



## **INTEROFFICE MEMORANDUM**

### **Oregon Occupational Safety & Health Division**

**Record No:** IM 93-04

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**To:** Technical Services Section

**From:** Marilyn K. Schuster  
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**Subject:** Rule Interpretation: Lockout device removed by employer.  
To answer the question of lockout device removal by the employer using a second key versus cutting the lock off.

**Discussion:** Question: Can there be a second key to a lockout device and under what circumstances can the key be used by the employer to remove the lock?

**Background:** When 1910.147 Subpart J - Lockout/Tagout rules were adopted by Oregon from the federal rules, they were modified to require that each person's lock have a key or combination which is unique to that lock.

The intent of this Oregon initiated rule was to prevent employers from having locks keyed alike that could be used by more than one employee. The employee placing the lock was to be the only person who could remove the lock with the exception of 437-02-147 (e) (3) which is strictly controlled and allows for a lock's removal when the employee has left the work site and the lock must be removed.

There was, however, no intent to require all locks under a single employee's are to be keyed different for each lock. One employee could have ten locks to lock out a system with a single key for all the locks.

Under controlled conditions and with appropriate written procedures it is acceptable to have a second key to a lock. The following

conditions must be met to assure the safety of the workers who originally placed the lock.

1. The second key must be under the control of management and secured so that it cannot be used except under the company's written lockout-device-removal program.
2. The procedures for removing an employee's lock must be part of the company's energy isolation control program.
3. Employees removing the lock must be specifically trained in the lock removal procedures.
4. The lock removal must be fully documented.
5. The employer must try to locate the employee whose lock is to be removed and determine that the employee is not at the facility and is not available to come in and remove the lock and document those attempts.
6. The employer would next verify that the equipment is free of all employees including the one whose lock is being removed.
7. The employer would next follow the standard start up procedures removing the lock with the second key.
8. After removing the lock and starting the equipment the employer must ensure that the employee is notified of the lock removal upon returning to work.

**Conclusion:** If the procedures are properly followed, documented and the second key secured, there would be no violation of the lockout rules by having two keys to a lockout device.

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Standards & Technical Resources