

Facility Safety

## A LOTO Tools Tutorial

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A careful and organized approach to lockout/tagout is critically important. Lockout/tagout procedures protect the lives and well-being of workers; failure to build an effective lockout/tagout program can result in serious injury or death.

And yet, despite the critical nature of lockout/tagout and the staggering human cost of making lockout/tagout mistakes (as well as monetary costs by way of punitive fines), it continues to be found in OSHA's top 10 most-cited violations list every year. Given this information, it can be concluded that lockout/tagout non-compliance is a serious, widespread, current, and relevant problem. As such, the problem and potential solutions to the problem warrant a very close look. This article aims to discuss ways for companies to comply with lockout/tagout regulations in the safest, easiest, and most efficient manner possible. It will also cover a number of products that will help businesses create an organized and streamlined lockout/tagout program, including lockout stations, tag centers, group lockout boxes, and lockout information cabinets.

Employers should make every effort to not only observe OSHA standard 1910.147 (The Control of Hazardous Energy), but also make sure complying with the standard is as easy and efficient as possible.

OSHA's LOTO requirements are clear. The Control of Hazardous Energy (lockout/tagout), Title 29 Code of Federal Regulations Part 1910.147, outlines precisely what steps need to be taken in order to use lockout or tagout devices effectively. But, as previously mentioned, the clarity of the standard has not prevented LOTO from consistently appearing among OSHA's most cited infractions. This may be due in some cases to willful negligence or some other blatant disregard for workplace safety. In other cases, however, preventable accidents may occur due simply to poor organization or improper training. This last set of cases comprises our concern here; they may be less egregious, but they are no less dangerous. The most important question facing a business that is implementing a lockout/tagout program can be formulated in the following way: How can we comply with OSHA's requirements in the most organized, efficient, and safe manner? There are a number of products and programs that are designed to address this very question. A brief overview of some of these products follows.

### Lockout/Tagout Stations:

Lockout/tagout stations can help one organize one's lockout program. A lockout station stores and organizes padlocks, hasps, tags, and cable ties. Stations provide an organized, standardized arrangement of locks and easy access to those locks. This has several benefits:

1. Lockout stations foster a habitual, methodical, and organized approach to LOTO safety. By going to the same place to retrieve critical lockout devices, workers develop and maintain safe habits.
2. Lockout stations promote efficient operations. If workers know precisely where all required lockout devices are, this saves valuable time and thereby increases overall productivity.
3. Lockout stations also save space. A centralized location prevents confusion and clutter. Maximizing space, in addition to streamlining operations, also helps to make a facility safer.

Safety tag centers perform a similar function to lockout/tagout stations and will be especially valuable to businesses that require a number of different tags. Tag centers can store a business's most

commonly used tags in a convenient and easy-to-find location.

### **Lockout/Tagout Kits:**

Lockout/tagout stations and safety tag centers will provide a centralized location for important devices. In some cases, however, devices need to be frequently moved from one location to the next. For these instances, lockout/tagout kits are a good solution. Lockout/tagout kits can store several important devices, including hasps, locks, cable ties, and safety tags, while remaining easily portable. If workers are trained to work at several locations within a workplace, lockout kits ensure that all necessary tools and devices are easily carried to the relevant machine. Not only does this save time, but also it makes it easy to comply with safety requirements, making it less likely that crucial corners will be cut.

In much the same way that lockout/tagout devices benefit from organized storage, the same can be said about important lockout/tagout information, especially procedural and technical information. Having a written, machine-specific lockout procedure is required by OSHA. According to OSHA Standard 1910.147(c)(4)(i), "Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section." Lockout/tagout information cabinets can help store this vital information in a safe and organized manner. Usually wall-mountable and made from a strong and durable material, lockout/tagout information cabinets can store machine-specific procedures directly on the manufacturing room floor. This saves time because the procedures do not need to be retrieved from an office or other location. The cabinet will also aid in eliminating confusion; cabinets can be situated close to relevant machines and often contain binders for maximum organization. Manufacturing room floors can be very dirty and full of activity; lockout information cabinets can protect crucial procedural documents from becoming damaged or otherwise unreadable.

### **Group Lockout:**

Unlike lockout stations, kits, tag centers, and information cabinets—which, while highly recommended by this writer, are not explicitly required by OSHA—some type of group lockout device is required in group lockout maintenance or repair operations. OSHA standard 1910.147(f)(3)(ii)(D) states: "Each authorized employee shall affix a personal lockout or tagout device to the group lockout device, group lockbox, or comparable mechanism when he or she begins work, and shall remove those devices when he or she stops working on the machine or equipment being serviced or maintained."

When selecting that devices one will use on group lockout repair or maintenance operations, one should consider the same qualities enumerated previously: organization and efficiency. A group lockout box is a commonly used option, and for good reason. A group lockout box is an effective and easily portable way to organize lockout devices and protect workers. Group lockout boxes hold one lockout padlock on the front latch, usually for use by a supervisor, and feature holes for several other locks on the sides of the box, where maintenance and repair workers can place their locks. Each lock prevents the box from opening.

It works in the following manner: An authorized supervisor locks out the relevant machine at each energy isolation point with a lockout device. The operating key or keys to the lockout device are then placed in the lockout box, and the supervisor places his or her lock on the front latch of the lockout box. Each worker then locks his or her individual locks to the lockout box. The box is then impossible to open until each worker has removed his or her lock. The keys to the lockout devices can then be retrieved by the supervisor so that activation of the equipment can be completed in an orderly and safe manner.

Group lockout boxes are available in a number of different sizes and configurations. Finding a lockout

box that holds the appropriate number of locks should not be especially difficult.

### **A Low-Risk, High-Reward Proposition:**

The risks associated with LOTO non-compliance are grave. Poorly organized or poorly implemented lockout/tagout procedures can result in serious injury or death. Conversely, the rewards associated with a well-organized lockout/tagout program are myriad.

First and foremost, one's workplace will be safe; workers will know that every effort is being put forth to protect them from avoidable injury. In addition, businesses will be able to run more efficiently with a well-organized lockout/tagout program. Workers will not only go through lockout/tagout training, but also they will have the tools to use that training in the most organized and efficient manner possible.

It is hoped that this brief overview of some of the most widely available organizational tools for lockout/tagout has shown that using organizational tools as an integral component of one's lockout/tagout program is a low-risk, high-reward proposition and, as such, it merits serious consideration.

*Previously featured in Occupational Health & Safety magazine.*

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*More checklists, and a sample written program can be found [here](#).*

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