Generic Lockout Procedures Don’t Prevent Fatalities or OHS Violations

OHS regulations require employers to implement policies and procedures to ensure that machinery and equipment is locked out and isolated from its source of energy while it’s serviced. And those procedures must be ***specific to the machine/equipment*** being serviced. This isn’t just a throw-in or clarification but an essential requirement that can literally spell the difference between life and death.

Just ask the family of journeyman GM millwright Daniel Smith who was changing the bushings on the load end lift of conveyor 4 in the body shop when the lift unexpectedly activated, rose up and struck him squarely in the head killing him instantly.

GM did have an energy control procedure containing all of the elements required by the OSHA standard, including methods to shut down machines, place and remove lockout or tagout devices and verify the effectiveness of such devices and other energy control procedures. But as in this country, the U.S. OSHA standard requires that the procedure be ‘specific.’ OSHA contended the GM procedure was too generic and cited the company for a willful violation.

After more than 10 years of litigation, OSHA appeals tribunal upheld the citation, finding the 3-page lockout procedure too ‘bare-bones,’ especially given the complexity of the machines in the workplace. The procedure lacked the details necessary ‘to effectively guide servicing and maintenance employees through the process of fully de-energizing and locking out the equipment,’ the tribunal reasoned. For example, it told employees to use the ‘normal stopping procedure’ for shutting down machines without explaining what that procedure was. The result was a $692,000 fine.

Bottom Line: The Daniel Smith tragedy is a reminder of the need to comply with the OHS lockout and energy control requirements of your jurisdiction by ensuring that that your own lockout procedures are clear and specific enough for the machinery on which they’re used.