

LOCK OUT TAG OUT

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A Lock-Out Tag-Out program is an effective way to control hazardous energy in virtually every environment. In America, it is a requirement from OSHA to have this type of program in place, but more importantly, it is a proven way to minimize the risk of injuries and even fatalities for those who work with dangerous equipment.

Speaking in September at the National Safety Council 2019 Congress & Expo in San Diego, Deputy Director of OSHA's Directorate of Enforcement Programs, talked about the agency's willingness to assist employers with curbing violations involving Lock Out Tag Out and other standards. In the interview, the Deputy Director went on to state that the violations that they continue to find "...have been in place for a lot of years."¹

As per OSHA's most cited violations, fiscal year 2019 Lock Out Tag Out violations increased in ranking (2018 ranking was #5 and 2019 ranking is #4) where almost 3,000 violations were issued in North America as per Safety + Health. OSHA takes compliance with this regulation very seriously. In 2018 OSHA performed over 1400 inspections, and issued over 2500 citations, costing companies over **\$13 million** in proposed penalties. Even if improved safety isn't incentive enough for some companies, the threat of these very serious citations should certainly motivate them to compliance.²

¹ <https://www.safetyandhealthmagazine.com/articles/19087-oshas-top-10-most-cited-violations>

² <https://www.creativesafetysupply.com/qa/lockout-tagout/is-lockout-tagout-required-by-osha>

DEFINITION

Hazardous energy in occupational safety and health is any source of energy (*including electrical, mechanical, thermal, steam, chemical, hydraulic pressure, and or accumulation, gas, gravity, kinetic and pneumatic sources of energy*)³ that “can be hazardous to workers”, such as from discharge of stored energy. Failure to control the unexpected release of energy can lead to machine-related injuries or fatalities. The risk from these sources of energy can be controlled in a number of ways, including access control procedures such as Lock-Out Tag-Out.⁴

Lock Out, Tag Out (LOTO), Lock Out, Tag Out, Try Out (LOTOTO) or lock and tag is a safety procedure used in industry and research settings to ensure that dangerous machines are properly shut off and not able to be started up again prior to the completion of maintenance or repair work. It requires that hazardous energy sources be “isolated and rendered inoperative” before work is started on the equipment in question. The isolated power sources are then locked and a tag is placed on the lock identifying the worker who placed it. The worker then holds the key for the lock, ensuring that only he or she can remove the lock and start the machine. This prevents accidental startup of a machine while it is in a hazardous state or while a worker is in direct contact with it.⁵

AM I REQUIRED TO HAVE A PROGRAM IN PLACE?

The simple answer is yes. OSHA does require that companies use the Lock-Out Tag-Out system in many different situations. It is identified in a variety of different places within the OSHA regulations, but in general a company should know that they have to use it whenever control of hazardous energy is a priority. Control of hazardous energy is addressed in specific OSHA standards for general industry under ([29 CFR 1910](#)).

KEY OSHA REQUIREMENTS

- **Written Procedures** – The Lock Out Tag Out program must include a written energy-control procedure that covers how and when a machine should be disconnected from each energy source, how Lock Out and/or Tag Out devices should be placed to prevent the possibility of re-energization, and information on how to prevent the risk from stored and/or re-accumulated energy.
- **Training** – Employees must be given training about the program. This should include how to use and remove energy control devices.
- **Evaluation** – The facility is required to perform an annual evaluation of the Lock Out Tag Out program to ensure it is effective. During this evaluation the facility must identify any changes to machines that would require an update to the program. This evaluation should also look at whether employees are properly following the program. If they are not, additional training or enforcement may be necessary.

OSHA has a robust website that describes [concepts](#) of your LOTO program, fact sheet, a booklet describing general requirements of such and to include Small Businesses, workplace solutions, checklists, and more.⁶

Furthermore, OSHA has an [E-Tool](#) OSHA which is interactive and provides the user with an in-depth understanding of the LOTO standard, with three components: Tutorial, Hot Topics, and Case Studies.⁷

ADDITIONAL RESOURCES AND INFORMATION

- In partnership with Underwriters Laboratories (UL) Pure Safety, Allianz clients can access over 1,500 online courses specializing in workplace safety, fire protection, fleet safety and health and environmental topics. Available 24/7, these courses can help clients train their employees and lower the potential for claims that may occur in their organization.⁸
- Sample written program can be found [here](#)⁹ and [here](#)¹⁰

³ <https://www.creativesafetysupply.com/articles/lockouttagout-program/>

⁴ https://www.ccohs.ca/oshanswers/hsprograms/hazardous_energy.html

⁵ https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=9804&p_table=STANDARDS

⁶ <https://www.osha.gov/SLTC/controlhazardousenergy/>

⁷ <https://www.osha.gov/SLTC/controlhazardousenergy/program.html>

⁸ <https://ondemand.puresafety.com/>

⁹ <https://www.cdc.gov/nora/councils/manuf/lotof/pdfs/Sample-Written-Program-C.pdf>

¹⁰ <https://www.osha.gov/SLTC/controlhazardousenergy/program.html>

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