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Lockout/Tagout in California: Building a Cal/OSHA §3314 Energy Control Program

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Amputations and crushing injuries during machine servicing are among the most severe injuries Cal/OSHA investigates, and they almost always trace back to the same failure: someone reached into equipment that could still move. Title 8, Section 3314 governs the cleaning, repairing, servicing, and adjusting of prime movers, machinery, and equipment in California, and it requires far more than a box of padlocks. If you operate a manufacturing plant, food processing facility, warehouse with conveyors and balers, or a maintenance department that services any powered equipment, this standard applies to you, and the written program behind it is what an inspector will ask for first.

What Section 3314 Covers

The standard applies whenever unexpected energization, start-up, or release of stored energy during cleaning, servicing, or adjusting could cause injury. That includes electrical energy, but also hydraulic and pneumatic pressure, gravity, springs, and thermal and chemical energy. A press with a raised ram and a conveyor with a tensioned belt both carry stored energy after the switch is off.

The general rule is that machinery or equipment capable of movement must be stopped and the power source de-energized or disengaged, and, if necessary, the moveable parts mechanically blocked or locked out, before employees clean, service, or adjust it. Where the power disconnect can be locked, it must be locked. Tags alone are permitted only where lockout is not feasible, and then the employer has to show that the tagout system provides protection equivalent to a lock, with additional measures such as removing a valve handle, opening an extra disconnecting device, or blocking a control switch.

Two related requirements often get missed: a lock or tag may be removed only by the person who placed it, and the machine must be checked to ensure it cannot be started before work begins and restarted only after all employees are clear.

The Minor Servicing Exception and Its Limits

The standard allows an exception for minor tool changes and adjustments and other minor servicing activities that take place during normal production operations, provided they are routine, repetitive, and integral to the use of the equipment, and provided the work is performed using alternative measures that give effective protection. Clearing a jam on a packaging line is the classic example.

This exception is where many citations originate. Employers stretch it to cover work that is not routine, not repetitive, or not protected by any alternative measure. If an employee has to defeat an interlock, remove a guard, or place any part of the body in a point of operation, the exception almost certainly does



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not apply and full lockout is required. The alternative measures must be documented in the written procedure for that task, and Cal/OSHA will ask to see them.

The Written Program

Section 3314 requires the employer to establish a hazardous energy control procedure, and that procedure must be in writing. In practice a compliant program has two layers.

The first is the program document itself, which establishes:

- The scope of the program and the equipment it covers
- Who is an authorized employee (performs lockout), who is an affected employee (operates or works near equipment being locked out), and who is an “other” employee who must be kept away
- The lockout hardware in use: locks, tags, hasps, valve covers, plug locks, blocks, and chains, and the rule that each authorized employee has personally assigned locks that are used for no other purpose
- The sequence for shutdown, isolation, lock application, stored energy release, verification of zero energy, and restoration
- Group lockout procedures for jobs involving more than one person or more than one trade
- Shift change procedures so protection is continuous when the crew that started the job is not the crew that finishes it
- Contractor coordination, including how outside contractors’ lockout procedures are reconciled with yours
- Lock removal when the employee who applied it is not available, with verification that the employee is not at the machine before the lock comes off

The second layer is the set of machine-specific procedures. Each piece of equipment with more than one energy source, or with stored energy, or with a disconnect that is not immediately obvious, needs its own procedure identifying every energy source, the location of each isolating device, the method of releasing stored energy, and how to verify isolation. A single generic procedure for a plant with forty machines is one of the most common deficiencies I find, and it is the one inspectors find easiest to cite.

Training Requirements

Training has to match the role. Authorized employees need to know how to recognize hazardous energy sources, the type and magnitude of energy on the equipment they service, and the specific isolation and control methods. Affected employees need to know the purpose of the procedure and that they must never attempt to restart equipment that is locked or tagged. Other employees need to understand that they may not touch a lock or tag that is not their own.

Retraining is required when assignments, equipment, or processes change, and whenever an inspection or incident shows an employee is not following the procedure. Records should show the name, date, and content covered; a roster that says “LOTO training” with no content is weak evidence.



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Periodic Inspection

A written procedure that no one follows is worse than useless because it documents what the employer knew it should have been doing. The program must include periodic inspection of the energy control procedures to confirm they are still accurate and that employees are actually performing them. Federal OSHA requires this at least annually, and that is the benchmark Cal/OSHA inspectors and plaintiff attorneys measure against.

The inspection is not a paperwork review. An authorized employee other than the one being observed watches the procedure performed on the actual equipment, corrects any deviation, and documents the machine, date, employees, and inspector. Findings feed directly into retraining and procedure revision.

Common Citations Under Section 3314

- No written procedure, or one generic procedure applied to all equipment
- Employees clearing jams or cleaning with power on and guards removed, under a claimed minor servicing exception that is not documented
- Locks shared among employees, or a single key kept by a supervisor
- Tags used where the disconnect could have been locked
- No verification step; the disconnect is opened but no one tries the start button
- Stored hydraulic or pneumatic energy not bled down before work begins
- No periodic inspection records

Because these failures result in amputations and deaths, they are routinely classified as serious, and penalties can reach well into five figures per serious violation and higher for willful or repeat violations. Section 3314 also intersects with confined space rules under Section 5157 when mixers, tanks, and silos must be entered for service.

What to Do Now

- Inventory every machine and system that is cleaned, serviced, or adjusted, and identify each energy source and isolating device.
- Write a program document that defines roles, hardware, and the general sequence, and then write a machine-specific procedure for each piece of equipment that needs one.
- Issue individually assigned locks to every authorized employee and remove any shared locks from service.
- Review every task performed under a minor servicing exception, and either document the alternative protective measures or move the task into full lockout.
- Train authorized, affected, and other employees separately, and keep records that describe the content.



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- Schedule and document periodic inspections of the procedures in use, at least annually, with a different authorized employee observing.

McNeil Safety Consulting writes hazardous energy control programs and machine-specific procedures, trains authorized and affected employees, and conducts the periodic inspections that keep the program credible. If your lockout program is a box of locks and a good intention, call **(626) 546-9384** or learn more about our [safety plan writing services](#).

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