



Oregon
Theodore R. Kulongoski, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
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November 14, 2003

Reviewed: September 11, 2007

Dave Black
Timber Operators Council
895 Country Club Rd., Suite A-160
Eugene, OR 97401

Reference: Interpretation letter dated January 15, 1997

Dear Mr. Black:

This letter is to rescind the above referenced interpretation letter and clarify OR-OSHA's current position on periodic inspection requirements found in **1910.147, The Control of Hazardous Energy (Lockout/Tagout)**. Periodic inspections are intended to verify and ensure that energy control procedures are properly implemented; providing an opportunity to check on and correct procedure inadequacies and employee use.

Under **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.

(A) The periodic inspection shall be performed by an authorized employee other than the one(s) utilizing the energy control procedure being inspected.

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

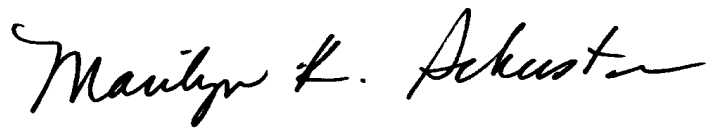
(C) Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected.

OR-OSHA interprets this to mean that each energy control procedure must be **separately** inspected at least **annually**. The authorized inspector conducting the periodic inspection does not have to observe every authorized employee implementing the energy control procedure. The standard is performance based and does not define the number of employees that need to be observed implementing the procedure.

The inspector must review (discuss) with **all** authorized employees their responsibilities under the procedure being inspected. This does not necessarily require separate one-on-one meetings. The review can be accomplished by the inspector meeting with the whole servicing crew (authorized employees who implement the procedure). Tagout procedures require a review with authorized and affected employees.

If you have questions or require further assistance, please contact the technical section at (503) 378-3272.

Sincerely,

A handwritten signature in black ink that reads "Marilyn K. Schuster". The signature is written in a cursive style with a long, sweeping underline.

Marilyn K. Schuster, Manager
Standards and Technical Resources Section
Oregon Occupational Safety and Health Division