

## SELECTED LETTERS OF INTERPRETATION

### OSHA Standards Interpretation and Compliance Letters

#### Certain provisions of the Occupational Safety and Health Administration's (OSHA's) lockout/tagout standard.

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- **Record Type:** Interpretation
  - **Standard Number:** [1910.147](#)
  - **Subject:** Certain provisions of the Occupational Safety and Health Administration's (OSHA's) lockout/tagout standard.
  - **Information Date:** 09/19/1995
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September 19, 1995

Mr. Lawrence P. Halprin  
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Suite 500  
West Washington D.C. 20001

Dear Mr. Halprin:

This is in response to your letter of April 17, regarding interpretation of certain provisions of the Occupational Safety and Health Administration's (OSHA's) lockout/tagout standard, 29 CFR 1910.147. Please accept our apology for the delay in responding.

In your letter, after extensive analysis, you conclude that:

- 1) 1910.147(c)(6) does not require that an employer conduct an annual or more frequent inspection of every equipment-specific, supplemental lockout/tagout checklist, procedure, etc. applicable to the equipment at its facility;
- 2) 1910.147(c)(6) does not require that the inspection include the physical observation by the "inspector" of every "authorized employee" in the facility (where lockout is used), and every "authorized employee" and "affected employee" in the facility (where tagout is used), implementing the energy control procedure; and
- 3) 1910.147(c)(6) does not require that the employer conduct an annual review of lockout/tagout responsibilities with every "authorized employee" in the

facility (where lockout is used), and every "authorized employee" and "affected employee" in the facility (where tagout is used), or, in the alternative, if 1910.147(a)(6) imposes such a requirement, annual refresher training which includes a review of lockout/tagout responsibilities satisfies that requirement.

Under the requirements of paragraph 1910.147(c)(6)(i), the employer is required to conduct a periodic inspection of the energy control procedure [required under paragraph 1910.147(c)(4)]. OSHA interprets this to mean that **each** energy control procedure must be **separately** inspected at least annually.

OSHA does agree, however, that a separate procedure does not have to be developed for each and every machine or piece of equipment and that a comprehensive (generic) energy control procedure with supplemental checklists or appendices may very well address adequately the steps necessary to perform servicing and maintenance safely. Such a procedure would normally be considered one procedure. OSHA believes, however, that there are also situations which require a unique energy control procedure to deal with the servicing and maintenance hazards.

OSHA will carefully examine the energy control procedure of any employer who claims that only one comprehensive procedure is necessary in its workplace to ensure that the single procedure is indeed adequate. While the agency does not insist on a multiplication of procedures, it does insist that they not become so complex that service and maintenance employees cannot easily follow them. In order to qualify as one procedure, the supplemental checklists or appendices must support the basic comprehensive (generic) energy control procedures by **having the same**:

- (1) intended uses for different machines or equipment,
- (2) procedural steps for shutting down, isolating, blocking and securing machines or equipment to control hazardous energy,
- (3) procedural steps for the placement, removal and transfer of lockout or tagout devices and the responsibility for them, and
- (4) requirements for testing a machine or equipment to determine and verify the effectiveness of lockout devices, tagout devices, and other energy control measures.

The annual inspection required to be performed on an energy control procedure is intended to ensure the following:

- 1) That the procedure is being followed,
- 2) That the employees involved know their responsibilities under the procedure,

and

3) That the procedure is adequate (with respect to servicing and maintenance of the machines or equipment covered by the procedure) to provide the necessary protection and to identify what changes, if any, are needed.

The employee performing the periodic inspection does not have to observe every authorized employee implementing the energy control procedure on the machine or equipment on which he or she is authorized to perform servicing and maintenance to meet the review requirements under paragraph 1910.147(c)(6)(i)(C)&(D).

The inspector participating in the review needs to:

(1) observe a representative number of such employees while implementing the procedure and

(2) talk with all other authorized employees even though they may not be implementing the energy control procedure.

This review may be completed in one or more meetings in which all authorized employees (as well as all affected employees when tagout is used) will be in attendance to review the specific energy control procedures, as the case may be. OSHA believes that these reviews, which will need to be performed during the periodic inspections at least on an annual basis, will assure that employees follow and maintain proficiency in the energy control procedures and that the inspector will be better able to determine whether changes are needed.

OSHA does not agree that by itself "annual refresher training" for all authorized employees, even if it includes a review of lockout/tagout responsibilities of **each** authorized employee's responsibility under the energy control procedure(s) whether or not he or she is actually implementing the energy control procedure, satisfies the periodic inspection review requirements of paragraph 1910.147(c)(6)(i)(C) and (D). Also, "annual refresher training" will not replace the review requirements of paragraph 1910.147(c)(6)(i)(C) & (D) because certain benefits expected to be derived from the talks with individual employees may not be addressed in this refresher training. Some of the advantages to be derived from these talks include the following: identify energy control procedure inadequacies including deficiencies, misinterpretations and deviations, evaluate task proficiency of authorized employees, provide immediate feedback regarding procedure implementation, and trigger specific retraining.

Group training sessions can be an effective way of accomplishing periodic inspection reviews during which employees' knowledge of the procedure(s) and their recognition that they need to follow the procedure(s) carefully to ensure

the safety of all employees is reenforced. Other review methods include random audits, planned visual observations and modified plant safety tours. One-on-one meetings between the instructor and authorized (and when applicable, affected) employees are not necessarily required.

Under paragraph 1910.147(c)(7)(iii)(A), retraining must be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard or when there is a change in the energy control procedure. OSHA will evaluate periodic inspection protocols to ensure that all energy control procedures are inspected and that each involved employee has an opportunity to review his or her energy control procedure responsibilities.

We appreciate your interest in employee safety and health. If we may be of further assistance, please contact the Office of General Industry Compliance Assistance, Mr. Ronald J. Davies, telephone (202) 219-8031, extension 110.

Sincerely,

John B. Miles, Jr., Director  
Directorate Compliance Programs