OSHA Training Toolbox Talk: OSHA's Lockout/Tagout Standard – Cord/Plug Powered Equipment

[Reference 1910.147(a)(2(iii)]

For every rule, it seems there is always an exception. And that certainly can be said about the OSHA Lockout/Tagout standard. However, misunderstanding when one of the main exceptions to the Lockout/Tagout standard does, and does not, apply when we are performing service or maintenance on equipment can result in our company receiving OSHA citations. Or worse, an employee could suffer an injury or death. So today, we are going to review one of the most commonly misunderstood exceptions to the rule; Cord and Plug Powered Equipment.

According to the exceptions listed in OSHA's Control of Hazardous Energy standard, Lockout/Tagout procedures do *not* have to be implemented when servicing or maintaining cord-and-plug connected electrical equipment IF complete de-energization of the equipment is achieved by unplugging the power cord from its energy source and keeping the plug under the exclusive control of the employee while they are performing the service and/or maintenance activity. But what exactly does that mean?

First of all, unplugging the equipment must address ALL sources of hazardous energy. As we have discussed in a previous toolbox talk, there are some pieces of equipment that still pose a hazard even after the electrical power source has been cut off or unplugged; this is due to residual or potential energy. Unplugging a compressor does not eliminate residual pneumatic power present in storage tanks, cylinders, and transmission lines. And equipment with capacitors and rectifiers may still hold an electrical charge even though the plug has been disconnected from the power receptacle. So step one is to make sure removal of the plug eliminates ALL hazardous energy.

Secondly, the plug must remain "under the exclusive control" of the employee performing the work. That term "exclusive" means if two or more employees are working on one piece of equipment, this exception is not applicable (in that case, all authorized workers would need to apply their personal locks to secure the plug). And the term "control" means the plug must constantly remain in the possession of the employee performing the work (e.g.: holding the plug; sticking the plug in their pocket . . .), or in arm's reach and in the line-of-sight of that employee. If that is not possible, then the employee must secure the plug with a lockout/tagout device.

So, after you have unplugged a piece of equipment, do not overlook the conditions and precautions that apply when utilizing the cord-and-plug powered exception. And if there's ever any doubt? Go ahead and lock it out!

Does anybody have a question or comment about the "cord-and-plug powered" equipment exception listed in the OSHA Lockout/Tagout standard? Please be sure to sign your name to the training certification form so you get credit for attending this training session.