

Phillips, Kim (NRCAN/RNCAN)

From: Colin MacIntosh <cm@ca.falcksafety.com>
Sent: September 8, 2016 08:32
To: Phillips, Kim (NRCAN/RNCAN)
Cc: Clinton Cariou (clinton.t.cariou@exxonmobil.com)
Subject: Comments on the Atlantic Offshore OHS Initiative
Attachments: Colin MacIntosh.vcf

Hi Kim,

Below are my comments regarding the proposed OHS regulations. I included my previous comments that I sent to you prior to the July meeting as well as some new points.

Confined Space:

1. Section 103, (2), D) (Confined Space entry procedures)
Quote " Additional rescue equipment including a yoke and adequate means to extract an unconscious person."
End quote

The yoke referenced above (more commonly called a Spreader Bar) is not a piece of rescue equipment and is not used for rescue. It is however a piece of equipment used to lower and raise a conscious worker into and out of a vertical hatch for normal confined space work and is only compatible with a class "E" fall protection harness.

The wording used would require us to have this on site for all confined space entries regardless of the fact that we may have a horizontal entry (no vertical movement) and regardless of the fact that the class of harness worn by the entrant may not be an "E" class harness, as harness type is determined during the assessment, identified in section 103, (2), c).

2. As stated in section 115: The employer shall ensure the confined space is continuously monitored and that the atmosphere remains at all times in compliance within Section 112.
 - a. This statement is in direct contradiction to section 120 and 121.
3. As stated in section 118: Equipment used in testing and monitoring shall be calibrated, maintained and used according to the manufacturer's instructions, and shall be bump tested, at minimum, every 12-hour shift.
 - b. Most manufacturers require the bump test once a day or once every 24 hours, undue bump testing can affect the usable life of the gas detector.
4. Training (section 107)
 - a. Section 107, i), mentions duties of the supervisor and the entrant but does not indicate the Safety Attendant duties;
 - b. Section 127 should indicate that the attendant requires the same training as the entrant. As the attendant's role is to provide assistance to the entrant and monitor the entrant they require the same level of training.

Fall Protection

1. As stated in Section 208: Where a fall may reasonably result in death or serious injury, a work permit is required pursuant to section 224.
 - a. What is the definition of “may reasonably result”? This seems vague and open for interpretation; I know of a woman who had her back broken falling from the 4th rung of a step ladder.
 - b. Some offshore companies require a permit when working above 1.8 meters and within the Provincial Regulations (Nova Scotia) a “Working at Heights Plan” is required above 7.5 meters.
 - c. I fully agree with the permit requirement when working at heights but, if possible, I would like to see some clarification of when we are required to have a work permit.

If you have any questions regarding these items please contact me any time.

Kindest regards



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