

### Bureau of Safety and Environmental Enforcement

### **SAFETY ALERT**

Contact: bseepublicaffairs@bsee.gov

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## **BSEE Risk-Based Inspections Reveal Increase in** Slip-Trip-Fall Hazards on Offshore Facilities



Figure 1: An example of tripping hazards aboard an offshore facility.

Background: The Bureau of Safety and Environmental Enforcement (BSEE) Gulf of America Region (GOAR) identified a potential risk associated with slips, trips and falls (STFs) across the Outer Continental Shelf (OCS) between May 2024 and April 2025. During this period, 22% of all injuries reported to BSEE were attributed to STFs, surpassing lifting-related injuries for the first time in recent years. These STF injuries were often severe, resulting in major injuries defined as three or more days away from work, restricted work, or job transfer.

In response to the rise in operator and contractor injuries, BSEE initiated a Performance-Based Risk Inspection (PBRI). The inspection covered 19 assets, including production platforms and well operations, across the Gulf. These assets were operated by 17 unique operators.

#### **Incident Findings**

- Training While a few operators and contractors provided limited computer-based training associated with STFs, most of the operators and contractors associated with the inspected facilities had no formal training requirements or program for the prevention of STFs.
- Hazard Identification / Hunts Throughout the inspection, offshore personnel
  indicated they had a regular work schedule to clear paths and ensure walkways
  were free from obstructions, which they considered part of their daily operations.
  However, only one Operator provided evidence of a "Start Work Check" that requires
  employees to clear paths and floorways before lifting, pumping, tubular handling
  and high-pressure testing operations.
- Unguarded or Sharp Edges BSEE inspection teams identified unguarded and sharp edges on multiple inspections. These edges could cause severe injuries like cuts, lacerations, punctures, and even amputations during STF incidents.
- Mental Focus Investigation teams reviewed non-reportable incidents from operator logs and found that a common cause in multiple STF incidents was the lack of attention while walking. An example was walking forward and looking upward at the same time.
- Simultaneous Operations On facilities where simultaneous operations were underway, such as construction and well-related activities, working surfaces and walkways were inundated with hazards. Inspectors found wet floors with loose, flakey rust; hoses and tubing on the ground in front of an egress route and life vest box; areas with uneven grating; temporary electrical lines without proper tagging; scaffolding and a ladder in the path of an egress route; and metal pipe and tubing on the deck floor that was not anchored down or properly stored. BSEE inspectors identified all these hazards, not contract or operator personnel, during pre-job hazard hunts, toolbox talks, or in job-specific Job Safety Analysis (JSA).
- Safety Boots The inspection confirmed most operators and contractors had safety boot policies in place that covered ANSI Z41-1999 and ASTM F2413 recommendations. However, little evidence was provided on boot inspection programs implemented on the OCS to ensure the boots were in safe working order.
- Marking of Obstructions / Contrast and Visibility Contrasting colors and surface markings were used where applicable; however, BSEE inspectors identified areas

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that needed improvement, which the operator corrected. A recent 20-foot fall down stairs and a trip over a deck penetration were also attributed to faded paint on the grating, and a lack of contrasting colors to help identify the hazard.

# To help prevent similar incidents in the future, BSEE recommends that operators and their contractors, where appropriate, consider the following:

- Emphasize the importance of offshore workers remaining alert, especially in highrisk areas like stairwells, decks, and worksite exits. While on OCS facilities, individuals should take a moment to scan their path for potential hazards. Some operators presented information on their "20-20-20 rule" Every 20 minutes, take 20 seconds to look 20 feet around you, actively searching for any hazards.
- Ensure that high-traffic areas are kept clear of obstruction and maintained in a safe condition. Consider utilizing IOGP's Start Work Checks to ensure safeguards are implemented to prevent STFs by workers at the job location before work commences.
- Evaluate OSHA's regulations (29 CFR 1910 Subpart D) for walking and working surfaces and consider developing formalized training requirements that address the causes of slips, trips and falls and how to avoid them.
- Require all offshore personnel to wear appropriate foot protection and have programs in place to ensure they inspect and maintain the soles to achieve firm traction. Operators should follow 33 CFR 142.33 and ensure foot protection for personnel is adequate for their duties.
- Review the work activities on all OCS facilities and bring awareness to walkways
  with a larger equipment presence (generators, pumps, scaffolding, hoses, etc.).
  Additionally, operators on fixed and floating offshore facilities should review United
  States Coast Guard Regulations 33 CFR Part 142 Workplace Safety and Health.
- Complete walk-downs of their platforms and identify all sharp or unguarded edges. If any are identified, mitigation measures should be implemented to reduce the risk of cuts or lacerations during a STF event.

- BSEE -

A Safety Alert is a tool used by BSEE to inform the offshore oil and gas industry of the circumstances surrounding a potential safety issue. It also contains recommendations that could assist avoiding potential incidents on the Outer Continental Shelf.