

**U.S. Department of Labor**

Occupational Safety and Health Administration  
Washington, D.C. 20210



Reply to the attention of: DEP/GIAE/RI/23657

JUN - 3 2013

Mr. Brandon Furber  
Electromark  
6188 West Point Bay Road  
Wolcott, New York 14590

Dear Mr. Furber:

Thank you for your February 11, 2013 letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Enforcement Programs (DEP). You asked about OSHA's general requirements under 29 CFR 1910.147 and 29 CFR 1910.269 for tagout devices.

This letter constitutes OSHA's interpretation only of the requirements discussed below and may not be applicable to any question not delineated within your correspondence and our subsequent telephone communication. Your paraphrased background information and question and our response follow.

**Background:** The provisions at §1910.147(c)(5)(ii)(C)(2) and §1910.269(d)(3)(ii)(D) contain essentially identical language. The provision under §1910.269 reads as follows:

Tagout devices, including their means of attachment, shall be substantial enough to prevent inadvertent or accidental removal. Tagout device attachment means shall be of a non-reusable type, attachable by hand, self-locking, and non-releasable with a minimum unlocking strength of no less than 50 pounds and shall have the general design and basic characteristics of being at least equivalent to a one-piece, all-environment-tolerant nylon cable tie.

**Question:** Does the “minimum unlocking strength of no less than 50 pounds” required of the attachment means (that is, nylon cable tie (otherwise known as a “zip tie”)) for tagout devices also extend to being a requirement for the minimum tear strength resistance for the tag material and the attachment hole that is a typical feature of the tag itself?

**Reply:** No. Although 29 CFR 1910.147(c)(5)(ii)(C)(2) and 29 CFR 1910.269(d)(3)(ii)(D) specify minimum unlocking strengths for the means of attachment, this requirement does not apply to the tag portion of the tagout device.<sup>1</sup>

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<sup>1</sup> *Tagout device* is defined under 29 CFR 1910.147(b) as:

A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

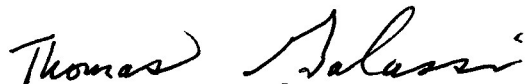
Regarding tags for tagout devices, provisions under §1910.147(c)(5) and §1910.269(d)(3)(ii) require that these tags must meet certain requirements. These requirements include, but are not limited to:

Tags must:

1. be singularly identified; must be the only devices used for controlling energy; may not be used for other purposes (§1910.147(c)(5)(ii); §1910.269(d)(3)(ii));
2. be capable of withstanding the environment to which they are exposed for the maximum period of time that exposure is expected (§1910.147(c)(5)(ii)(A)(1); §1910.269(d)(3)(ii)(A));
3. be constructed and printed so that exposure to weather conditions or wet and damp locations will not cause the tag to deteriorate or the message on the tag to become illegible (§1910.147(c)(5)(ii)(A)(2); §1910.269(d)(3)(ii)(A)(1));
4. not deteriorate when used in corrosive environments (such as areas where acid and alkali chemicals are handled and stored) (§1910.147(c)(5)(ii)(A)(3); §1910.269(d)(3)(ii)(A)(2));
5. be standardized within the facility in at least one of the following criteria: Color, shape, size, including standardized print and format (§1910.147(c)(5)(ii)(B); §1910.269(d)(3)(ii)(B));
6. be substantial enough to prevent inadvertent or accidental removal (§1910.147(c)(5)(ii)(C)(2); §1910.269(d)(3)(ii)(D));
7. indicate the identity of the employee applying the device(s) (§1910.147(c)(5)(ii)(D); §1910.269(d)(3)(ii)(E)); and
8. warn against hazardous conditions if the machine or equipment is energized and must include a legend such as the following: *Do Not Start, Do Not Open, Do Not Close, Do Not Energize, Do Not Operate* (§1910.147(c)(5)(iii); §1910.269(d)(3)(ii)(F)).

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA's requirements are set by statute, standards, and regulations. Our letters of interpretation do not create new or additional requirements but rather explain these requirements and how they apply to particular circumstances. This letter constitutes OSHA's interpretation of the requirements discussed. From time to time, letters are affected when the Agency updates a standard, a legal decision impacts a standard, or changes in technology affect the interpretation. To ensure that you are using the correct information and guidance, please consult OSHA's website <http://www.osha.gov/>. If you have further questions, please feel free to contact the Directorate of Enforcement Programs at (202) 693-2100.

Sincerely,



Thomas Galassi, Director  
Directorate of Enforcement Programs