

Whitepaper: Lockout Tagout Minor Servicing Option

The Minor Service Exception allows employees to access hazardous areas of the machine without performing lockout/tagout, so long as certain criteria are met.

Lockout Tagout Standard, 1910.147(a)(2)(ii)

Normal production operations are not covered by this standard (See Subpart O of this Part). Servicing and/or maintenance which takes place during normal production operations is covered by this standard only if:

1910.147(a)(2)(ii)(A)

An employee is required to remove or bypass a guard or other safety device; or

1910.147(a)(2)(ii)(B)

An employee is required to place any part of his or her body into an area on a machine or piece of equipment where work is actually performed upon the material being processed (point of operation) or where an associated danger zone exists during a machine operating cycle.



Note: Exception to paragraph (a)(2)(ii): Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations, are not covered by this standard if they are routine, repetitive, and integral to the use of the equipment for production, provided that the work is performed using alternative measures which provide effective protection (See Subpart O of this Part).

Three specific criteria can be used to determine if the minor servicing exception would apply to a particular activity.

First, the activity must be conducted during normal production operations, i.e., while the machine or equipment is actually performing its intended production function.



Second, the activity must be:

Routine: The activity must be a regular course of procedure in accordance with established practices.

Repetitive: The activity must be regularly repeated as part of the production process.

Integral: The activity must be essential to the production process.

Third, if all of these apply, the employer must use alternative measures to provide effective protection from the hazardous energy. Some acceptable alternative measures include specially designed tools, remote devices, interlocked barrier guards, local disconnects, or control switches which are under the exclusive control of the employee performing the minor servicing. These alternative measures must enable the employee to safely perform the servicing task without being exposed to the unexpected energization or activation of the equipment, or the release of stored energy.

If the minor servicing exception is not met in full, the Lockout/Tagout standard is applicable and the machine or equipment must be deenergized and all potentially hazardous energy rendered safe.

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