SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

Lost and Found: The Only Legal Way a Lock Comes Off Without Its Owner

TOPIC NO.	DURATION	AUDIENCE
LO-09	**10 to 15 min**	**All Crew**

OSHA REFERENCE 29 CFR 1910.147(e)(3) · 29 CFR 1910.147(c)(5)(ii)(D) · 29 CFR 1910.147(f)(4)

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

It is 4:30. The crew needs the pump. The pump has a red lock on the disconnect. The name on the lock is a mechanic nobody has seen since lunch. His key is sitting on the bench right under it. Everybody is looking at you, and the key is right there. Here is what you do not know: whether he went home, went to the supply house, or is inside the pump housing on the far side where you cannot see him. The lock does not know either. That is the point of the lock. The standard allows exactly one way to remove it without him, and "the key was right there" is not on the list.

02 THE RULE

WHO REMOVES A LOCK

1

PERSON

1910.147(e)(3)

THE ONE WHO PUT IT ON

29 CFR 1910.147(e)(3): each lockout or tagout device **“shall be removed from each energy isolating device by the employee who applied the device.”** Not the foreman. Not the super. Not the guy who found the key. The standard allows an exception only when the authorized employee **“is not available”**, and only under a written procedure with specific steps, which is the rest of this talk.

03 THE EXCEPTION, STEP BY STEP

When the person who applied the lock is not available to remove it, **1910.147(e)(3)** allows the employer to remove it under a procedure that is **documented in the energy control program** and includes, at minimum:

STEP **1**

VERIFY THE PERSON IS NOT AT THE FACILITY

(e)(3)(i): the employer **verifies that the authorized employee who applied the device is not at the facility.** Not “somebody said he left.” Check the gate log, the sign-out, the truck, the phone. Walk the machine. A person who is still on site is available, and the exception does not apply.

STEP **2**

MAKE ALL REASONABLE EFFORTS TO CONTACT THEM

(e)(3)(ii): the employer **makes all reasonable efforts to contact the authorized employee** to tell them the lock is being removed. Call, text, radio, call the office, call the spouse. Document every attempt. The goal is for the employee to hear it from you, not to discover it tomorrow.

STEP 3

MAKE SURE THEY KNOW BEFORE THEY RESUME WORK

(e)(3)(iii): the employer **ensures the authorized employee has this knowledge before resuming work** at the facility. The worst case the standard is guarding against: the mechanic comes back in the morning, sees the pump, assumes it is still locked out, and goes back inside it. He has to be told, in person, before he touches the machine.

STEP 4

ONLY A DESIGNATED PERSON CUTS IT, AND IT GETS WRITTEN DOWN

The program names who is authorized to remove another person's lock (usually the supervisor or safety manager), how (bolt cutters, not the found key), and the record kept: who, when, why, what efforts were made. The key on the bench **goes to the supervisor**, not into the lock.

04 THREE SITUATIONS, ONE PROCEDURE

THE SITUATION	WHAT YOU DO
LOCK ON, OWNER GONE, KEY FOUND Lock on the disconnect, the key lying nearby, owner nowhere in sight.	LOCK ON, OWNER GONE, KEY FOUND **Do not use the key. Give it to the supervisor. Supervisor runs (e)(3): verify off-site, contact, record, remove, and brief the owner before he works again.**
LOCK ON, OWNER GONE, KEY IN HIS POCKET Lock on the disconnect, owner went home with the only key.	LOCK ON, OWNER GONE, KEY IN HIS POCKET **Same procedure. Verify, contact, document. The designated person cuts the lock. The lock is destroyed and the owner gets a new one.**
YOU LOST YOUR OWN KEY You are the authorized employee and your key is gone.	YOU LOST YOUR OWN KEY **Report it immediately. The supervisor cuts your lock under the procedure, destroys it, and issues a new lock and key. A lock with a key somewhere unknown is a lock anyone might open.**

⚠ **THE KEY ON THE BENCH IS A TRAP**

A found key feels like permission. It is the opposite. It means the owner may be ten feet away inside the machine and set it down to work. The person who uses a found key to remove someone else's lock has bypassed every protection the standard provides and, under most company programs, is finished on the site that day. Hand it to the supervisor and let the procedure run.

05 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

Every program needs the (e)(3) procedure written down before it is needed: who can remove a lock, how, what gets documented. A site that has it runs the steps in twenty minutes. A site that does not has a foreman with bolt cutters and no record.

[INDIVIDUAL]

FOR YOU

The lock with your name on it is only worth something if nobody else will ever open it. The day a found key opens one lock, every lock on the site becomes a suggestion, including yours.

[HOME]

FOR LIFE OFF-SITE

You will never need this at home. But the principle is the same: the person who unplugged the saw is the person who plugs it back in. Nobody else.

06 TODAY'S DRILL

TODAY'S DRILL **FIND THE PROCEDURE, NAME THE PERSON**

Open the site's written energy control program and find the lock removal procedure under (e)(3). Name the person on this site who is designated to remove another employee's lock. Name where the record is kept. If the program does not have the procedure, or nobody can name the designated person, that is the gap to close this week. Then check every lock on the site right now for a name.

07 CREW DISCUSSION

Take 2 minutes. Pick one.

1. Has anyone ever seen a lock cut or removed by someone other than its owner? What happened before and after?
2. If you found a key next to a lock right now, who would you hand it to, and would they know what to do with it?
3. Has anyone here ever gone home with a lock still on a machine? How did you find out, and who told you?

08 ATTENDANCE & SIGN-OFF

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

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

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