August 19, 2019

OSHA Docket Office
Technical Data Center, Room N3653
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Docket No. OSHA-2016-0013 or RIN 1218-AD00; The Control of Hazardous Energy (Lockout/Tagout)

Dear Sir/Dear Madam:

The National Chicken Council, the U. S. Poultry & Egg Association, and the National Turkey Federation, are non-profit trade associations representing the producers and processors of chickens, turkeys, duck, other poultry, eggs, and affiliated industry suppliers. Combined, our organizations represent companies that produce 90 percent of the nation's poultry products and employ more than 500,000 workers. We are committed to providing a safe and healthy work environment for our employees. We appreciate the opportunity to submit these comments to OSHA on its proposed regulation, *The Control of Hazardous Energy (Lockout/Tagout)* (97 Fed. Reg. 2019-10247, May 20, 2019). We understand OSHA's desire to improve and update this standard and, we respectfully submit the following comments based on an industry-wide survey regarding the proposed updates.

Control Circuit Type Devices

In the Request for Information, Data, and Comments section, the proposed rule asks, "In what work processes should OSHA consider allowing the use of control circuit type devices for hazardous energy control?" OSHA should consider allowing the use of control circuit type devices in work practices where Programmable Logic Controllers (PLC) are used to control the operation of a piece of equipment or robotics. Additional requirements should be maintained for equipment and robotics manufacturers where the shutdown of equipment's or robotics PLC controls will require boot-up time from a full power shutdown. Control circuits must be present and provide: 1) The opening of a control circuit disables the operation of the machine (ex. open doors or guard removal). 2) The control circuit is designed and certified by the manufacturer of the device to provide an alternative form of protection. 3) The manufacturer offers detailed Lockout/Tagout procedures when all energy sources must be brought to a zero-energy state with locks or tags applied.

OSHA should consider a two tier Lockout/Tagout system like the "Affected and Authorized" exposure to energy sources:

- Example 1. Operators enter natural gas ovens when they are "turned off," but do not "lockout" the mechanical gas valve. Maintenance will lockout the gas valve if they are working on the oven.
- Example 2. Operators use the control circuit to shut the machine down to clear a jam (open panel to remove obstruction), but they do not open the electrical panel or mechanical drive systems. Maintenance, however, will need to perform full energy lockout because they may access electrical and mechanical energy sources.

In the Request for Information, Data, and Comments section, the proposed rule asks, "Are there any specific conditions under which the use of control circuit type devices would not be advisable?" Control circuit devices do not reduce the machine to a zero-energy state and could, therefore, only be used to perform defined activities in which the control circuit prevents energy movement. Actions which could potentially release energy (opening an electrical panel, changing a pneumatic or hydraulic cylinder, working under an elevated object) would require full energy isolation.

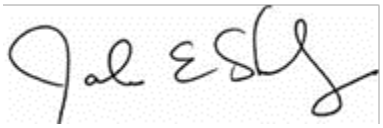
Robotic Technology

In the Request for Information, Data, and Comments section, the proposed rule asks, "Should OSHA consider revising the Lockout/Tagout standard that address advances to robotics technology concerning hazardous energy control? If so, what revisions should OSHA consider?" The industry is increasing the use of industrial robotics, especially in material handling and palletizing operations. Robotics providers design their equipment with barrier guarding, photo-eye sensors, and pressure sensing controls. OSHA should invest in research efforts regarding the robotics technology prior to creating regulations around entry into danger zone operation areas of the robotics.

Thank you for the opportunity to comment. If you have any questions or require additional information concerning these comments, please do not hesitate to contact us directly.

Sincerely,

Mike Brown
President, National Chicken Council



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