

March 28, 2018

Eric Brown  
President  
ALTA Refrigeration  
403 Dividend Drive  
Peachtree City, GA 30269

Dear Mr. Brown:

On behalf of the Global Cold Chain Alliance (GCCA) I am writing to support the position of the International Institute of Ammonia Refrigeration (IIAR) regarding the applicability of Standard 1910.147, lockout/tagout (LOTO) to the ammonia refrigeration industry. GCCA supports the position that LOTO does not apply to manually operated valves (non-automated / non-actuated). The standard does apply to refrigeration equipment or machines that can “unexpectedly energize or startup or release stored energy”.

GCCA is a family of trade associations in the temperature-controlled logistics industry. Our largest and oldest core partner is the International Association of Refrigerated Warehouses (IARW). The majority of our IARW warehouse members utilize ammonia for their industrial refrigeration systems. GCCA and its members work closely with IIAR and rely on its standards and guidelines to ensure safe and efficient operations. This includes following IIAR policies and practices related to LOTO.

According to Standard 1910.147, LOTO is required “when servicing and maintenance of machines and equipment in which the **unexpected** energization or startup of the machines or equipment, or release of stored energy, could harm employees.” Based on the plain language of the standard, manual valves are not covered under LOTO.

Manual valves are not subject to unexpected energization or release of stored energy. The very nature of a manual valve requires an intentional act that would result in an **expected** release or stoppage of stored energy. As a result, Standard 1910.147 does not apply to manual valves. This interpretation of the standard’s application is consistent with industry practice.

GCCA is committed to the safe operation of ammonia refrigeration systems based on the application of industry standards and best practices. GCCA welcomes the opportunity to discuss the application of LOTO to ammonia refrigeration systems and stands ready to engage with policy officials on this and other policies impacting our industry.

Regards,



Corey Rosenbusch  
President & CEO