Investigation into Grating Failure Fatality Reveals Deficiencies in Hazard Identification and Communication with Barriers and Barricades

On May 29, 2019, a night operator went missing on a production platform while performing routine assigned work. The operator was never located. Of the findings and probable causes discovered during this investigation; installation of a barricade and hazard communication were identified to be essential elements that could have prevented this fatality if executed.

The investigation showed there was a communication breakdown. Although the hazard of the weak grating had been known by supervisory personnel, a supervisor decided to delay the repair until other work was complete after placing two strands of red danger tape in the area. Supervisory personnel failed to share the information regarding the weak grating with the operators and construction crew.

Additionally, the hazardous grating was not barricaded with a rigid structure. The operating company conflated the definition barricade and barrier to include caution tape and fixed or hard structures. The method chosen did not impede personnel from accessing the hazardous area. Furthermore, the area was saturated with more red
danger tape in close proximity to the hazardous grating for hot work operations on the deck above. Various witnesses reported being in the area of the hazardous grating during the hot work operations and did not notice the red danger tape that was placed to call attention to the hazardous grating.

Therefore, BSEE recommends that operators consider the following:

- Review Safety Alert 353 in conjunction with this Safety Alert.
- Review internal Safe Work Practices and contractor Safe Work Practices and ensure that operations personnel understand the requirements/expectations of barricades. Effective hard barricades include rigid structures that cannot be moved and present an impedance to traversing an area of concern. Operators should re-emphasize the need to use hard barricades over caution tape. The tape will not always stop personnel from entering an area with hazards.
- Review and apply 30 CFR 250.1909 (h): Ensure that management of safety hazards and environmental impacts is an integral part of the design, construction, maintenance, operation, and monitoring of each facility.
- Review and apply 30 CFR 250.1914 (f): You must inform your contractors of any known hazards at the facility they are working on including, but not limited to fires, explosions, slips, trips, falls, other injuries, and hazards associated with lifting operations.
- Review bridging agreements at least annually and recognize any gaps in Safe Work Practices between contractor and operator.
- Conduct a review of your facility to identify any open holes or surfaces that are not capable of supporting personnel and, if such an area or open hole is identified, ensure that it has been properly barricaded and/or covered.
- Identify and mitigate additional hazards created from modified work zones during construction and other activities to ensure individuals do not miss or ignore barriers and barricades preventing access to hazardous work areas.
- Review internal Safe Work Practices to ensure that the method to communicate physical hazards and hazards due to ongoing operations are not the same. For example, using red danger tape to mark a location with heavy corrosion while also using red danger tape as area access control for a task.
- Provide signage on barricades to note if fall protection is required before entering and identify the known hazard(s).