

GENERAL DYNAMICS

Bath Iron Works

General Working Conditions in Shipyard Employment

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Objectives

- Background of Rule – History
- Temporary Delay
- Potential Impact to Shipyards

History

- Current Subpart F in place since 1972
 - Consisted of a variety of established Federal and consensus Standards
- 1982 - Shipbuilders Council of America (SCA) and American Waterways Shipyard Conference (AWSC) asked OSHA to revise, update, and consolidate the Standards
- 1988 - OSHA established SESAC (Shipyard Employment Standards Advisory Committee)
 - Consisted of industry, labor and professionals in the maritime community

History

- 1993 – SESAC submitted final draft recommendations to OSHA
- SESAC disbanded
- 1995 - OSHA established Maritime Advisory Committee for Occupational Safety and Health (MACOSH)
- MACOSH approved SESAC's draft and asked OSHA to proceed with rulemaking process
 - MACOSH advised OSHA to have separate rulemaking for the control of hazardous energy

History

- OSHA published proposed rule on December 20, 2007
- Public given 90 days to provide comment on proposed rule (due March 2008)
 - OSHA received many comments and requests for public hearings
- OSHA held two public hearings on the east and west coasts
 - After the last public hearing the judge ordered rule to remain open till February 2009

History

- Final Standard issued May 2, 2011
- Compliance with rule must be achieved August 1, 2011
- Lockout/Tags-Plus (LO/T-P) requirements have a later compliance date of October 31, 2011



Subpart F Elements

- ❑ Housekeeping
- ❑ Lighting
- ❑ Utilities
- ❑ Working alone
- ❑ Vessel radar and communication systems
- ❑ Lifeboats
- ❑ **Medical services and first aid**
- ❑ **Sanitation**
- ❑ **Control of hazardous energy (lockout/tags-plus)**
- ❑ Safety color code for marking physical hazards
- ❑ Accident prevention signs and tags
- ❑ Retention of DOT markings, placards and labels
- ❑ **Motor vehicle safety equipment, operation and maintenance**
- ❑ Servicing multi-piece and single-piece rime wheels

Most significantly changed from proposed to final rule.

Industry's Response to Final Rule

- Rule generated a lot of questions and concerns
 - ↗ Written questions submitted to OSHA by several private shipyards with a request to meet and discuss
 - ↗ OSHA agreed to meet with shipyards to answer their questions – June 29, 2011
 - Discussed requests for extensions
 - Compliance Directive being developed to further explain Standard
 - ↗ SCA issued request for reconsideration on the entire Standard on the same day
- Several shipyards filed for extensions
- OSHA responded to the extension requests on August 2, 2011

Extensions

- August 1, 2011 is the effective date for all sections except:
 - ↗ Lighting 1915.82 – October 31, 2011



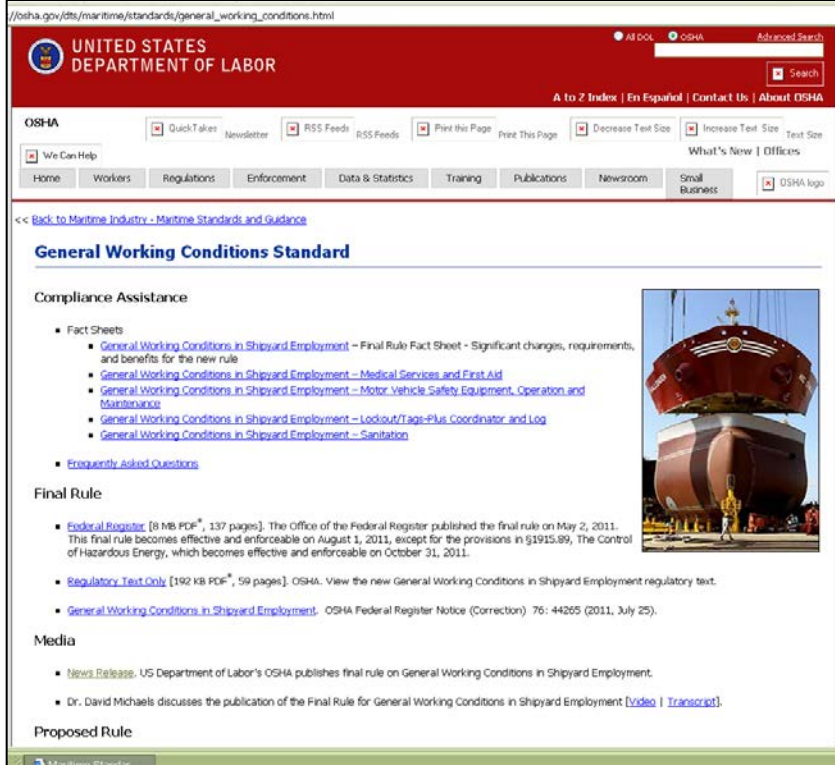
Extensions

- August 1, 2011 is the effective date for all sections except:
 - Motor Vehicle Safety equipment, Operation, and Maintenance 1915.93 – October 31, 2011
 - *Except 1915.93 (b)(4) the need to have a secured seat for everyone – still in effect August 1, 2011*
- October 31, 2011 is the effective date for Control of Hazardous Energy 1915.89
 - *Except 1915.89(k)(2)(ii) - extended until January 31, 2012*



Potential Impact - General

- Lighting
- Lockout/Tags-plus
- Motor Vehicle Safety



The screenshot displays the OSHA website page for the General Working Conditions Standard. The page header includes the OSHA logo, navigation links (Home, Workers, Regulations, Enforcement, Data & Statistics, Training, Publications, Newsroom, Small Business), and a search bar. The main content area is titled "General Working Conditions Standard" and is organized into several sections:

- Compliance Assistance:**
 - Fact Sheets:**
 - [General Working Conditions in Shipyard Employment - Final Rule Fact Sheet - Significant changes, requirements, and benefits for the new rule](#)
 - [General Working Conditions in Shipyard Employment - Medical Services and First Aid](#)
 - [General Working Conditions in Shipyard Employment - Motor Vehicle Safety Equipment, Operation and Maintenance](#)
 - [General Working Conditions in Shipyard Employment - Lockout/Tags-Plus Coordinator and Log](#)
 - [General Working Conditions in Shipyard Employment - Sanitation](#)
 - Frequently Asked Questions**
- Final Rule:**
 - [Federal Register](#): [8 MB PDF^a, 137 pages]. The Office of the Federal Register published the final rule on May 2, 2011. This final rule becomes effective and enforceable on August 1, 2011, except for the provisions in §1915.89, The Control of Hazardous Energy, which becomes effective and enforceable on October 31, 2011.
 - [Regulatory Text Only](#): [192 KB PDF^a, 59 pages]. OSHA. View the new General Working Conditions in Shipyard Employment regulatory text.
 - [General Working Conditions in Shipyard Employment](#). OSHA Federal Register Notice (Correction) 76: 44265 (2011, July 25).
- Media:**
 - [News Release](#): US Department of Labor's OSHA publishes final rule on General Working Conditions in Shipyard Employment.
 - Dr. David Michaels discusses the publication of the Final Rule for General Working Conditions in Shipyard Employment [[Video](#) | [Transcript](#)].
- Proposed Rule**

An image of a large ship's hull is visible on the right side of the page.

Potential Impact - Lighting

- Lighting Surveys
- Additional Lights Required
- Recurring Costs
 - ↗ Materials
 - ↗ Labor
 - ↗ Increased utilities expense
- Confusion/Interpretation of the Standard
- Implementation techniques
 - ↗ No OSHA Directive to help with interpretations of Standard



Potential Impact - LO/T-P

- Administrative
 - New procedures
 - Additional training
 - Inspections
 - Log Books
- Potential new positions
 - LO/T-plus Coordinator
 - Primary Authorized Employee
- Recurring Costs
 - New equipment
 - Materials



Potential Impact - LO/T-P

- Confusion/Interpretation of the Standard
- Implementation techniques
 - No OSHA Directive to help with interpretations of Standard



Potential Impact - Motor Vehicle Safety

- Seatbelts for motor vehicles used to transport employees
- Dedicated vehicle travel lanes
- Dedicated walkways
- Confusion/Interpretation of the Standard
- Implementation techniques
 - No OSHA Directive to help with interpretations of Standard



Summary

- There is confusion regarding interpretation of the language in the Standard
 - Washington OSHA knows there is confusion and appears willing to work with industry
- A Compliance Directive may help with consistent enforcement from regional and area offices
 - Being developed
 - Not complete prior to implementation dates