Policy Name: Lockout/Tagout (Energy Control) Policy

Policy Applies to: **All Corporate and Parts & Services Operations**

Prepared by	**Effective Date**
Risk Management/Safety	February, 2020

INTRODUCTION:

Developing a proactive safety program is one of the best ways to protect our employees from injury. PODS is committed to helping reduce the risk of injuries or loss by working together to develop controls.

Lockout/Tagout (LOTO) Energy Control is a Policy that defines company requirements for the locking and tagging of energy isolating devices whenever maintenance or servicing is done on machines or equipment.

PURPOSE

This document is designed to define and establish a policy for managing energy sources in which unexpected start-up or the release of stored energy, in compliance with OSHA standard 29 CFR 1910.147.

The LOTO Energy Control Procedure is a separate document that provides guidance for managing the control of energy sources and to ensure that machines or equipment are isolated and locked before the performance of any servicing or maintenance.

DEFINITIONS:

Authorized employee – an employee who locks or tags machines or equipment in order to perform servicing or maintenance

Affected employee – an employee who is required to use machines or equipment on which servicing is performed

Other employees – all employees who are or may be in the area where energy control procedures are being utilized.

Servicing and/or maintenance that takes place during normal production operations will fall under this requirement, if:

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

Energy sources: electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other sources

- Motion waiting to happen found in elevated, suspended, compressed or coiled materials (i.e. containers, doors)
- Kinetic – released loads, uncoiling springs and moving machinery (i.e. PODzilla, overhead doors)
- Electrical – equipment and conductors, circuit breakers, transformers, motors, etc. (i.e. generators)
- Hydraulic – pressurized lift systems (i.e. PODzilla, generators, hoists, forklift, power press)
- Mechanical – turbine, water moving, vehicle/moving equipment, spring compression
- Pressurized air or gas systems – (i.e. compressors)
- Thermal – hot water/steam

LOTO: Key source or shut down mechanism that is locked with a "tag" of consistent and uniform format so that everyone who encounters it will know of its intent and how to avoid danger.

Lockout Devices: locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware. Lockout devices must be substantial enough to prevent their removal without the use of excessive force or unusual techniques, such as bolt cutters or other metal cutting tools.

Tagout devises and ties must be substantial enough to prevent inadvertent or accidental removal. The Tagout devise attachment must be non-reusable, attachable by hand and self-locking and include a sign stating "DO NOT START" or "DO NOT OPERATE".

Non-Company Personnel (Contractors/Temporary staff, etc.)

When outside servicing personnel are engaged in activities covered by the scope of this plan, the site or territory management or other competent professional and the outside employer, in conjunction with risk management, will inform each other of their respective LOTO procedures.

Site or territory manager or other competent professional, in conjunction with risk management, will ensure that our employees understand and comply with the restrictions and prohibitions of the outside employer's energy control program.

- A copy of the contractor's plan will be compared with our plan. The contracting company official will be required to sign an agreement stating that they will follow our policy, as it is unique to our equipment and operations. This agreement will be maintained with the contractor file and retained after completion of the job.
- Site or territory manager or other competent professional will inspect the work of the contractor to ensure that the agreement is being upheld. Any problem or lack of follow-through with the lockout procedure, as identified in the agreement, will be grounds for work to be temporarily stopped and reevaluated. Disregard for the policy and procedure in this plan will be grounds for actions as stipulated in the contract.

EXCEPTIONS: minor tool changes, adjustments, and other minor servicing activities that take place during normal operations are not covered if they are routine, repetitive, and integral to the use of the equipment for operation, provided that the work is performed using alternative measures that provide effective protection in accordance with operational procedures.

COMPLIANCE

All employees are required to comply with the restrictions and limitations imposed upon them during the use of LOTO. Authorized employees are required to perform the LOTO in accordance with identified in this Policy. All employees, upon observing machine(s) or equipment which are locked out for the performance of servicing or maintenance, shall not attempt to start, energize, or use the machine(s) or equipment.

An annual review of the policy will be performed, when changes occur to 29 CFR 1910.147 that prompt revision, or when operational changes occur. This program will be communicated to all persons affected by the risk of injury and subject to the training requirements contained here. This includes both authorized and affected persons, as defined in the OSHA standard.

Non-compliance or abuse of this policy may be grounds for associate counseling action, up to and including termination of employment

EMPLOYEE TRAINING

Each employee authorized to work on equipment for set-up, maintenance, installation or other reason, shall receive training on this Policy and the LOTO (Energy Control) Procedures. All employees will receive initial and supplementary training as needed to fully understand their responsibilities under this Policy.

OVERSIGHT AND MONITORING

Requirements and performance under this policy are closely monitored by the Human Resources Department, Business Unit Leaders and the Risk Manager. Additionally, policy compliance audits will be performed by the Internal Audit Department.

QUESTIONS/ COMMENTS

Any questions or comments surrounding this policy should be forwarded to the Director of Risk Management.

References and Resources:

California Code of Federal Regulations, Title 8, Section 3314
http://www.dir.ca.gov/Title8/3314.html
29 Code of Federal Regulation, Section 1910.147
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9804
Liberty Mutual Safety Net
https://safetynet.libertymutual.com/Documents/ReferenceNotes/RC121.pdf