

# CRAFTSMAN'S CRIBSHEET NUMBER 51

Miles Free – Director of Technology and Industry Research  Technical  Regulatory  Quality  Management

## Lockout Tagout: What Management Needs to do for Periodic Inspection

There are three main areas that are solely the responsibility of management:

1. Documenting a de-energization/hazardous energy control procedure (lockout/tagout procedure) for every piece of equipment in your plant
2. Training employees
3. Performing periodic assessment of the efficacy of your hazardous energy control program

Providing lockout/tagout devices, ensuring that equipment is capable of being locked out and tagged out are other management responsibilities and are typically well in hand in the shops I visit. If management hasn't got their part right, there is next to no chance that the company will pass an audit. We'll discuss documenting procedures and training in additional posts. Today, we'll take a look at the requirements for periodic inspection of your company's hazardous energy control program (lockout/ tagout).

### Periodic Inspection

1910.147(c)(6)(i)

"The employer shall 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."

That's pretty clear. Employer "shall" conduct a periodic review. Have you done yours yet? Can you show me documentary evidence of the review?

1910.147(c)(6)(i)(A)

"The periodic inspection shall be performed by an authorized employee other than the ones(s) utilizing the energy control procedure being inspected."

Who is authorized to perform this review in your shop?

1910.147(c)(6)(i)(B)

"The periodic inspection shall be conducted to correct any deviations or inadequacies identified."

So, can you show me documentary evidence that you found deficiencies and took corrective actions? Or is your program perfect until the inspector asks an employee to demonstrate and they fail?

1910.147(c)(6)(i)(C)

"Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected."

Can you show me the evidence of review for each authorized employee?

1910.147(c)(6)(i)(D)

"Where tagout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized and affected employee, of that employee's responsibilities under the energy control procedure being inspected, and the elements set forth in paragraph (c)(7)(ii) of this section."

I personally do not prefer tagout, but if your system uses tagout, you must be able to provide evidence that you comply with this requirement.

1910.147(c)(6)(ii)

"The employer shall certify that the periodic inspections have been performed. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection and the person performing the inspection."

As the lawyers say, "duces tecum" – bring your papers. Can you show me the documents of your periodic inspections, covering all equipment and all employees?

Where you cannot, you are vulnerable. More importantly, so are those employees.

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