

# SAFETY ALERT



**Safety Alert No. 2020-389**

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## **Fatality Caused By Freefalling Pipe Underscores the Need to Adhere to Safety and Environmental Management Systems & Safe Work Practices**

A fatal incident occurred during construction operations on a Gulf of Mexico facility when a contractor was using ½-inch manila rope to lower a 6-inch diameter pipe cut 4 ft. long over 30 feet onto the +10 deck below. During the descent, the rope parted causing the pipe to free fall. At the same time, a contractor on the +10 deck was maneuvering in the landing zone. The pipe struck the contractor in the head, hit the +10 deck then went overboard into the Gulf of Mexico. Despite wearing a hard hat, the contractor suffered a fatal injury.

A subsequent investigation revealed that contractors hired by the operator started a firewater piping system demobilization the day before the fatality. The job safety analysis (JSA) failed to identify specific task steps and potential hazards specific to the job task. Scaffolding erected for the construction operation was not built per policy and procedure and known hazards were not discussed in pre-job safety meeting.

During the demobilization, two contractors on scaffolding were cutting the firewater piping into pieces. On both the morning the incident occurred and the day before, contractors allowed several pieces of pipe to fall over 30 feet from scaffolding and into the Gulf of Mexico. At no time did the contractors use stop work authority (SWA) to determine the imminent risk or danger. On the morning of the fatality, the fallen pipe hazard was not mentioned or identified as a hazard in the pre-job safety meeting.

The operator representative assigned as the facility person in charge and ultimate work authority was not familiar with all the responsibilities and obligations required for the position. The contractor representative assigned to lead the construction operation did not review all the operator's policies and procedures and allowed construction operations to proceed without proper permits. The investigation determined that neither supervisor maintained Safety and Environmental Management Systems (SEMS) oversight nor implemented effective safe work practices (SWP).

Some contractor personnel could not read English. BSEE's Investigation Team determined that these employees were unable to read copies of the operators SWP manual, employee & non-employee orientation checklist or job specific JSAs. BSEE is not suggesting that these personnel did not understand safety, but it would be difficult for anyone to understand the information on the documents they are required to initial/sign when they cannot read the specific language used in the documents.

The purpose of a SEMS is to enhance the safety of operations by reducing the frequency and severity of incidents. A SEMS plan and SWP are ineffective if not enforced by those responsible for leading personnel or supervising operations on the OCS. It is imperative that operators understand that it is their responsibility to ensure compliance with, and adherence to, SEMS and SWP.

**Therefore, BSEE recommends that operators consider the following:**

- Ensure personnel are familiar with their job descriptions and have the knowledge and training to accomplish the duties assigned per CFR 250.1913 (d).
- Add fire watch responsibilities per 30 CFR 250.113(2) to Hot Work Permits.
- Provide adequate training for employees responsible for leading personnel and supervising operations on offshore facilities.
- Communicate Safe Work Practices and Safety and Environmental Management Systems and ensure full compliance during operations.
- Have policies for scaffolding operations on facilities.
- Re-emphasize each person's obligation to use SWA when a hazardous situation appears imminent or an unsafe condition or act is observed that could affect the safety of personnel and/or the environment.
- Review the marine trash and debris video produced by BSEE (<https://bit.ly/2vMHlhx>) and re-emphasize that it is an employee's obligation to report items that fall into the marine environment.
- Provide safety documents in languages that can be understood by the workers on your facilities.

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.