

Lockout/ Tagout Tip Sheet



Lockout/tagout (LOTO), or the control of hazardous energy, consistently ranks among the Occupational Health and Safety Administration's (OSHA) top 10 most frequently cited standards. Its regular appearance on this list clearly indicates that there's significant room for improvement in this area!

Making the top puts workers on the bottom

The LOTO standard, 29 CFR 1910.147, aims to protect workers from the release of hazardous energy during maintenance or servicing of machines or equipment. The standard outlines how to control hazardous energies including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, and other energy sources.

Topping OSHA's list indicates a lack of compliance for ensuring the proper use of energy-isolating safety devices which can have devastating consequences. OSHA estimates that an effective and strict LOTO program can prevent 120 fatalities and 50,000 injuries can be prevented each year.



Lockout/Tagout Tip Sheet (continued)



Topping the list affects your bottom line!

OSHA issues thousands of LOTO citations each year across a range of industries, from manufacturing and agriculture to retail and entertainment.

In fiscal year 2023 alone, the agency issued 2,688 LOTO citations.

The resulting penalties, amounting to millions of dollars, represent a significant financial impact and are likely aren't the only costs incurred.

Direct costs of OSHA citations may also include legal expenses and the cost to correct or abate the findings. Additionally, citations can lead to increased insurance or workers' compensation premiums, difficulty obtaining work contracts, or damage to the company's reputation. The consequences can be significant long-term considering OSHA citations can remain on a company record for up to five years and keep you in their spotlight.

Additionally, employee morale can be substantially impacted. Employees that don't feel safe at their workplace may not be as engaged in safety initiatives, which can ultimately affect productivity.

Even a minor LOTO citation can have a significant impact if issues aren't addressed promptly. Employers must evaluate the overall impact of penalties and fines, employee productivity and morale, and future consequences to ensure employee safety and company profitability.

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Getting off OSHA's list

LOTO citations often stem from a misunderstanding of the standard, insufficient training, or a mistaken belief that implementing safety procedures and equipment is too costly or could decrease productivity. These roadblocks can be overcome by following these tips:

- ☐ **Prioritize safety** at an executive level to demonstrate vested interest in employee well-being. This commitment includes promptly addressing safety concerns, actively participating in safety meetings, and investing in training.
- ☐ **Perform risk and hazard assessments** that identify hazardous equipment and energy sources requiring proper LOTO during maintenance and service activities. Additionally, include the analysis of inspection data, injury and illness records, and emergency and non-routine events.



Lockout/Tagout Tip Sheet (continued)



- ☐ **Develop written, step-by-step procedures** that include:
 - o What the energy sources and associated magnitudes for each piece of equipment are;
 - o Which locks, tags, and safety devices are available and approved, and where to locate them;
 - o Where to apply LOTO devices to ensure de-energization (include pictures whenever possible); and
 - o How to test de-energization before beginning servicing or maintenance.
- ☐ **Update procedures** when equipment or conditions change, such as when:
 - o Different safety devices are made available to workers;
 - o Equipment has been removed, added, or altered; or
 - o Cord and plug equipment has been added or updated.
- ☐ **Perform audits and inspections** that include:
 - o A review of equipment maintenance history;
 - o A walk-through of the documented LOTO procedures for each applicable machine;
 - o A review of locks and tags to ensure they are standardized, durable, and substantial; and
 - o Consideration of new and improved safety devices or LOTO technology available.
- ☐ **Institute a Management of Change (MOC) process** to ensure similar equipment is maintained and treated the same when changes are made to parts, processes, or procedures.
- ☐ **Implement an effective near miss and incident reporting process** to ensure safety issues are investigated and corrective measures can be taken to prevent future incidents.
- ☐ **Provide employee, supervisor, and contractor training that cover:**
 - o Types and magnitude of energy, such as electricity, mechanical, hydraulic, pneumatic, chemical, thermal, and other energy sources (pressure inside pipe, gravity, or springs).
 - o Roles, responsibilities, and expectations of authorized, affected, and other employees;
 - o Procedures for individuals, groups, and shift changes;
 - o Limitations related to the use of tags; and
 - o Inspection and audit requirements.
- ☐ **Maintain accurate records** for preventative maintenance, inspections, training certifications, and procedures for the control of hazardous energy.
- ☐ **Review programs annually** and when conditions or equipment change to ensure compliance with regulatory requirements.



Lockout/Tagout Tip Sheet (continued)



Lockout/Tagout Consulting Services

J. J. Keller®
CONSULTING SERVICES

To help you maintain the highest standards of safety at your facility, our J. J. Keller® consultants will come onsite to assist you with the implementation, training and/or auditing of your LOTO procedures.

Services include:



LOTO Program Implementation

Our consultants will assist you with implementing a compliant LOTO program, ensuring that your facility is in full compliance with every aspect of the requirements, and has a full understanding of how to maintain compliance with both the program and the OSHA requirements.



LOTO Employee Safety Training

Ensure that your employees understand OSHA's lockout/tagout requirements, including the types of hazardous energy, proper safety procedures, and roles and responsibilities for each type of employee.



LOTO Facility Audit

Get an objective, expert assessment of your operation's compliance with the LOTO regulatory requirements with this comprehensive audit that measures your site-specific performance and provides a complete report of any gaps that need to be addressed.



Energy Control Procedures Documentation

Let our experts create your site-specific written energy control procedures that document all equipment which contains or has a potential to release hazardous energy during maintenance or servicing.

Contact us today to get started!

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