

OSHA to Step Up Enforcement Initiatives

By Jason LeMasters, Vice President, FDRsafety

OSHA's crackdown on enforcement is now specifically targeted at the oil and gas industry, with the agency giving notice that it will be paying special attention to issues surrounding flame resistant clothing.

In addition, the agency has just announced other enforcement initiatives that oil and gas companies, like those in other industries, need to be aware of (More about that later in this article). David Michaels, head of OSHA, recently said that the agency had cited almost twice as many employers for egregious violations in the first quarter of 2010 then it had in all of the previous fiscal year. In a March 19 memo, OSHA ordered its inspectors to issue citations to employers who do not insure that workers are using flame resistant clothing (FRC) where there is the potential of flash fires. The requirements are not new, but OSHA is putting more emphasis on them.

Specifically citations could be issued when FRC is not used in drilling operations once active gas or hydrocarbon zones are reached and until the final casing is cemented and the well is effectively closed. OSHA will be looking for the absence of FRC in snubbing, swabbing, fracturing, perforating, plugging, cementing and stimulation as well as production operations in line breaking, gauging, transfer, hot work, heating and open flame operations. Violations could result in a maximum serious penalty citation of \$7,000 per violation.

Companies also need to focus on training, education and documentation. OSHA's regulations require employers to conduct a hazard assessment to determine what types of personal protective equipment are necessary for tasks performed by employees. OSHA requires that the hazard assessment be documented and certified. If work conditions, operations or job tasks change, the hazard assessment should be evaluated to ensure personal protective equipment remains effective against hazards such as flash fires.

Training in personal protective equipment is of utmost importance. OSHA requires that employees understand when personal protective equipment is required. It is also necessary to train employees on how to properly use the equipment as well as informing them on the capabilities and limitations of the equipment being used. Additionally, OSHA has just recently clarified that the employer, in most cases, is responsible for paying for personal protective equipment required to be worn by employees.

This enforcement initiative is just one of several the agency has recently announced. Others include:

- A significant increase in penalties. The average penalty per citation will triple or quadruple, according to OSHA chief David Michaels.
- A proposal to require every company to have an accident and illness prevention program.
- Increased attention to

recordkeeping.

- Special focus on companies that are both significantly above their industry average for accident rates as well as those significantly below average. (Below average sounds good, but OSHA wants to make sure the numbers are accurate.)

To keep up-to-date on these changes, check out our blog, www.fdrsafety.com/blog, which is written by FDRsafety President Jim Stanley, who is a former No. 2 nationally for OSHA. Or you can have blog posts sent directly to your mailbox by visiting www.fdrsafety.com/feed.


Jason LeMasters, vice president of FDRsafety, has been working closely with OOGA on safety issues, including hydrogen sulfide concerns. FDRsafety works with oil and gas companies on FRC issues as well as a broad range of OSHA compliance services, training and safety staffing. FDRsafety has trainers that are certified by the Petroleum Education Council. Contact Jason at jlemasters@fdrsafety.com or (740) 207-3104.

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