

LOCKOUT/TAGOUT – WHY IS IT SO HARD TO COMPLY WITH?

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OUR TEAM FOR TODAY'S PRESENTATION



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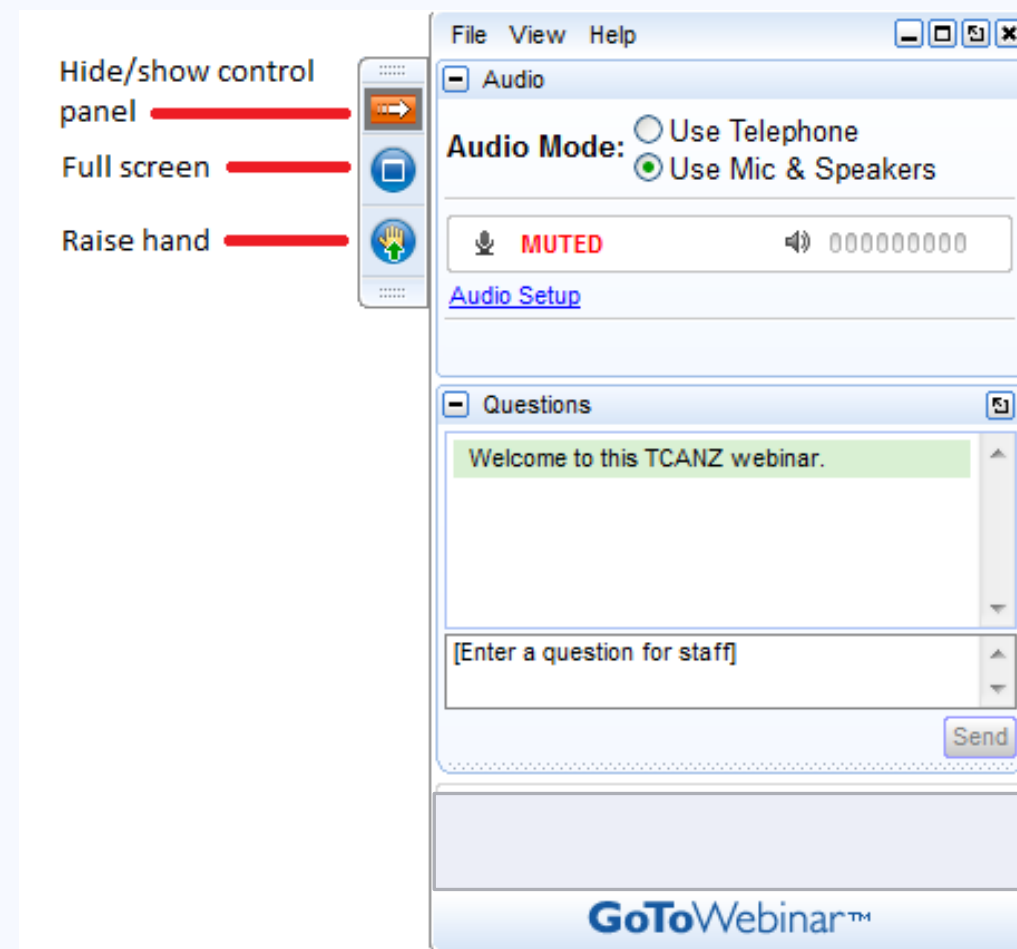
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HOUSEKEEPING

- This presentation is being recorded and will be shared.
- Everyone will be muted to prevent background noise.
- Use the question button to log your question.



TODAY'S TOPICS

- Background of the control of hazardous energy (Lockout/Tagout) importance
- Potential Outcomes for Non-Compliance
- Compliance with LOTO Regulations
- Best Practices



BACKGROUND OF LOCKOUT/TAGOUT IMPORTANCE

- Lockout/Tagout prevents 50,000 injuries per year and 124 death per year (<https://www.osha.gov/sites/default/files/publications/factsheet-lockout-tagout.pdf>)
- Lockout/Tagout is on the top 10 most cited standards list every year for OSHA

OSHA's 2021 Top 10 Most Frequently Cited Violations



OSHA CITATION EXAMPLES

US Department of Labor fines New Jersey auto parts seller \$1.2M for 33 workplace safety, health violations following worker's serious hand injury
OSHA inspection identifies willful, repeat, serious violations

US Department of Labor proposes \$480K in additional fines to Ohio vehicle parts manufacturer for continuing to expose workers to multiple hazards

US Department of Labor proposes \$145K in fines after worker suffers fatal injury at Chicago-area pizza manufacturer
Sanitation workers exposed to equipment hazards during cleaning operations

US Department of Labor finds worker suffered serious internal injuries because employer ignored machine safety procedures

WHAT ARE EMPLOYERS MISSING

1. **Failure to develop equipment-specific LOTO procedures**
2. Failure to train employee in LOTO
3. **Failing to conduct periodic inspections**
4. Failing to establish a LOTO program
5. **Failing to follow the sequence of LOTO steps**
6. Failing to protect workers during group LOTO
7. Failing to identify all energy sources and/or failing to lockout all disconnect sources
8. Failure to notify other employees
9. **Abusing the “minor tool servicing exemption”**
10. Failing to manage shift changes

LOTO PROCEDURES

REQUIREMENTS OF PROCEDURES

- Outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy
- Statement of intended use of procedure
- Steps for shutting down, isolating, blocking and securing machines or equipment
- Steps for the placement, removal and transfer of lockout devices or tagout devices
- Requirements for testing a machine or equipment

BEST PRACTICES

- Include photos of each lockout point
- Post equipment-specific procedures at the machine
- Identify lockout points through markings



Lockout/Tagout Posted Procedure

ID#: Slitter Rewinder□	Facility: XYZ Company	Location: Finishing / Bindery
Created: 9/28/2022	Description: Service and Maintenance	
Revised: 9/28/2022		





2 Lockout Points

Note: Equipment - 2 locks and tags.
*Deviations from this procedure are not permitted.

Lockout Application Process

1. Notify affected personnel. 2. Property shut down machine. 3. Isolate all energy sources. 4. Apply lockout devices, locks, & tags. 5. Dissipate Residual Energy 6. Verify total de-energization of all sources.

Lockout Steps

Step #	Action	Info
1  Note	Prepare for lockout by reviewing the lockout/tagout equipment-specific procedure, notifying affected personnel, and obtaining the necessary lockout equipment, locks, tags, and tools.	Slitter Rewind 
2  Electrical 480 volts	Shut down the unit by pressing the red stop button on the control panel. The electric disconnect is located on the wall behind the unit. Turn the disconnect to the "off" position and apply a lock and tag. Verify the disconnect cannot be switched to the "on" position with the lock in place.	Electrical Disconnect 



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Lockout Steps

Step #	Action	Info
3  Pneumatic 80-115 psi	The pneumatic valve is located on the wall behind the unit next to the electrical disconnect. Turn the red valve to "closed" position and apply a lock and tag. Verify the valve cannot be "opened" with the lock in place. Note – Air will automatically dissipate when the valve is closed.	Pneumatic Disconnect 

Verification of Energy Isolation

Verify that all energy sources are isolated and at a Zero Energy State by attempting to start machine with normal operating controls.

Lockout Removal Process

1. Ensure all tools and items have been removed. 2. Confirm that all employees are safely located. 3. Verify that controls are in neutral. 4. Remove lockout devices and reenergize machine. 5. Notify affected employees that servicing is completed.

LOTO TRAINING REQUIREMENTS

EMPLOYEES DEFINITIONS

Authorized Employee - A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.

Affected Employee - An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

TRAINING REQUIREMENTS

- Initial Training - Provided upon initial assignment for employees
- Re-Training – Provided when there's:
 - A change in their job assignments
 - A change in machines, equipment or processes that present a new hazard
 - A change in the energy control procedure
 - When periodic inspections show's deviations or inadequacies

PERIODIC INSPECTIONS

- Conducted by an Authorized employee
- Review between inspector and authorized employee
- Certified through a Periodic Inspection Form



Best Practices:

- Schedule the inspections throughout the year
- If you have a PM system, utilize it for tracking

LOCKOUT/TAGOUT POLICY

Develop policy to meet OSHA requirements:

- Energy control procedures
- Employee training
- Periodic inspections
- Lockout/Tagout devices and equipment
- Group procedures
- Shift change procedures
- Contractors
- Emergency lock removal steps



LOCKOUT/TAGOUT SEQUENCE OF STEPS

Authorized employee will:

1. Notify affected employees
2. Shut down energized equipment
3. Isolate energy sources from equipment
4. Lock out or tag out the energy isolation device
5. Release stored energy
6. Test / Verify

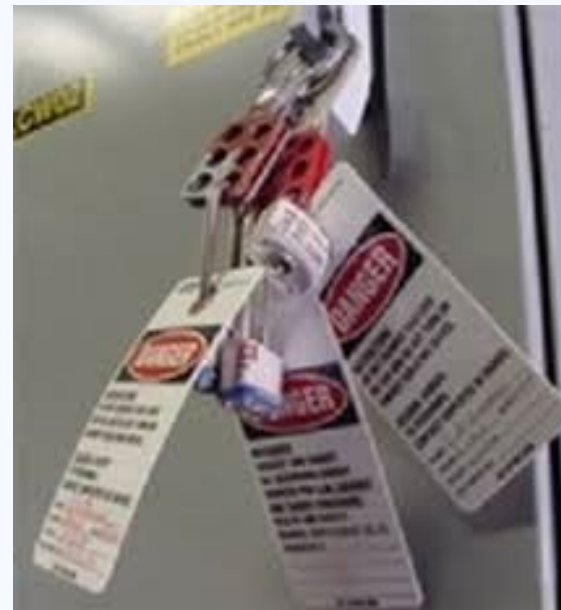


GROUP LOCKOUT/TAGOUT

When service or maintenance is performed by a crew

The “Head Authorized Employee” of the crew is responsible to coordinate the efforts

Each *Authorized* Employee shall place *their own lock* on the energy isolating device



FAILING TO IDENTIFY OR LOTO ENERGY SOURCES

Employees may often just LOTO the electrical source

Causes:

- Lack of enforcement
- Training wasn't effective
- Periodic inspections not conducted or not done thoroughly
- Employees think the other power sources won't hurt them



FAILURE TO NOTIFY OTHERS

Employees may not notify others that LOTO is about to occur.

Causes:

- Lack of enforcement
- Training wasn't effective
- Periodic inspections not conducted or not done thoroughly



ABUSING MINOR TOOL SERVICE EXEMPTION

MINOR TOOL EXEMPTION

- OSHA Exemption: Note: Exception to paragraph (a)(2)(ii): Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations, are not covered by this standard if they are routine, repetitive, and integral to the use of the equipment for production, provided that the work is performed using alternative measures which provide effective protection (See subpart O of this part).

OTHER EXEMPTIONS

- When hazardous energy does not exist
- Cord-controlled devices
- Single-source equipment that can be locked out with a single lock

SHIFT OR PERSONNEL CHANGE

- Transfer of lockout and tag out devices between off going and on coming employees
- Notifying on coming affected employees of the lockout in progress and start up testing to be performed
- Performing a start up test on the equipment or machinery being serviced to verify a de-energized state.





Questions?

Thank you for joining us.



Connect with us for a 15 minute
consultation.

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