

Comments on: Atlantic Offshore Occupational Health and Safety Initiative Consolidated Revised Policy intent for the Atlantic OHS Regulations

Dated May 2018

Part 13, section 73.6 – Where there is potential for arc flash, PPE should be arc rated, NOT fire resistant.

Part 13, section 88.1 – This section makes no mention of the requirement for arc rated PPE.

Part 13, section 88.2 – A non-conductive rescue hook would only be required in case of shock hazard, not arc flash hazard.

Part 22, section 241.2 – There is no instruction on how the electrical cables are to be de-energized.

Part 28, section 332 – No requirement for re-training.

Part 28, section 333 – The design and construction of workplaces has NOTHING to do with shock approach boundaries.

Part 28, section 334.2 – What about the requirement to wear appropriate PPE?

Part 28, section 335.2 – The work permit required should be an “energized electrical work permit” as detailed in CSA Z462, the workplace electrical safety standard.

Also, what safe work procedures must be followed?

Part 28, section 336 – This paragraph would restrict electrical workers from doing diagnostic work, which can only be done when the circuits are energized.

Part 28, section 338 a) – What is an appropriate method? and b) What type of controls must be identified and put in place?

Part 28, sections 1 & 2 – This is NOT clear and what about the requirement for PPE?

Part 28, section 340 – What about protection for the worker? (PPE)

Part 28, section 341 – This cannot happen because of section 336 above.

Part 28, section 342 – What are the qualifications of an electrical safety watcher?

Part 28, section 344.3 – Does this mean that volatile flammable substances may be used where low voltage electrical current is present?

Part 28, section 345 – The requirement for signs is not clear. (Where required and what type?)

Part 28, section 355 – There is nothing on how to achieve an “electrically safe work condition”; nothing on verifying the “absence of voltage”; and no lockout/tagout procedures.

Part 33, section 418.2 – The appropriate controls that are required to mitigate the hazard must be explicit.

The following subjects are not addressed and in my opinion, should be part of the initiative:

- Requirements for electrical safety re-training for qualified workers;
- Risk assessment procedure;
- Hierarchy of risk control methods;
- Job planning and job briefing requirements;
- Auditing requirements for the electrical safety program, field work, lockout/tagout program and procedures;
- Emergency procedures training;
- Requirement for GFCI protection;
- Establishing an electrically safe work condition;
- Lockout/tagout program and procedures;
- Arc flash risk assessment;
- Shock risk assessment;
- Selection of PPE for arc flash and shock hazards;
- Equipment labeling requirements;
- Protective tools and equipment;
- Safety related maintenance requirements.

I feel that most of my comments and missing subjects could be very easily addressed by making (or referring to) CSA Z462 as a mandatory standard for the offshore electrical workplace.

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