

Lockout Tagout – Periodic Inspection

How many of you know that a periodic inspection of the energy control procedure is required at least once per year? I would bet a few of you did not know this requirement.

1910.147(c)(6) Periodic inspection.

1910.147(c)(6)(i)

The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed. **I typically conducted this at the end of the year along with other annual requirements. Make a list of all the annual requirements that are required each year. Place this list in your calendar and set a reminder at least a month before they are due. Do not wait until the last minute and try to complete all the annual requirements. I have been there and done that. It does not work very well.**

1910.147(c)(6)(i)(A)

The periodic inspection shall be performed by an authorized employee other than the ones(s) utilizing the energy control procedure being inspected. **I always call the electricians or maintenance personnel and schedule an inspection when an actual LOTO job was being performed. Thus I did not have to interrupt an employee's time.**

1910.147(c)(6)(i)(B)

The periodic inspection shall be conducted to correct any deviations or inadequacies identified.

1910.147(c)(6)(i)(C)

Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected. **This can be difficult to do if there are a lot of employees that fall under this requirement.**

1910.147(c)(6)(i)(D)

Where tagout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized and affected employee, of that employee's responsibilities under the energy control procedure being inspected, and the elements set forth in paragraph (c)(7)(ii) of this section. **Develop an inspection sheet and record all the individuals involved.**

1910.147(c)(6)(ii)

The employer shall certify that the periodic inspections have been performed. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection. **The inspection sheet developed above can serve as the inspection and the certification. Place a certification statement at the bottom of the sheet.**

Questions? Contact The Redstone Group at 617-763-5034 x7007 or jwilliams@redstonegrp.com