

## TALKING PAPER ON LOCKOUT/TAGOUT FREQUENTLY ASKED QUESTIONS

This talking paper will give you, the supervisor, clarification on use and application of Lockout/Tagout in accordance with AFOSH Std 91-501, Ch. 21 and 29 CFR 1910.147.

*Do I need a lockout/tagout program?*

First, let's review the scope of the Lockout/Tagout program, as defined by the Occupational Safety and Health Administration (OSHA):

*29 CFR 1910.147(a)(1)(i) This standard covers the servicing and maintenance of machines and equipment in which the **unexpected** energization or start up of the machines or equipment, or release of stored energy could cause injury to employees. This standard establishes minimum performance requirements for the control of such hazardous energy.*

We want to focus on “*servicing and maintenance of machines and equipment*”. There is an overwhelming amount of confusion regarding this sentence. As interpreted by Wing Safety, if your unit owns/operates any equipment or machines, and an employee (USAFR, AGR, ART, Civ) must remove a guard or panel (exposing themselves to hazardous energy) to provide service or maintenance, then you must have a Lockout/Tagout program in accordance with AFOSH Std 91-501, Ch. 21. If your machines are maintained and serviced by contractors, the contractor is required, by OSHA, to have a Lockout/Tagout program in accordance with all applicable regulations/standards.

*When do I need locks, and when do I need tags?*

Numerous questions have come up lately regarding locking and tagging equipment. To clarify, it is not a Lockout and Tagout program, but a Lockout or Tagout program. Only when performing electrical work on conductors and circuits does Lockout and Tagout become mandatory. When you have determined that a machine must be locked out, the first item needing to be addressed is “Can I lockout immediately?” Meaning, do you have the necessary equipment (i.e. locks, procedures, etc.) on hand to isolate energy from this machine? If the answer is “yes”, you may proceed with your locally developed Lockout procedures. If the answer is “no”, you must immediately tag the equipment to warn all affected employees that the machine is out of service and unexpected start up could pose a hazard. Assuming the answer is “no” what tag do you need to apply in the interim? The answer is dependent upon the hazard posed by the out of service machine. The question to ask is, “Is the hazard posed by this machine an immediate danger to life and/or health?” If the answer is “yes”, apply AF Form 979 “Danger Tag” and notify Wing Safety immediately. If the answer is “no”, apply AF Form 982 “Do Not Start Tag”, and follow normal Lockout procedures as soon as possible. Upon application of the lock during your routine Lockout procedures the “Do Not Start Tag” may be removed from the machine. You are now ready to proceed with service/maintenance.

*What if I can unplug the machine/equipment that needs servicing/maintenance?*

If your unit only has equipment or machines that can be unplugged, there is no need for a formal Lockout/Tagout program. This does not preclude you from adhering with proper tagging procedures, in accordance with AFOSH Std 91-501, Ch. 21. When service/maintenance is required on an unplugged machine, the plug end of the cord must be tagged with an AF Form 982 “Do Not Start Tag”, as well as controlled by the individual working on the equipment.

*Are our procedures compliant with applicable standards and regulations?*

One of the most identified findings during a Lockout/Tagout program assessment is inadequate procedures. Procedures must be extremely detailed; enough so that an individual unfamiliar with your area could read the procedures, and completely Lockout/Tagout a piece of equipment. Procedures must detail make, model, and location of equipment, exact location of Lockout/Tagout point, and which Lockout equipment is needed for each specific piece of equipment (i.e. breaker lock, valve lock, etc.). These procedures, when created or modified, must be coordinated with Wing Safety, this will ensure the inclusion of all necessary information.

*What if an individual leaves the lock on the machine and we need to unlock it immediately?*

Removal of a lock/tag that is in place due to servicing and maintenance, by anyone other than the employee who applied the lock/tag is **strictly prohibited**. In the event that a lock/tag must be removed, due to mission criticality, by anyone other than the employee who applied it, the following steps must be taken prior to removal:

- Specific training and procedures are developed, documented and incorporated into the shop energy control program. These procedures must demonstrate equivalent safety to the removal of the device by the “authorized employee” who applied it and contain the following elements.
- Verification by the employer that the “authorized employee” who applied the device is not at the facility.
- Making all reasonable efforts to contact the “authorized employee” to inform him/her that his/her lockout or tagout device has been removed.
- Ensuring that the “authorized employee” has the knowledge the lockout/tagout device has been removed before he/she resumes work at the facility.
- Wing Ground Safety (x-1284) must be notified that the lockout/tagout device is being removed by an employee who is not the “authorized employee”.

This paper should be incorporated into your Lockout/Tagout training plan, and is meant to serve as a simple interpretation of the regulations, standards, and guidelines currently in-place.

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