

TO: Distribution

FROM: T. G. Grumbles

DATE: August 9, 1991

Interoffice
Communication

SUBJ: LOCK-OUT/TAG-OUT STANDARD

TGG: JCL: FBJ: / RF

XF: None

VISTA

During our Audit Development Meeting, a question was raised regarding the content of Paragraph (c)(4), Energy Control Procedure, of the standard.

In summary, with a simple reading of the standard (attached), it could be interpreted to require a specific lockout-tagout procedure for every piece of applicable equipment that doesn't meet all eight of the exceptions listed in (c)(4). Also, the OSHA compliance guideline for the standard speaks to the need to "maintain a written procedure for a specific machine or piece of equipment" that doesn't meet the eight conditions listed in the exception note (pages attached).

However the preamble to the rule (attached) clearly states the employer doesn't necessarily need to develop "a separate procedure for each and every machine or piece of equipment". It states... "similar machines and/or equipment (those using the same type and magnitude energy) which have the same or similar types of controls can be covered with a single procedure".

In essence, I believe OSHA's intent was to allow a written procedure, if detailed enough, apply to multiple pieces of equipment. Specific procedures for a single piece, or similar pieces of equipment would be required if specific circumstances made it different from most. In other words specific procedures would be required by exception, rather than the rule.



T. G. Grumbles

dlj
.302

Distribution: K. L. Fogg-LCCP, Brent White-Balt, M. Lunsford-LCVCM

VVV 000007520