



# SCP Tribune®

## RESPIRATORS NOT ENOUGH



Confined spaces can be nasty. We know that. But the nastiest are those that have yet to be cleaned. We're talking about those process vats and fishwaste sumps, the sewage tanks and sludgy diesel double-bottoms.

It turns out workers who clean such tanks are in a unique craft, with their own safety rules and protective equipment. And especially with their own unique ventilation requirements.

For instance, with us ordinary workers OSHA says (Subpart B; "Precautions Before Entry") that we must have essentially fresh air before we enter a space.

But in the very next section, "Cleaning and Cold Work," OSHA comes to the common-sense realization that tank cleaners hard at their work can **never** expect anything like "fresh air." So, from the start Cleaners are never without respirators. Other workers? We need respirators only rarely, if at all.

Another safety difference between us and the Cleaners is how moving air is at the core of their job as they blast away with a pressure-wash machine. All tank residues (not just the volatiles) are airborne in the stream of a pressure wash and must be immediately controlled. By contrast, other Crafts need forced ventilation only when their repairs involve "hot work." (Continued)

## TRAINING

### Shipyard Competent Person

#### Full 3-Day Courses

Mar 1-3 @ SSC\*

Apr 5-7 @ SSC\*

May 3-5 @ SSC\*

\*South Seattle College  
Georgetown Campus



#### 1-Day Update Courses

Mar 2 @ SSC\*

Mar 8 @ Fremont Maritime

Apr 6 @ SSC\*

Apr 12 @ Fremont Maritime

May 4 @ SSC

May 10 @ Fremont Maritime



#### DIRECTIONS:

Fremont Maritime is at Fishermen's Terminal

SSC: Georgetown Campus very close to I-5,  
Michigan St Exit, straight to Corson Ave S

#### OSHA 10 Maritime

10-hour training on 29 CFR 1915 or 1910 provides methods on recognition, avoidance, abatement, and prevention of safety and health hazards in workplaces specific to maritime.

Any Questions? Call 206-932-0206

## RESPIRATORS NOT ENOUGH

Because ventilation is so important in cleaning tanks it has extra backing in OSHA, which says:

1. The Ventilation must move enough air (Subpart B-1915.12)
2. A **Shipyard Competent Person** will check out the ventilation to make sure it is properly set up and effective. (Subpart B-1915.12)
3. The **SCP** will make sure cargo vapors are not vented to dangerous places (Subpart B-1915.12)
4. If work (like cleaning) creates airborne danger inside a tank, then "...more than one means of access shall be provided..." (Subpart E's "Access to Cargo Spaces-1915.76.) Which is why every tank barge cargo tank has not only a manway, but also a separate port designed specifically for ventilation. Military vessels too are designed with fuel tanks having 2 accesses so air travels throughout a tank during cleaning. Obviously, both covers should be removed so the Cleaners can benefit from that cross-ventilation military tanks are designed for.



For all the talk of exotic hazards, the basics still apply; and nothing is more basic to tank cleaners than ventilation.

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## FIRE SAFETY PLAN...AGAIN

Last month's SCP Tribune (February) preached a sermon (there is no better word...) about how OSHA's required **Fire Safety Plan** can prevent many Ship Repair fires. The following horror story illustrates:

*A boatyard hauled a steel-hulled yacht for repairs to wasted hull plate. Because such structural repairs were beyond their craft base, the boatyard hired a subcontractor to insert the steel in several areas, one of which was a void near the engine room. The subcontractor repair workers ignited foam insulation in the area. Soon fire enveloped the entire vessel, with total losses above \$20,000,000.*

*An investigation showed the boatyard lacked any system for proper communication of dangers, for documenting safety inspections, for properly supervising contractors, for emergency response, for firewatch training, for proper fire protection, or for proper insurance documentation.*

If we were regulators, we might say the boatyard lacked a **Fire Safety Plan**, as required by the Ship Repair Standard's Subpart P.

(Incidentally, the latest OSHA statistics (2016) show 1/5 of serious citations involved exactly that issue.)

So, what does an effective FSP look like? Subpart P (1915.502) details 8 required items. But five (for instance, "Evacuation Routes") don't apply here. Three, however, stand out. And you can guess what they are: (Continued)

## FIRE SAFETY PLAN...AGAIN

First, “**Identify significant fire hazards**”. The “Plan” must detail some scheme whereby the **Employer in Charge** will contact EVERYONE for their “Fire Safety Wisdom”: from estimators to safety supervisors; from project managers to craft leads and union stewards; And most important: talk to all those Shipyard Competent Persons. (Should the boatyard have known about the foam near the steel repairs? Of course.)

Second design “**Procedures for Reporting Unsafe Conditions.**”

**Obvious Question:** We have worked hard to find out various hazards. How do we make



sure everyone knows about them?? **Obvious Answer:** Production Meetings, Host/Subcontractor meetings, safety meetings, Shipyard Competent Person Reports, e-Mail chains, posting unsafe spaces... (Should the foam have been a military secret to the hired workers? Whose job was the “Safe for Hot Work” inspection anyhow?)

And lastly, “**Names, job titles, or Departments to Contact for Plan Information.**” (A common saying in safety work is that 85% of our efforts are aimed at proper communication. And when hazards turn up suddenly, how do we communicate effectively unless we have good contact information? It’s essential.)

Here, we imagine some sort of plasticized sheet with names; titles; desk, cell, and home numbers; email addresses of shipyard and vessel owners, of subcontract employers, craft supervisors, safety-ESH people, craft leads, and of course, every Shipyard Competent Person involved with the repair contract. (Some hazards, when discovered, should be broadcast immediately!) All should be on the hook to deal with unsafe conditions.

Fire Safety Plans are expensive. They take planning and meetings. Both of which take time, which is money. But because maritime fires are so expensive, it is turning out that FSP’s can be very, very cost-effective.

Congrats to **Mike Schrock** of **Westport Yachts** February’s Winner:  
(Honorable Mention: Jason Overby-Morgison.)

**Q:** In the drafting and layout of yacht hull panels any line almost-but-not- perfectly straight is referred to as a “**Fair Line**”

### **March’s Question:**

What’s the Ship Repair term for an electrical conduit through a water-tight bulkhead?

Please send your answer to: [newsletter@soundtestinginc.com](mailto:newsletter@soundtestinginc.com) or [admin@soundtestinginc.com](mailto:admin@soundtestinginc.com) before March 25

Each correct answer will be entered into a random drawing and one person will win a **\$50** gift card!

One entry per person, please.