



HAZARDOUS ENERGY CONTROL SOLUTIONS INC.

8 Critical Mistakes

in Your LOTO Procedures

...and how to fix them before OSHA does

Most LOTO failures aren't accidents — they're predictable gaps in procedure design and program management.

At Hazardous Energy Control Solutions, we've audited hundreds of programs. Here are the 8 mistakes we see most often.

- 1 Relying on generic procedures without meeting OSHA's criteria**

OSHA permits generic procedures only for truly identical equipment — same energy sources, same magnitude, same disconnect locations. Using one procedure across dissimilar machines is one of the fastest ways to earn a citation. Hazardous Energy Control Solutions builds machine-specific procedures that hold up under inspection.
- 2 Procedures that haven't been reviewed in over a year**

Equipment moves, gets modified, and ages. A procedure written three years ago for a machine that has since been retrofitted is a liability waiting to happen. Annual reviews aren't optional — they're required. Hazardous Energy Control Solutions offers annual procedure audit packages to keep your program current and compliant.
- 3 Missing stored and residual energy sources**

Electrical disconnects are often the starting point — not the finish line. Capacitors, gravity loads, compressed springs, hydraulic pressure, steam, and pneumatic systems can all cause serious injury after power is cut. Every procedure Hazardous Energy Control Solutions writes accounts for all stored and residual energy, fully documented.
- 4 No verification step to confirm zero energy state**

Isolating energy and verifying isolation are two different things. Procedures must include an explicit verification step — testing controls, checking gauges, or attempting startup — to confirm equipment has reached a zero energy state. We build this into every procedure we author.
- 5 Procedures too complex for workers to follow in the field**

A procedure no one follows is worse than no procedure at all — it creates a false sense of compliance. Hazardous Energy Control Solutions procedures use clear visual layouts, step-by-step formatting, and plain language designed for use at the machine, not just in a binder on a shelf.
- 6 Failing to specify the required lockout devices**

Telling workers to 'lockout the machine' without specifying which devices to use leaves the job open to improvisation — and improvisation gets people hurt. Hazardous Energy Control Solutions identifies exact devices needed for each energy source, so workers arrive prepared and execute consistently.
- 7 Treating a procedure document as your entire LOTO program**

Procedures are the foundation — not the program. A complete LOTO program includes employee training, annual inspections, program audits, and a culture of accountability. Hazardous Energy Control Solutions partners with facilities to build programs that go beyond paper compliance to real, lasting safety outcomes.
- 8 No plan for group lockout, shift changes, or contractor coordination**

When multiple workers, shifts, or contractors are involved, a single lock is never enough. Every worker must apply their own personal lock to a group hasp. Outgoing shift locks must be formally transferred before work continues. Host employers must also align their LOTO program with contractors — assuming the other party has it covered is a gap that OSHA citations are built on. We design procedures and programs that account for every person on the equipment.

Ready to fix your LOTO program?

Hazardous Energy Control Solutions provides end-to-end LOTO procedure creation, consulting, and training tailored to your facility, equipment, and workforce.

[HazardousEnergyControlSolutions.com](https://www.hazardousenergycontrolsolutions.com)

Safety first. Compliance always.

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