SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

Locks and Tags: Five Rules for the Only Padlock That Is Protecting a Life

TOPIC NO.	DURATION	AUDIENCE
LO-04	10 to 15 min	All Crew

OSHA REFERENCE 29 CFR 1910.147(c)(5) · 29 CFR 1910.147(c)(3) · 29 CFR 1926.702(j)(2)

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

There is a padlock on the gang box, a padlock on the fuel cage, a padlock on the gate, and a padlock on the disconnect for the mixer. Three of them protect property. One of them protects a man with his arm inside the drum. If all four locks look the same, nobody walking past the disconnect knows which kind it is. If the lock on the disconnect is a hardware-store brass padlock that a pair of pliers opens, it is not protecting anything. OSHA wrote five rules for lockout hardware, and every one of them exists because somebody died behind a lock that did not meet it.

02 THE FIVE REQUIREMENTS IN 1910.147(c)(5)

RULE 1

DURABLE

(c)(5)(ii)(A): locks and tags must be **capable of withstanding the environment** for the maximum time the exposure is expected. Outdoors, wet, corrosive, hot. A lock that rusts shut in a week or a paper tag that dissolves in rain does not meet it. Tags must not deteriorate or become illegible in wet or corrosive conditions.

RULE 2

STANDARDIZED

(c)(5)(ii)(B): lockout and tagout devices must be **standardized within the facility** by at least one of color, shape, or size. For tags, also print and format. The point: anyone on the site can recognize a lockout lock from across the room and knows it is not the gate lock. Red safety padlocks, one style, site-wide.

RULE 3

SUBSTANTIAL

(c)(5)(ii)(C): locks must be **substantial enough to prevent removal without excessive force or unusual techniques**, like bolt cutters or other metal-cutting tools. Tags and their attachments must be non-reusable, self-locking, non-releasable, hand-attachable, and have a **minimum unlocking strength of 50 pounds**: a one-piece nylon cable tie, not a twist tie or a string.

RULE 4

IDENTIFIABLE

(c)(5)(ii)(D): every lock and tag must **indicate the identity of the employee who applied it**. Name on the lock, engraved or on a durable tag. Or a numbered lock with a log that says whose it is. The affected employee who needs the machine has to be able to find you by looking at the lock.

RULE
5

USED FOR NOTHING ELSE

(c)(5)(i): lockout and tagout devices are **singularly identified**, are the **only devices used** for controlling energy, and **are not used for other purposes**. Your red lockout lock never goes on a gate, a toolbox, or a locker. The day it does, the one on the disconnect stops meaning anything.

03 WHAT THE TAG HAS TO SAY

1910.147(c)(5)(iii) requires tags to warn against the hazardous condition if the machine is energized and to carry a legend such as **“Do Not Start. Do Not Open. Do Not Close. Do Not Energize. Do Not Operate.”** In construction, **1926.702(j)(2)** says tags on concrete and masonry equipment "shall read **Do Not Start** or similar language.“ The tag also carries the authorized employee’s name and, under most programs, the date and the reason. A tag that says ”Out of Service" with no name is a note, not a tagout.

✓ A LOCKOUT DEVICE	✗ NOT A LOCKOUT DEVICE
THE LOCK **Red (or the site color) safety padlock, keyed differently from every other lock, one key held by the person who applied it**	THE LOCK **A brass hardware-store padlock, a combination lock, a lock with a spare key in the gang box, a lock keyed alike to the gate**
THE TAG Durable plastic tag, “DANGER: DO NOT OPERATE,” name, date, attached with a 50-pound self-locking nylon tie	THE TAG Masking tape and a Sharpie. A paper tag on a string. A note on the panel. A rag tied around the handle
THE HARDWARE Breaker lockout clips, valve covers, plug locks, multi-lock hasps, group lock box	THE HARDWARE Zip-tying the handle. Taping the breaker. Removing the fuse and putting it in your pocket
WHO HOLDS THE KEY Only the person who applied it. No spares, no master in the office	WHO HOLDS THE KEY Anyone. A master key on the super’s ring that opens every lockout lock on the site

04 LOCK FIRST. TAG ONLY WHEN YOU CANNOT LOCK.

THE RULE **LOCKOUT BEATS TAGOUT**

1910.147(c)(2) and (c)(3)

✗ **DON'T TAG WHAT YOU COULD HAVE LOCKED**

1910.147(c)(2)(ii): if the energy isolating device **is capable of being locked out, the employer shall use lockout**, unless they can show a tagout system gives full employee protection. A tag is a warning. It does not physically stop anyone. A tag alone is allowed only on a device that cannot physically accept a lock, and then only with extra measures under **(c)(3)(ii)**: pulling a fuse, removing an isolating circuit element, blocking a controlling switch, opening an extra disconnect.

✓ **LOCK IT, AND TAG IT TOO**

Most programs require both: the lock physically prevents operation, the tag tells everyone whose lock it is and why. Where you cannot lock (an old breaker with no hasp, a valve with no cover), tag it, add the extra isolation step, and get the device fixed so it can be locked next time. **(c)(2)(iii)**: any new or overhauled equipment must have lockable isolation devices.

⚠ **A LOCK WITH A SPARE KEY IS A TAG**

The entire system rests on one fact: the only person who can remove the lock is the person it is protecting. A master key, a spare in the foreman's truck, a combination everybody knows, or a lock keyed alike to the next guy's lock turns a lockout into a tagout without the extra protections. One key, in one pocket, on one person who is inside the machine.

05 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

Lockout hardware is cheap and the citations are not. A site-wide kit of standardized red locks, breaker and valve lockouts, hasps, and printed tags makes every lockout look the same and proves the program exists the moment an inspector opens the gang box.

[INDIVIDUAL]

FOR YOU

The lock on the disconnect is the only thing between a coworker's thumb on the start button and your arm in the machine. It needs to be the right lock, with your name on it, and the only key in your pocket.

[HOME]

FOR LIFE OFF-SITE

Breaker lockout clips cost a few dollars and fit the panel in your house. The next time you are inside a junction box or a dishwasher, put one on the breaker. Nobody in the house will flip it to "see why the lights are off."

06 TODAY'S DRILL

TODAY'S DRILL **INSPECT YOUR LOCK**

Everyone who is an authorized employee holds up their lockout lock. Check it against the five rules: durable for this site, the standard site color and style, substantial (not a brass padlock), your name on it, and never used on anything else. Check that you have the only key. Then open the lockout kit and confirm there are breaker clips, valve covers, hasps, and tags with a legend that reads "Do Not Operate." Anything missing goes on the order today.

07 CREW DISCUSSION

Take 2 minutes. Pick one.

1. Whose lock is on any disconnect on this site right now? Can you tell by looking at it?
2. Is there a spare key or master key for the lockout locks anywhere on this site? Who has it, and why?
3. What have you seen used as a "tag" on this site? Tape, a rag, a note? Would it hold 50 pounds?

08 ATTENDANCE & SIGN-OFF

All attendees confirm they participated in this Toolbox Talk and understand the content covered.

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

SKILLSIGNAL™
Construction Safety & Compliance

READY TO DIGITIZE YOUR TOOLBOX TALKS?

Digital sign-offs, instant distribution, and your full safety program in one place. No more paper.

Book a demo at **skillsignal.com**