



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

August 9, 2019

OSHA Docket Office
Docket No. OSHA-2016-0013 or RIN 1218-AD00
Technical Data Center, Room N3653
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

ANSI/ASSP Z244 COMMITTEE COMMENT
29 CFR Part 1910 [Docket No. OSHA-2016-0013]
RIN: 1218-AD00 [The Control of Hazardous Energy(Lockout/Tagout)]

The American Society of Safety Professionals (ASSP) is writing in regard to the U.S. Occupational Safety and Health Administration's (OSHA) Request for Information for "Control of Hazardous Energy (Lockout/Tagout)". ASSP represents over 39,000 Occupational Safety and Health Professionals (OSH) from a wide variety of different disciplines and focuses.

ASSP is an accredited developer of American National Standards via the American National Standards Institute, (ANSI). The ANSI/ASSP Z244 Committee has submitted a statement and comment, attached with this letter, addressing the call for information on Lockout/Tagout. The committee has a wide array of experience with control of hazardous energy and consists of members who significantly participated in the development of standards for many years.

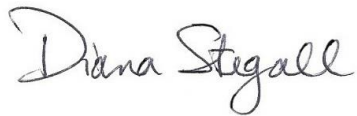
The committee has stated that the current regulation regarding Lockout/Tagout should be opened for revision with the goal of making the process more effective, efficient, and reflective of modern technology and equipment. It is important to note that alternative methods for Lockout/Tagout have been developed since Z244 was drafted in 1982. ASSP points out that possible revisions, to include alternative methods, are based around the concept that an accompanying risk assessment is important in deciding upon any course of remediation.

Due to the complex nature of this topic, the Z244 Committee suggests that OSHA open a dialog with Z244 and other impacted stakeholders following conclusion of this Request for Information. The comment submitted by the Z244 committee provides an in-depth overview of the suggested revisions for Lockout/Tagout and such a dialog of a technical nature would be of benefit.

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Thank you for your attention to this matter, and ASSP is more than willing to assist OSHA with this possible reopening of the rule and revision.

Respectfully Submitted,

A handwritten signature in black ink that reads "Diana Stegall". The signature is written in a cursive style with a large initial "D".

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