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Energy Control Program aka LOTO T8CCR3314

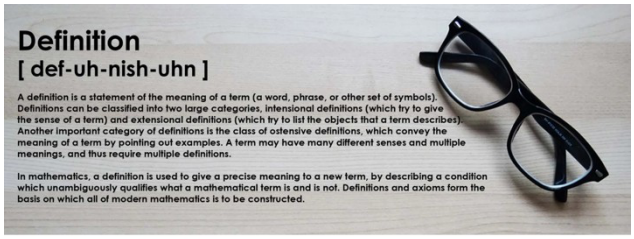
The May 2026 Newsletter Special Topic is a discussion of T8CCR3314 "Control of Hazardous Energy" and some of the related safety orders associated with an inspection regarding that topic. The 2024 Cal/OSHA most frequently cited table site indicates that citation listed has also listed as positions 4, 5, and 7; in other words consistently in the top 10 most commonly issued citations since well before 2015. An examination of this safety order is even more urgent since Federal OSHA has made this topic a **"National Emphasis Program" (NEP)** for enforcement through their "Compliance Directive" on HAZARDOUS MACHINERY Dated 06-26-2025.

The Top 10 Most Frequently Cited Standards by Calendar Year
Calendar Year 2024

Rank	Standard & Link	Standard Description	Resources	Rank in 2023	Rank in 2020	Rank in 2017
6	3314	Control of Hazardous Energy	Lockout/Blockout	7	5	4

Researching the OSHA Investigation Summary site for National data driving this NEP is proof enough of why this topic reached this level of OSHA scrutiny at this time. The screenshots below show the results of search terms related to this topic and is a reminder that an Energy Control Program can NOT just be a document, it needs to be practiced and annually tested. Sharing this information is a reminder that; 1) populating this database is mandatory for every inspection involving a serious injury and/or fatality nationwide within 24 hours of the initial response; 2) is used by Compliance to prove a "realistic possibility"; and 3) requires a "mandatory" serious Citation.

Having established the OSHA priority of this topic, it would be useful to remind the reader that this Code as well as some of the related codes such as the IIPP have some very specific terms that are binding on its context and should be reviewed, defined and documented. In addition to the target Code such as 3314 Energy Control "Definitions" section, there exists "generic", "global" definitions for General Industry, Construction and other sections that will give a clue on how to proceed with Code compliance. One such generic definitions Code is T8CCR3207.



OSHA DEFINITIONS, GLOSSARY & COMMONLY USED TERMS

Historical Data worth investigating as a reminder in support of **TRAINING/RETRAINING! (Screen Shots)**

osha.gov/ords/imis/accidentsearch.display_keyword?v_keywordletter=T

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Investigation Summary Keywords for the Letter T

The table below lists the number of OSHA-170 abstracts by keyword value. The keywords are established at the time the abstract is reviewed.

Keyword List: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z i s

KeyWord Occurances - 57390

Table - 47 | Table Lamp - 1 | Table Saw - 1397 | Tag - 36 | Tag Line - 63 | Tagout - 113 | Tailbone - 15 | Tailgate - 187 | Tandem Lift - 15 | Tank - 1635 | Tank Cleaning - 160 | Tank Truck - 464 | Tarp - 22 | Teacher - 30 | Tear - 38 | Technician - 123 | Telecom Work - 595 | Temperature - 100 | Temporary - 69 | Temporary Employment Agency - 174 | Temporary Floor - 14 | Temporary Lighting - 11 | Temporary Wiring - 15 | Temporary Worker - 185 | Tendon - 391 | Tension - 42 | Tension Release - 8 | Test Equipment - 227 | Testing - 79 | Testing Lab - 28 |

osha.gov/ords/imis/accidentsearch.display_keyword?v_keywordletter=L

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Investigation Summary Keywords for the Letter L

The table below lists the number of OSHA-170 abstracts by keyword value. The keywords are established at the time the abstract is reviewed.

Keyword List: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z i s

KeyWord Occurances - 73358

LP Gas - 21 | Lab Supervisor - 1 | Lab Worker - 30 | Laboratory - 13 | Laborer - 510 | Laceration - 11538 | Lack of Engineering Controls - 669 | Lack of Work Procedures - 671 | Lack of oxygen - 120 | Lacquer - 21 | Lacquer Thinner - 29 | Ladder - 8117 | Ladder Hooks - 23 | Ladder Jack Scaffold - 123 | Ladle - 66 | Landfill - 126 | Landscaper - 219 | Landscaping - 317 | Language Barrier - 5 | Lanyard - 871 | Laser - 38 | Lathe - 511 | Law Enforcement - 20 | Lawn Mower - 721 | Lead - 55 | Leading Edge - 73 | Leaf Blower - 5 | Leak - 778 | Leaning over - 60 | Leg - 11417 | Legionnaires Disease - 21 | Legionnaires' Disease - 14 | Letter Carrier - 3 | Lid - 8 | Life Jacket - 222 | Lifeline - 506 | Lift - 100 | Lift Bucket - 36 | Lift operator - 1 | Lift operator - 45 | Liftgate - 23 | Lifting - 101 | Ligament - 37 | Light Curtain - 115 | Lighting - 432 | Lighting Circuit - 279 | Lighting Fixture - 555 | Lightning - 160 | Lightning Arrester - 23 | Limbing - 93 | Lime - 29 | Lime Kiln - 2 | Limit Switch - 57 | Line Clearance - 43 | Line Connector - 30 | Live-Line Tool - 38 | Liver - 366 | Livestock - 2 | Load Binder - 73 | Load Line - 282 | Load Shift - 764 | Load Stakes - 1 | Loader - 1018 | Loader Bucket - 308 | Loader/Backhoe - 76 | Loading - 1666 | Loading Bridge - 5 | Loading Dock - 891 | Loading Ramp - 97 | Locking Pins - 85 | Lockout - 8711 | Lockout/Tagout - 2783 | Locomotive - 88 | Lodged Tree - 213 | Log - 770 | Log Deck - 31 | Log Loader - 90 | Log Trailer - 34 | Log Truck - 134 |

osha.gov/ords/imis/accidentsearch.display_keyword?v_keywordletter=M

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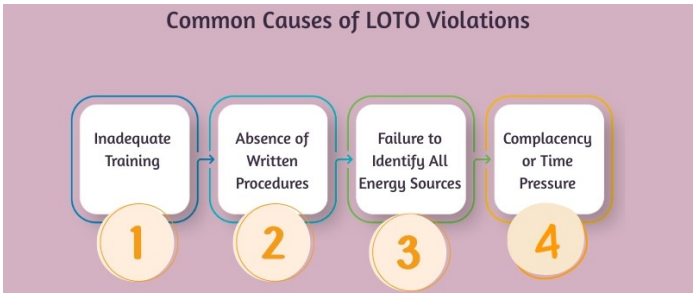
The table below lists the number of OSHA-170 abstracts by keyword value. The keywords are established at the time the abstract is reviewed.

Keyword List: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z i s

KeyWord Occurances - 42556

Machine Cycled - 348 | Machine Guarding - 2759 | Machine Operator - 1889 | Machine Shop - 63 | Machine operator - 2131 | Machine--Misc - 437 | Machinist - 478 | Magnet - 78 | Mail Carrier - 10 | Maintenance - 5709 | Make Up Air - 3 | Malathion - 6 | Malfunction - 255 | Manager - 32 | Mandrel - 72 | Manhole - 385 | Manhole Cover - 71 | Manual Mat Handling - 1162 | Manufacturing - 238 | Marking - 52 | Mason - 18 | Masonry - 53 | Masonry Wall - 115 | Mast - 49 | Mast Climber Scaffold - 3 | Material Handling - 3011 | Maul - 4 | Mdi - 9 | Measuring



*What follows is an edited version of T8CCR3314 from the perspective of any compliance officer finding any evidence leading to the decision to issue a citation for **NOT** maintaining compliance to the Safety Order as required.*

Lockout/Tagout for Employers *etool*

§3314. The Control of Hazardous Energy for the Cleaning, Repairing, Servicing, Setting-Up, and Adjusting Operations of Prime Movers, Machinery and Equipment, Including Lockout/Tagout.

(a) Application.
Subsections (1)-(4) establish the context for which this order applies and directs the employer to the electrical safety orders as a primary controlling safety order in the event of activities related to "installation" of electrical power generation activities.

Compliance *will determine the appropriate order depending on the activity.*

(b) Definitions: "Affected employee, Authorized employee or person**,** Locked-out, Normal Production Operations, Prime Mover".

Compliance will want to ID all the assigned titled personnel by name; *and will want to see if the employer has quantified and defined definitions that apply to their equipment and processes.*

(c) Cleaning, Servicing and Adjusting Operations.
"Machinery or equipment capable of movement shall be stopped and …. Accident prevention signs or tags or both shall be placed on the controls of the power source of the machinery or equipment."

Compliance will *verify that this is mandated by the written LOTO program and applied consistently*

"If the machinery or equipment must be capable of movement during this period in order to perform…"

Compliance will *verify compliance with Manufacturers Specifications and users' guidelines as well as review content, delivery and instructor performing the training.*

(d) Repair Work and Setting-Up Operations.
"Prime movers, equipment, or power-driven machines equipped with lockable controls or readily adaptable to lockable controls shall be locked out or ….In all cases, accident prevention signs or tags or both shall be placed on the controls of the equipment, machines and prime movers during repair work and setting-up operations."
EXCEPTIONS to subsections (c) and (d):
"1. Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations are not covered by the requirements of Section 3314 if they are routine, repetitive, and integral to the use of the equipment or machinery for production, provided that the work is performed using alternative measures which provide effective protection.
2. Work on cord and plug-connected electric equipment for which exposure to the hazards of unexpected energization or start up of the equipment is controlled by the unplugging of the equipment from the energy source and by the plug being under the exclusive control of the employee performing the work.
3. Where an employer has a uniform system with unique and personally identifiable locks designed for lockout, that are placed on the source of energy, accident prevention signs or tags are not required."

Compliance will *verify that **ANY** exceptions claimed are verified and documented.*

(e) Materials and Hardware. "The employer shall provide accident prevention signs, tags, padlocks, seals or other similarly effective means…." Tagout device attachment means shall be of a non-reusable type, attachable by hand, self-locking, and non-releasable with a minimum unlocking strength of no less than 50 pounds."

Compliance will *verify product specifications.*

(f) Repetitive Process Machines. "On repetitive process machines, such as numerical control machines, which require power or current continuance to maintain indexing and where repair, adjustment, testing, or setting-up operations cannot be accomplished with the prime mover or hazardous energy source disconnected, such operations may be performed under the following conditions:….

…***NOTE: "Participant"*** shall mean any other person(s) engaged in the repair, adjustment, testing, or setting up operation in addition to the qualified operator or craftsman having control of the machine operating station."

Compliance will *verify that* ***IF*** *the employer takes advantage of this option that they can prove that reality and has designated and trained "participants" in the process.*

(g) Hazardous Energy Control Procedures. "A hazardous energy control procedure shall be developed and utilized by the employer when employees are engaged in the cleaning, repairing, servicing, setting-up or adjusting of prime movers, machinery and equipment.
(1)(A) through (D) and (2)(A) and
EXCEPTION to subsection (g)(2)(A): The procedural steps for the safe lockout/tagout of prime movers, machinery or equipment may be used for a group or type of machinery or equipment, when either of the following two conditions exist:(1) through (2)

Compliance will *request and critically compare, and contrast the WRITTEN DOCUMENT and test its veracity through interviews and requests for demonstrations of protocols*

(h) Group Lockout or Tagout.
"(1) through (2)(A-D) When servicing and/or maintenance is performed by a crew, craft, department or other group, they shall utilize a procedure which affords the employees a level of protection equivalent to that provided by the utilization of a personal lockout or tagout device…."

Compliance will *request and critically compare, and contrast the WRITTEN DOCUMENT and test its veracity through interviews and demonstrations of protocols*

(i) Shift or Personnel Changes.
Specific hazardous energy control procedures (i.e. lock-out/tag-out) shall be utilized during shift or personnel changes to ensure the continuity of lockout or tagout protection, including, but not necessarily limited to, provision for the orderly transfer of lockout or tagout device protection between off-going and oncoming employees, in order to minimize exposure to hazards from the unexpected energization or start-up of the machine or equipment, or the release of stored energy.

Compliance will *verify that this is addressed in the LOTO program*

(j) Periodic Inspection.
"The employer shall conduct a periodic inspection of the energy control procedure(s) at least annually to evaluate their continued effectiveness and determine necessity for updating the written procedure(s)…."

Compliance will *verify that this occurs and is documented consistently*

(k) Whenever outside servicing personnel are to be engaged in activities covered by this section, the *on-site employer's lockout or tagout* procedures shall be followed.

Compliance will *seek to verify that this is applicable to ALL service personnel including those where the equipment is leased and maintained by the leasing company.*

(l) Training.
"(1) through (4) which invokes the training shall be documented as required by Section 3203.

Compliance will *review ALL documents to assess topic, type, frequency, delivery and vet the trainer for qualifications.*
NOTE: Computer based training only will typically be deemed INEFFECTIVE!

LOTO Examples & Forms Resources to Investigate

UC Berkeley LOTO
UC Regents
State of Oklahoma

California Department of Industrial Relations
Division of Occupational Safety & Health
Publications Unit
SAFETY & HEALTH | FACT SHEET

Lockout/Tagout for Employees

Performing work on equipment and machinery such as set-up, un-jamming, repairs, cleaning, servicing and adjusting can be dangerous. When uncontrolled energy, such as electrical, mechanical, hydraulic, pneumatic, chemical, or thermal, causes unexpected startup or movement of the equipment or machinery, workers can get caught in the moving parts. They can be killed or suffer amputations, crushed body parts or electrical burns.

In California, on average, about 20 workers suffer amputations or die annually when doing this type of work.

Photo Credit: Adobe Stock

Photo Credit: Adobe Stock

Why Do Injuries Happen?

Some common reasons include:

- Not all hazardous energy sources were de-energized and controlled.
- Equipment was not locked out or tagged out after powering off.
- Moveable parts were not mechanically blocked to prevent inadvertent movement or release of stored energy.
- Lockout/Tagout procedures were inadequate.
- Workers had inadequate or no training.
- Workers took shortcuts.

How to Work Safely

California Code of Regulations, title 8, section **3314** requires your employer to implement Hazardous Energy Control Procedures, also called a Lockout/Tagout (LOTO) program, to protect you from the unexpected startup of a machine or sudden release of hazardous energy.

When working on de-energized low-voltage electrical equipment, also follow the requirements in section **2320.4**.

If working in a group, follow your employer's procedures and attach personal lockout or tagout devices to the group lockout or tagout devices. If the work continues through a shift or personnel change, transfer the protections to oncoming workers.

What is Lockout/Tagout (LOTO)?

Lockout means placing a physical lockout device on machinery or equipment, so it cannot operate or move until the lockout device is removed. Once the machinery or equipment is locked, you can safely do your work.

Tagout means placing a visible tag on the machine or equipment, to communicate that restarting or operating the machine or equipment is prohibited.

Use both safety measures together.

What You Can Do

To work safely, make sure you **receive training and understand your employer's LOTO program. If you have any questions or doubts about how to work safely, ask your supervisor right away.** For each machine, piece of equipment or prime mover you have been assigned to work on or around, be sure to **follow your employer's program**, which must include:

- Knowing all hazardous energy sources for each machine. These include:
  - Main and secondary power supplies, and
  - Potential and stored energy (such as capacitors; springs; elevated machine members; rotating flywheels; hydraulic systems; and air, gas, steam, or water pressure).
- Controlling all hazardous energy sources by performing all the necessary actions to de-energize machinery or prevent the release of stored energy, which may include one or more of the following:
  - Shutting down equipment (e.g., depressing a button)
  - Closing valves, disconnecting switches, or unplugging machinery
  - Blocking movable parts
  - Inserting blank flanges
  - Bleeding or opening drain/vent valves
  - Relieving or restraining potential energy.

- Applying personal locks and tags (unless exceptions to section **2320.4** or **3314**(c) or (d) apply).
- Testing and checking that the hazardous energy has been controlled.
- Safely restoring equipment, machinery, and prime movers back to service.

Warnings

- Just turning off a switch is not the same as locking out the energy source, because there may still be energy in the switch. If there is a short at the switch, or the machine is accidentally turned on, the machine will become energized and start to run.
- Remember, there are many types of hazardous energy sources, such as electricity; springs; compressed air; and oil, steam, or water pressure. Any of these can cause sudden and unexpected movement of machines or release of stored energy, which can hurt or kill you.

  To work safety, all hazardous energy sources must be controlled so that no machine or machine part can move and no stored energy can be released.
- Sometimes machines and equipment must be serviced with the power on. If so, your employer must minimize the hazards to you by providing extension tools (e.g., extended swabs, brushes, scrapers) or other methods to protect you from injury. Be sure you are trained on how to use these tools or methods, and always use them properly.

May 2022

This document is available with active links at www.dir.ca.gov/dosh/dosh_publications
For assistance regarding this subject matter, employers may contact
Cal/OSHA Consultation Services at 1-800-963-9424 or **InfoCons@dir.ca.gov**
www.dir.ca.gov/dosh/consultation.html