

The Good News about LOTO

By Theodore J. Weidner, Ph.D., P.E., CEFP, AIA

Many facility officers may be unaware of OSHA standard 1910.147(c)(6)(i), which requires employers to “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.” It seems to be saying simply that a facility organization must have an annual training refresher on the importance of **lockout/tagout (LOTO)**. Unfortunately, it’s not that easy.

The standard directs that any energy-using equipment has to be checked to make sure the people performing maintenance on that equipment know and can perform appropriate LOTO procedures, and can be observed doing so, on an annual basis. In other words, those servicing every piece of equipment that operates with energy (steam, electricity, fossil fuel, or potential energy) must be observed doing the LOTO procedures annually. On the surface, it appears that you must have an observer tag along during the annual preventative maintenance (PM) of every piece of equipment to make sure the mechanics de-energize the equipment correctly; and that even if there was no annual PM planned, it’s still necessary to go through the LOTO steps to make sure the equipment can be de-energized correctly!

A first glance at the rule makes it sound as if it’s necessary for those managing a facility with thousands of pieces of equipment to hire at least three or four people just to observe and document that the mechanics know how to turn it off correctly. Most managers can’t afford to perform even the necessary PM, and now the government is telling you that you have to use employee time to “play act” de-energizing equipment and not necessarily do anything to increase the life and/or reliability of the equipment.

THERE ARE OPTIONS

However, a strict reading of the rule provides a number of options to reduce an initial overwhelming

regulatory mandate that does very little. It isn’t necessary to have an inspector observe every employee LOTO every piece of equipment safely and then file the paperwork. Here are some measures that can be taken to avoid that headache.

I’ll first assume there is a complete inventory of all equipment at the facility (I know, big assumption). The next assumption is that all like equipment (similar in function, size, and operation) is known. Third, all employees are similarly trained in LOTO



procedures and are available, at least once each year, to talk with the inspector about LOTO procedures in your facility. The last provision is the easiest, because it can happen in a relatively short time, at a single location, and is somewhat similar to a training session.

Next, let’s look at how to handle observing and documenting LOTO procedures for all equipment. Separate LOTO procedures for similar equipment, which utilize the same or similar types of control measures, can be grouped together and still comply with

the regulation. That is, if there are 100 air handlers, each equipped with similar devices to control energy flow, and the procedures for these similar units are the same, then the inspector may observe the LOTO procedures for 1 unit instead of 100 units. In addition, as mentioned above, a representative group of employees may be observed doing the LOTO procedures—every employee is not required to perform the LOTO procedures in front of the inspector.

THE GOOD NEWS

The good news is that it's not necessary to hire several inspectors just to document your employees performing the LOTO on each and every machine throughout the facility. However, there still has to be an annual demonstration of competence in LOTO procedures for all fundamentally different machines.

So, what do you do next to make sure you are compliant and not at risk for being fined by OSHA?

1. Make sure you know what equipment must have LOTO procedures in place for the safe maintenance of that equipment.

2. Refine the list of equipment so similar LOTO procedures are known.
3. Identify all the unique LOTO procedures and identify the employees who must be familiar with LOTO procedures to do their job safely.
4. Estimate the time for each LOTO procedure; the sum of the times for the list in No. 3 becomes the total time needed for the inspector to observe the minimum number of procedures annually to ensure compliance.

As each procedure is performed, the inspector observes and records compliance (use an easy form from oshatraining.com) to certify that the procedure was followed and is appropriate. ☺

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 Ted Weidner is an associate professor at Purdue University, West Lafayette, IN, and consults on facilities management issues primarily for educational organizations. He can be reached at tjweidne@purdue.edu.

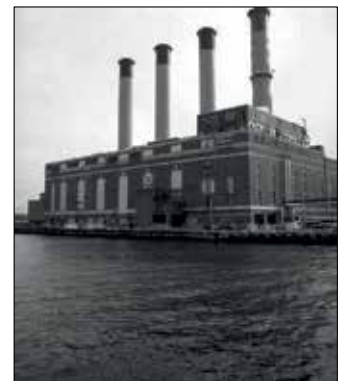


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By William A. Daigneau

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Bill Daigneau is a Colorado-based consultant and writer who retired in 2012 from the University of Texas MD Anderson Cancer Center in Houston, Texas, where he served as vice president and chief facilities officer. He is an APPA Fellow and a four-time recipient of APPA's Rex Dillow Award for Outstanding Article.



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