

## The LOTO Periodic Inspection - More than Just an “Annual Review”

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### Chat Questions & Answers

**Q:** How does this affect construction companies that occasionally use LOTA for demo phase of construction for replacement of electrical devices such as outlets and light switches?

**A:**

The 1910.147 standard does not apply to construction activities. The reference to LOTO for construction activities is found in OSHA’s Construction standard [1926.417](#) which references Tagout.

#### Additional Resources provided:

The Mabley interpretation letter can be found at this link: <https://www.osha.gov/laws-regs/standardinterpretations/1996-10-29-1>

The Hill interpretation letter can be found at this link: <https://www.osha.gov/laws-regs/standardinterpretations/2010-11-30>

The OSHA Directive CPL 02-00-147, The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures can be downloaded:

[https://www.osha.gov/sites/default/files/enforcement/directives/CPL\\_02-00-147.pdf](https://www.osha.gov/sites/default/files/enforcement/directives/CPL_02-00-147.pdf)

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