

# Gulf of Mexico Walking/Working Surfaces Program Summary



## 1. Purpose

The purpose of this program is to establish the minimum requirements for walking/working surfaces and working at height to ensure work activities can be performed in a safe and efficient manner.

## 2. Applicability

The document applies to all operations in the Gulf of Mexico (GoM) under the Anadarko Petroleum Corporation License to Operate. Contractors must have a program that meets or exceeds the requirements outlined in this program.

## 3. Requirements

Performing work on walking/working surfaces or at height shall be reviewed prior to initiation of the work to determine the appropriate precautions to be taken.

- This program does not supersede more stringent obligations due to local, state, or federal regulation and/or lease requirements.
- Working at height is considered performing work at 4 feet (1.2 meters) or more above a lower level for all offshore facilities.
- Working at height is considered performing work at 6 feet (1.8 meters) or more above a lower level for all shore base facilities.

## 4. General Requirements

- **Walking/Working Surfaces**
  - Shall be kept clean, orderly, and sanitary and shall be inspected regularly to maintain a safe condition.
  - Surfaces are to be free of hazards (sharp objects, loose boards, corrosion, leaks, spills, etc.).
  - A safe means of access and egress shall be provided and used.
- **Working at Height**
  - All work activity shall be assessed for hazards related to personnel or objects falling to a lower level.
  - All falling hazards shall be mitigated prior to commencing work.
- **Protection from Falling Objects**
  - When exposed to fallen objects:
    - Head protection shall be worn.
    - Tools and equipment shall be secured (when regularly used at height, tool registry shall be used).
  - In addition, one or more of the following shall be implemented:
    - Erecting toe boards, screens, or a guardrail.
    - Prohibiting entry with barricades.
    - Keeping objects far enough away from the edge or opening to prevent them from falling.
- **Guardrail System**
  - Unprotected sides and edges of an elevated platform shall have guardrails installed on all unprotected sides/edges.
  - Guardrails shall have toe boards when:
    - Personnel can pass under or near walking/working surfaces.
    - There is moving machinery below the work surface.
    - There is equipment with which fall materials will create a hazard.
- **Stairways**
  - Stairs shall be kept free of obstruction.
  - Personnel shall have at least one hand on a handrail while ascending/descending stairs.
- **Floor/Deck Openings**
  - OXY personnel or OXY Core Contractors are the only personnel authorized to make open holes.
  - Hole openings shall be covered, guarded, or otherwise made inaccessible as not to create tripping hazards.
  - Hole covers shall be capable of supporting at least twice the maximum load anticipated.
  - Covers must be secured and marked "HOLE" or "COVER" using high visibility paint.
  - The top of barricades must be at least 42 inches in height, withstand 200 pounds, and if using hard pipe or cable have a middle railing.
  - A danger tag or danger tape shall be applied where scaffolding materials have been used to construct a barricade.
  - Any open hole that cannot be barricaded immediately must be monitored at all times by an open hole attendant.
    - The open hole attendant shall always wear fall protection.
  - NOTE: Prior to an open hole being created the OIM shall be notified so that it can be added to the permit to work system. Once an open hole is identified it shall be discussed with all personnel onboard the facility.
- **Ladders**
  - Ladders are to be maintained in good condition and inspected by the user prior to each use.
  - When climbing or descending a ladder, personnel shall maintain 3 points of contact.
  - Nonconductive ladders shall be used for electrical work.
  - A PFAS is not required when using ladders unless working within 4 feet or a guardrail.
  - Ladders shall be used and maintained in accordance with 29 CFR 1910.23 *Walking-Working Surfaces, Ladders*.
- **Scaffolding**
  - General
    - Scaffolding that is being erected, moved, dismantled, or modified by Scaffolding personnel is to be done under the supervision of a Competent Person.
    - All scaffolds and scaffold components shall be capable of supporting, without failure, their own weight and at least 4 times the maximum intended load.
    - Scaffolds shall be designed, constructed, maintained, inspected, and used in accordance with 29 C.F.R. 1926.451 *Scaffolds, General Requirements*.

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- Scaffold Platforms
  - Scaffold platform construction – each platform on all working levels of scaffolds shall be fully planked or decked between the front uprights and the guardrail supports.
  - Each platform unit (e.g., scaffold plank, fabricated plank, fabricated deck, or fabricated platform) shall be laid tightly side by side so that the space between the platform and the uprights is no more than 1 inch (2.5 cm). Openings greater than 1” shall be covered to prevent personnel or materials from falling through.
  - All completed Scaffold platforms shall be at least 18 inches (46 cm) wide. In areas where it is so narrow that platforms cannot always be 18”, walkways shall be as wide as feasible, and employees working in those areas shall be protected from fall hazards by the use of guardrails and/or fall arrest systems.
  - Each scaffold plank will be secured against movement by using hooks, nails, wire, or other reasonable means.
  - The front edge of all platforms shall not be more than 12 inches from the face of the work unless guardrail systems are erected along the front edge and/or personal fall arrest systems are used.
- Inspections
  - Scaffolds and scaffold components shall be inspected for defects by a competent person before each work shift and after any occurrence that could affect its integrity.
  - When unsafe conditions or defects are identified, the scaffold shall be tagged out of service (Red-Tag).
- Tags
  - Green Tag – scaffold meets minimum scaffolding contractor (and OXY) standards (no fall hazard). Only applicable to Onshore.
  - Yellow Tag – scaffold shall be approached with caution as it will not meet minimum company and customer standard and will require PPE to overcome the hazard associated with its use (i.e. no handrail, hole in deck).
  - Red Tag – scaffolds are not to be used by any person other than scaffolding contractor personnel performing work on the scaffolds.
- Personal Fall Arrest System (PFAS)
  - PFASs shall be used when personnel perform work at heights which are not protected by a guardrail or where there is a risk of falling from the work platform such as within suspended work baskets or buckets.
  - Personnel shall wear a PFAS when working in an articulating and/or telescoping boom lift (e.g., man lift, scissor lift).
  - Personnel shall wear a PFAS when working at height and when working within 4 feet (1.2 meters) of a guardrail. Where PFAS is not practical, alternate means shall be considered.
  - Personnel using PFASs shall not work alone unless the person has the ability to perform self-rescue. One other person shall be present to perform a rescue or notify a rescue team.
  - PFASs shall be inspected prior to use by the user and by a competent person at least annually.
  - A full body harness shall be worn when a PFAS is required.
  - Lifelines shall be selected, inspected, used, and maintained in accordance with 29 C.F.R. 1910.140 *Personal Protective Equipment, Personal Fall Protection Systems*.
  - Only one PFAS can be attached to a single vertical lifeline.
  - Guardrails and handrails shall not be used as anchor points for lifting or supporting a load, or as an anchor point for fall protection gear.
  - Anchor points shall be located directly above the person’s head to eliminate the hazard of a swinging fall and in a manner that minimizes potential free fall distance.
  - Anchor points shall be capable of withstanding a weight of at least 5,000 pounds (2,273 kilograms) for each person attached and shall not be the same point used for suspending platforms.
  - Anchor point connectors shall be suitable for anchor points and the work environment.
  - Anchor points shall be designed, installed, and used in accordance with 29 C.F.R. 1910. 140 Personal Protective Equipment, Personal Fall Protection Systems.
  - The piping listed below should not be used as anchor points:
    - Fiber bond
    - Conduit
    - Copper nickel
    - Firewater or Deluge system
  - Rescue plans shall be discussed during the pre-job meeting, kept with the JSA, and be in place prior to working at height.
- Working Over Water
  - Prior to and after each use, buoyant work vests or personal flotation devices (PFD) shall be inspected.
  - Ring buoys with at least 90 feet of line shall be provided and readily available for emergency rescue operations.
  - At least one lifesaving boat shall be immediately available at locations where employees are working over or adjacent to water.
  - Life jackets and buoyant work vests shall be used, stored, and inspected in accordance with 29 C.F.R. 1926.106 *Working over or near Water* and 33 C.F.R. 146.20 *Work Vests*.

## 5. Training Requirements

- Competent persons (Scaffolding and Fall Protection Systems) for contractors shall complete the Walking/Working Surfaces and Working at Height Training and role-specific training (detailed in 29 CFR 1926.451 and 1910.140).
- Retraining shall be conducted when:
  - There are changes in the type of scaffold, fall protection, falling object protection, or another hazard in which a person has not been trained.
  - Person’s work indicates they have not retained the requisite proficiency.
  - Changes in the workplace render previous training obsolete or inadequate.
  - Changes in types of fall protection systems or equipment render previous training obsolete or inadequate.
  - Inadequacies in an Authorized Person’s knowledge or use of fall protection systems/equipment.