	No
Ethylene Oxide	1910.1047	Yes *	No	No	Yes	Yes	Yes	No
Formaldehyde	1910.1048	Yes *	Yes	No	Yes	Yes	Yes	No
Methylenedianiline (MDA)	1910.1050	Yes *	Yes	No	Yes	Yes	Yes	No
1,3-Butadiene (BD)	1910.1051	Yes *	Yes	No	Yes	Yes	Yes	No
Methylene Chloride	1910.1052	No *	No	No	Yes	Yes	No	Yes

*Medical evaluation required

Best Practice Recommendations (Programs not specifically required but programs to be considered nonetheless)		
Safety Rules for Employees	Disaster Recovery Plans	Safety Committee or Safety Teams
Safety Rules for Contractors	Workplace Violence Prevention Plan	Return-to-Work Program
Working with Contractors (legal issues)	Site Security Plan	Medical Management Program
Job Safety Analysis Program	Ergonomic Evaluation Process	New Employee Orientation Program

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