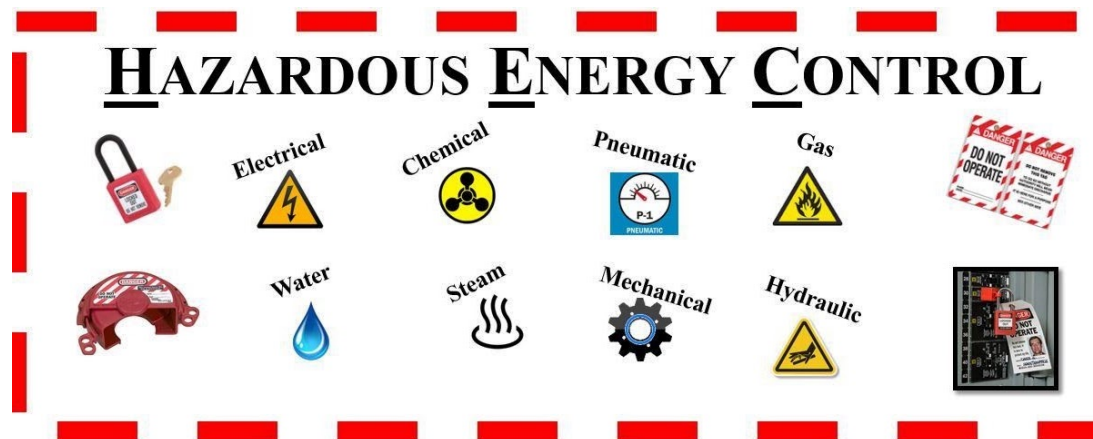


Preventing OSHA Citations for the Control of Hazardous Energy, Part 6



This article explains OSHA's requirements for periodic inspections of energy control procedures under 29CFR.1910.147, emphasizing the importance of ongoing compliance and employee safety through regular reviews and inspections.

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Key Takeaways

- Periodic inspections must be conducted at least annually by an authorized employee not involved in the energy control process.
- Inspections should verify adherence to OSHA requirements and identify any deviations or inadequacies in the energy control procedures.
- Reviews with employees are essential, especially when using lockout or tagout methods, to confirm understanding of responsibilities.
- Additional review of training elements is required when using tagout, ensuring employees are properly trained on procedures.

Frequent inspections help demonstrate good judgment to OSHA, showing proactive safety management beyond just annual checks.

OSHA provides the requirements for the control of hazardous energy in 29CFR.1910.147. The general requirements [1910.147(c)] are extensive.

Let's look at the requirements that pertain to periodic inspection [1910.147(c)(6)]. The employer must inspect the energy control procedure to ensure that:

- It's being followed [1910.147(c)(6)(i)], and
- The OSHA requirements for energy control are being followed.

This inspection must be conducted:

- Periodically, at a period no longer than annual [1910.147(c)(6)(i)].
- By an authorized employee other than those using the energy control procedure being inspected [1910.147(c)(6)(i)(A)].
- To identify and correct any deviations or inadequacies [1910.147(c)(6)(i)(B)].

Where lockout is used for energy control, the periodic inspection shall include a review between the inspector and each authorized and affected employee.

The review is about that employee's responsibilities under the energy control procedure being inspected [1910.147(c)(6)(i)(C)].

Where tagout is used for energy control, the periodic inspection shall include a review between the inspector and each authorized and affected employee.

The review is about that employee's responsibilities under the energy control procedure being inspected [1910.147(c)(6)(i)(D)]. An additional requirement versus using lockout as the control method is that inspection

must also cover the training elements of 1910.147(c)(7)(ii); these pertain to using tagout as a control method.

But why doesn't OSHA simply mandate an annual inspection rather than add "periodic" to the mix? Why not just have an annual inspection to satisfy OSHA? Because an annual inspection might not satisfy OSHA.

Let's say you conduct that inspection for the first time and generate an embarrassingly big list of problems, including rampant non-compliance. Eleven months later, OSHA shows up and finds pretty much the same list and cites you for failing to inspect.

But you're smarter than that. You conduct an inspection after a few days to see what progress, if any, is being made on that list. Depending on the results, you might inspect again after a couple of weeks. Or if progress is good, you might wait a couple of months to inspect again. Now when OSHA shows up eleven months after that first inspection, you have a record of periodically inspecting your energy control procedure. You might still have problems, but one thing you don't have is apathy. OSHA will cut you some slack. The period between one inspection and the next is a judgment call, and OSHA expects you to show good judgment.

Of course, your main goal is to keep employees safe. If you fail to do that, you fail your employees. This periodic conducting of an inspection allows you to tune the training and oversight as needed for the conditions being faced. Not to check off an compliance box, but to keep your employees safe.