



MARINE SAFETY ALERT

Inspections and Compliance Directorate

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Washington, DC

Safety Alert 08-03

PERSONAL PROTECTIVE EQUIPMENT

Last spring an uninspected towing vessel (UTV) suffered a personnel casualty while engaged in a dredging operation. The casualty resulted in serious injury to a crewmember and an undisclosed monetary settlement of a Jones Act Claim against the marine employer by the injured crewman.

The crewmember was conducting an unscheduled repair to a navigation light fixture attached to the mast located above the upper wheelhouse. For personal fall protection, the crewmember collected a body belt and a positioning lanyard from a storage location on the vessel.

The crewmember climbed the mast, fastened the lanyard around the mast, leaned back supported by the belt and began working. Just minutes into the repair the lanyard parted. The crewmember fell to the deck approximately 40 feet below and sustained a broken leg, arm, ribs and contusions to the head and back.

The Coast Guard's investigation focused on the human element and equipment performance. Although the investigation is not yet complete, important regulatory issues regarding the use, training, and storage of Personal Protective Equipment (PPE) have been discovered. Specifically:

- Effective January 1, 1998, body belts were deemed unacceptable for use as part of a personal fall arrest system by the Occupational Safety and Health Administration (OSHA).
- The manufacturer's instructions for the proper use, care and inspection schedule for the body belt and positioning lanyard were not followed.
- The marine employer did not adhere to the requirements of 29 CFR 1915.159 for personal fall arrest systems.
- The marine employer did not adhere to the requirements of 29 CFR 1915.160 for positioning device systems.
- The marine employer did not adhere to the requirements of 29 CFR 1915.152, general requirements for training and documentation.

Investigators determined that the positioning lanyard was manufactured in November of 1993. The manufacturer's instructions called for semi-annual inspection and removal from service no later than November of 1998.

Further investigation revealed that company policy prohibited the use of a body belt for personal fall protection and required the use of a full body harness; however, the vessel was never provided with a body harness and instead retained two body belts and lanyards. The Coast Guard could not establish that the involved individuals had been trained on their use, storage and limitations.

Persons owning and operating uninspected vessels are required to comply with OSHA regulations with regards to PPE and are subject to fines for noncompliance. Owners/operators are strongly encouraged to:

- Visit the U.S. Department of Labor website to view [Directive CPL 2-1.20 - OSHA / U.S. Coast Guard Authority Over Vessels](#) at: <http://www.osha.gov>.
- Develop, document and provide specialized crew training which includes demonstrations to ensure familiarity with use, storage, and limitations of Personal Protective Equipment.

Questions related to this information may be directed to the U.S. Coast Guard Marine Safety Office Hampton Roads, Investigations Office at (757) 668-5540.

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