



## Air Force Occupational Safety Letter of Interpretation

### AF LOI # 17-001

Subject: Hazardous Energy Control (LOTO) - Active Maintenance, Service/Administration Locks and Tags

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Air Force Publications: AFI 91-203 Chapter 21 (21.1.3.4, 21.3.4.3.2 and 21.4.9.1)

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Air Force safety requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional obligations. This letter constitutes AFSEC's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA, DoD and/or Air Force rules. To keep apprised of such developments, you can consult the Air Force Occupational Safety SharePoint site at <https://cs.eis.af.mil/sites/10178>.

**Question:** What is the OSHA definition of "active maintenance" as applied to LOTO locks?

**Response:** "Active maintenance", as used in paragraphs 21.1.3.4, 21.3.4.3.2 and 21.4.9.1, is not defined by OSHA. The intent of the terms, "active maintenance" and "service/administration locks and tags" as defined by AFSEC/SEG, is to clarify the OSHA requirement of 29 CFR 1910.147(c)(5)(ii), which states: "*Lockout devices and tagout devices shall be singularly identified; shall be the only device(s) used for controlling energy; shall not be used for other purposes....*" AFI 91-203, paragraph 21.1.3.4 states, "Equipment not under active maintenance shall not be locked with a LOTO lock. Refer to paragraphs **21.4.9** and **21.4.9.1.1** for additional guidance on service/administrative locks and long-term lockout."

When a piece of equipment is not under "active maintenance", i.e., out of service for an extended period with no maintenance, a configuration control function or other purposes, a service/administration lock would be applied. AFI 91-203, paragraphs 21.4.9.1.2 through 21.4.9.1.2.7 list examples of the suitable use of service/administrative locks and tags (see below):

21.4.9.1.2. Examples of suitable use of service/administrative locks and tags include:

21.4.9.1.2.1. Equipment is (or suspected of being) defective or faulty and cannot be used without producing further damage.

21.4.9.1.2.2. Equipment is placed out-of-service for extended period of time (i.e., shop move, waiting on repair parts).

21.4.9.1.2.3. Equipment is awaiting service personnel who will perform lockout/tagout.

21.4.9.1.2.4. Equipment is configured in a special manner or deemed to be essential in its operational state, and any changes in operating parameters or configuration will impair its proper operation or pose a hazardous situation for personnel.

21.4.9.1.2.5. An actual or potentially hazardous environment exists, and access shall be restricted.

21.4.9.1.2.6. Equipment may require special training or authorization to use.

21.4.9.1.2.7. Newly installed equipment or systems are not fully tested or approved for use.

AFI 91-203, paragraphs 21.1.3.4 and 21.4.9.1.2 will be reworded in the future guidance memorandum and will read as follows:




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**24.1.3.4.** Equipment not under active maintenance shall not be locked with a LOTO lock. Refer to paragraphs **21.4.9.**, **21.4.9.1.1.** and **21.4.9.1.2** for additional guidance on service/administrative locks and long-term lockout, i.e., not under active maintenance.

21.4.9.1.2. Examples of suitable use of service/administrative locks and tags (not under active maintenance) include, but are not limited to:

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